REVISED
9:27 am, Jan 08, 2016

GIS REGISTRY
Cover Sheet

POST CLOSURE

May, 2009
(RR 5367)

Source Property Information

CLOSURE DATE: Jun 27, 2011

BRRTS #: **02-20-548126**

FID #: 420039840

ACTIVITY NAME: Wells MFG Corp - CVOC

DATCP #:

PROPERTY ADDRESS: 12 S Brooke St

COMM #:

MUNICIPALITY: Fond du Lac

PARCEL ID #: FDL-15-17-10-34-787-00

***WTM COORDINATES:**

X: **644347** Y: **368354**

** 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:

[X] Groundwater Contamination > ES *(236)*

- [ ] Contamination in ROW
- [ ] Off-Source Contamination

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

[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")*

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)*
- [X] Cover or Barrier *(222)*

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

- [ ] Vapor Mitigation *(226)*
- [ ] Maintain Liability Exemption *(230)*

(***note:*** *local government or economic development corporation)*

Monitoring Wells:

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

(●) Yes ( ) No ( ) N/A

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

PLEASE ASSEMBLE IN THIS ORDER

GIS Registry Checklist

Form 4400-245 (R 3/10)

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 #: 02-20-548126 *(No Dashes)* PARCEL ID #: FDL-15-17-10-34-787-00

ACTIVITY NAME: Wells MFG Corp - CVOC WTM COORDINATES: X: 644347 Y: 368354

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

- [x] **Closure Letter**
- [x] **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)
- [x] **Conditional Closure Letter**
- [ ] **Certificate of Completion (COC)** (for VPLE sites)

SOURCE LEGAL DOCUMENTS

- [x] **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:**
- [x] **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.

- [x] **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 Map**
- [x] **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 #: 2 **Title: Site Plan**
- [x] **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 #: 3,4 **Title: Areas of Residual Soil Contamination Direct Contact Hazard/Except Direct Contact**

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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 #: 5 **Title: Post-Remediation West to East Cross-Section A-A'**

Figure #: 6 **Title: Post-Remediation West to East Cross-Section B-B'**

☒ **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 #: 7 **Title: Areas of Residual Groundwater Contamination - December 2009**

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

Figure #: 8 **Title: Groundwater Contour Map March 27, 2008**

Figure #: 9 **Title: Groundwater Contour Map September 26, 2008**

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 #: 1, 2 & 3 **Title: Soil Analytical Results - Detected VOC Compounds, PAH Compounds, RCRA Metals**

☒ **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 #: 4, 5 & 6 **Title: Groundwater Analytical Results - Selected VOC Compounds, PAH Compounds, Metals**

☒ **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 #: 7 **Title: Groundwater Elevation Data**

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).

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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
Oshkosh Service Center
625 E CTY Y, Suite 700
Oshkosh WI 54901

Scott Walker, Governor
Cathy Stepp, Secretary
Jean Romback-Bartels, Acting Regional Dir.
Telephone 920-424-3050
FAX 920-424-5424
TTY Access via relay - 711

June 27, 2011

Wells Manufacturing Corporation
Mr. Mike Baumhardt
26 South Brooke Street
Fond du Lac WI 54935

SUBJECT: Final Case Closure with Continuing Obligations
Wells Manufacturing, 26 S. Brooke Street, Fond du Lac, Wisconsin
WDNR BRRTS Activity # 03-20-548124, 02-20-548126 & 02-20-548127

Dear Mr. Baumhardt:

On September 10, 2010, the Northeast Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On September 15, 2010, you were notified that the Closure Committee had granted conditional closure to this case,

On June 22, 2011, the Department received information or documentation indicating that you have complied with the requirements for final closure. Conditions of closure included monitoring well abandonment, investigative waste disposal and submittal of a final cap maintenance plan.

The Department reviewed the case closure request regarding the petroleum, metals and chlorinated solvent contamination in soil and groundwater at this site. Based on the correspondence and data provided, it appears that your case meets the closure requirements in ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time. However, you and future property owners must comply with certain continuing obligations as explained in this letter.

GIS Registry
This site will be listed on the Remediation and Redevelopment Program's internet accessible GIS Registry, to provide notice of residual contamination, and of any continuing obligations. The continuing obligations for this site are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier.
- Groundwater contamination is present above Chapter NR 140 enforcement standards.

All site information, including the maintenance plan, is on file at the WDNR Oshkosh Service Center. This letter and information that was submitted with your closure request application, including the maintenance plan, will be included on the GIS Registry, in a PDF attachment. 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. If the property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, 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 at http://dnr.wi.gov/org/water/dwg/3300254.pdf or at the web address listed above for the GIS Registry.

Closure Conditions

Please be aware that pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which Wells Manufacturing and any subsequent property owners must adhere. Wells Manufacturing must pass on both the information about these continuing obligations and the maintenance plan to the next property owner or owners. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. The Department intends to conduct inspections in the future to ensure that the conditions included in this letter including compliance with attached maintenance plan are met.

Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

Soil contamination remains at soil sample locations GP-1, GP-2, GP-4, MW5, MW6, MW7, MW8, MB9, B10, MW11, MW12, MW13, B14, B15, B18, B19, MW20, MW21, MW22, MW23, B25, B26, B27, HA2, B29, B30 and B31 as shown on the attached map and in the information submitted to the Department of Natural Resources. If soil in the specific locations shown on the attached map is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner 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 statutes and rules. In addition, all current and future owners and occupants of the property 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 during excavation activities to prevent a health threat to humans.

The attached maintenance plan and inspection log are to be kept up-to-date and on-site. Please submit the inspection log to the Department only upon request.

Prohibited Activities

The following activities are prohibited on any portion of the property where pavement is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure.

Upon Department approval to replace the existing barrier, the replacement barrier must be one of similar permeability, until contaminant levels no longer exceed the applicable standards.

Residual Groundwater Contamination

Groundwater impacted by petroleum, metals and chlorinated solvent contamination greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code, is present on this contaminated as shown on the attached map.

Post-Closure Notification Requirements

In accordance with ss. 292.12 and 292.13, Wis. Stats., you must notify the Department before making changes that affect or relate to the conditions of closure in this letter. For this case, examples of changed conditions requiring prior notification include, but are not limited to:

- Disturbance, construction on, change or removal in whole or part of pavement, an engineered cover or a soil barrier that must be maintained over contaminated soil.

Please send written notifications in accordance with the above requirements to the Remediation and Redevelopment program at the address at the top of the letter head.

PECFA Reimbursement

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. If there is equipment purchased with PECFA funds remaining at the site, contact the Commerce PECFA Program to determine the method for salvaging the equipment.

The following DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" helps explain a property owner's responsibility for continuing obligations on their property. You may obtain a copy at http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf.

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.

The Department 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 Kevin McKnight at 920-424-7890.

Sincerely,

Kristin DuFresne

Kristin DuFresne, Acting Team Supervisor
Northeast Region Remediation & Redevelopment Program

Attachments

cc: File
Ken Ebbott, Alpha Terra - via email

POST CLOSURE

From: McKnight, Kevin - DNR
To: Ken Ebbott
Cc: Dyann Benson (dbenson@fdl.wi.gov); Brent Schumacher (bschumacher@commonwealthco.net); McKnight, Kevin - DNR
Subject: RE: Final Cap Maintenance Plan Former Wells Facility Fond du Lac
Date: Monday, December 14, 2015 9:40:42 AM

Ken,

Thank you for providing the updated Cap Maintenance Plan for this site. The Department will use this plan dated November 10, 2015 for future inspection purposes and will update the BRRTS system to reflect this. Please contact me with any further questions.

Kevin

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Kevin D. McKnight
Phone: (920)-424-7890
kevin.mcknight@wisconsin.gov

From: Ken Ebbott [mailto:kebbott@fehr-graham.com]
Sent: Wednesday, December 02, 2015 5:50 PM
To: McKnight, Kevin - DNR
Cc: Dyann Benson (dbenson@fdl.wi.gov); Brent Schumacher (bschumacher@commonwealthco.net); Ken Ebbott
Subject: Final Cap Maintenance Plan Former Wells Facility Fond du Lac

Kevin,

Per your request, attached is the final cap maintenance plan and cover letter.

A hard copy will be sent in the mail.

Thanks,

Ken

KENDRICK EBBOTT | P.G. Branch Manager
Fehr Graham - Engineering & Environmental

1237 Pilgrim Road
Plymouth, WI 53073
P: 920.892.2444
C: 920-980-4231
F: 920.892.2620
www.fehr-graham.com

POST CLOSURE

REVISED CAP MAINTENANCE PLAN

November 10, 2015

Property Located at:

Former Wells Manufacturing Facility, 26 S. Brooke Street, Fond du Lac, WI

WDNR BRRTS #s: 03-20-548124, 02-20-548126 & 02-20-548127

See attached legal description (Exhibit A) for Parcel ID #:FDL-15-17-10-34-787-00

City of Fond du Lac, Fond du Lac County, Wisconsin

Introduction

This document is the revised Maintenance Plan for a pavement cover and building barrier at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The revisions are necessary due to demolition of part of the building and redevelopment of the property.

More site-specific information about this property/site may be found in:

- The case file in the DNR office in Oshkosh
- BRRTS on the Web (DNR's internet based data base of contaminated sites)for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
- RR Sites Map/GIS Registry layer for a map view of the site, and
- The DNR project manager for Fond du Lac County, currently Mr. Kevin McKnight, Oshkosh.

Cap maintenance activities relate to the existing slab-on-grade building and paved surfaces occupying the area over remaining contaminated groundwater plume and soil on-site. The contaminated groundwater plume is impacted by vinyl chloride, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, barium, lead and zinc. The contaminated soil is impacted by tetrachloroethylene (PCE), trichloroethylene (TCE) cis-1,2 dichloroethylene, several PAH compounds, lead, cadmium, arsenic and mercury. The locations of residually impacted soil and groundwater are displayed on Figures 1 through 3.

The locations of the paved surfaces or other impervious barriers to be maintained in accordance with this Maintenance Plan are identified on Figure 4. During partial building demolition, the portions of the building floor and concrete parking lot that overly mapped remaining contamination was left intact, as shown on Figure 4. Approximately six inches of additional material was placed on top of the remaining asphalt or concrete cap for improved function of the site. Details regarding the added material in relation to the cap are provided below.

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Cap Purpose

The paved surfaces and building over the contaminated soil serve as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. The impervious covers over the contaminated soil also serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

Cap Description and Photographic Documentation

As shown on Figure 4, the former cap areas will be used for a variety of purposes, as described below:

Southeast Cap, estimated dimensions 400 square feet – this concrete surface will remain partially covered by the existing building footprint, with the existing slab on grade floor. There is essentially no change to this portion of the existing cap. The remainder of this cap area outside the building footprint remains intact, but has been covered with railroad ties and approximately six inches of granular fill, filter fabric, an estimated 12 inches of clay / topsoil and mulch. The area is being used for decorative plantings. As noted on the attached figures, this concrete cap was not in perfect condition when originally identified as a cap, and some minor cracks were apparent prior to this cap modification effort.

West Cap in Grass and Outdoor Garden Center Areas – west of the buildings and the new asphalt parking lot is a former asphalt driveway and a former concrete building floor surface that has remained intact during the reconstruction efforts. These areas have been covered with an estimated six inches of gravel fill and / or soil, followed by a filter fabric and clay / topsoil / mulch to grade. Vegetation will be established in this area, including grass to the south, and other plants primarily maintained in balled burlap covers or in planters maintained in the mulch.

Photographs of the west cap and southeast cap are attached, including photographs of a check on the cap condition in Sept 2014 following partial demolition but prior to final restoration.

Inspection Schedule

The capped areas shown in Figure 4 will be inspected once every five years. The next inspection is due in 2019. This relatively long period is considered appropriate due to the protected nature of the existing cap. Degradation of the existing asphalt and concrete cap will be minimized due to the planned covering with gravel, soil, and mulch in most areas. Heavy vehicular traffic is not expected on the capped areas, and minimal degradation due to weather and the elements is expected.

The longer periods between inspections for the cap are planned due to the difficulty associated with the inspection process. Inspections in these areas will be completed once

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every five years by removal of the mulch, topsoil, filter fabric and gravel from an estimated three areas of the cap, including two areas on the western cap, and one area on the eastern cap. An approximate three foot by one foot area of the underlying asphalt or concrete cap will be exposed and viewed. Pictures will be taken of the condition of the cap, and any damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors.

A log of the inspections and any repairs will be maintained by the property owner and is attached as WDNR Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log shall be kept on-site and presented to the Wisconsin Department of Natural Resources ("WDNR") upon request.

Maintenance Activities

If problems are noted during the inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling operations or they can include larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment ("PPE"). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the paved surfaces overlying the contaminated soil are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover or Cap

The following activities are prohibited on any portion of the property where the cap is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure, 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact DNR at least 45 days before taking such an

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action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

Contact Information

Current as of November 10, 2015

Site Owner and Operator: The Commonwealth Companies, LLC
54 E. First Street, Fond du Lac, WI 54935
Brent Schumacher, Senior Vice President
920 922-8170

Consultant: Fehr Graham Inc.
1237 Pilgrim Road, Plymouth, WI 53073
Kendrick Ebbott, Hydrogeologist, 920/892-2444

WDNR: Wisconsin Department of Natural Resources
Kevin McKnight, Hydrogeologist, RR Program
625 East County Road Y, Suite 100, Oshkosh, WI 54901-9731
920/424-7890

Attachments:
Cap Photographs, May 2014 to October 2015
Figure 1: Areas of Residual Groundwater Contamination Above Enforcement Standards December 2009
Figure 2: Areas of Residual Soil Contamination Direct Contact Hazard
Figure 3: Areas of Residual Soil Contamination Except Direct Contact
Figure 4: Site Layout and Cap Covering Materials
WDNR Form 4400-305, Continuing Obligations Inspection and Maintenance Log

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Cap Photographs May 2014 to Oct 2015

5/13/14. SE Concrete Cap, Pre Demolition, view west showing general starting condition of cap has some cracks prior to demolition activities.

9/19/14, SE Concrete Cap, View NW, Gravel cover over intact concrete, pending installation of filter fabric, soil, mulch, plantings

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10/27/15, SE Cap Area, View SW, fence, RR ties and soil over cap

10/27/15, SE Cap Area, view south, concrete cap covered with RR ties and soil

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10/27/15, Center Entry to Property to New Asphalt Parking Lot

9/19/14, West Cap, southern end, view south. Gravel cover over intact concrete from former building floor. Installation of further materials pending, including filter fabric, topsoil, and vegetative cover (grass). Note exposed asphalt cap to west (right) in excellent condition, which will be covered in future by soil / mulch / vegetation

POST CLOSURE

9/19/14, West Cap, middle area, view south. Gravel cover over intact concrete from former building floor, pending installation of filter fabric, topsoil, and vegetative cover (grass). Note exposed asphalt cap to west (right), in excellent condition, which will be covered in future by soil / mulch / vegetation

9/19/14, West Cap, northern exposure, view south. Gravel cover over intact concrete from former building floor, pending installation of filter fabric, topsoil, and vegetative cover (grass). Note exposed asphalt cap to west (right), in excellent condition, which will be covered in future by soil / mulch / vegetation

POST CLOSURE

10/27/15, West Cap center, view south, showing new asphalt lot and gravel cover, which will be further developed with topsoil and vegetation.

10/27/15, West Cap, south end, view south, showing sidewalk along building edge, and topsoil being applied to gravel cover over cap.

POST
CLOSURE

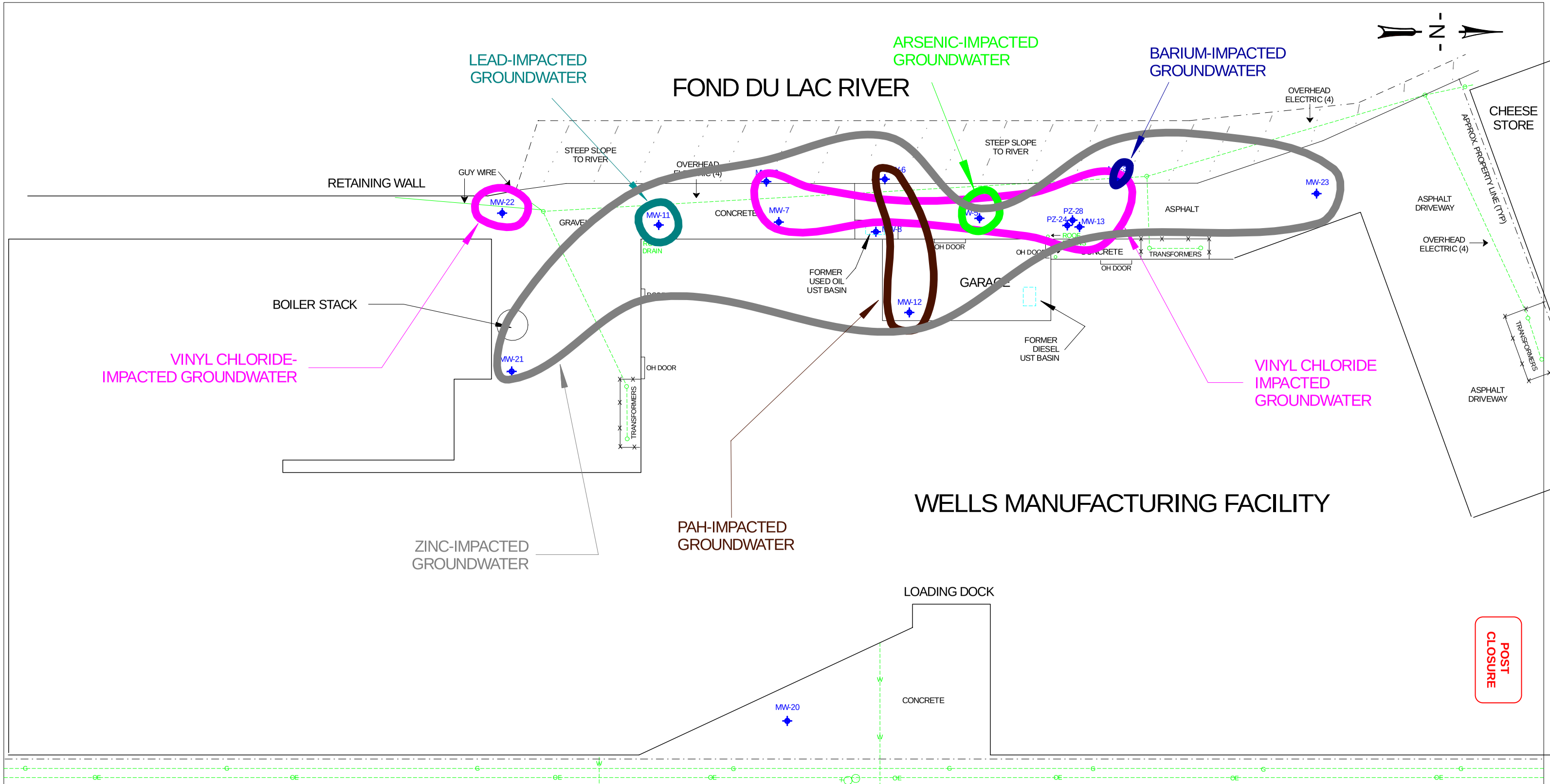
10/27/15, West Cap, view north, showing sidewalk at edge of building and gravel cover, with topsoil and vegetation to be installed.

POST CLOSURE

5/13/14, west cap, north end, view east and view north. During demolition showing asphalt soil cap east extent delineated with paint line, and demolition of non-cap building floor being completed using a breaker ball (in background), and placement of sandy fill.

POST CLOSURE

10/27/15, West cap, view north, showing edge of new asphalt parking lot and concrete apron, with gravel over cap area. Further placement of fill will be completed over the intact underlying asphalt and concrete surface. Note far west (left) area of exposed existing asphalt remaining near power pole.



LEGEND

MW-5 — MONITORING WELL LOCATION & IDENTIFICATION

CONTAMINANT CONCENTRATION > ES

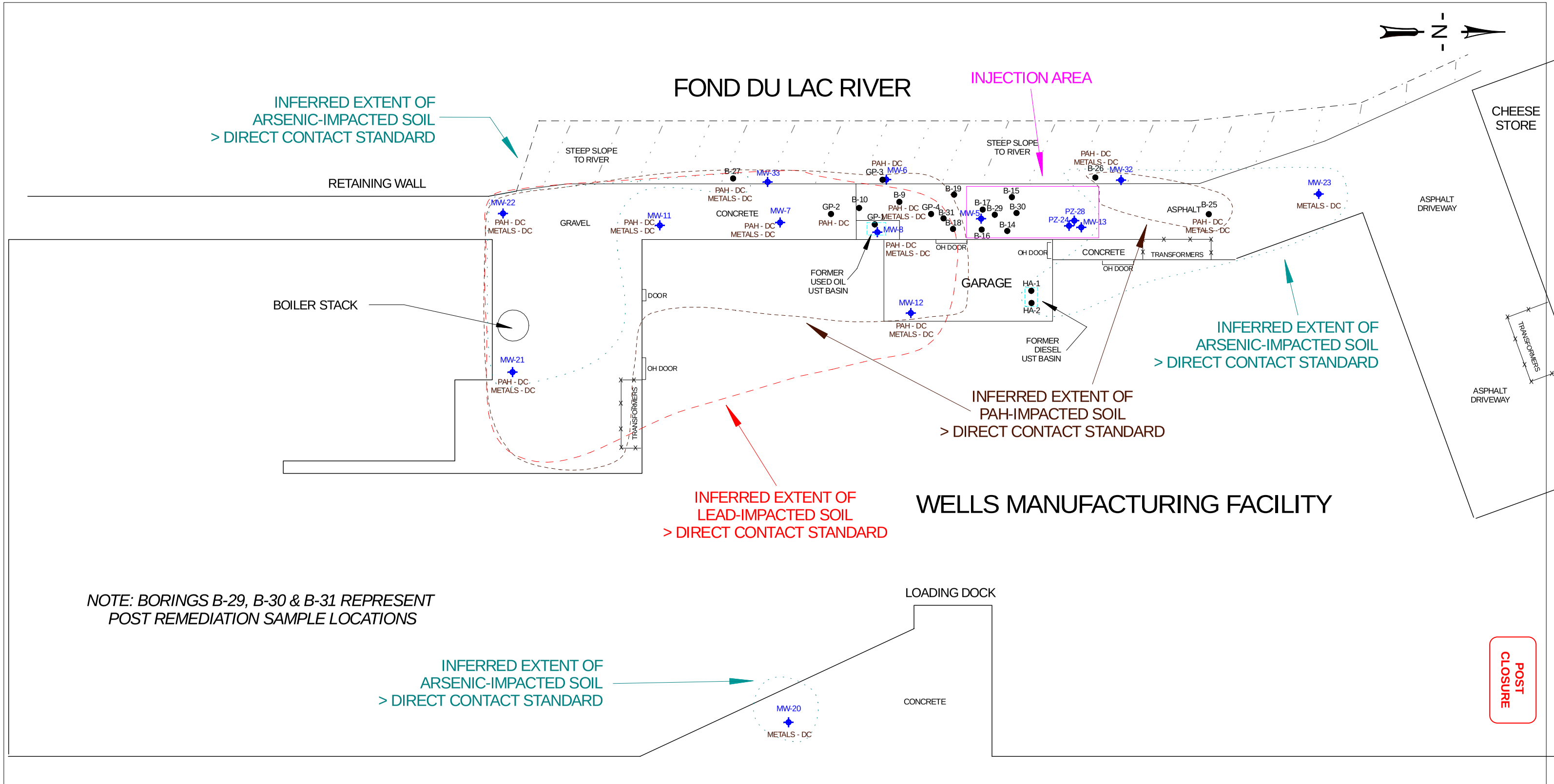
CONTAMINANT CONCENTRATION > PAL

UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL GROUNDWATER CONTAMINATION ABOVE ENFORCEMENT STANDARDS- DECEMBER 2009			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 1



LEGEND

GP-1 ● BORING LOCATION & IDENTIFICATION

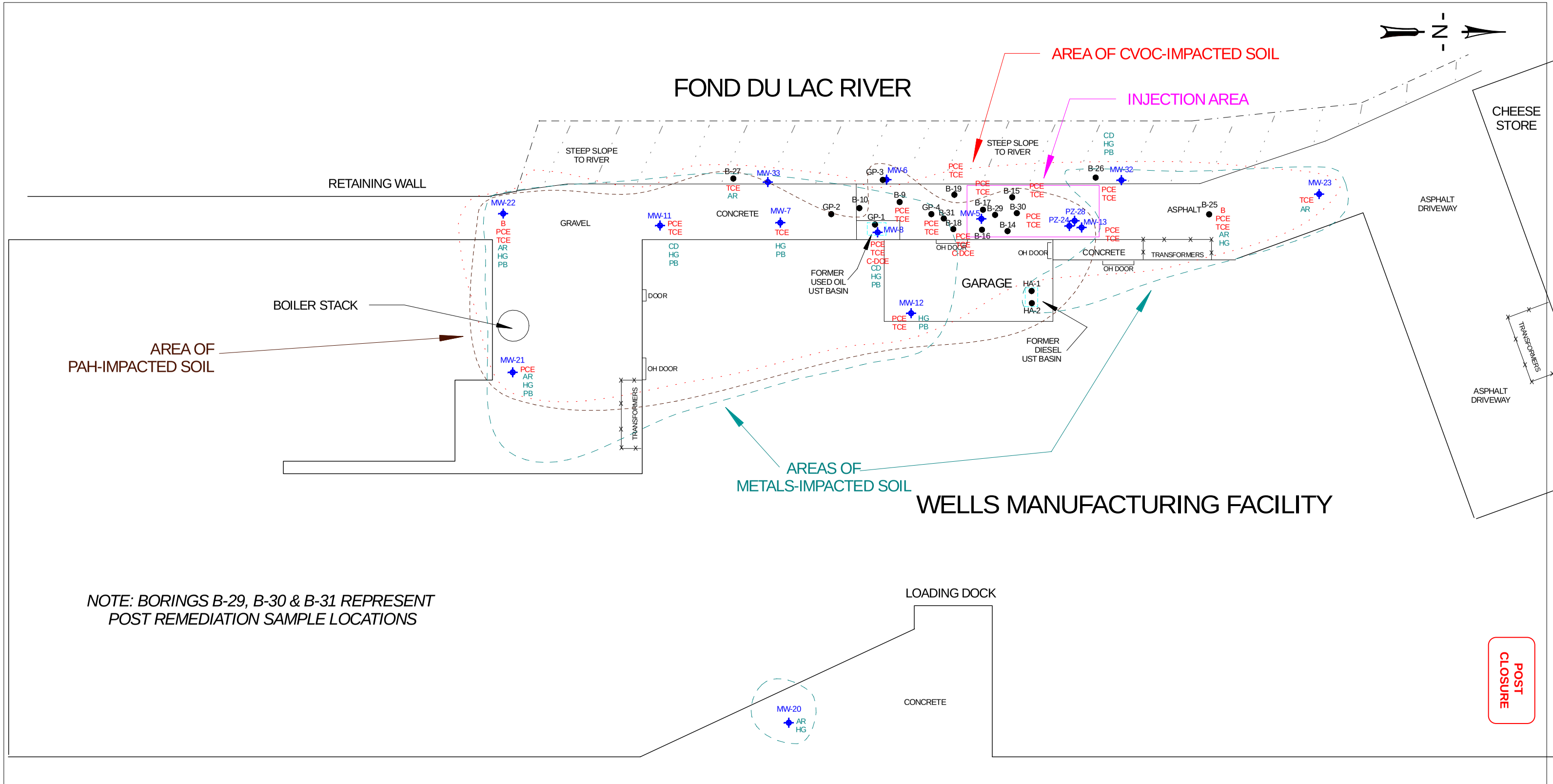
MW-5 ✦ MONITORING WELL LOCATION & IDENTIFICATION

PAH - DC PAH CONTAMINATION ABOVE DIRECT CONTACT LEVEL
METALS - DC METALS CONTAMINATION ABOVE DIRECT CONTACT LEVEL

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL SOIL CONTAMINATION DIRECT CONTACT HAZARD			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 2



LEGEND

GP-1 ●	BORING LOCATION & IDENTIFICATION
MW-5 ✦	MONITORING WELL LOCATION & IDENTIFICATION
B	RESIDUAL CONTAMINATION - BENZENE
PCE	RESIDUAL CONTAMINATION - TETRACHLOROETHYLENE
TCE	RESIDUAL CONTAMINATION - TRICHLOROETHYLENE
C-DCE	RESIDUAL CONTAMINATION - CIS 1,2 DICHLOROETHYLENE
AR	RESIDUAL CONTAMINATION - ARSENIC
HG	RESIDUAL CONTAMINATION - MERCURY
PB	RESIDUAL CONTAMINATION - LEAD
CD	RESIDUAL CONTAMINATION - CADMIUM

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL SOIL CONTAMINATION (EXCEPT DIRECT CONTACT)			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 3

LEGEND

X Location of Cap Evaluations (2014) and Photographs

Required Cap Area (Asphalt covered by soil/gravel)

Outdoor Garden Center Areas

Soil Cap Location (shaded,typ.)
- Existing Cap to Remain Intact
- Soil or Gravel Fill (6") Over Existing Asphalt Cap
- All Plantings in Planters, or Mulched in Above Cap

N

POST CLOSURE

West Branch Fond du Lac River

Forest Avenue

Existing Chimney

Grass Area: Topsoil over Asphalt Cap

Outdoor Garden Center

Hoop House and Shade Structure Held on Cap Surface with Concrete Block Structure NO PENETRATION OF CAP

Shade Structure

Hoop House

Asphalt

Asphalt

Retained 8' Masonry Wall From Existing Building

Division Street

Outdoor Garden Center

Asphalt

Parking (Asphalt Over Gravel Base Over Pulverized Existing Concrete / Asphalt)

BUILDING Tenant Spaces 1st & 2nd Flr.; Commonwealth Offices 3rd Flr.

Planting and Tree Inventory (gravel fill 6" over pulverized existing concrete)

BUILDING Landscape Store

sidewalk

sidewalk

6' Wrought Iron Fence

Landscape Sales (Gravel Fill 6" Over Pulverized Existing Concrete / Asphalt)

Retained 8' Masonry Wall From Existing Building

Brooke Street

Soil Cap Location
Gravel and/or Soil Fill over Intact Existing Concrete Cap

Green Space / Landscaping (Gravel /soil Fill 6" over Pulverized Existing Concrete)

20 10 0 40
Scale

TITLE				
Site Layout and Cap Covering Materials Wells Mfg., Fond du Lac, WI				ALPHA TERRA SCIENCE
REV	DATE	DESCRIPTION	APPVD	DATE: 7/29/2013 / DWG #: DEMOConcept Plan.skf
		printed:11/19/15		DRAWN BY: North / MKH / FIGURE 4

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

POST CLOSURE

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. 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.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at http://dnr.wi.gov/botw/SetUpBasicSearchForm.do, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name	BRRTS No.
Former Wells Manufacturing Property	02-20-548126

Inspections are required to be conducted (see closure approval letter):

- ○ annually
- ○ semi-annually
- ◉ other – specify Every Five Years

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	West Asphalt Cover: Exposed Two Locations, Asphalt Condition is :		○ Y ○ N	○ Y ○ N
		☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	East Concrete Cover: Exposed One Location, Concrete Condition is :		○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:

CAP MAINTENANCE PLAN

February 15, 2010

Property Located at:

26 S. Brooke Street, Fond du Lac, WI

WDNR BRRTS #s: 03-20-548124, 02-20-548126 & 02-20-548127

See attached legal description (Exhibit A) for Parcel ID #:FDL-15-17-10-34-787-00

City of Fond du Lac, Fond du Lac County, Wisconsin

Introduction

This document is the Maintenance Plan for a pavement cover and building barrier at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing slab-on-grade building and paved surfaces occupying the area over the contaminated groundwater plume and soil on-site. The contaminated groundwater plume is impacted by vinyl chloride, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, barium, lead and zinc. The contaminated soil is impacted by tetrachloroethylene (PCE), trichloroethylene (TCE) cis-1,2 dichloroethylene, several PAH compounds, lead, cadmium, arsenic and mercury. The locations of residually impacted soil and groundwater are displayed on Figures 1 through 3.

The locations of the paved surfaces or other impervious barriers to be maintained in accordance with this Maintenance Plan are identified on Figure 4.

Cap Purpose

The paved surfaces and building over the contaminated soil serve as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. The impervious covers over the contaminated soil also serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

Annual Inspection

The paved surfaces and building foundation overlying the contaminated soil and groundwater plumes as depicted in Exhibit A will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into underlying soils. The inspections

will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included as Exhibit B, Cap Inspection Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log shall be kept on-site and presented to the Wisconsin Department of Natural Resources ("WDNR") upon request, unless otherwise directed in the case closure letter.

Maintenance Activities

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling operations or they can include larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment ("PPE"). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the paved surfaces overlying the contaminated soil are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the paved surfaces, will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover or Cap

The following activities are prohibited on any portion of the property where pavement is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

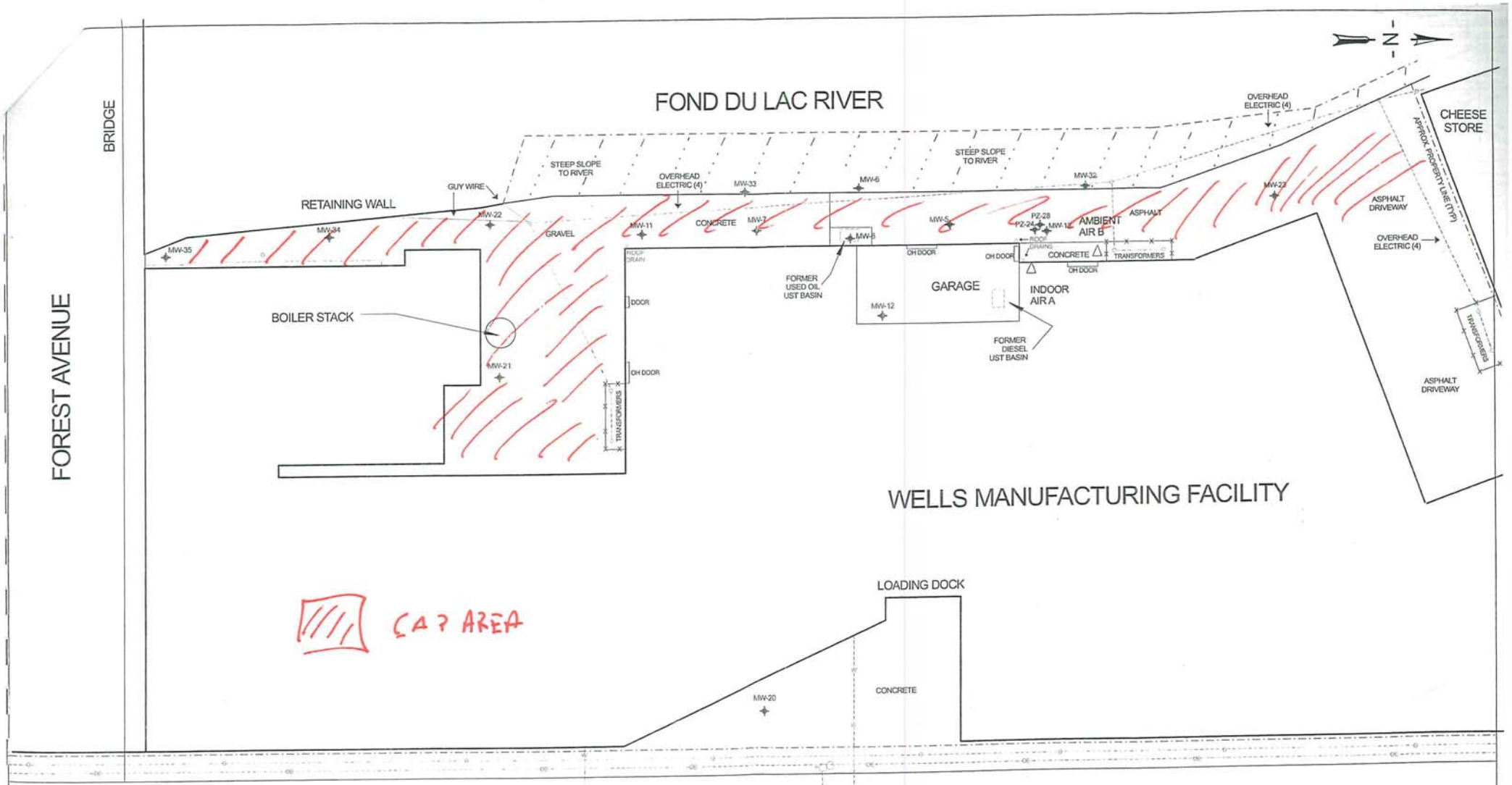
Contact Information

Current as of February 15, 2010

Site Owner and Operator: Wells Manufacturing, L.P.
c/o Mike Baumhardt
P. O. Box 70
26 S. Brooke Street, Fond du Lac, WI 54936-0070
Phone: (920) 929-6311

Consultant: Alpha Terra Science
1237 Pilgrim Road, Plymouth, WI 53073
920/892-2444

WDNR: Wisconsin Department of Natural Resources
Kevin McKnight, Hydrogeologist, RR Program
625 East County Road Y, Suite 100, Oshkosh, WI 54901-9731
920/424-7890



LEGEND

MW-5 ✦ MONITORING WELL LOCATION & IDENTIFICATION

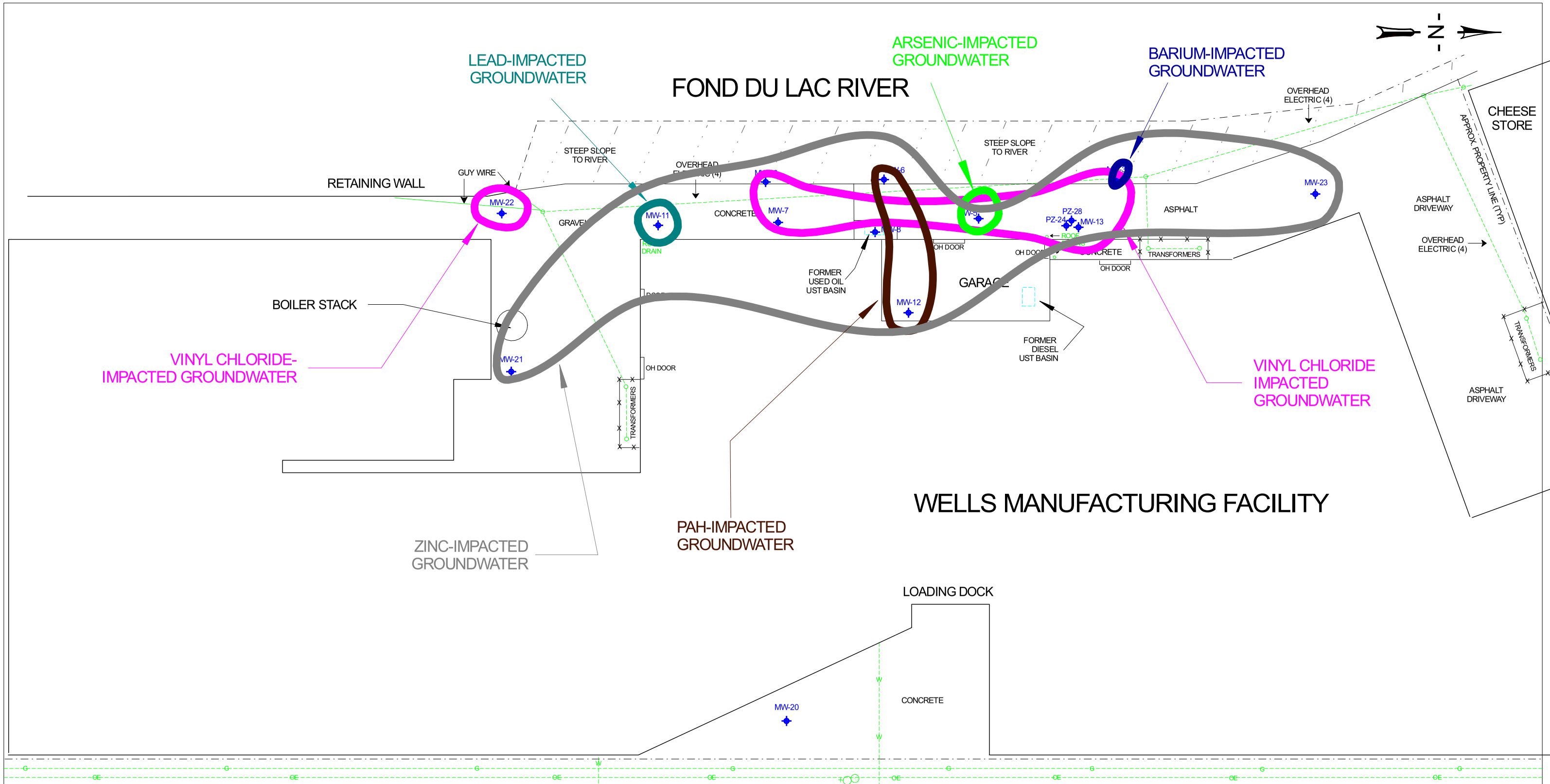
△ INDOOR AIR A — AIR SAMPLE

- - - - - UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: GROUNDWATER SAMPLE LOCATIONS WITH VAPOR SAMPLE LOCATIONS			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 9/3/10	DWG #:... rescalesite.skf
REV: DATE:	DESCRIPTION:	APPVD.: DRAWN BY: KAE	FIGURE E-1



LEGEND

MW-5 — MONITORING WELL LOCATION & IDENTIFICATION

CONTAMINANT CONCENTRATION > ES

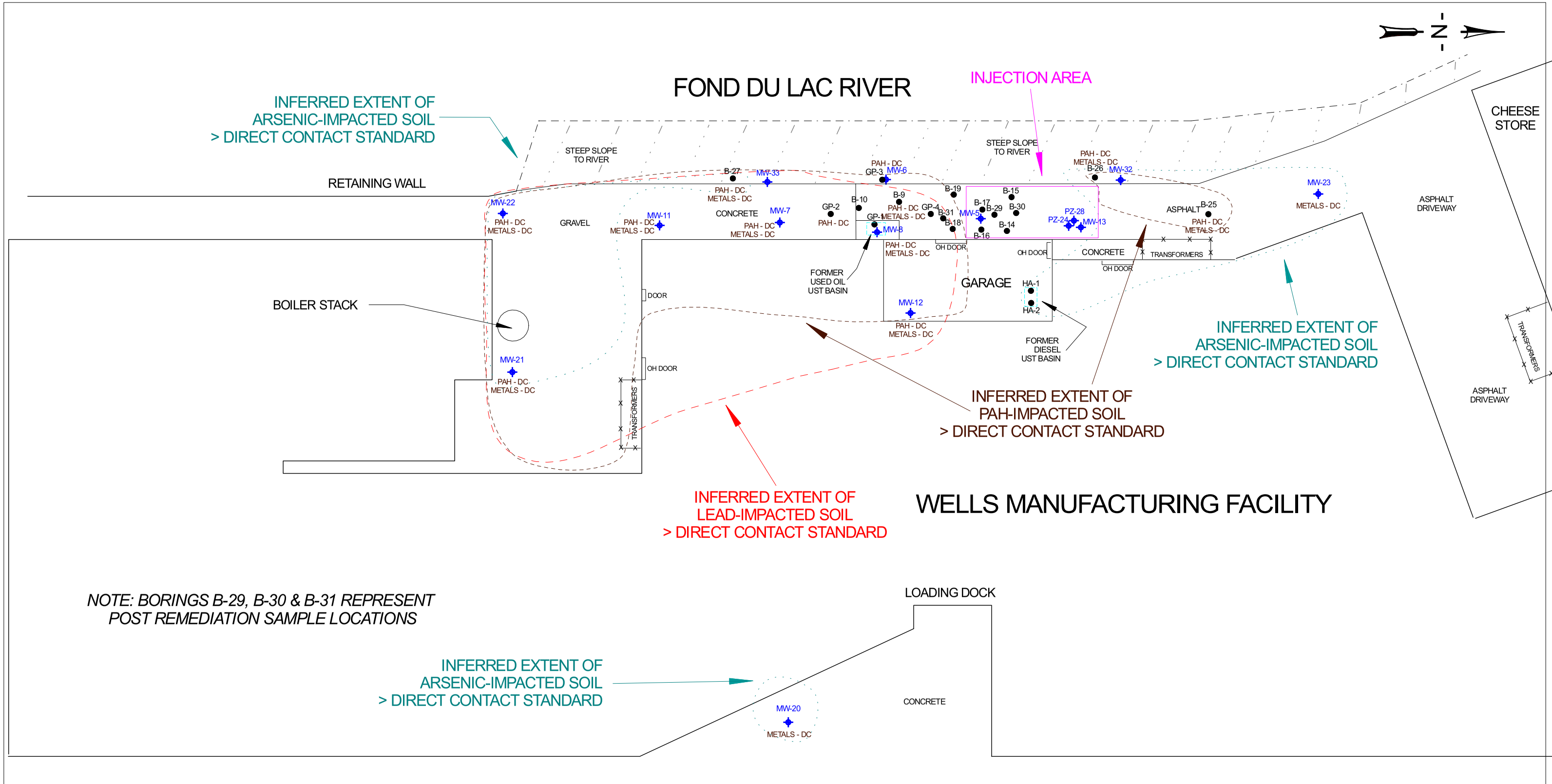
CONTAMINANT CONCENTRATION > PAL

UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL GROUNDWATER CONTAMINATION ABOVE ENFORCEMENT STANDARDS- DECEMBER 2009			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03		DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION:	APPVD.:	DRAWN BY: AH	FIGURE 1



LEGEND

GP-1 ● BORING LOCATION & IDENTIFICATION

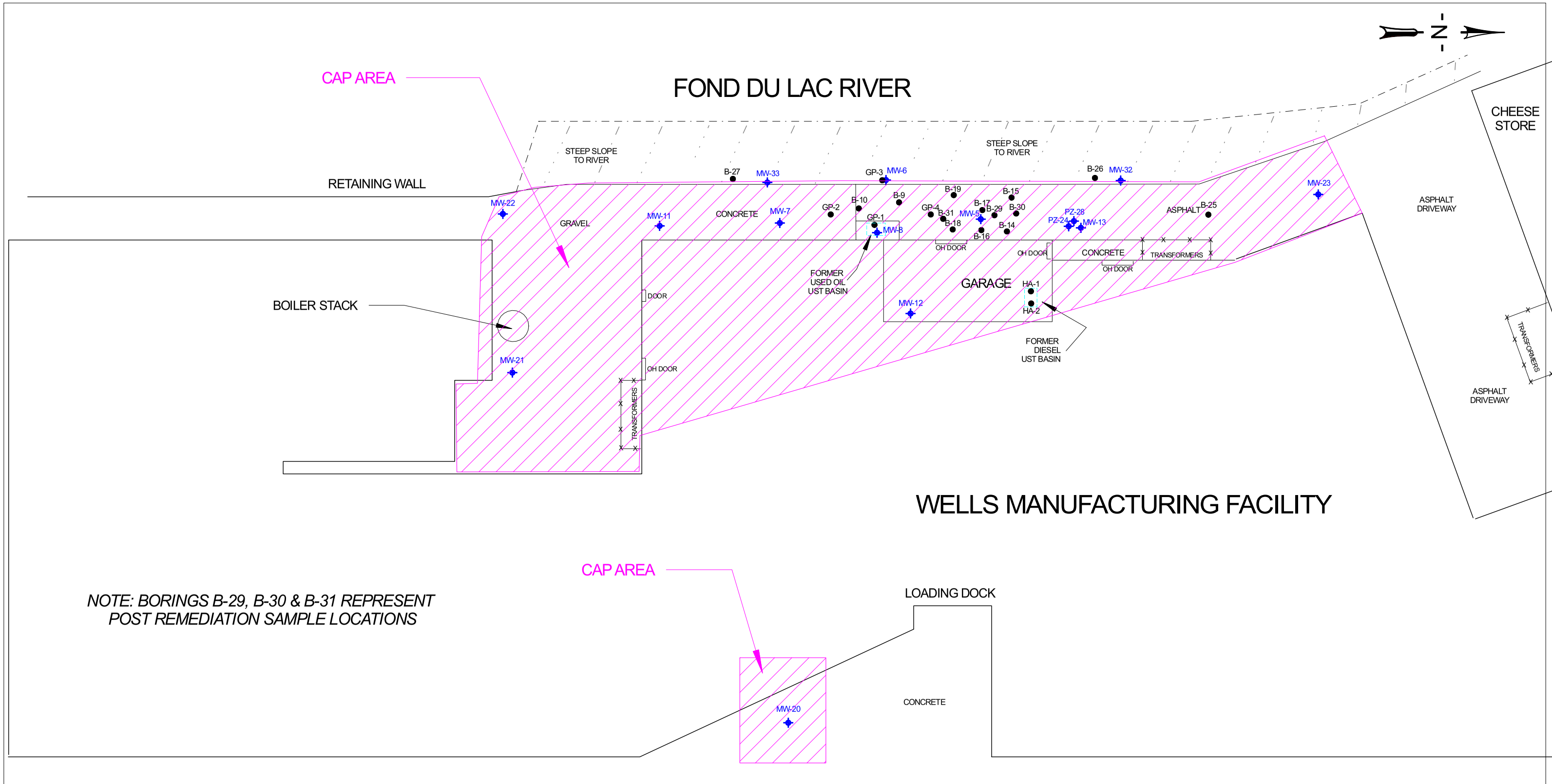
MW-5 ✦ MONITORING WELL LOCATION & IDENTIFICATION

PAH - DC PAH CONTAMINATION ABOVE DIRECT CONTACT LEVEL
METALS - DC METALS CONTAMINATION ABOVE DIRECT CONTACT LEVEL

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL SOIL CONTAMINATION DIRECT CONTACT HAZARD			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 2



NOTE: BORINGS B-29, B-30 & B-31 REPRESENT POST REMEDIATION SAMPLE LOCATIONS

LEGEND

GP-1 ● BORING LOCATION & IDENTIFICATION

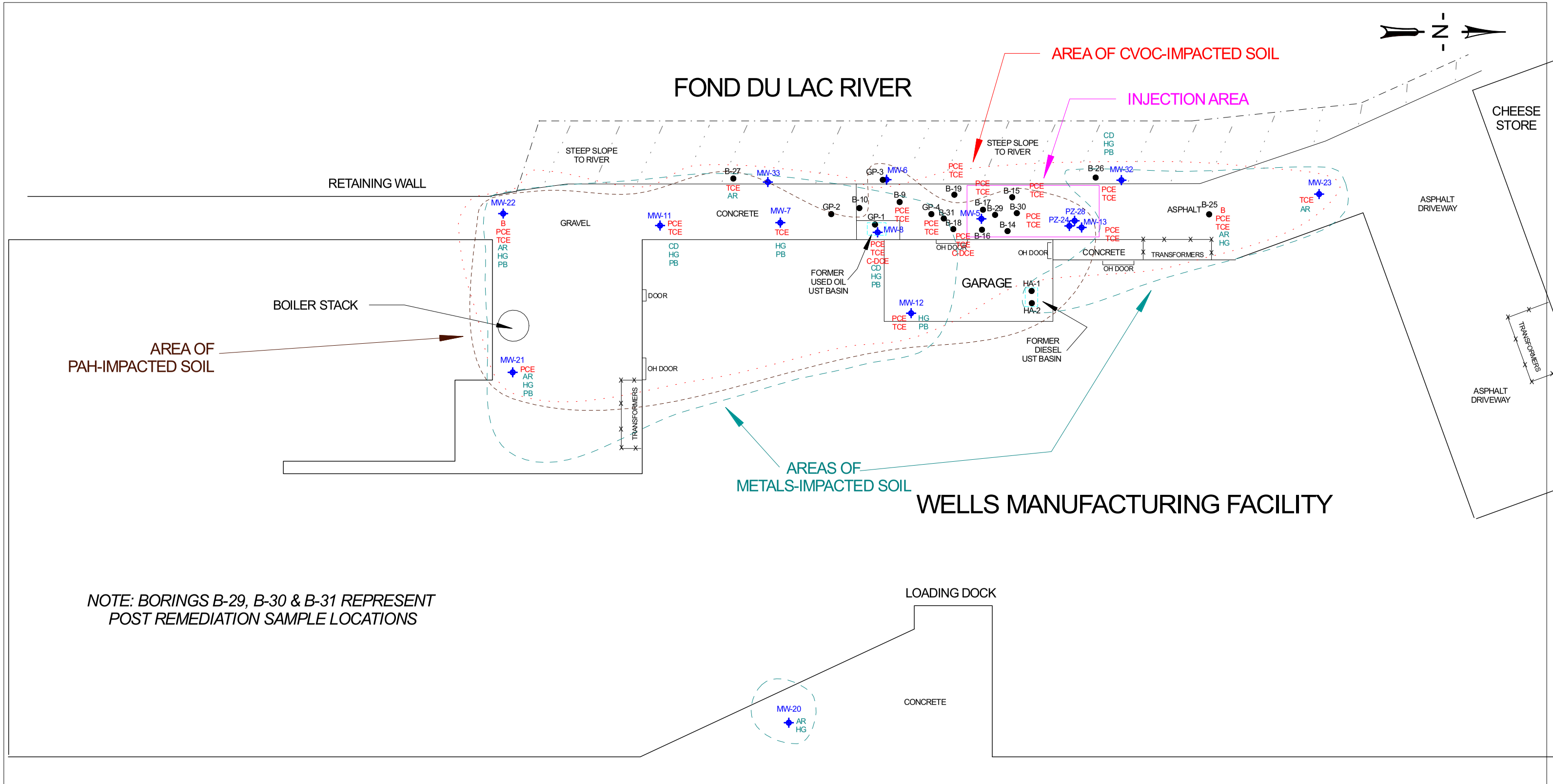
MW-5 ✦ MONITORING WELL LOCATION & IDENTIFICATION

AREA WHERE IMPERVIOUS CAP MUST BE MAINTAINED

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: IMPERVIOUS CAP AREAS			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03		DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION:	APPVD.:	DRAWN BY: AH	FIGURE 4



LEGEND

GP-1 ●	BORING LOCATION & IDENTIFICATION
MW-5 ✦	MONITORING WELL LOCATION & IDENTIFICATION
B	RESIDUAL CONTAMINATION - BENZENE
PCE	RESIDUAL CONTAMINATION - TETRACHLOROETHYLENE
TCE	RESIDUAL CONTAMINATION - TRICHLOROETHYLENE
C-DCE	RESIDUAL CONTAMINATION - CIS 1,2 DICHLOROETHYLENE
AR	RESIDUAL CONTAMINATION - ARSENIC
HG	RESIDUAL CONTAMINATION - MERCURY
PB	RESIDUAL CONTAMINATION - LEAD
CD	RESIDUAL CONTAMINATION - CADMIUM

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL SOIL CONTAMINATION (EXCEPT DIRECT CONTACT)			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 3

Exhibit B
Barrier INSPECTION LOG

Inspection Date	Inspector	Condition of Cap	Recommendations	Have Recommendations from previous inspection been implemented?

IF REQUESTED, MAIL ANNUAL INSPECTION FORMS TO:
WDNR/ RR
625 E. COUNTY ROAD Y, SUITE 700
OSHKOSH, WI 54901-9731

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Wisconsin Department of Natural Resources
Oshkosh Service Center
625 E CTY Y, Suite 700
Oshkosh, Wisconsin 54901
FAX 920-424-4404

September 15, 2010

Wells Manufacturing Corporation
Mr. Mike Baumhardt
26 South Brooke Street
Fond du Lac WI 54935

Subject: Conditional Closure Decision,
With Requirements to Achieve Final Closure
Wells Manufacturing, 26 S. Brooke Street, Fond du Lac, Wisconsin
WDNR BRRTS Activity # 03-20-548124, 02-20-548126 & 02-20-548127

Dear Mr. Baumhardt:

On September 10, 2010, 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 petroleum, chlorinated solvent and metal contamination on the site from current and historic uses of the property 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 s. NR 726.05, Wis. Adm. Code and will be closed if the following conditions are satisfied:

MONITORING WELL ABANDONMENT

The monitoring wells at the site must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to Kevin McKnight on Form 3300-005 found at http://dnr.wi.gov/org/water/dwg/gw/ or provided by the Department of Natural Resources.

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 Department of Natural Resources' 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.

CAP INSTALLATION and MAINTENANCE PLAN

A impermeable cap needs to be maintained for groundwater protection and to prevent direct contact with contaminated materials in the area identified on the attached figure. It is the Departments

understanding that Wells Manufactuirng intends to repave this area in the Fall of 2010 or Spring 2011. A Cap Maintenance Plan needs to be submitted for the capped area.

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 GIS Registry. Information that was submitted with your closure request application will be included on the GIS Registry. To review the site on the GIS Registry web page, visit the RR Sites Map page at: http://dnr.wi.gov/org/aw/rr/gis/index.htm.

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 920-424-7890

Sincerely,

Kevin D. McKnight
Hydrogeologist
Remediation & Redevelopment Program

Enclosure

cc: file
Alpha Terra-via email

241593

DEED

THIS INDENTURE, made by WELLS MFG. CORP., an Indiana corporation, grantor, hereby quitclaims to WELLS MFG. CORP., a Wisconsin corporation, grantee, for the sum of One Dollar ($1.00) and other valuable consideration, the tracts of land described on Schedule A attached hereto located in Fond du Lac County, Wisconsin.

IN WITNESS WHEREOF, the said grantor has caused this instrument to be executed on June 9, 1969, in its corporate name by its proper corporate officers and its corporate seal to be hereunto affixed, at New York, New York, as of the 9th day of June, A.D., 1969.

Signed and Sealed in
the Presence of:

Andrew G. Pietrini
Assistant Secretary

WELLS MFG. CORP.,

Marvin M. Koenig
Vice President

[Seal]

SCHEDULE A

PARCEL NO. 1

Lot 1 and fractional Lot 2 and Lots 3, 4 and 5, Block 4, Darling, Moore & Walker's Subdivision of Tracts 41 and 43, Section 10, Township 15, Range 17 East, City of Fond du Lac, Wisconsin (aforesaid Lot 1 is also described as Lot 1, Block 3, Darling, Moore and Drury's Addition).

Lots 19, 20, 21, 22 and 23, Block 5, Darling, Moore & Walker's Subdivision of Tracts 41 and 43, Section 10, Township 15, Range 17 East, City of Fond du Lac, Wisconsin.

The East half of vacated Moore Street from Brooke Street to West Division Street and the West half of vacated Moore Street between Brooke Street and the northwesterly line of Lot 19, Block 5, as extended, all within Darling, Moore & Walker's Subdivision according to the recorded plat thereof.

Lot 7, Block 3, Darling, Moore and Drury's Addition to the City of Fond du Lac.

PARCEL NO. 2

Lots numbered 14, 15 & 16 of Block number 1 and Lots numbered 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12 of Block number 2 in Darling, Moore and Walker's Subdivision of part of Tracts 41 and 43 in Section 10 in Township 15 North of Range 17 East, in the City of Fond du Lac, Wisconsin.

PARCEL NO. 3

All of Lots Fourteen (14) and Fifteen (15), and that part of Lot Thirteen (13) in Block One (1) of Darling, Moore & Drury's Addition to Fond du Lac, that lies Easterly of a line drawn parallel with and distant Twenty (20) feet Easterly, measured at right angles from the centerline of the most Easterly main track of the Chicago and North Western Railway Company.

All of Lot Eleven (11), and that part of Lot Twelve (12) in Block Two (2) of Darling, Moore & Drury's Addition to Fond du Lac (sometimes shown for record as Darling, Moore & Druries Addition) which lies Easterly of a line drawn parallel with and distant Twenty (20) feet Easterly, measured at right angles from the centerline of the most Easterly main track of the Chicago and North Western Railway Company.

All of Lots Two (2), Three (3), and Four (4) and the West half of Lot Five (5), all in Block Three (3) of Darling, Moore and Walker's Subdivision, Tracts Forty-one (41) and Forty-three (43), Section Ten (10) Township Fifteen (15) North, Range Seventeen (17) East, City and County of Fond du Lac, Wisconsin.

PARCEL NO. 4

Also, commencing at the southwest corner of Lot 7, Block 3, Darling, Moore & Drury's Addition to the City of Fond du Lac, running thence westerly on the South line of said Lot 7 as extended to the East bank of the West branch of the Fond du Lac River, thence northerly along said river bank to a point opposite the northerly line, as extended, of Lot 19, Block 5, Darling, Moore & Walker's Subdivision of Tracts 41 and 43, Section 10, Township 15, Range 17 East, City of Fond du Lac, Wisconsin, thence easterly on said extended line to the northwest corner of said Lot 19, thence southerly along the westerly line of Lots 19, 20, 21, 22 and 23, Block 5, Darling, Moore & Walker's Subdivision of Tracts 41 and 43, Section 10, Township 15, Range 17 East, City of Fond du Lac, Wisconsin, and the westerly line of Lot 7, Block 3, Darling, Moore & Drury's Addition to the City of Fond du Lac, to the place of beginning.

Together with all right, title and interest, if any, of the grantor in and to the beds of streets, roads and alleys in front of, or adjoining the above-described land and all the structures, buildings and improvements thereon and all rights and easements of every kind and description appurtenant thereto.

VOL 808 PAGE 105

STATE OF NEW YORK)
COUNTY OF NEW YORK) SS:

Personally came before me this 26 day of June A.D., 1969, the above named Marvin M. Koenig Vice-President, and Andrew G. Pietrini , Assistant Secretary, of the above named corporation, to me known to be the persons who executed the foregoing instrument and to me known to be such Vice President and Assistant Secretary of said corporation and acknowledged that they executed the foregoing instrument as such officers as the deed of said corporation, by its authority.

Thomas E. Rasmussen
Notary Public

THOMAS E. RASMUSSEN
Notary Public, State of New York
No. 24-4670705
Qualified in Richmond County
Cert. Filed with N. Y. County Clerk
Commission Expires March 30, 1970

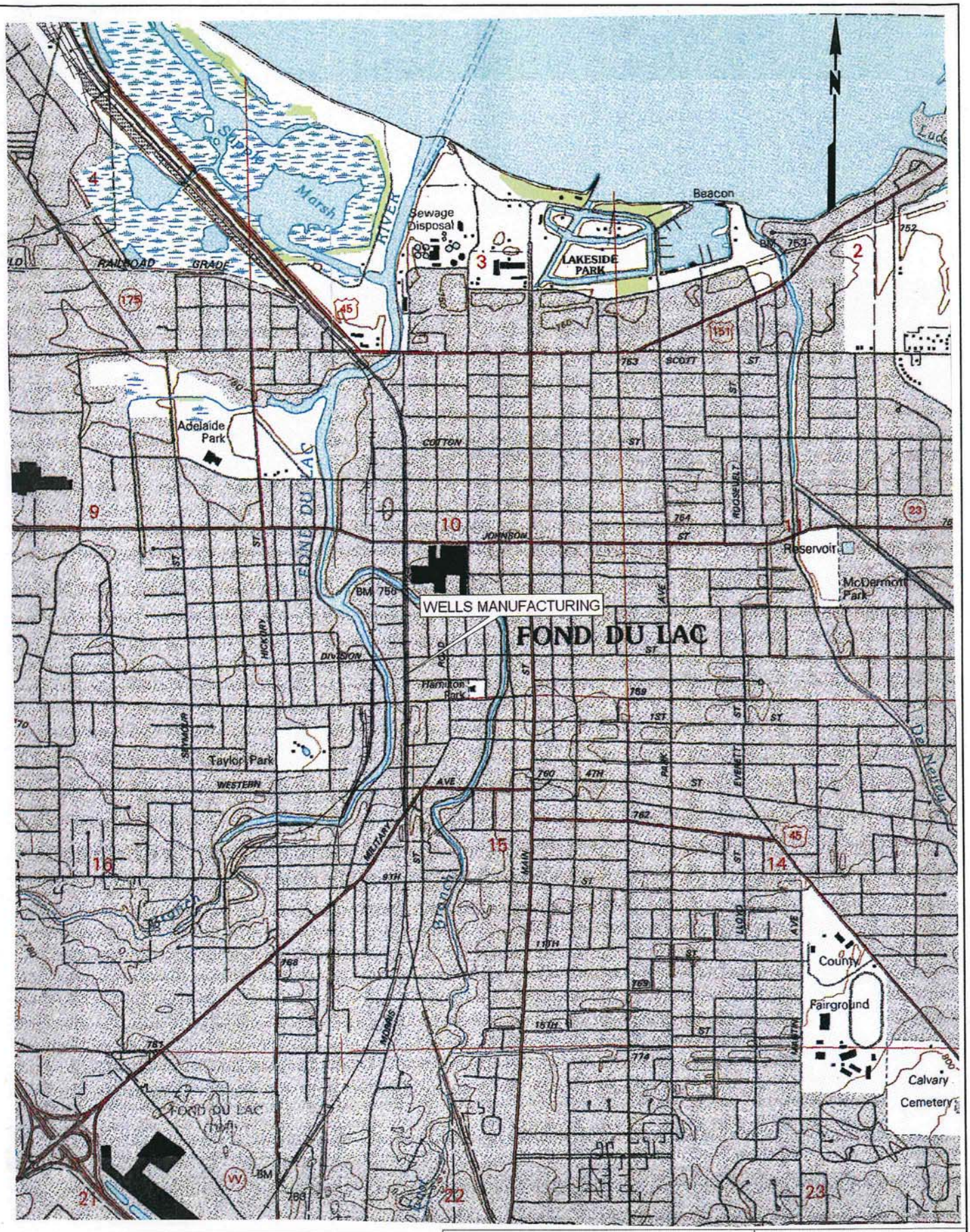
This instrument was drafted by:
Robert B. Gluckman, Esq.
655 Madison Avenue
New York, New York 10021

REGISTER'S OFFICE
FOND DU LAC COUNTY, WIS.
RECORDED AT 1:10 P M.
JUL 15 1969 IN
Vol. 608 Records Page 404
Kenneth S. Betz
REGISTER OF DEEDS

I have reviewed the attached legal description for the Wells Manufacturing Property. I believe the legal description is complete and accurate for the property located at 26 S. Brooke Street, City of Fond du Lac, Wisconsin, with residual soil and groundwater contamination.

12/15/10

Don Lauby
V. P. of Operations
Wells Manufacturing, L.P.



Scale 1 : 24,000
1" = 2000 ft

SOURCE: Fond du Lac 7.5 minute topographic quadrangle 1995

SITE LOCATION MAP			ALPHA TERRA SCIENCE	
Wells Manufacturing, Fond du Lac, WI				
DATE	DESCRIPTION	APPVD	DATE: 5/26/06	DWG #... siteloc
SCALE 1:=24,000			APPROVED: AH	FIGURE 1

FOND DU LAC RIVER

N

OVERHEAD ELECTRIC (4)

CHEESE STORE

APPROX. PROPERTY LINE (TYP)

STEEP SLOPE TO RIVER

STEEP SLOPE TO RIVER

RETAINING WALL

GUY WIRE

OVERHEAD ELECTRIC (4)

B-27

MW-33

GP-3

MW-6

B-26

MW-32

MW-23

MW-22

GRAVEL

MW-11

CONCRETE

MW-7

GP-2

B-10

B-9

GP-1

MW-8

GP-4

B-19

B-15

B-17

MW-5

B-18

B-16

B-14

PZ-28

PZ-24

MW-13

ASPHALT

B-25

ASPHALT DRIVEWAY

OVERHEAD ELECTRIC (4)

ROOF DRAIN

OH DOOR

ROOF DRAINS

OH DOOR

CONCRETE

TRANSFORMERS

OH DOOR

FORMER USED OIL UST BASIN

GARAGE

HA-1

HA-2

MW-12

BOILER STACK

DOOR

OH DOOR

MW-21

TRANSFORMERS

FORMER DIESEL UST BASIN

TRANSFORMERS

ASPHALT DRIVEWAY

WELLS MANUFACTURING FACILITY

LOADING DOCK

CONCRETE

MW-20

S. BROOKE STREET

LEGEND

GP-1 ● BORING LOCATION & IDENTIFICATION

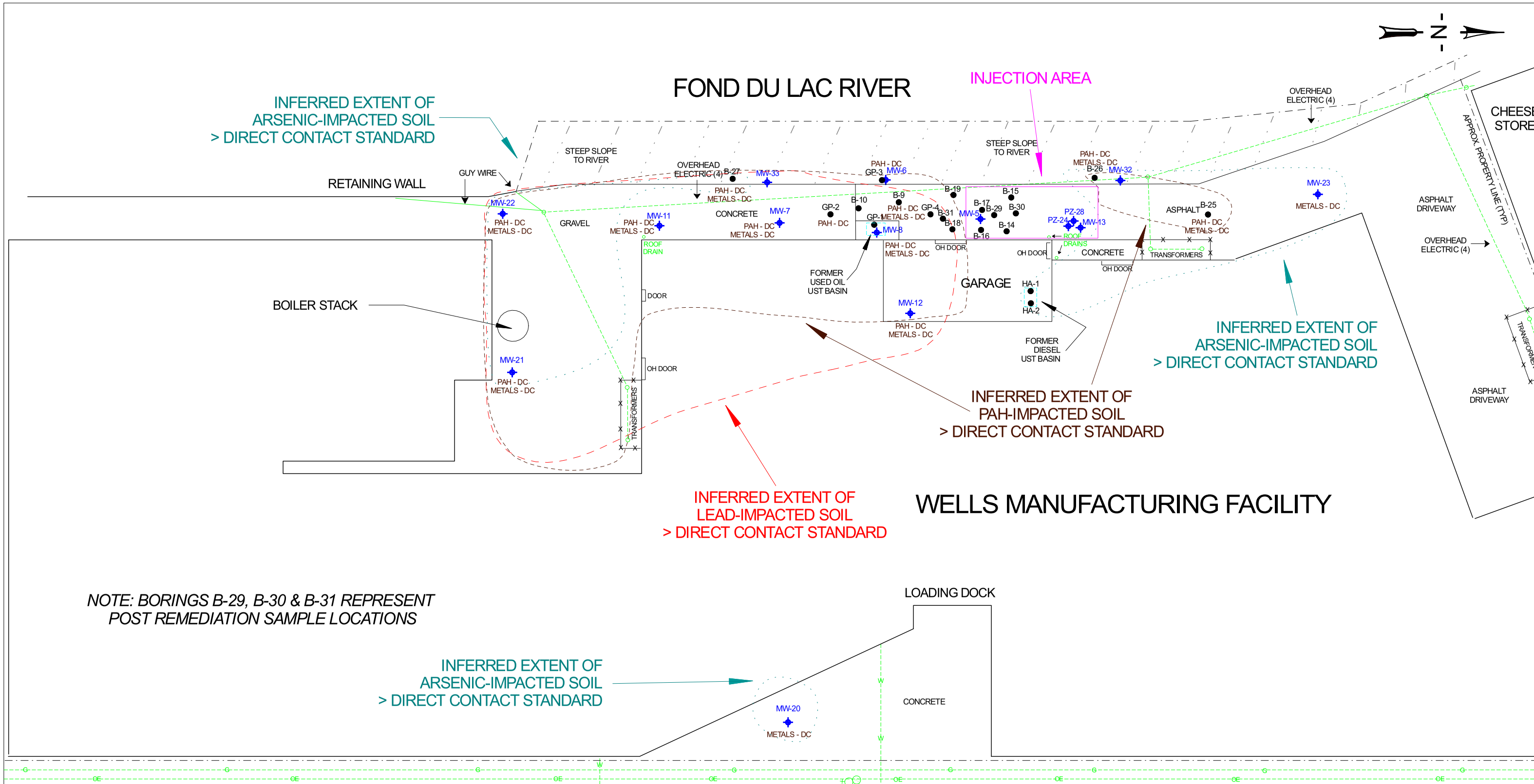
MW-5 ✦ MONITORING WELL LOCATION & IDENTIFICATION

UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: SITE PLAN			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03		DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION:	APPVD.:	DRAWN BY: AH	FIGURE 2



LEGEND

GP-1 ● BORING LOCATION & IDENTIFICATION

MW-5 ✦ MONITORING WELL LOCATION & IDENTIFICATION

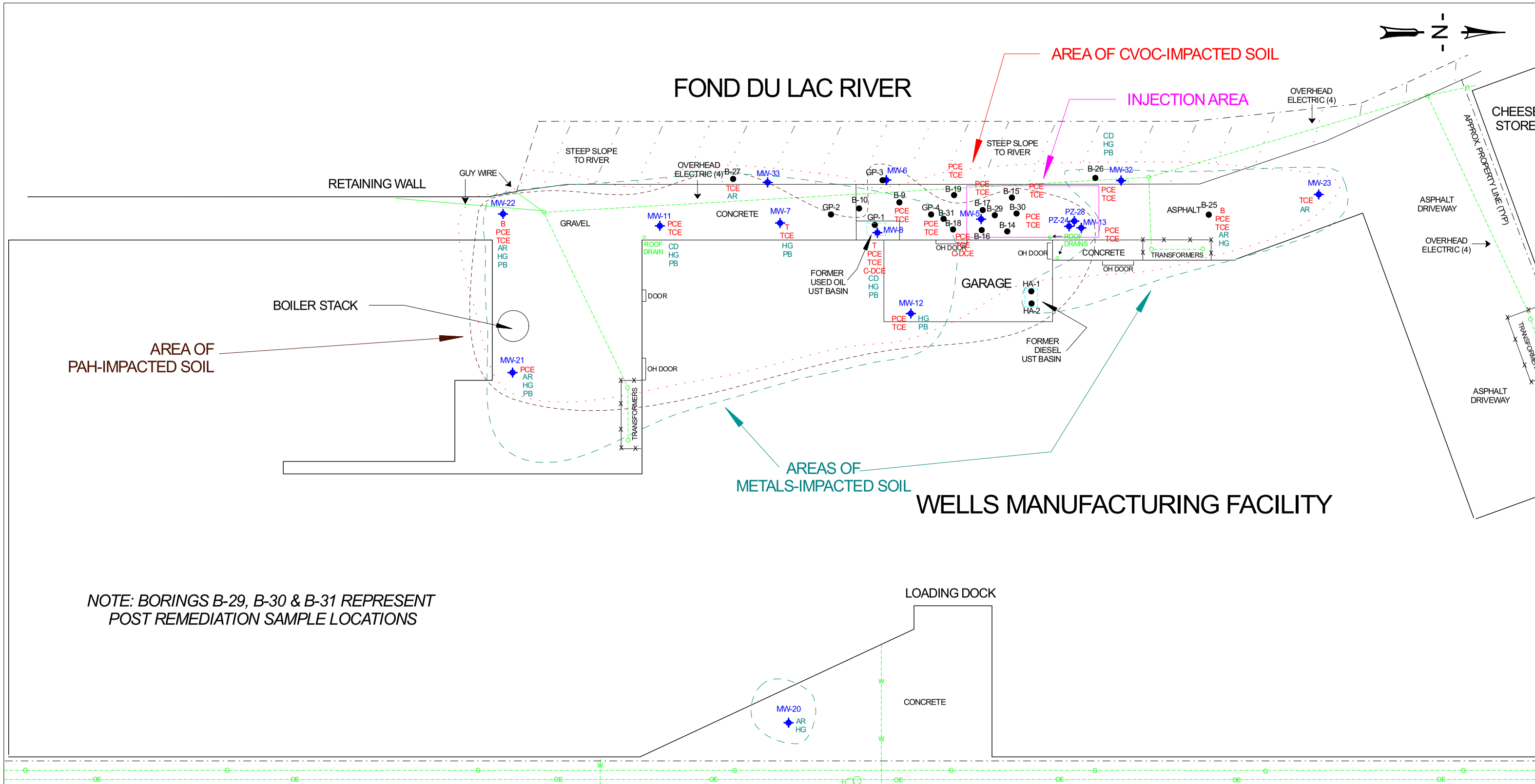
PAH - DC PAH CONTAMINATION ABOVE DIRECT CONTACT LEVEL
METALS - DC METALS CONTAMINATION ABOVE DIRECT CONTACT LEVEL

-------- UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL SOIL CONTAMINATION DIRECT CONTACT HAZARD			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 3



NOTE: BORINGS B-29, B-30 & B-31 REPRESENT POST REMEDIATION SAMPLE LOCATIONS

LEGEND

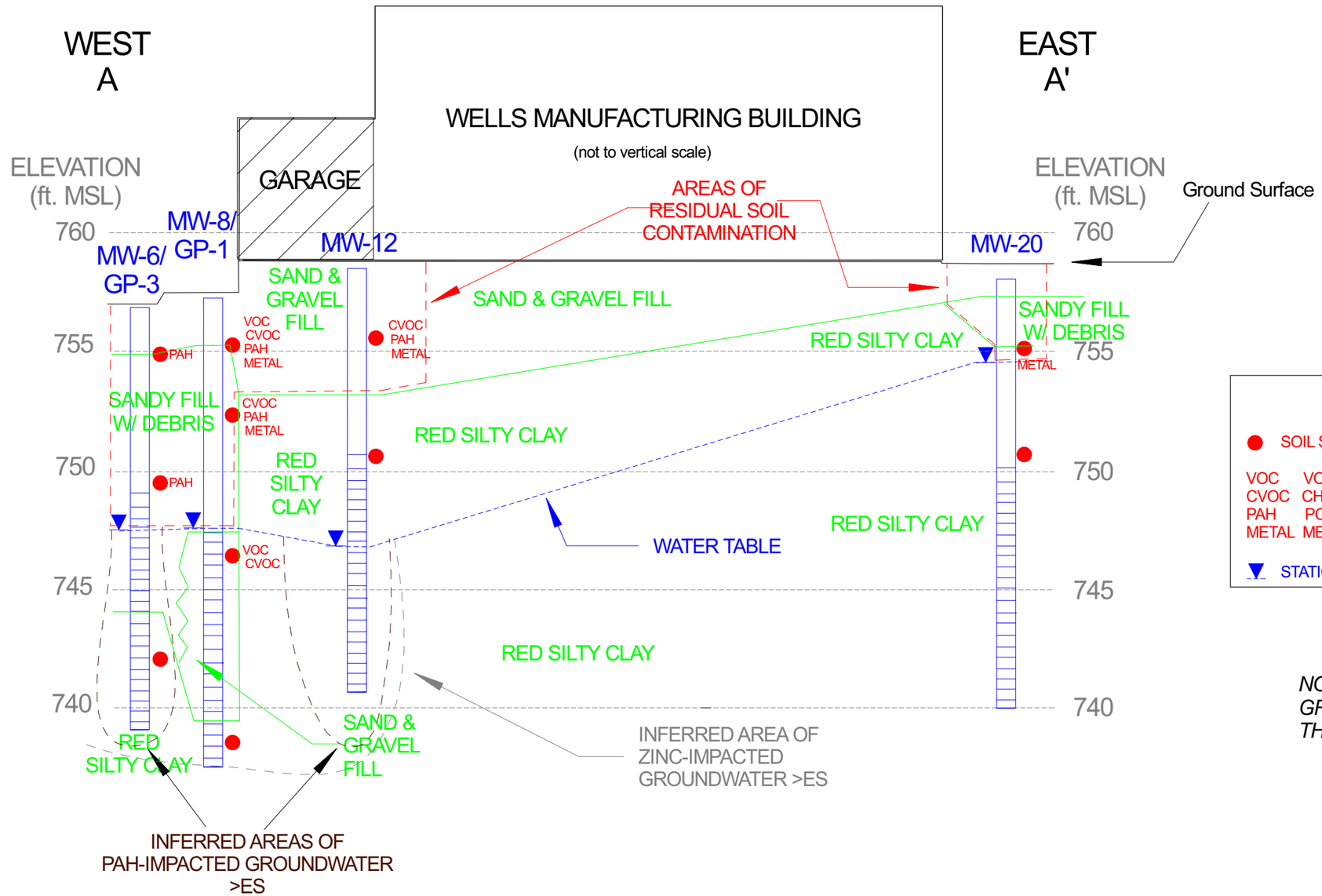
GP-1 ●	BORING LOCATION & IDENTIFICATION
MW-5 ✦	MONITORING WELL LOCATION & IDENTIFICATION
B	RESIDUAL CONTAMINATION - BENZENE
T	RESIDUAL CONTAMIANTION - TOLUENE
PCE	RESIDUAL CONTAMINATION - TETRACHLOROETHYLENE
TCE	RESIDUAL CONTAMINATION - TRICHLOROETHYLENE
C-DCE	RESIDUAL CONTAMINATION - CIS 1,2 DICHLOROETHYLENE
AR	RESIDUAL CONTAMINATION - ARSENIC
HG	RESIDUAL CONTAMINATION - MERCURY
PB	RESIDUAL CONTAMINATION - LEAD
CD	RESIDUAL CONTAMINATION - CADMIUM

- - - - - - - UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL SOIL CONTAMINATION (EXCEPT DIRECT CONTACT)			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 4



LEGEND

● SOIL SAMPLE LOCATION

VOC VOLATILE ORGANIC COMPOUNDS ABOVE RCL
CVOC CHLORINATED VOLATILE ORGANICS ABOVE RCL
PAH POLYCYCLIC AROMATIC HYDROCARBONS ABOVE RCL
METAL METALS ABOVE RCL

▼ STATIC WATER LEVEL - FEBRUARY 2006

NOTE: NO VOC OR METALS CONTAMINATED GROUNDWATER WITHIN THE AREA OF THIS CROSS-SECTION

0 1 2 3 4 5
VERTICAL SCALE: 1 INCH = 5 FEET

0 5 25
HORIZONTAL SCALE: 1 INCH = 25 FEET

TITLE: POST-REMEDIATION WEST TO EAST CROSS-SECTION A-A'			ALPHA TERRA SCIENCE
SITE: WELLS MANUFACTURING, FOND DU LAC, WI			
SCALE: 1"=25' V 1"=5'	ATS PROJECT NUMBER: WEL 2003-02	DATE: 5/4/06	DWG #: wel xsxa-a'
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 5

SOUTH
B
ELEVATION
(ft. MSL)

NORTH
B'
ELEVATION
(ft. MSL)

760
755
750
745
740
735
730

Ground Surface

MW-22
MW-11
MW-7
MW-8/
GP-1
B-31
B-18
MW-5
B-29
B-30
PZ-28
PZ-24/MW-13
B-25
MW-23

SAND & GRAVEL FILL
SANDY FILL W/ DEBRIS
RED SILTY CLAY
SAND & GRAVEL FILL
GRAY SILTY CLAY
WATER TABLE

VOC
CVOC
PAH
METAL

AREA OF CONTAMINATED SOIL
AREA OF RESIDUAL SOIL CONTAMINATION
AREA OF LEAD-IMPACTED GROUNDWATER > ES
AREAS OF VC-IMPACTED GROUNDWATER >ES
AREA OF VC-IMPACTED GROUNDWATER >ES
AREA OF ARSENIC-IMPACTED GROUNDWATER > ES
AREA OF ZINC-IMPACTED GROUNDWATER >ES

10 foot vertical section break

NOTE: NO PAH-CONTAMINATED GROUNDWATER WITHIN THE AREA OF THIS CROSS SECTION

0 1 2 3 4 5
VERTICAL SCALE: 1 INCH = 5 FEET

0 5 25
HORIZONTAL SCALE: 1 INCH = 25 FEET

LEGEND

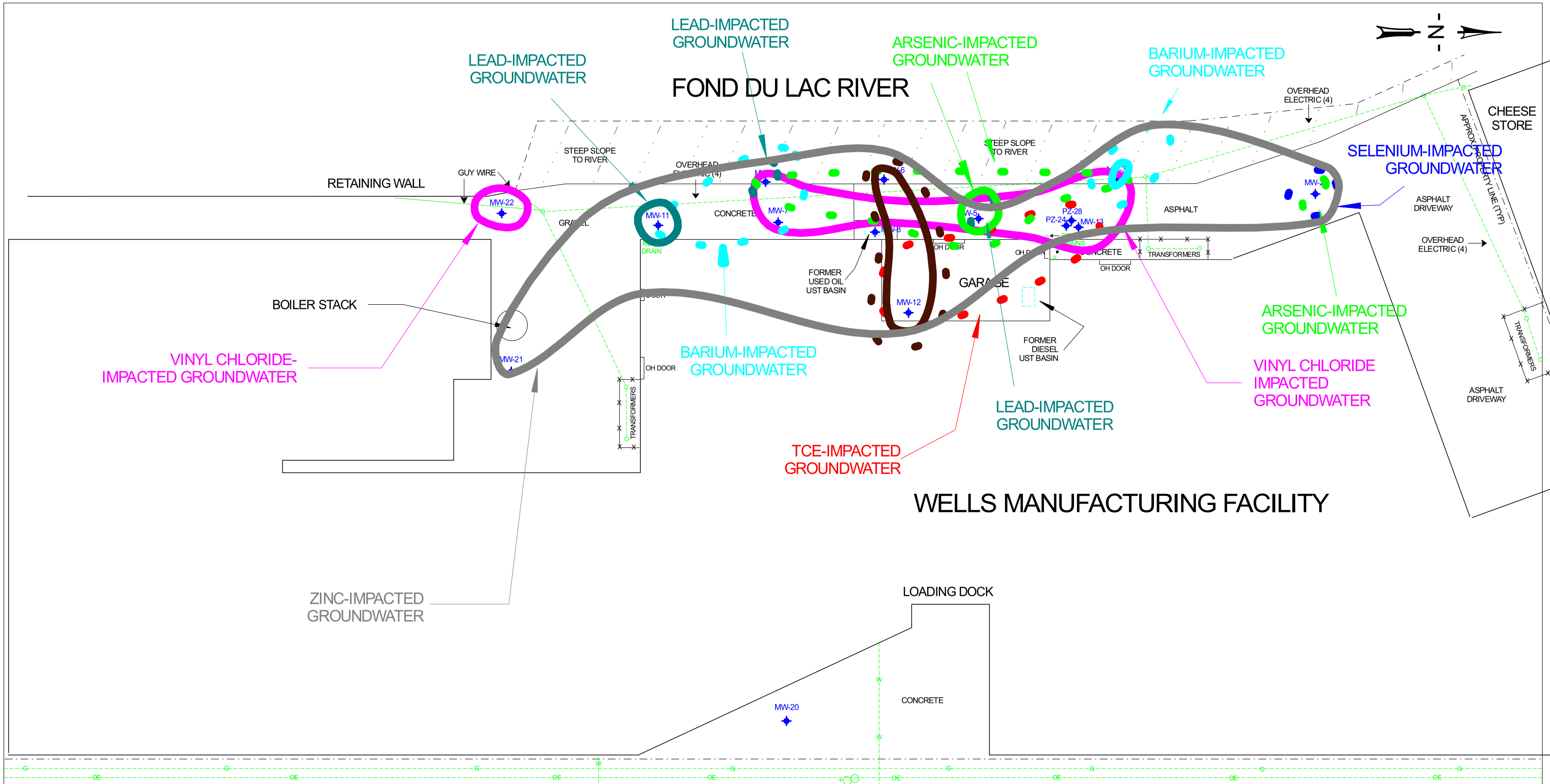
- ● SOIL SAMPLE LOCATION- PRE-REMEDIATION
- ▲ SOIL SAMPLE LOCATION- POST-REMEDIATION
- VOC VOLATILE ORGANIC COMPOUNDS ABOVE RCL
- CVOC CHLORINATED VOLATILE ORGANICS ABOVE RCL
- PAH POLYCYCLIC AROMATIC HYDROCARBONS ABOVE RCL
- METAL METALS ABOVE RCL
- ▼ STATIC WATER LEVEL - FEBRUARY 2006

TITLE: POST-REMEDIATION
SOUTH TO NORTH CROSS-SECTION B-B'

SITE: WELLS MANUFACTURING, FOND DU LAC, WI

ALPHA TERRA SCIENCE

SCALE: 1"=25' V 1"=5'	ATS PROJECT NUMBER: WEL 2003-02	DATE: 5/5/06	DWG #: wel xsxb-b'
REV: DATE: DESCRIPTION: APPVD.:		DRAWN BY: AH	FIGURE 6



LEGEND

MW-5 — MONITORING WELL LOCATION & IDENTIFICATION

CONTAMINANT CONCENTRATION > ES

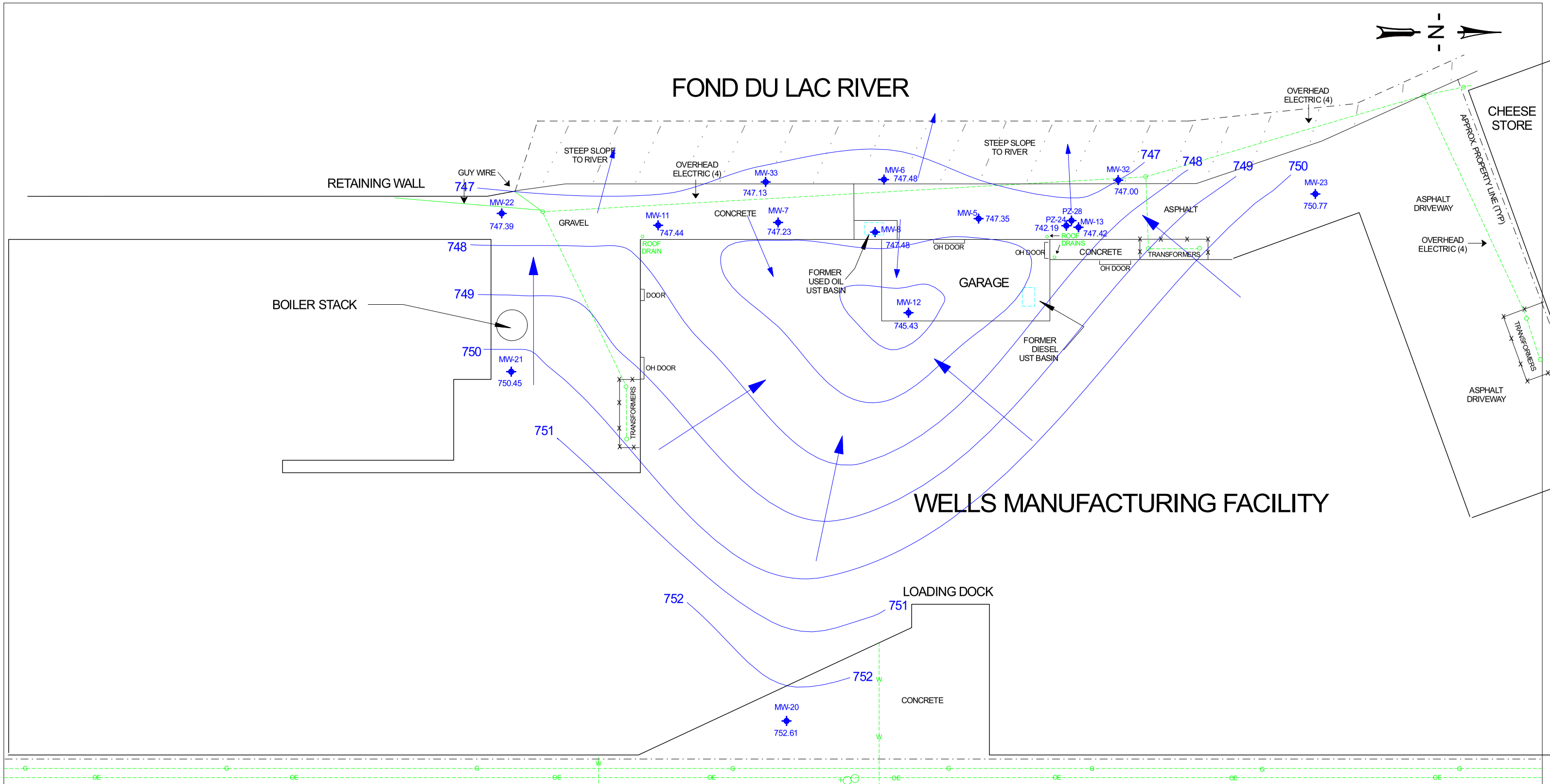
CONTAMINANT CONCENTRATION > PAL

UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: AREAS OF RESIDUAL GROUNDWATER CONTAMINATION - DECEMBER 2009			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 7



LEGEND

MW-5 — MONITORING WELL LOCATION & IDENTIFICATION

754.62 — GROUNDWATER ELEVATION (FT MSL)

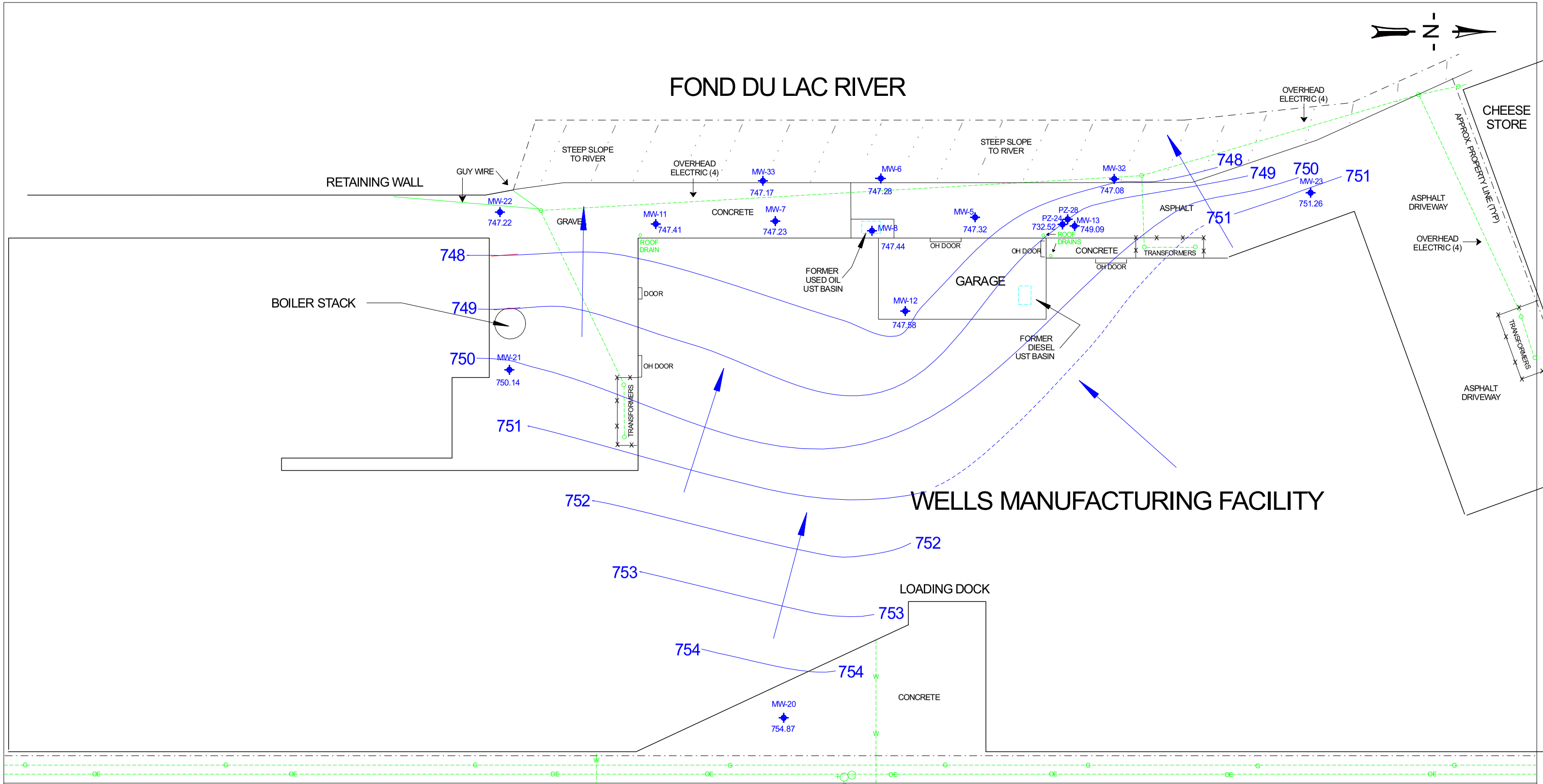
GROUNDWATER FLOW DIRECTION

UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: GROUNDWATER CONTOUR MAP MARCH 27, 2008			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 8



LEGEND

MW-5 — MONITORING WELL LOCATION & IDENTIFICATION

754.62 — GROUNDWATER ELEVATION (FT MSL)

GROUNDWATER FLOW DIRECTION

UTILITY LINE (WATER, ELECTRIC, GAS)

15 10 5 0 15 30

SCALE = 1"=30'

TITLE: GROUNDWATER CONTOUR MAP SEPTEMBER 26, 2008			ALPHA TERRA SCIENCE
SITE: Wells Manufacturing Corp., Fond du Lac, WI			
SCALE: 1"=30'	ATS PROJECT NUMBER: WEL 2003-03	DATE: 2/23/05	DWG #:.. rescalesite.skf
REV: DATE:	DESCRIPTION: APPVD.:	DRAWN BY: AH	FIGURE 9

TABLE 1
SOIL ANALYTICAL RESULTS - DETECTED VOC COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

			ANALYTICAL PARAMETERS													
Sample ID	Depth (feet)	PID Reading (su)	Benzene (ug/kg)	Ethylbenzene (ug/kg)	Toluene (ug/kg)	1,2,4 TMB (ug/kg)	1,3,5 TMB (ug/kg)	Xylenes (ug/kg)	Naphthalene (ug/kg)	n-Butylbenzene (ug/kg)	Tetrachloroethene (ug/kg)	Trichloroethene (ug/kg)	cis-1,2-DCE (ug/kg)	Vinyl Chloride (ug/kg)	n-Propylbenzene (ug/kg)	Other Compounds? (ug/kg)
UST ASSESSMENT SAMPLES COLLECTED OCTOBER 17 AND 30 2003																
HA 1	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
#1	5.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
SITE INVESTIGATION SAMPLES COLLECTED DECEMBER 16, 2003																
GP1	10-12	1.9	<31	<31	728	78	<31	138	58	<31	**50**	**5770**	<31	<44	<31	ND
GP2	2-4	6.5	<41	<41	**2470**	110	75	356	<41	<41	<41	**877**	<41	<58	<41	ND
GP3	14-16	3.2	<37	<37	<37	<37	<37	<50	<37	<37	<37	<37	<37	<50	<37	ND
GP4	0-2	3.4	<29	<29	488	48	<29	43	<29	<29	**114**	**5290**	<29	<39	<29	1,1,1,2-Tetrachloroethane=45
SITE INVESTIGATION SAMPLES COLLECTED MAY 19, 2004																
MW-6	1-4	0.8	<38	<38	<38	43	<38	55	**2930**	<38	<38	<38	<38	<53	<38	ND
MW-6	7-8	0.0	<79	<79	<79	100	<79	<110	**6340**	<79	<79	<79	<79	<79	<79	ND
MW-7	2-4	0.8	<110	164	**5050**	709	191	1110	327	136	<110	**518**	<110	<150	130	Carbon Tetrachloride = 164 Chloroform=120
MW-7	6-10	NA	<30	<30	<30	<30	<30	<42	30	<30	<30	**93**	<30	<42	<30	ND
MW-8	1-4'	NA	<271	<271	**1570**	4130	2140	769	**1850**	<271	<271	**8550**	**484**	<370	<271	p-Isopropyltoluene=812
MW-8	4-6'	NA	<35	<35	571	71	40	120	66	<35	**186**	**11,500**	<35	<47	<35	ND
MW-8	18-20'	0.0	<32	<32	<32	<32	<32	<45	<32	<32	<32	<32	<32	<45	<32	Methylene Chloride=799
B-9	2-4'	0.4	<44	<44	82	<44	<44	110	201	<44	**68**	**4770**	<44	<61	<44	ND
B-9	4-8'	0.4	<42	<42	120	64	<42	157	209	<42	<42	**785**	<42	<60	<42	ND
B-10	2-4'	0.2	<41	<41	386	<41	<41	63	70	<41	<41	**1650**	<41	<58	<41	ND
B-10	4-8'	0.6	<45	<45	95	<45	<45	<62	68	<45	<45	**744**	<45	<62	<45	ND
SITE INVESTIGATION SAMPLES COLLECTED JANUARY 25, 2005																
MW-11	2-4'	0.0	<48	110	599	553	196	1610	**1270**	74	**403**	**426**	<48	<69	<48	ND
MW-11	7-9'	0.0	<52	<52	<52	<52	<52	<73	52	<52	<52	<52	<52	<73	<52	ND
MW-11	16-18'	0.0	<31	<31	<31	<31	<31	<43	<31	<31	<31	<31	<31	<43	<31	ND
MW-12	2-4'	0.0	<37	<37	<37	71	<37	120	**585**	<37	**54**	**1830**	<37	<51	<37	ND
MW-12	7-9'	0.0	<30	<30	<30	<30	<30	<42	<30	<30	<30	<30	<30	<42	<30	ND
SITE INVESTIGATION SAMPLES COLLECTED SEPTEMBER 9, 2005																
MW-20	2.2-4'	0.0	<32	<32	<32	<32	<32	<110	<63	<32	<32	<32	<32	<44	<32	ND
MW-20	7-8'	0.0	<30	<30	<30	<30	<30	<100	<59	<30	<30	<30	<30	<41	<30	ND

TABLE 1
SOIL ANALYTICAL RESULTS - DETECTED VOC COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

Sample ID	Depth (feet)	PID Reading (su)	Benzene (ug/kg)	Ethylbenzene (ug/kg)	Toluene (ug/kg)	1,2,4 TMB (ug/kg)	1,3,5 TMB (ug/kg)	Xylenes (ug/kg)	Naphthalene (ug/kg)	n-Butylbenzene (ug/kg)	Tetrachloroethene (ug/kg)	Trichloroethene (ug/kg)	cis-1,2-DCE (ug/kg)	Vinyl Chloride (ug/kg)	n-Propylbenzene (ug/kg)	Other Compounds? (ug/kg)
			ANALYTICAL PARAMETERS													
SITE INVESTIGATION SAMPLES COLLECTED SEPTEMBER 9, 2005																
MW-21	2-4'	0.0	<30	<30	<30	<30	<30	<100	<60	<30	**440**	<30	<30	<42	<30	ND
MW-21	7-8'	0.0	<30	<30	<30	<30	<30	<100	<59	<30	<30	<30	<30	<42	<30	ND
MW-22	2-4'	1.3	**680**	93	1100	240	67	880	**410**	<41	**290**	**15,000**	<41	<58	52	Chloroform = 89, Isopropylbenzene = 41
MW-22	12.6-13.6'	0.0	<31	<31	<31	<31	<31	<100	<61	<31	<31	<31	<31	<43	<31	
MW-23	2-4'	0.0	<29	<29	<29	<29	<29	<98	<58	<29	<29	**31**	<29	<41	<29	ND
MW-23	8-10'	0.0	<30	<30	<30	<30	<30	<100	<59	<30	<30	<30	<30	<42	<30	ND
B-25	2-4'	0.0	**43**	31	190	130	33	320	290	<30	**120**	**95**	<30	<42	<30	ND
B-25	7-8'	0.0	<29	<29	<29	<29	<29	<98	<57	<29	<29	<29	<29	<40	<29	ND
B-26	2-4'	0.0	<32	<32	<32	<32	<32	<110	<64	<32	**72**	**270**	<32	<45	<32	ND
B-27	2-4'	0.0	<35	<35	83.0	87.0	<35	210	**420**	<35	<35	**800**	<35	<49	<35	ND
SITE INVESTIGATION SAMPLES COLLECTED DECEMBER 6, 2005																
HA-2	7.9'		<32	140	<32	4800	1200	1600	**3100**	<32	<32	<32	<32	<44	570	sec-Butylbenzene = 380, p Isopropyltoluene = 480
POST SODIUM PERMANGANATE INJECTION SAMPLES COLLECTED NOVEMBER 14, 2007																
B-29	2-4'	0.0	<29	36	310	150	54	430	310	<29	**840**	**11,000**	<29	<41	<29	ND
B-29	7-9'	0.0	<32	<32	<32	<32	<32	<110	<64		**55**	**990**	<32	<45	<32	ND
B-30	2-4'	0.0	<31	95	300	260	76	730	300	<31	**2300**	**6300**	<31	<43	<31	ND
B-30	7-9'	0.0	<31	<31	<31	<31	<31	<110	<63	<31	**78**	**230**	<31	<44	<31	ND
B-31	2-4'	0.0	<27	<27	<27	43	<27	<93	93	<27	**180**	**5100**	<27	<38	<27	ND
B-31	7-9'	0.0	<38	<38	<38	<38	<38	<130	<76	<38	<38	**290**	<38	<53	<38	ND
NR 720 & RR-682 Residual Contaminant Levels			5.5	2900	1500	NS	NS	4100	400 [1]	NS	4.1	3.7	27		NC	
NR 746 & RR-682 Soil Saturation Levels			8500	4600	38000	83000	11000	42000	2700	NS	240,000	1,300,000	1,300,000		NC	
RR-682 SSL Inhalation Volatiles - Industrial Site			NC	NC	NC	NC	NC	NC	NC	NC	33,000	14,000	1,300,000		NC	
RR-682 SSL Soil Ingestion - Industrial Site			1100	NS	NS	NS	NS	NS	NS	NS	55,000	260,000	156,000		NC	

Notes: *Xylenes reported as total of m-, o-, p-xylenes* *TMB= trimethylbenzene* *ND= No other compounds detected* *NA= Not analyzed for parameter* *NS = No standard established*
BOLD *indicates exceedance of residual contaminant level for migration to groundwater.* ***BOLD*** *indicates exceedance of Soil Screening Level.* *NC= Standard not calculated*
[1] *Naphthalene RCL from Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAH) Interim Guidance, WDNR Publication RR-519-97, April 1997 (corrected)*
RR 682- Determining Residual Contaminant Levels using the EPA Soil Screening Level Web Site, WDNR Publication RR-692-02, January 2002

TABLE 2
SOIL ANALYTICAL RESULTS - PAH COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

		ANALYTICAL PARAMETERS																		
Sample ID	Depth (feet)	Diesel Range Organics (mg/kg)	Acenaphthene (mg/kg)	Acenaphthylene (mg/kg)	Anthracene (mg/kg)	Benzo(a)anthracene (mg/kg)	Benzo(a)pyrene (mg/kg)	Benzo(b)fluoranthene (mg/kg)	Benzo(k)fluoranthene (mg/kg)	Benzo(ghi)perylene (mg/kg)	Chrysene (mg/kg)	Dibenzo(a,h)anthracene (mg/kg)	Fluoranthene (mg/kg)	Fluorene (mg/kg)	Ideno(123-cd)pyrene (mg/kg)	1-methyl naphthalene (mg/kg)	2-methyl naphthalene (mg/kg)	Naphthalene (mg/kg)	Phenanthrene (mg/kg)	Pyrene (mg/kg)
UST ASSESSMENT SAMPLES COLLECTED OCTOBER 17 AND 30 2003																				
HA 1	3	**120**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
#1	5.5	**120**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SITE INVESTIGATION SAMPLES COLLECTED DECEMBER 16, 2003																				
GP1	10-12	**1020**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GP2	2-4	**1640**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GP3	14-16	<6.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GP4	0-2	37	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SITE INVESTIGATION SAMPLES COLLECTED MAY 19, 2004																				
MW-6	1-4'	**21,600**	<16.000	<27.500	8.780	14.000	12.700	8.400	5.090	7.250	11.700	<2.400	40.700	5.090	7.630	<9.500	<8.000	<9.500	**36.900**	42.000
MW-6	7-8	**74,000**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-7	2-4'	**259**	<6.000	<10.500	8.590	**50.500**	34.100	23.200	16.400	17.700	36.800	5.320	101.000	<1.200	19.100	<3.600	**32.700**	**4.370**	**20.500**	120.000
MW-7	6-10	17	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-8	1-4'	**726**	13.000	<9.000	19.900	**64.100**	**54.100**	35.600	24.200	31.300	**49.900**	8.260	165.000	6.700	32.800	4.990	19.900	**5.700**	**86.900**	170.000
MW-8	4-6'	**769**	<4.600	<8.200	2.850	8.810	8.810	5.710	3.720	6.330	7.200	1.360	19.900	1.130	5.960	<2.800	8.930	<2.800	**13.600**	22.300
MW-8	18-20'	<6.5	<0.065	<0.110	<0.0065	0.017	0.016	0.013	0.0082	0.013	0.016	<0.0097	0.051	<0.013	0.014	<0.039	<0.032	<0.039	0.030	0.043
B-9	2-4'	**3,390**	<24.000	<41.200	55.200	**181.000**	**159.000**	105.000	66.500	90.300	169.000	23.800	482.000	17.600	90.300	<14.000	<12.000	<14.000	**251.000**	469.000
B-9	4-8'	**733**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B-10	2-4'	**441**	<1.000	<1.800	0.165	1.380	1.650	1.170	0.730	1.320	1.090	0.289	2.480	<0.210	1.270	<0.620	<0.510	<0.620	0.716	2.890
B-10	4-8'	55	<0.110	<0.200	0.019	0.120	0.068	0.030	0.034	0.100	0.058	<0.016	0.208	<0.022	0.098	<0.068	<0.056	<0.068	0.110	0.164
SITE INVESTIGATION SAMPLES COLLECTED JANUARY 25, 2005																				
MW-11	2-4'	NA	2.190	<4.900	3.340	10.400	6.450	3.690	3.000	3.920	6.570	0.749	24.200	1.840	3.460	3.690	12.700	**3.340**	**18.400**	20.700
MW-11	7-9'	NA	<0.087	<0.150	<0.0087	0.030	0.052	0.056	0.036	0.174	0.042	0.026	0.021	<0.017	0.120	<0.052	<0.043	<0.052	0.0094	0.019
MW-11	16-18'	NA	<0.061	<0.100	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0061	<0.0092	<0.012	<0.012	<0.0061	<0.037	<0.031	<0.037	<0.0061	<0.0061
MW-12	2-4'	**15900**	**622**	<20	1220	**1460**	**979**	**588**	446	402	**1010**	**79.3**	**4510**	**510**	428	**268**	**2170**	**134**	**4600**	4510
MW-12	7-9'	NA	<0.060	<0.100	0.029	0.133	0.095	0.062	0.047	0.075	0.095	0.013	0.253	0.016	0.070	<0.036	<0.030	<0.036	0.133	0.265

TABLE 2
SOIL ANALYTICAL RESULTS - PAH COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

		ANALYTICAL PARAMETERS																		
Sample ID	Depth (feet)	Diesel Range Organics (mg/kg)	Acenaphthene (mg/kg)	Acenaphthylene (mg/kg)	Anthracene (mg/kg)	Benzo(a)anthracene (mg/kg)	Benzo(a)pyrene (mg/kg)	Benzo(b)fluoranthene (mg/kg)	Benzo(k)fluoranthene (mg/kg)	Benzo(ghi)perylene (mg/kg)	Chrysene (mg/kg)	Dibenzo(a,h)anthracene (mg/kg)	Fluoranthene (mg/kg)	Fluorene (mg/kg)	Ideno(123-cd)pyrene (mg/kg)	1-methyl naphthalene (mg/kg)	2-methyl naphthalene (mg/kg)	Naphthalene (mg/kg)	Phenanthrene (mg/kg)	Pyrene (mg/kg)
SITE INVESTIGATION SAMPLES COLLECTED SEPTEMBER 9, 2005																				
MW-20	2.2-4'	NA	<0.063	<0.110	<0.0063	0.013	0.0088	<0.0063	<0.0063	0.013	0.0086	0.011	0.016	<0.013	<0.0063	<0.038	<0.032	<0.038	0.007	0.013
MW-21	2-4'	NA	5.400	<5.100	5.400	**19.000**	14.000	8.500	7.200	<0.300	14.000	1.700	46.000	2.400	8.700	<1.800	2.500	<1.800	20.000	30.000
MW-22	2-4'	NA	10.000	<2.300	12.000	**17.000**	12.000	6.800	5.300	<0.140	13.000	1.300	52.000	7.100	6.900	4.400	**23.000**	**2.800**	**53.000**	31.000
MW-23	2-4'	NA	<0.058	<0.098	0.010	0.044	0.036	0.036	0.026	0.044	0.039	<0.0087	0.110	<0.012	0.037	<0.035	<0.029	<0.035	0.073	0.110
B-25	2-4'	NA	<0.540	<0.920	0.120	0.840	0.680	0.480	0.380	0.530	0.710	0.098	1.800	<0.110	0.500	<0.330	<0.270	<0.330	0.840	1.600
B-26	2-4'	NA	<1.300	<2.200	0.360	1.600	1.200	0.790	0.650	<0.130	1.200	0.190	2.900	<0.260	0.820	<0.770	1.100	<0.770	1.700	2.300
B-27	2-4'	NA	1.700	<2.000	3.400	7.800	6.000	3.400	2.700	<0.120	5.600	0.690	22.000	1.800	3.600	1.700	9.900	**2.600**	**18.000**	13.000
SITE INVESTIGATION SAMPLES COLLECTED DECEMBER 6, 2005																				
HA-1	7.6'	**1800**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HA-2	7.9'	**1000**	0.290	<0.110	0.230	0.053	<0.0063	<0.0063	<0.0063	<0.0063	0.110	<0.0095	2.700	1.100	<0.0063	5.300	9.500	**2.800**	**2.000**	1.600
POST SODIUM PERMANGANATE INJECTION SAMPLES COLLECTED NOVEMBER 14, 2007																				
B-29	2-4'	NA	<0.0059	<0.01	0.0016	0.011	0.012	0.0085	0.0047	0.0079	0.0077	0.0012	0.023	<0.0012	0.0078	<0.0035	<0.0029	<0.0035	0.012	0.017
B-29	7-9'	NA	<0.0064	<0.011	0.0093	0.026	0.019	0.0014	0.0083	0.012	0.017	0.0023	0.056	<0.0035	0.013	<0.0038	<0.0032	<0.0038	0.049	0.055
B-30	2-4'	NA	<0.12	<0.096	0.17	0.53	0.56	0.46	0.041	0.33	0.42	0.061	1.4	0.11	0.33	0.078	0.7	0.19	0.91	0.81
B-30	7-9'	NA	<0.0063	<0.011	0.0017	0.0052	0.0032	0.0032	0.0019	0.0061	0.0037	<0.00094	0.011	<0.0013	0.0051	<0.0038	<0.0031	<0.0038	0.0069	0.008
B-31	2-4'	NA	0.79	<1.2	1.3	9.4	7.2	4.5	2.6	4.1	5.5	0.62	14	0.48	4.0	<0.41	4.1	<0.41	3.6	16
B-31	7-9'	NA	<0.0069	<0.0120	0.00069	0.0013	0.0014	0.0012	<0.00069	0.0014	0.00096	<0.001	0.0022	<0.0014	0.0012	<0.0041	<0.0034	<0.0041	0.0012	<0.00069
GENERIC CLEANUP LEVEL																				
Groundwater Pathway		100	38	0.7	3000	17	48	360	870	6800	37	38	500	100	680	23	20	0.4	1.8	8700
Direct Contact - Industrial		NS	60,000	360	300,000	3.9	0.39	3.9	39	39	390	0.39	40,000	40,000	3.9	70,000	40,000	110	390	30000

Notes: *NA= Not analyzed for parameter* *NS = No standard established*
Generic Cleanup Levels from Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAH) Interim Guidance, WDNR Publication RR-519-97, April 1997 (corrected)
BOLD *indicates exceedance of suggested residual contaminant level for protection of groundwater.*
Boxed indicates exceedance of suggested residual contaminant level for Direct Contact - Industrial.

TABLE 3
SOIL SAMPLE ANALYTICAL RESULTS - RCRA METALS
Wells Manufacturing Corp., Fond du Lac, WI

		ANALYTICAL PARAMETERS							
Sample ID	Depth (feet)	Arsenic (mg/kg)	Barium (mg/kg)	Cadmium (mg/kg)	Chromium ** (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)	Selenium (mg/kg)	Silver (mg/kg)
SITE INVESTIGATION SAMPLES COLLECTED MAY 19, 2004									
MW-5	2-4'	NA	NA	NA	NA	50	NA	NA	NA
MW-6	1-4'	NA	NA	NA	NA	379	NA	NA	NA
MW-7	2-4'	NA	NA	NA	NA	2,270	NA	NA	NA
MW-7	6-10'	NA	NA	NA	NA	3,190	NA	NA	NA
MW-8	1-4'	NA	NA	NA	NA	1,240	NA	NA	NA
MW-8	4-6'	**10**	335	**52**	29	1,030	**0.91**	<5.0	<0.14
MW-8	18-20'	NA	NA	NA	NA	280	NA	NA	NA
B-9	4-8'	NA	NA	NA	NA	35,100	NA	NA	NA
SITE INVESTIGATION SAMPLES COLLECTED JANUARY 25, 2005									
MW-11	1-4'	<12	237	5	53	520	**0.38**	<4.5	<1.2
MW-11	6-9'	<13	2,400	**26**	24	3,240	**1.00**	<4.8	<1.3
MW-12	2-4'	<27	329	4.3	65	622	**2.80**	<4.9	<1.3
MW-12	7-9'	<8.0	121	1.1	27	9.9	0.018	<4.8	<0.66
MW-13	2-4'	<8.0	193	2.8	19	205	0.04	<4.8	<0.40
MW-13	7-9'	<8.4	215	0.33	46	35	0.02	<5.1	<0.70
SITE INVESTIGATION SAMPLES COLLECTED SEPTEMBER 9, 2005									
MW-20	2.2-4'	**18**	100	0.81	20	14	**0.54**	<5.1	<0.14
MW-21	2-4'	**20**	210	1.2	20	770	**0.98**	<4.8	<0.13
MW-22	2-4'	**33**	290	10	45	810	**2.1**	<5.5	<0.15
MW-23	2-4'	**18**	96	0.51	15	40	0.12	<4.6	<0.13
B-25	2-4'	**21**	200	1.5	15	440	**0.24**	<4.3	<0.12
B-26	2-4'	**23**	410	**20**	43	490	**0.22**	<5.1	0.42
B-27	2-4'	**19**	210	1.6	14	550	0.13	<4.7	<0.13
SITE INVESTIGATION SAMPLES COLLECTED DECEMBER 6, 2005									
HA-2	7.9'	**4.3**	100	0.57	20	6.8	<0.013	<5.1	<0.14
NR 720 Direct Contact Residual Contaminant Level -Industrial Site (4')		1.6	NS	510	NS / 200	500	NS	NS	NS
Site Specific Level -Inhalation of Fugutive Dust		1470	1,130,000	3520	MR / 528	(1)	679,000	(1)	(1)
Site Specific Level -Ingestion		3.82	7150	219	1,530,000/ 3070	(1)	(1)	5110	1100
Site Specific Level -Volatile Inhalation		MR	MR	MR	MR/ MR	(1)	28	MR	MR
Site Specific Level -Soil to GW Path		0.58	3300	12	2200/ 0.44	(1)	0.21	0.31	1.5
Background Levels - DNR		2 - 5	---	0.01 - 7	5 - 200	15 -25	0.01 - 0.5	---	---
Background Levels - EPA		1 - 50	100 - 3000	0.01 - 0.7	1 - 1000	2 - 200	0.01 - 0.3	0.1 - 2	0.01 - 5

Notes: *NA = Not analyzed for parameter* *NS = No standard established*
MR= Pathway of minimal risk based on chemical properties *(1) = see report text*
***First number is standard for trivalent chromium, second is for hexavalent chromium. Reported as total chromium.*
indicates exceedance of NR720 RCL for Direct Contact at Industrial Site
BOLD *indicates exceedance of Site Specific Level for Soil to Groundwater Pathway*

TABLE 4
GROUNDWATER ANALYTICAL RESULTS - SELECTED VOC COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

			Analytical Parameter													
Sample ID	Sample Date	Static Water Level (ft. MSL)	Benzene (ug/l)	Ethylbenzene (ug/l)	Toluene (ug/l)	Xylenes (ug/l)	TMB (ug/l)	Naphthalene (ug/l)	cis-1,2 DCE (ug/l)	trans-1,2 DCE (ug/l)	Tetrachloroethene (ug/l)	Trichloroethene (ug/l)	Vinyl Chloride (ug/l)	Methane (ug/l)	Ethene (ug/l)	Ethane (ug/l)
TW-1	1/9/04	742.70	0.20	<0.50	20	1.2	0.73	2.2	0.63	<0.50	<0.50	**6.9**	<0.20	NA	NA	NA
TW-2	1/9/04	742.78	<0.20	<0.50	<0.20	<0.50	<0.20	<0.25	<0.50	<0.50	<0.50	0.47	<0.20	NA	NA	NA
TW-3	1/9/04	742.35	<0.20	<0.50	<0.20	<0.50	<0.20	<0.25	<0.50	<0.50	<0.50	**1.1**	**0.34**	NA	NA	NA
TW-4	1/9/04	742.82	<0.20	<0.50	0.24	<0.50	12.3	2.5	1.0	<0.50	<0.50	**2.1**	**0.54**	NA	NA	NA
MW-5	6/26/09	747.34	0.32	<0.50	<0.50	<0.50	<0.50	0.46	0.99	0.56	<0.50	0.26	**1.3**	14,900	NA	NA
MW-5	12/21/09	747.07	0.44	<0.50	<0.50	<0.50	0.24	0.57	0.90	0.61	<0.50	0.31	**1.3**	12,000	<10.0	21.0
MW-6	1/20/09	746.73	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	7720	<11.0	<14.0
MW-6	12/21/09	746.95	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	8020	<10.0	<10.0
MW-7	1/20/09	746.68	<0.20	<0.50	<0.20	<0.50	<0.40	<0.25	0.63	<0.50	<0.50	<0.20	<0.20	4210	<11.0	<14.0
MW-7	12/21/09	746.91	<0.20	<0.50	<0.20	<0.50	<0.40	<0.25	0.63	<0.50	<0.50	<0.20	**0.29**	7290	<10.0	<10.0
MW-8	1/20/09	747.23	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	**0.50**	<0.20	374	<11.0	<14.0
MW-8	12/21/09	747.45	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	0.33	<0.20	1600	<10.0	<10.0
MW-11	1/20/09	747.26	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	**0.53**	<0.20	8660	<11.0	<14.0
MW-11	12/21/09	747.33	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	**0.50**	<0.20	8060	<10.0	<10.0
MW-12	1/20/09	746.66	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	**1.4**	<0.20	<15.0	<11.0	<14.0
MW-12	12/21/09	746.68	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	**1.5**	<0.20	NA	NA	NA
MW-13	6/26/09	748.20	<1.0	<2.5	<2.5	<2.5	<2.0	<1.2	**21**	5.2	<2.5	**2.6**	**28**	11,300	60	<14.0
MW-13	12/21/09	748.23	<0.80	<2.0	<2.0	<2.0	<1.6	<1.0	6.7	2.5	<2.0	**1.9**	**6.3**	9,890	12.0	<10.0
MW-20	3/27/08	752.61	<0.20	<0.50	<0.20	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	36.0	12.2	<14.0
MW-20	1/20/09	752.72	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	<15.0	<11.0	<14.0
MW-21	3/27/08	750.45	<0.20	<0.50	<0.20	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	<15.0	12.1	<14.0
MW-21	1/20/09	749.71	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	<15.0	<11.0	<14.0
MW-22	6/26/09	747.31	<0.20	<0.50	<0.50	<0.50	<0.40	0.28	4.4	<0.50	<0.50	<0.20	**4.6**	NA	NA	NA
MW-22	12/21/09	747.22	<0.20	<0.50	<0.50	<0.50	<0.40	0.37	**8.3**	<0.50	<0.50	<0.20	**5.2**	6030	<10.0	<10.0
MW-23	3/27/08	750.77	<0.20	<0.50	<0.20	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	<15.0	12.3	<14.0
MW-23	1/20/09	750.31	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	<0.20	<15.0	<11.0	<14.0
PZ-24	6/26/09	744.46	<0.20	<0.50	1.1	<0.50	<0.40	<0.25	5.0	1.6	<0.50	**0.87**	**1.6**	11,700	NA	NA
PZ-24	12/21/09	743.47	<0.20	<0.50	1.1	<0.50	<0.40	<0.25	2.8	1.5	<0.50	**0.76**	**1.0**	9,750	<10.0	<10.0

TABLE 4
GROUNDWATER ANALYTICAL RESULTS - SELECTED VOC COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

			Analytical Parameter													
Sample ID	Sample Date	Static Water Level (ft. MSL)	Benzene (ug/l)	Ethylbenzene (ug/l)	Toluene (ug/l)	Xylenes (ug/l)	TMB (ug/l)	Naphthalene (ug/l)	cis-1,2 DCE (ug/l)	trans-1,2 DCE (ug/l)	Tetrachloroethene (ug/l)	Trichloroethene (ug/l)	Vinyl Chloride (ug/l)	Methane (ug/l)	Ethene (ug/l)	Ethane (ug/l)
MW-32	6/26/09	747.22	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	0.29	**0.33**	14,300	NA	NA
MW-32	12/21/09	746.80	0.23	<0.50	<0.50	<0.50	<0.40	<0.25	<0.50	<0.50	<0.50	<0.20	**0.39**	8,950	<10.0	28.0
MW-33	6/26/09	747.26	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	0.62	<0.50	<0.50	<0.20	**0.80**	NA	NA	NA
MW-33	12/21/09	746.61	<0.20	<0.50	<0.50	<0.50	<0.40	<0.25	0.87	<0.50	<0.50	<0.20	**0.90**	1680	<10.0	<10.0
NR 140.10 Preventive Action Limit			0.5	140	200	1000	96	10	7	20	0.5	0.5	0.02	NS	NS	NS
NR 140.10 Enforcement Standard			5	700	1000	10,000	480	100	70	100	5	5	0.2	NS	NS	NS

Notes: *Xylenes reported as total of m-, o-, p-xylenes*
NA= Not analyzed for parameter
BOLD *value indicates exceedance of NR 140.10 Preventative Action Limit*
TMB reported as total of 1,2,4- and 1,3,5-trimethylbenzene
NS = No standard established
BOLD *value indicates exceedance of NR 140.10 Enforcement Standard*

TABLE 5
GROUNDWATER ANALYTICAL RESULTS - PAH COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

		ANALYTICAL PARAMETERS																	
Sample ID	Date	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(a)pyrene	Benzo(ghi)perylene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Ideno(123-cd)pyrene	1-methyl naphthalene	2-methyl naphthalene	Naphthalene	Phenanthrene	Pyrene
		ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
MW-5	3/28/08	0.69	<0.73	0.25	<0.047	<0.10	<0.052	<0.034	<0.13	<0.044	<0.14	1.1	2.0	<0.066	12	2.8	1.9	1.4	<0.047
MW-5	9/26/08	<0.35	<0.73	<0.040	<0.046	<0.10	<0.052	<0.034	<0.13	<0.043	<0.14	<0.085	0.45	<0.065	3.1	1.1	0.78	0.20	<0.046
MW-6	1/20/09	<0.34	<0.71	<0.039	0.0062	<0.10	<0.051	**0.064**	<0.12	**0.052**	<0.13	0.12	<0.064	<0.064	<0.33	<0.32	<0.41	0.057	0.17
MW-6	12/21/09	<0.34	<0.71	0.075	0.25	**0.26**	0.11	**0.50**	0.35	**0.24**	<0.13	0.32	<0.064	0.260	<0.33	<0.32	<0.41	0.20	0.79
MW-7	2/8/06	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	0.12	<0.062	<0.062	<0.32	<0.31	<0.40	0.038	0.12
MW-7	1/20/09	<0.94	<2.0	<0.11	<0.13	<0.28	<0.14	<0.091	<0.34	<0.12	<0.37	<0.23	<0.18	<0.18	<0.91	<0.89	<1.1	<0.086	<0.13
MW-8	2/9/06	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	0.20	<0.062	<0.062	<0.32	<0.31	<0.40	0.032	<0.044
MW-8	11/15/07	<0.34	<0.71	<0.039	<0.045	<0.10	<0.051	<0.033	<0.12	<0.042	<0.13	<0.084	<0.064	<0.064	<0.33	<0.32	<0.41	<0.031	<0.045
MW-11	2/8/06	<0.33	<0.69	0.062	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	0.18	<0.062	<0.062	<0.32	<0.31	<0.40	0.036	<0.044
MW-11	1/20/09	<0.35	<0.73	<0.040	<0.046	<0.10	<0.052	<0.034	<0.13	<0.043	<0.14	<0.085	<0.065	<0.065	<0.34	<0.33	<0.42	0.041	<0.046
MW-12	1/20/09	<0.34	<0.71	0.22	0.85	**0.53**	0.33	**0.79**	0.57	**0.60**	<0.13	1.9	<0.064	0.46	<0.33	<0.32	<0.41	0.65	1.7
MW-12	12/21/09	<0.34	<0.70	0.89	4.4	**4.9**	1.4	**5.5**	4.3	**4.4**	0.54	9.3	<0.063	3.2	<0.33	<0.32	<0.41	3.3	12
MW-13	10/12/05	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	<0.081	0.11	<0.062	<0.32	<0.31	<0.40	<0.030	0.045
MW-13	11/15/07	<0.72	<1.5	<0.083	<0.096	<0.21	<0.11	<0.070	<0.26	<0.089	<0.28	<0.18	<0.13	<0.13	<0.70	<0.67	<0.87	<0.065	<0.096
MW-20	10/12/05	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	<0.081	<0.062	<0.062	<0.32	<0.31	<0.40	<0.030	0.062
MW-20	2/9/06	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	0.18	<0.062	<0.062	<0.32	<0.31	<0.40	<0.030	<0.044
MW-21	1/20/09	<0.34	<0.70	<0.039	<0.045	<0.10	<0.050	<0.033	<0.12	<0.042	<0.13	<0.083	<0.063	<0.063	<0.33	<0.32	<0.41	0.15	<0.045
MW-21	12/21/09	<0.34	<0.71	<0.039	<0.045	<0.10	<0.051	<0.033	<0.12	<0.042	<0.13	<0.084	<0.064	<0.064	<0.33	<0.32	<0.41	<0.031	<0.045
MW-22	9/26/08	3.1	<0.73	0.047	0.079	<0.10	<0.052	<0.034	<0.13	<0.043	<0.14	0.29	0.32	<0.065	1.1	<0.33	<0.42	0.15	<0.046
MW-22	1/20/09	2.4	<0.72	0.073	0.098	<0.10	<0.051	<0.033	<0.12	<0.043	<0.14	0.32	0.20	<0.065	0.64	1.60	<0.42	0.14	0.061
MW-23	11/11/05	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	<0.081	<0.062	<0.062	<0.32	<0.31	<0.40	<0.030	<0.044
MW-23	2/8/06	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	0.25	<0.062	<0.062	<0.32	<0.31	<0.40	<0.030	<0.044
PZ-24	2/9/06	<0.33	<0.69	<0.038	<0.044	<0.098	<0.049	<0.032	<0.12	<0.041	<0.13	0.21	<0.062	<0.062	<0.32	<0.31	<0.40	<0.030	<0.044
PZ-24	11/15/07	<0.66	<1.4	<0.076	<0.088	<0.20	<0.098	<0.064	<0.24	<0.082	<0.26	<0.16	<0.12	<0.12	<0.64	<0.64	<0.80	<0.060	<0.088

TABLE 5
GROUNDWATER ANALYTICAL RESULTS - PAH COMPOUNDS
Wells Manufacturing Corp., Fond du Lac, WI

		ANALYTICAL PARAMETERS																	
Sample ID	Date	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(a)pyrene	Benzo(ghi)perylene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Ideno(123-cd)pyrene	1-methyl naphthalene	2-methyl naphthalene	Naphthalene	Phenanthrene	Pyrene
		ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
MW-32	9/26/08	<0.34	<0.72	<0.040	<0.046	<0.10	<0.051	<0.033	<0.12	<0.043	<0.14	<0.084	<0.065	<0.065	<0.33	<0.32	<0.42	<0.031	<0.046
MW-32	1/21/09	<0.37	<0.77	<0.042	<0.049	<0.11	<0.054	<0.036	<0.13	<0.046	<0.14	<0.090	<0.069	<0.069	<0.36	<0.34	<0.44	<0.033	<0.033
MW-33	9/26/08	<0.34	<0.70	<0.039	<0.045	<0.10	<0.050	<0.033	<0.12	<0.042	<0.13	<0.083	<0.063	<0.063	<0.33	<0.32	<0.41	<0.031	<0.045
MW-33	1/21/09	<0.34	<0.72	<0.040	<0.046	<0.10	<0.051	<0.033	<0.12	<0.043	<0.14	<0.084	<0.065	<0.065	<0.33	<0.32	<0.42	<0.031	<0.046
NR 140.10 Preventive Action Limit		NS	NS	600	NS	0.02	NS	0.02	NS	0.02	NS	80	80	NS	NS	NS	10	NS	50
NR 140.10 Enforcement Standard		NS	NS	3,000	NS	0.2	NS	0.2	NS	0.2	NS	400	400	NS	NS	NS	100	NS	250

Notes: ***BOLD*** *value indicates exceedance of NR 140.10 Preventive Action Limit.*
BOLD *value indicates exceedance of NR 140.10 Enforcement Standard.*

TABLE 6
GROUNDWATER ANALYTICAL RESULTS - METALS
Wells Manufacturing Corp., Fond du Lac, WI

		GROUNDWATER ANALYTICAL PARAMETER											
Sample ID	Sample Date	Arsenic (ug/l)	Barium (ug/l)	Cadmium (ug/l)	Chromium (ug/l)	Lead (ug/l)	Mercury (ug/l)	Selenium (ug/l)	Silver (ug/l)	Aluminum (ug/l)	Iron (ug/l)	Sodium (ug/l)	Zinc (ug/l)
MW-5	1/20/09	**10**	NA	NA	NA	**2.9**	NA	NA	NA	<150	**32,000**	310,000	**12**
MW-5	12/21/09	**12**	NA	<0.61	NA	**2.1**	NA	NA	NA	NA	**58,000**	160,000	<6.0
MW-6	1/20/09	**3.6**	NA	NA	NA	1.3	NA	NA	NA	<150	**2100**	240,000	**420**
MW-6	12/21/09	**4.1**	NA	NA	NA	1.1	NA	NA	NA	NA	**2200**	140,000	**300**
MW-7	6/26/09	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<6.0
MW-7	12/21/09	NA	**420**	NA	NA	NA	NA	NA	NA	NA	**8,400**	250,000	<6.0
MW-8	1/20/09	NA	NA	**0.71**	NA	NA	NA	NA	NA	<150	**250**	93,000	**35**
MW-8	12/21/09	NA	NA	<0.61	NA	NA	NA	NA	NA	NA	**850**	74,000	<6.0
MW-11	6/26/09	NA	NA	NA	NA	**23**	NA	NA	NA	NA	NA	NA	NA
MW-11	12/21/09	NA	**400**	NA	NA	**120**	NA	NA	NA	NA	**12,000**	370,000	**2,000**
MW-12	1/20/09	NA	NA	NA	NA	NA	NA	NA	NA	<150	NA	130,000	**60**
MW-12	12/21/09	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	120,000	**54**
MW-13	1/21/09	NA	NA	<0.12	2.1	NA	NA	NA	NA	<150	**53,000**	290,000	<6.0
MW-13	12/21/09	NA	NA	NA	NA	<0.61	NA	NA	NA	NA	**32,000**	230,000	**7.2**
MW-20	1/20/09	NA	NA	NA	0.41	NA	NA	NA	NA	<150	NA	290,000	NA
MW-20	12/21/09	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	480,000	NA
MW-21	1/20/09	NA	NA	NA	1.2	NA	NA	4.4	NA	<150	NA	110,000	<6.0
MW-21	12/21/09	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	120,000	**6.1**
MW-22	1/20/09	NA	NA	NA	NA	NA	NA	NA	NA	<150	NA	200,000	NA
MW-22	12/21/09	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	200,000	NA

TABLE 6
GROUNDWATER ANALYTICAL RESULTS - METALS
Wells Manufacturing Corp., Fond du Lac, WI

Sample ID	Sample Date	GROUNDWATER ANALYTICAL PARAMETER											
		Arsenic (ug/l)	Barium (ug/l)	Cadmium (ug/l)	Chromium (ug/l)	Lead (ug/l)	Mercury (ug/l)	Selenium (ug/l)	Silver (ug/l)	Aluminum (ug/l)	Iron (ug/l)	Sodium (ug/l)	Zinc (ug/l)
MW-23	6/26/09	NA	NA	NA	NA	NA	NA	**40**	NA	NA	NA	NA	NA
MW-23	12/21/09	**1.7**	NA	NA	0.96	NA	NA	**17**	NA	NA	NA	130,000	**9.5**
PZ-24	1/21/09	NA	310	<0.12	0.78	<0.12	NA	NA	NA	<150	**34,000**	100,000	**7.6**
PZ-24	12/21/09	NA	NA	NA	NA	NA	NA	NA	NA	NA	**16,000**	97,000	<6.0
MW-32	6/26/09	**3.4**	**2200**	NA	NA	**20**	NA	NA	NA	NA	NA	NA	NA
MW-32	12/21/09	**2.1**	**2000**	NA	NA	**2.8**	NA	NA	NA	NA	**6200**	250,000	**360**
MW-33	6/26/09	**2.0**	**870**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-33	12/21/09	**2.9**	**550**	NA	NA	NA	NA	NA	NA	NA	**1100**	120,000	**17**
NR 140 Preventive Action Limit		1	400	0.5	10	1.5	0.2	10	10	NS	0.00015	NS	0.0025
NR 140 Enforcement Standard		10	2000	5	100	15	2	50	50	NS	0.0003	NS	0.005

NOTES: *NA= Not analyzed for parameter* *NS= No standard established*
BOLD *indicates exceedance of NR 140 Preventive Action Limit.* ***BOLD*** *indicates exceedance of NR 140 Enforcement Standard.*

TABLE 7
GROUNDWATER ELEVATION DATA
Wells Manufacturing Corp., Fond du Lac, WI

Well Identification	TW-1	TW-2	TW-3	TW-4	MW-5
Ground Surface Elevation (ft MSL)	757.48	757.42	757.11	757.66	757.99
Top of Casing Elevation (ft MSL)	757.41	757.33	757.11	757.57	757.61

Well Identification	MW-6	MW-7	MW-8	MW-11	MW-12
Ground Surface Elevation (ft MSL)	757.03	757.46	757.52	757.47	758.77
Top of Casing Elevation (ft MSL)	756.83	757.20	757.29	757.07	758.56

Well Identification	MW-13	MW-20	MW-21	MW-22	MW-23
Ground Surface Elevation (ft MSL)	758.60	758.61	757.33	755.59	757.88
Top of Casing Elevation (ft MSL)	758.21	758.14	756.91	755.03	757.38

Well Identification	PZ-24	PZ-28	MW-32	MW-33
Ground Surface Elevation (ft MSL)	758.42	758.37	757.41	757.21
Top of Casing Elevation (ft MSL)	758.07	757.89	756.97	756.81

	MW-5		**MW-6**		**MW-7**	
Date	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.
11/15/07	10.18	747.43	9.99	746.84	NOT MEASURED	
3/27/08	10.26	747.35	9.57	747.26	9.97	747.23
6/26/08	9.74	747.87	8.96	747.87	9.39	747.81
9/26/08	10.29	747.32	9.55	747.28	9.97	747.23
1/20/09	10.83	746.78	10.10	746.73	10.52	746.68
6/26/09	10.27	747.34	9.45	747.38	9.92	747.28
12/21/09	10.54	747.07	9.88	746.95	10.29	746.91

	MW-8		**MW-11**		**MW-12**	
Date	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.
11/15/07	10.16	747.13	NOT MEASURED		15.07	743.49
3/27/08	9.81	747.48	9.63	747.44	13.13	745.43
6/26/08	9.53	747.76	9.30	747.77	12.20	746.36
9/26/08	9.85	747.44	9.66	747.41	10.98	747.58
1/20/09	10.06	747.23	9.81	747.26	11.90	746.66
6/26/09	9.80	747.49	9.63	747.44	11.73	746.83
12/21/09	9.84	747.45	9.74	747.33	11.88	746.68

TABLE 7
GROUNDWATER ELEVATION DATA
Wells Manufacturing Corp., Fond du Lac, WI

	MW-13		MW-20		MW-21	
Date	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.
11/15/07	9.71	748.50	NOT MEASURED		NOT MEASURED	
3/27/08	10.69	747.52	5.53	752.61	6.46	750.45
6/26/08	7.99	750.22	3.11	755.03	5.89	751.02
9/26/08	9.12	749.09	3.27	754.87	6.77	750.14
1/20/09	10.20	748.01	5.42	752.72	7.20	749.71
6/26/09	10.01	748.20	2.04	756.10	6.85	750.06
12/21/09	9.98	748.23	3.67	754.47	6.84	750.07

	MW-22		MW-23		PZ-24	
Date	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.
11/15/07	NOT MEASURED		5.96	751.42	11.86	746.21
3/27/08	7.64	747.39	6.61	750.77	15.88	742.19
6/26/08	7.31	747.72	6.02	751.36	14.09	743.98
9/26/08	7.81	747.22	6.12	751.26	25.55	732.52
1/20/09	7.91	747.12	7.07	750.31	15.53	742.54
6/26/09	7.72	747.31	5.90	751.48	13.61	744.46
12/21/09	7.81	747.22	6.20	751.18	14.60	743.47

	PZ-28		MW-32		MW-33	
Date	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.	Depth to Water	Groundwater Elev.
11/15/07	dry	<708.31	10.28	746.69	10.04	746.77
3/27/08	dry	<708.31	9.97	747.00	9.68	747.13
6/26/08	dry	<708.31	9.17	747.80	8.99	747.82
9/26/08	dry	<708.31	9.89	747.08	9.64	747.17
1/20/09	dry	<708.31	10.33	746.64	10.19	746.62
6/26/09	dry	<708.31	9.75	747.22	9.55	747.26
12/21/09	dry	<708.31	10.17	746.80	10.20	746.61