GIS REGISTRY
Cover Sheet

March, 2010
(RR 5367)

Source Property Information

CLOSURE DATE: Jul 29, 2011

BRRTS #: **03-20-553033**

FID #: 420024110

ACTIVITY NAME: Manowske Welding Inc - 1000 Gal Fuel Oil

DATCP #:

PROPERTY ADDRESS: 192 N Main St (formerly 200 N Main St)

COMM #:

MUNICIPALITY: Fond Du Lac

PARCEL ID #: FDL-15-17-10-13-662-00

***WTM COORDINATES:**

X: **644902** Y: **369096**

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

WTM COORDINATES REPRESENT:

- ○ Approximate Center Of Contaminant Source
- ◉ Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

Contaminated Media:

☐ Groundwater Contamination > ES *(236)*

- ☐ Contamination in ROW
- ☐ Off-Source Contamination

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

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

- ☐ Contamination in ROW
- ☐ Off-Source Contamination

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

Land Use Controls:

☐ N/A (*Not Applicable*)

☐ Soil: maintain industrial zoning *(220)*

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

☐ Structural Impediment *(224)*

☐ Site Specific Condition *(228)*

☒ Cover or Barrier *(222)*

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

☐ Vapor Mitigation *(226)*

☐ Maintain Liability Exemption *(230)*

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

Monitoring Wells:

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

◉ Yes ○ No ○ N/A

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

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 #: 03-20-553033 PARCEL ID #: FDL-15-17-10-13-662-00

ACTIVITY NAME: Manowske Welding Inc - 1000 Gal Fuel Oil WTM COORDINATES: X: 644902 Y: 369096

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**
- [x] **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.*
- [x] **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 #: 1 **Title: Fond Du Lac County Certified Survey Map #**
- [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: Sampling Locations**
- [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 **Title: Sampling Locations and RCL Exceedances**

BRRTS #: 03-20-553033 ACTIVITY NAME: Manowske Welding Inc - 1000 Gal Fuel Oil

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 #: 4 **Title: Geologic Cross-Section A-A'**

Figure #: **Title:**

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

Figure #: 5 **Title: Groundwater Contour Map**

☐ **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 #: **Title:**

Figure #: **Title:**

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

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

☒ **Soil Analytical Table:** A table showing remaining soil contamination with analytical results and collection dates.
Note: This is one table of results for the contaminants of concern. Contaminants of concern are those that were found during the site investigation, that remain after remediation. It may be necessary to create a new table to meet this requirement.

Table #: 1, 2 **Title: Soil Analytical Results, Summary of VOC Soil Analytical Results, Summary of PAH**

☒ **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 #: 3, 4 **Title: Summary of Monitoring Well Groundwater Analytical Results, GW Analytical Results**

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

Table #: 5 **Title: Field Data - Groundwater**

IMPROPERLY ABANDONED MONITORING WELLS

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.
Note: *If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.*

☒ **Not Applicable**

☐ **Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.
Note: *If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.*

Figure #: **Title:**

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

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

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

BRRTS #: 03-20-553033 ACTIVITY NAME: Manowske Welding Inc - 1000 Gal Fuel Oil

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

Scott Walker, Governor
Cathy Stepp, Secretary
Bruce Urben, Regional Air & Waste Leader

Plymouth Service Center
1155 Pilgrim Rd
Plymouth, Wisconsin 53073
Phone (920) 892-8756
Fax (920) 892-6638

July 29, 2011

Brian Cummings
MRED CUMMINGS
W228 N745 Westmound Dr
Waukesha, WI 53186

Subject: Final Case Closure with Continuing Obligations
Former Manowske Welding Redevelopment Site,
180 N. Main Street, Fond du Lac, Wisconsin
WDNR BRRTS #03-20-553033

Dear Mr. Cummings:

Regarding the closure request for Former Manowske Welding, the Department of Natural Resources (Department) considers this site closed and no further investigation or remediation is required at this time. This final closure decision is based on the correspondence and data provided, and is issued under ch. NR 726, Wisconsin Administrative Code.

The Former Manowske Welding and the adjacent former Georgetown Cleaners are on the same Deed and are both enrolled in the Voluntary Party Liability Exemption Process (VPLE). You will receive a Certificate of Completion for the Deeded property in a couple of weeks when all closure actions are completed.

Previously on January 23, 2009, the NER Closure Committee reviewed the Closure Request regarding the petroleum and metal contamination on the site from the Former Manowske Welding underground storage tanks and historic waste. A conditional closure letter was issued by the Department on February 10, 2009; however, this case was left open to use monitoring well #MW-MW 5 for the adjacent Georgetown Cleaners investigation and cleanup.

The following conditional closure documentation was received:

- April 27, 2009 (GIS Registry & Pavement Cover Maintenance Plan)
- April 16, 2010 (Department of Health Services memo stating no vapor mitigation system needed*) that the conditions in that letter were met
- August 10, 2010 (Abandonment of monitoring well MW-MW 5),
- September 28, 2010, March 17, 2011 and May 26, 2011 (Utility Trench Plug Installation Reports), and

*Note: *A vapor venting system has been voluntarily installed beneath the newly constructed retail building and is being maintained by Walgreens now located on the former Manowske and former Georgetown Cleaners properties.*

This site was used as a welding, machining and metal structure assembly business from the 1960s to 2005. Soil has been contaminated with petroleum and historical waste metals. The contaminated soil on the property was excavated to the extent practicable. Pavement and landscaping completed the remedial action at the site. A passive venting system was installed under the new retail building. However the Department is not requiring maintenance of this system as a continuing obligation because no contamination was detected under the building. Utility plugs were installed in the utility trenches. Petroleum contamination exists on the former Manowski Welding and the former Georgetown Cleaners sites at monitoring well locations MW-7, MW-7D, MW-8, and MW-8A from an off-site source known as Mobile Gas Mart (COMM #54935346075). Some contaminated soil remains (one sample point on the northwest side of the property) and is addressed by the conditions of closure in this letter.

The final closure decision was based on the property being used for retail purposes and customer parking. This use affected the type of cleanup employed, and the type of continuing obligations required.

While the Department considers this case closed, you and future property owners must comply with the continuing obligations as explained in this letter. Please provide a copy of this letter and any attached maps and maintenance plan to anyone who purchases this property from you.

Continuing Obligations and GIS Registry

The continuing obligations for this site are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- A building, pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier.

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. 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 below for the GIS Registry.

All site information, impervious cover (parking lot) maintenance plan, is also on file at the DNR's Oshkosh Service Center, 625 E County Rd Y STE 700, Oshkosh, WI 54901-9731. 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 site on the GIS Registry web page, visit the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm.

Prohibited Activities

Certain activities are prohibited due to a condition of closure which requires maintenance of a barrier intended to limit or prevent contact with or exposure to contamination remaining at the site. Department notification is required before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where parking lot pavement is required as shown on the **attached map - Figure 11 Cover Maintenance**], 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; and 6) construction or placement of a different building or other structure.

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

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 the current property owner and any subsequent property owners must adhere. You must pass on both the information about these continuing obligations and the maintenance plan to the next property owner or owners. 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.

Residual Soil Contamination

Residual low level soil contamination remains at one soil sample point (Former Tank 5 – South sample), which is below the current Walgreens building on the northwest side of the building as indicated on the **attached map - Figure 3 Residual DRO Soil,** and in the information submitted to the Department of Natural Resources.

If soil in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats. and chs. 500 to 536, 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 standards 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 to prevent a direct contact health threat to humans.

Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the building, pavement, or other impervious cover that exists in the location shown on the **attached map - Figure 11 Cover Maintenance** 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. The **attached maintenance plan and inspection log** are to be kept up-to-date and on-site. Only upon request should you submit the inspection log to the Department.

When to Notify the Department about Property Use or Conditions of Closure

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, changed conditions requiring prior notification are:

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

Please send written notifications in accordance with the above requirements to Plymouth Service Center, 1155 Pilgrim Rd, Plymouth, WI 53073, to the attention of Christine Lilek, Hydrogeologist.

The attached DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain a copy at http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf.

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 Christine Lilek at (920) 892-8756, extension 3025.

Sincerely,

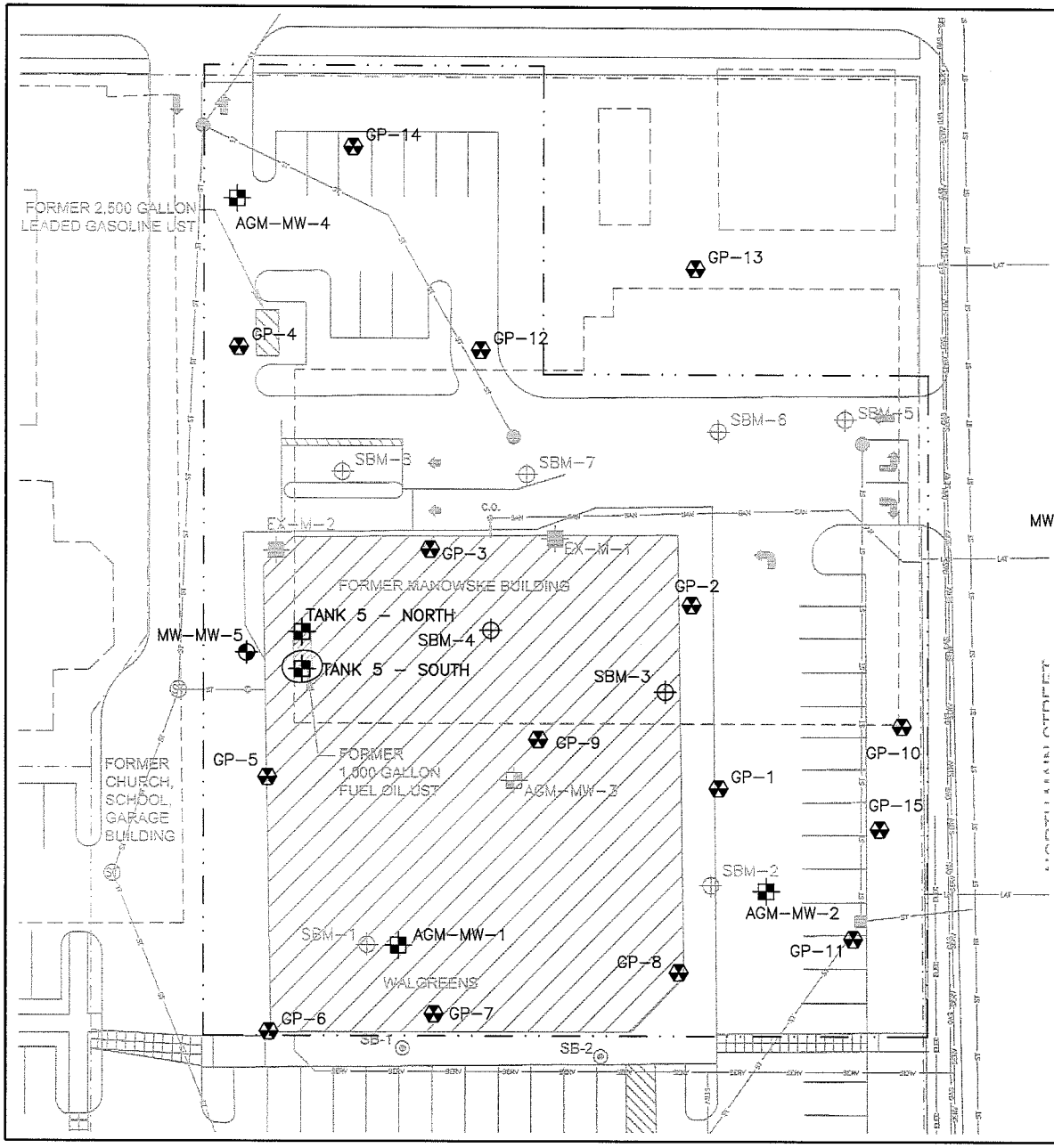
Jennifer Borski

Jennifer Borski, Acting Team Supervisor
Northeast Region Remediation & Redevelopment Program

Attachments:

- remaining soil contamination map - Figure 3 Residual DRO Soil
- extent of cap map - Figure 11 Cover Maintenance
- maintenance plan
- PUB-RR 819

cc: NER Case File - Plymouth
Andrew Mott – Andrew.mott@aecom.com
Don Gallo – dgallo@reinhartlaw.com
Michelle Williams – mwilliams@reinhartlaw.com
Cathy Burrow – CF/2, Jessica Coda - RR/5



LEGEND

- PROPERTY BOUNDARY
- FORMER MANOWSKE WELDING PROPERTY BOUNDARY
- AGM-MW-4 — APPROXIMATE LOCATION ARCADIS MONITORING WELL (2006)
- AGM-MW-4 — APPROXIMATE LOCATION ARCADIS MONITORING WELL (2006) (EXCEEDS APPLICABLE RCLS)
- GP-9 — APRROXIMATE LOCATION ARCADIS GEOPROBE (2006) (EXCEEDS APPLICABLE RCLS)
- SBM-4 — APPROXIMATE LOCATION CLAYTON SOIL BORING (2005)
- SBM-4 — APPROXIMATE LOCATION CLAYTON SOIL BORING (2005) (EXCEEDS APPLICABLE RCLS)
- EX-M-2 — APPROXIMATE LOCATION ARCADIS SOIL EXCAVATION SIDEWALL SAMPLE (2006)
- MW-MW-5 — STS MONITORING WELL LOCATION (EXCEEDS APPLICABLE RCLS)
- EXISTING SAN. MANHOLE
- EXISTING STRM. MANHOLE
- EXISTING TRAFFIC MANHOLE
- RAZED BUILDINGS
- EXISTING WATER SERVICE
- EXISTING UNDERGROUND GAS
- EXISTING STORM SEWER
- EXISTING SANITARY SEWER
- EXISTING UNDERGROUND FIBER OPTIC LINE
- APPROXIMATE EXTENT OF RESIDUAL DRO IMPACTS TO SOIL
- SOIL EXCAVATION FOR BUILDING

NOTE:
BASE MAP DERIVED FROM AN ALTA/ASCM DATED 11/30/2005 WITH REVISIONS MADE ON 3/31/2006

30 0 30 60
1" = 30'

N

STS | AECOM
558 North Main Street
Oshkosh, Wisconsin
920-235-0270
www.stsconsultants.com
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SAMPLING LOCATIONS AND RCL EXCEEDANCES
FORMER MANOWSKE WELDING
200 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Drawn:	MAS	9/12/2008
Checked:	BAL	9/12/2008
Approved:		
PROJECT NUMBER	200704507	
FIGURE NUMBER	3	

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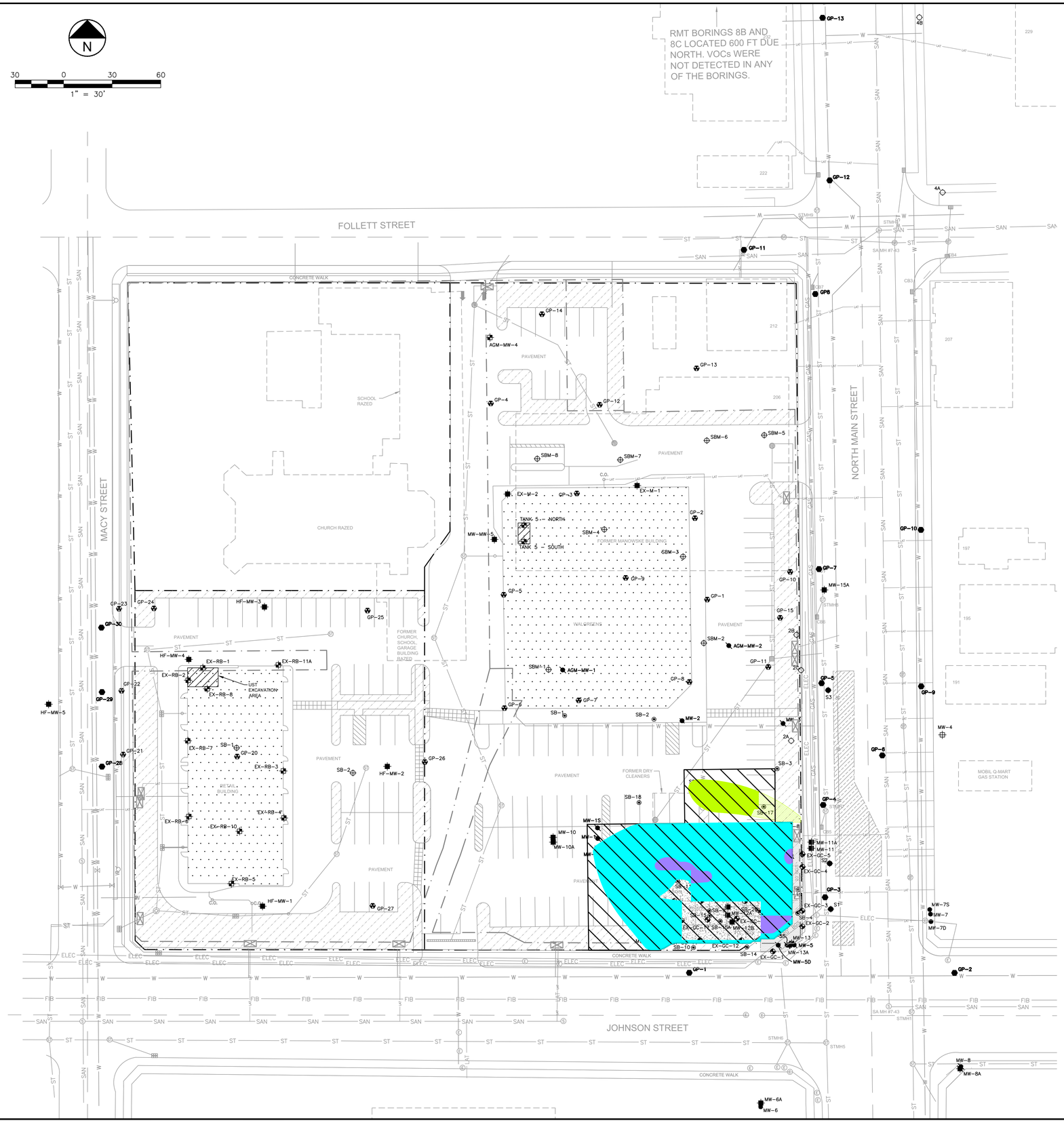

"THE INFORMATION SHOWN ON THIS DRAWING CONCERNING TYPE AND LOCATION OF UNDER-GROUND UTILITIES IS NOT GUARANTEED TO BE ACCURATE OR ALL INCLUSIVE. THE CONTRACTOR IS RESPONSIBLE FOR MAKING HIS OWN DETERMINA-TIONS AS TO THE TYPE AND LOCATION OF UNDER-GROUND UTILITIES AS MAY BE NECESSARY TO AVOID DAMAGE THERETO."

CLOSURE SAMPLE LOCATION EXCEEDANCES AT TIME OF CLOSURE

GEORGETOWN CLEANERS 02-20-546625

SAMPLE ID	CHLORINATED - DC	CHLORINATED - GW	PETROLEUM - GW PROTECTION
TANK-4-MIDDLE		PCE, TCE	
MW-1D		PCE	
MW-4D	PCE	Cis, PCE, TCE	
MW-11A	PCE	Cis, PCE, TCE	BENZENE
MW-14		PCE	
SB-7		Cis, PCE, TCE	
SB-8		PCE	
SB-12		Cis, PCE	
SB-16	PCE, VC	Cis, PCE, TCE	
SB-21	PCE, TCE	Cis, PCE, TCE	
SB-22	PCE	PCE	
SB-23		PCE	
EX-GC-6		PCE, TCE	
EX-GC-7		Cis, PCE, TCE	
EX-GC-8		Cis, PCE, TCE	
EX-GC-9		Cis, PCE, TCE	
EX-GC-10		Cis, PCE, TCE	
EX-GC-11		Cis, PCE, TCE	
EX-GC-12		PCE	
EX-GC-13		Cis, PCE, TCE	
EX-GC-14		Cis, PCE, TCE	
EX-GC-15		Cis, PCE, TCE	
EX-GC-16		PCE	
TANK-1 S			1, 3, 5- TMB & XYLENE
TANK-2 S			ASSUME NOT ANALYZED
TANK-3 S			ASSUME NOT ANALYZED
SB-6			NAPHTALENE

LEGEND

- PROPERTY BOUNDARY
- FORMER PROPERTY BOUNDARY
- RAZED BUILDINGS
- SERV — EXISTING WATER SERVICE
- GAS — EXISTING UNDERGROUND GAS
- ST — EXISTING STORM SEWER
- SAN — EXISTING SANITARY SEWER
- FIB — EXISTING UNDERGROUND FIBER OPTIC LINE
- PHYTOREMEDIATION TRENCH
- 5' BGS — EXTENT OF EXCAVATION AND DEPTH BELOW GROUND SURFACE
- MW-1D — ARCADIS MONITORING WELL
- MW-1D — ARCADIS ABANDONED MONITORING WELL
- SB-2 — ARCADIS GEORGETOWN CLEANERS SOIL BORING
- MW-13 — AECOM MONITORING WELL LOCATION
- MW-11A — AECOM PIEZOMETRIC WELL
- GP-1 — AECOM HYDRAULIC SOIL PROBE LOCATION
- GP-7 — ARCADIS GEOPROBE LOCATION
- EX-GC-12 — ARCADIS SOIL EXCAVATION SIDEWALL/BASE SAMPLE
- APPROXIMATE 2009 WATER MAIN EXCAVATION LIMITS
- SBM-1 — ARCADIS HOLY FAMILY AND MANOWSKE SOIL BORING
- EX-RB-10 — ARCADIS SOIL SAMPLE LOCATION
- MW-4 — QUICK MART MONITORING WELL
- S — EXISTING SAN. MANHOLE
- ST — EXISTING STRM. MANHOLE
- E — EXISTING TRAFFIC MANHOLE
- FORMER GASOLINE UNDERGROUND STORAGE TANK
- S1 — STRAND SAMPLING LOCATIONS
- 2A — RMT SOIL BORING LOCATIONS
- UTILITY TRENCH PLUG
- BUILDING
- GREENSPACE (LANDSCAPE CAP)

DIRECT CONTACT | BOTH | LUST TANK REMNANTS
GW PATH RCL | POTENTIAL LEVELS | GW PROTECTION

COVER MAINTANCE AREA

AECOM

558 North Main Street
Oshkosh, WI 54901

920-235-0270

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CAP AREA
GEORGETOWN CLEANERS
180 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Issued

Rev	Date	Description

Designed:	BAL	12/22/2008
Drawn:	REO	12/22/2008
Checked:	AGM	12/22/2008
Approved:		

PROJECT NUMBER
60139927

SHEET REFERENCE NUMBER

Figure 11

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PAVEMENT AND LANDSCAPE BARRIER MAINTENANCE PLAN

March 31, 2011

Property Located at:
180 North Main Street
Fond du Lac, Wisconsin 54935

WDNR BRRTS #02-20-546625

LEGAL DESCRIPTION – Attached

Introduction
This document is the Maintenance Plan for a pavement and building barrier at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code (WAC). The maintenance activities relate to the existing landscape areas and paved surfaces occupying the area over the solid waste soils on-site. The soil and groundwater are impacted by volatile organic compounds (VOCs), which are above State of Wisconsin standards. The location of the paved surfaces and landscape cap to be maintained in accordance with this Maintenance Plan, as well as the impacted soil and groundwater are identified in the attached Figure 2 and Figure 7. The attached Figure 11 depicts the cap area.

Cover and Building Barrier Purpose
The paved surfaces and the landscape cap over the contaminated soil serve as a partial direct contact barrier to minimize future soil-to-human contact. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

Annual Inspection
The paved surfaces and landscape cap overlying the contaminated soil and groundwater on the former Georgetown Cleaners property 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 will be sent to the Wisconsin Department of Natural Resources ("WNDR") at least annually after every inspection, 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.

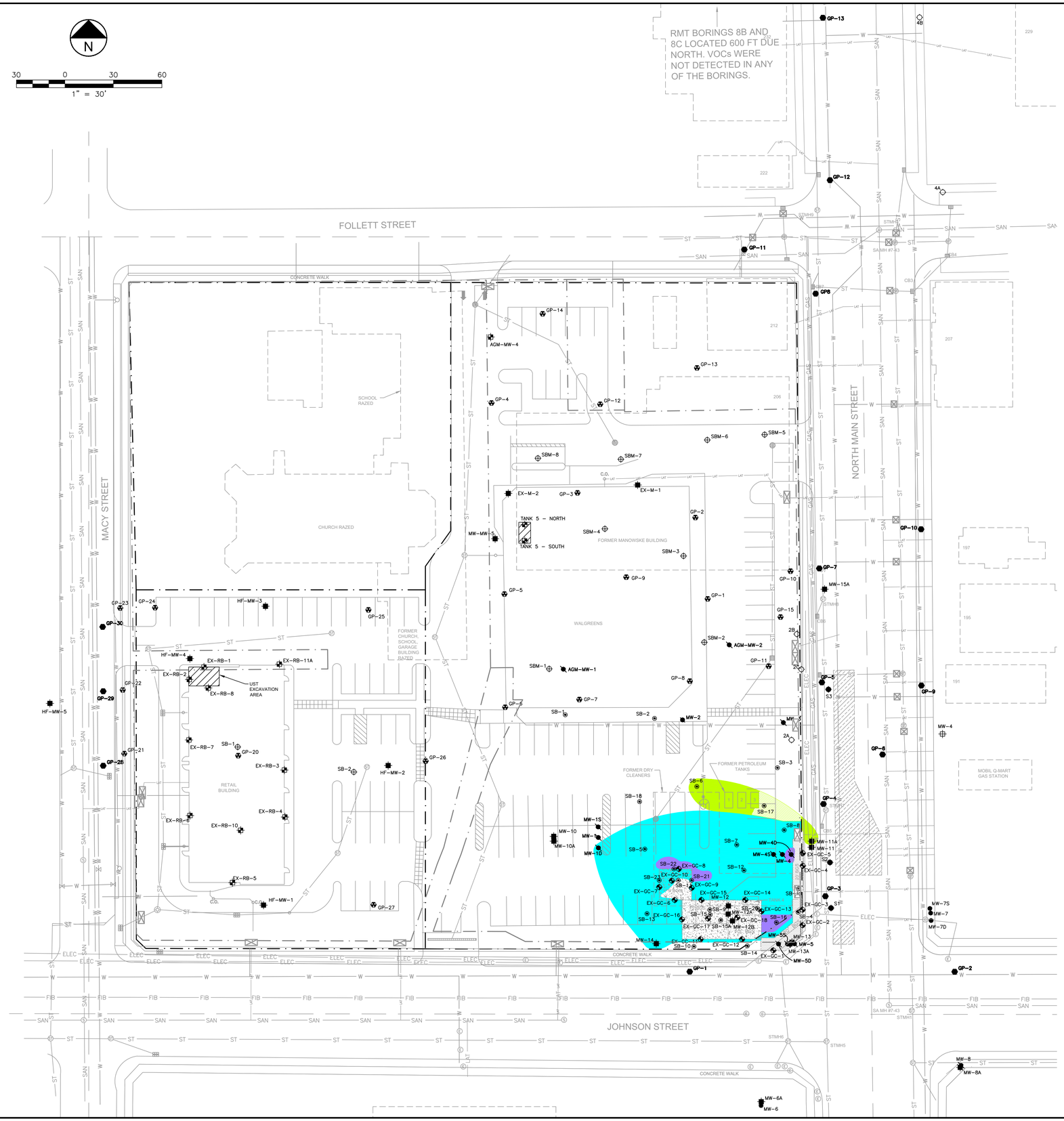
In the event the paved surfaces and/or the building overlying the contaminated soil are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated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

The property owner, in order to maintain the integrity of the paved surfaces and/or the landscape cap, 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.

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
February 2011

Site Owner and Operator:	Waltrust Properties, Inc. 104 Wilmot Deerfield, IL 60015
Consultant:	Andrew Mott, AECOM 558 North Main Street, Oshkosh, Wisconsin 54901 920-236-6722
WDNR:	Christine Lilek 1155 Pilgrim Road, Plymouth, WI 53073 920-892-8756



"THE INFORMATION SHOWN ON THIS DRAWING CONCERNING TYPE AND LOCATION OF UNDER-GROUND UTILITIES IS NOT GUARANTEED TO BE ACCURATE OR ALL INCLUSIVE. THE CONTRACTOR IS RESPONSIBLE FOR MAKING HIS OWN DETERMINA-TIONS AS TO THE TYPE AND LOCATION OF UNDER-GROUND UTILITIES AS MAY BE NECESSARY TO AVOID DAMAGE THERETO."

CLOSURE SAMPLE LOCATION EXCEEDANCES AT TIME OF CLOSURE

GEORGETOWN CLEANERS 02-20-546625

SAMPLE ID	CHLORINATED - DC	CHLORINATED - GW	PETROLEUM - GW PROTECTION
TANK-4-MIDDLE		PCE, TCE	
MW-1D		PCE	
MW-4D	PCE	Cis, PCE, TCE	
MW-11A	PCE	Cis, PCE, TCE	BENZENE
MW-14		PCE	
SB-7		Cis, PCE, TCE	
SB-8		PCE	
SB-12		Cis, PCE	
SB-16	PCE, VC	Cis, PCE, TCE	
SB-21	PCE, TCE	Cis, PCE, TCE	
SB-22	PCE	PCE	
SB-23		PCE	
EX-GC-6		PCE, TCE	
EX-GC-7		Cis, PCE, TCE	
EX-GC-8		Cis, PCE, TCE	
EX-GC-9		Cis, PCE, TCE	
EX-GC-10		Cis, PCE, TCE	
EX-GC-11		Cis, PCE, TCE	
EX-GC-12		PCE	
EX-GC-13		Cis, PCE, TCE	
EX-GC-14		Cis, PCE, TCE	
EX-GC-15		Cis, PCE, TCE	
EX-GC-16		PCE	
TANK-1 S			1, 3, 5- TMB & XYLENE
TANK-2 S			ASSUME NOT ANALYZED
TANK-3 S			ASSUME NOT ANALYZED
SB-6			NAPHTALENE

LEGEND

- PROPERTY BOUNDARY
- FORMER PROPERTY BOUNDARY
- RAZED BUILDINGS
- SERV — EXISTING WATER SERVICE
- GAS — EXISTING UNDERGROUND GAS
- ST — EXISTING STORM SEWER
- SAN — EXISTING SANITARY SEWER
- FIB — EXISTING UNDERGROUND FIBER OPTIC LINE
- PHYTOREMEDIATION TRENCH
- 5' BGS — EXTENT OF EXCAVATION AND DEPTH BELOW GROUND SURFACE
- MW-1D — ARCADIS MONITORING WELL
- MW-1D — ARCADIS ABANDONED MONITORING WELL
- SB-2 — ARCADIS GEORGETOWN CLEANERS SOIL BORING
- MW-13 — AECOM MONITORING WELL LOCATION
- MW-11A — AECOM PIEZOMETRIC WELL
- GP-1 — AECOM HYDRAULIC SOIL PROBE LOCATION
- GP-7 — ARCADIS GEOPROBE LOCATION
- EX-GC-12 — ARCADIS SOIL EXCAVATION SIDEWALL/BASE SAMPLE
- APPROXIMATE 2009 WATER MAIN EXCAVATION LIMITS
- SBM-1 — ARCADIS HOLY FAMILY AND MANOWSKE SOIL BORING
- EX-RB-10 — ARCADIS SOIL SAMPLE LOCATION
- MW-4 — QUICK MART MONITORING WELL
- EXISTING SAN. MANHOLE
- EXISTING STRM. MANHOLE
- EXISTING TRAFFIC MANHOLE
- FORMER GASOLINE UNDERGROUND STORAGE TANK
- S1 — STRAND SAMPLING LOCATIONS
- 2A — RMT SOIL BORING LOCATIONS
- UTILITY TRENCH PLUG
- RMT UTILITY TRENCH PLUG*

* PLUG AND EXCAVATION AREAS REFERENCED FROM RMT'S EMAIL DATED 03/17/2011.

DIRECT CONTACT | GW PATH RCL | BOTH | LUST TANK REMNANTS | POTENTIAL LEVELS | GW PROTECTION

AECOM

558 North Main Street
Oshkosh, WI 54901

920-235-0270

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SOIL GIS MAP
GEORGETOWN CLEANERS
180 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Issued

Rev	Date	Description

Designed:	BAL	12/22/2008
Drawn:	REO	12/22/2008
Checked:	AGM	12/22/2008
Approved:		

PROJECT NUMBER
60139927

SHEET REFERENCE NUMBER
Figure 2

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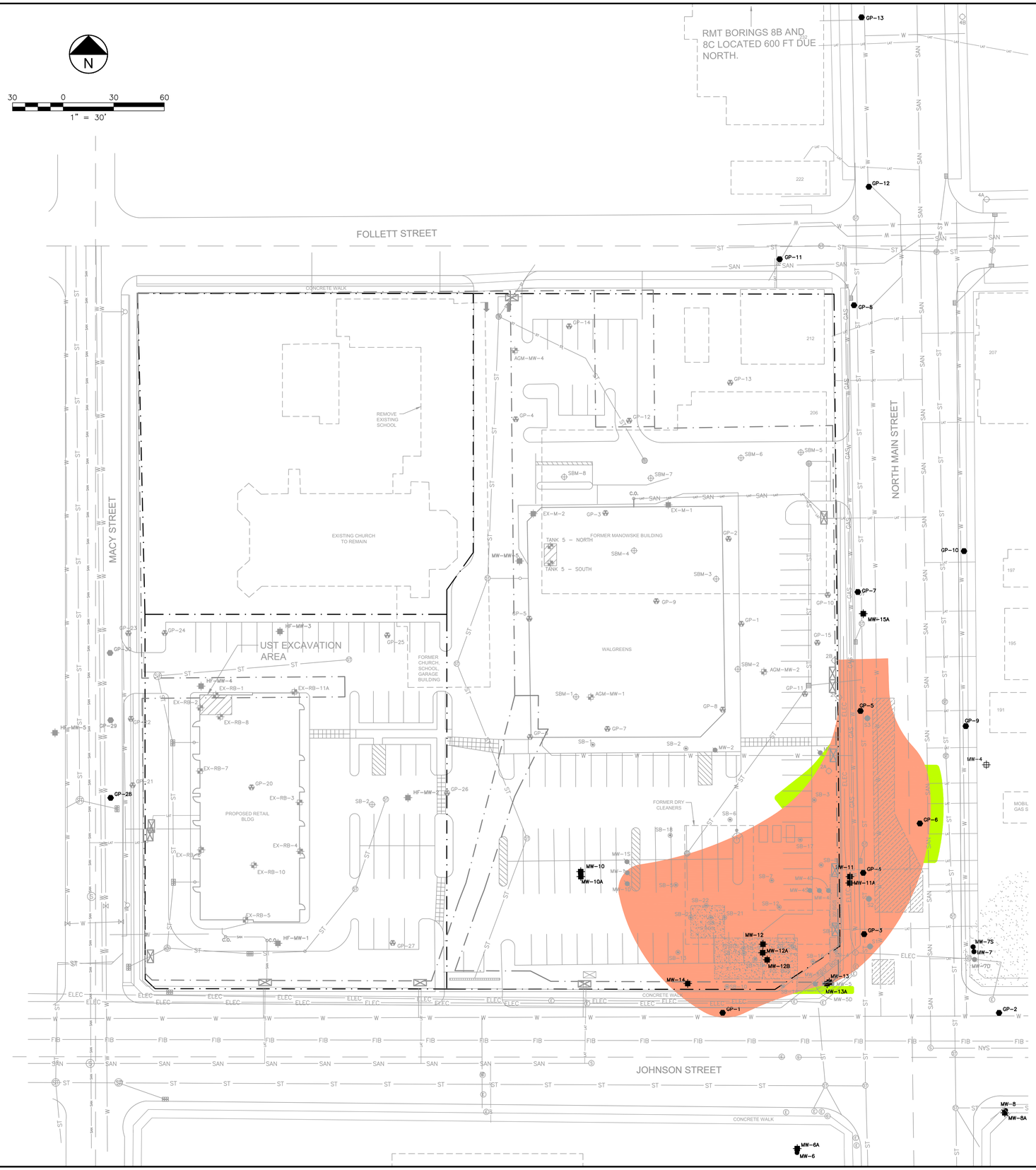

CLOSURE SAMPLE LOCATION EXCEEDANCES AT TIME OF CLOSURE		
GEORGETOWN CLEANERS 02-20-546625		
WELL	EX EXCEEDANCE	PAL EXCEEDANCE
MW-4	PCE	
MW-5	PCE	*
MW-5S	PCE, TCE	
MW-11	PCE, TCE, Cis 1, 2 DICHLOROETHENE, VC	
MW-11A	PCE, TCE, Cis 1, 2 DICHLOROETHENE, VC	
MW-12	PCE, TCE, Cis 1, 2 DICHLOROETHENE, VC	
MW-12A	PCE	TCE, VC
MW-12B	VC	PCE
MW-13A	VC	Cis 1, 2 DICHLOROETHENE
MW-14	VC	
SB-3	VC	PCE, TCE
SB-13	VC	Cis 1, 2 DICHLOROETHENE
SB-20	PCE, TCE, Cis 1, 2 DICHLOROETHENE, VC	
GP-1	VC	
GP-3	PCE, TCE, Cis 1, 2 DICHLOROETHENE	
GP-4	PCE, TCE, Cis 1, 2 DICHLOROETHENE, VC	
GP-5	PCE, TCE, Cis 1, 2 DICHLOROETHENE	
GP-6	Cis 1, 2 DICHLOROETHENE, VC	TCE, VC
		* 1, 1, 2 TRICHIOROETHANE, 1, 1 DICHLOROETHENE , 1, 2 DICHLOROETHENE , Cis 1, 2 DICHLOROETHENE

LEGEND

- PROPERTY BOUNDARY
- FORMER PROPERTY BOUNDARY
- RAZED BUILDINGS
- SERV — EXISTING WATER SERVICE
- GAS — EXISTING UNDERGROUND GAS
- ST — EXISTING STORM SEWER
- SAN — EXISTING SANITARY SEWER
- FIB — EXISTING UNDERGROUND FIBER OPTIC LINE
- PHYTOREMEDIATION TRENCH
- 5' BGS — EXTENT OF EXCAVATION AND DEPTH BELOW GROUND SURFACE
- APPROXIMATE 2009 WATER MAIN EXCAVATION LIMITS
- APPROXIMATE EXTENT OF ES EXCEEDANCE
- S1 — STRAND SAMPLING LOCATIONS
- 2A — RMT SOIL BORING LOCATION
- MW-1D — ARCADIS MONITORING WELL
- MW-1D — ARCADIS ABANDONED MONITORING WELL
- SB-2 — ARCADIS GEORGETOWN CLEANERS SOIL BORING
- MW-13 — AECOM MONITORING WELL LOCATION
- MW-11A — AECOM PIEZOMETRIC WELL
- GP-1 — AECOM HYDRAULIC SOIL PROBE LOCATION
- GP-7 — ARCADIS GEOPROBE LOCATION
- SBM-1 — ARCADIS HOLY FAMILY AND MANOWSKE SOIL BORING
- AGM-MW-2 — ARCADIS SOIL SAMPLE LOCATION
- MW-4 — QUICK MART MONITORING WELL
- EXISTING SAN. MANHOLE
- EXISTING STRM. MANHOLE
- EXISTING TRAFFIC MANHOLE
- UNDERGROUND STORAGE TANK
- UTILITY TRENCH PLUG
- ES EXCEEDANCE
- PAL EXCEEDANCE

AECOM

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Oshkosh, WI 54901

920-235-0270

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GIS GROUND WATER MAP
GEORGETOWN CLEANERS
180 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Issued

Rev Date
Description

Designed: BAL 11/30/2009
Drawn: REO 11/30/2009
Checked: AGM 2/11/2010
Approved:

PROJECT NUMBER
60139927

SHEET REFERENCE NUMBER

Figure 7

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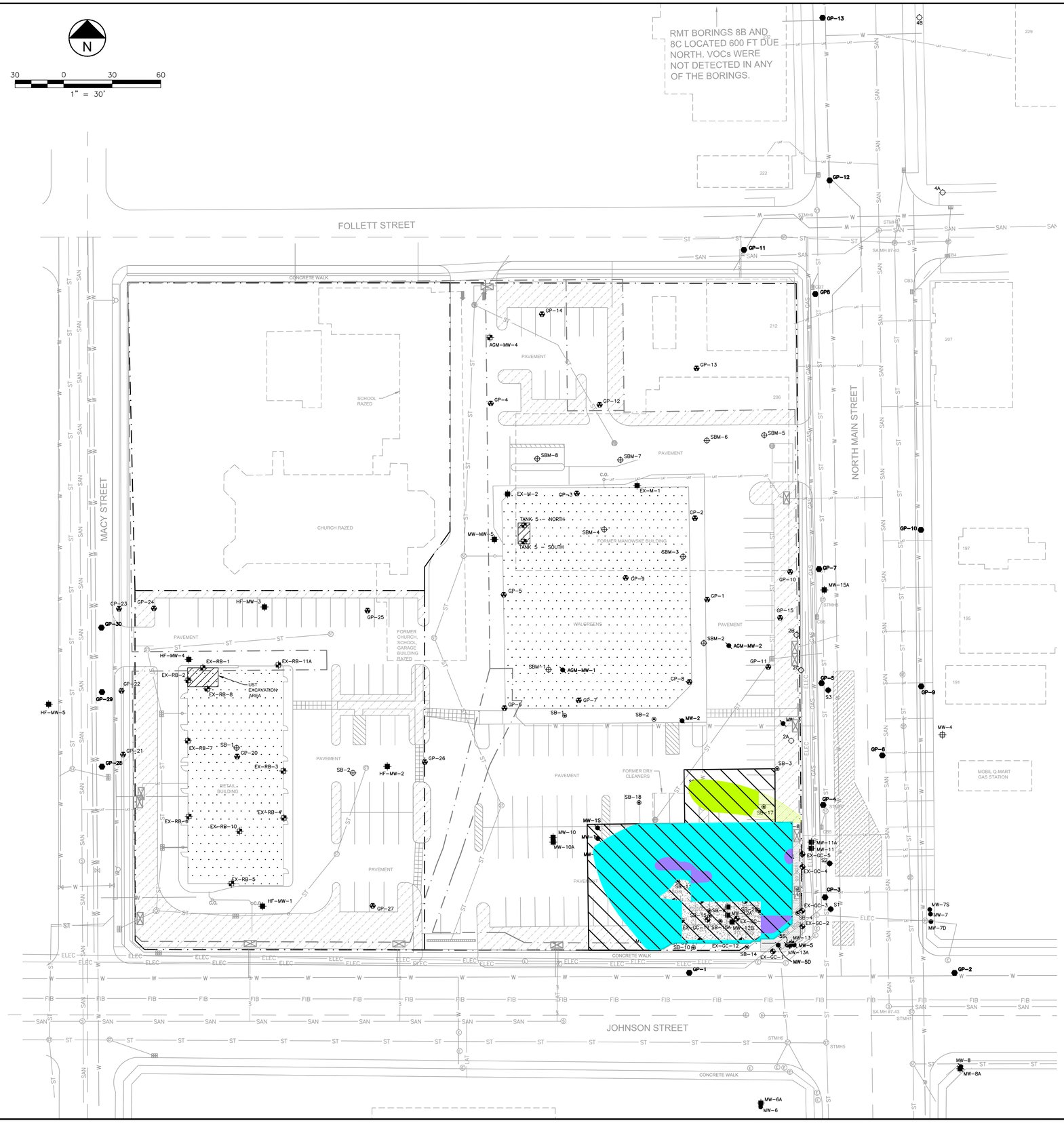

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GEORGETOWN CLEANERS 02-20-546625

SAMPLE ID	CHLORINATED - DC	CHLORINATED - GW	PETROLEUM - GW PROTECTION
TANK-4-MIDDLE		PCE, TCE	
MW-1D		PCE	
MW-4D	PCE	Cis, PCE, TCE	
MW-11A	PCE	Cis, PCE, TCE	BENZENE
MW-14		PCE	
SB-7		Cis, PCE, TCE	
SB-8		PCE	
SB-12		Cis, PCE	
SB-16	PCE, VC	Cis, PCE, TCE	
SB-21	PCE, TCE	Cis, PCE, TCE	
SB-22	PCE	PCE	
SB-23		PCE	
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EX-GC-10		Cis, PCE, TCE	
EX-GC-11		Cis, PCE, TCE	
EX-GC-12		PCE	
EX-GC-13		Cis, PCE, TCE	
EX-GC-14		Cis, PCE, TCE	
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TANK-1 S			1, 3, 5- TMB & XYLENE
TANK-2 S			ASSUME NOT ANALYZED
TANK-3 S			ASSUME NOT ANALYZED
SB-6			NAPHTALENE

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- FORMER PROPERTY BOUNDARY
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- SERV — EXISTING WATER SERVICE
- GAS — EXISTING UNDERGROUND GAS
- ST — EXISTING STORM SEWER
- SAN — EXISTING SANITARY SEWER
- FIB — EXISTING UNDERGROUND FIBER OPTIC LINE
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- EX-RB-10 — ARCADIS SOIL SAMPLE LOCATION
- MW-4 — QUICK MART MONITORING WELL
- S — EXISTING SAN. MANHOLE
- ST — EXISTING STRM. MANHOLE
- E — EXISTING TRAFFIC MANHOLE
- FORMER GASOLINE UNDERGROUND STORAGE TANK
- S1 — STRAND SAMPLING LOCATIONS
- 2A — RMT SOIL BORING LOCATIONS
- UTILITY TRENCH PLUG
- BUILDING
- GREENSPACE (LANDSCAPE CAP)

DIRECT CONTACT | BOTH | LUST TANK REMNANTS
GW PATH RCL | POTENTIAL LEVELS | GW PROTECTION

COVER MAINTANCE AREA

AECOM

558 North Main Street
Oshkosh, WI 54901

920-235-0270

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CAP AREA
GEORGETOWN CLEANERS
180 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Issued

Rev	Date	Description

Designed:	BAL	12/22/2008
Drawn:	REO	12/22/2008
Checked:	AGM	12/22/2008
Approved:		

PROJECT NUMBER
60139927

SHEET REFERENCE NUMBER

Figure 11

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Exhibit B

Cap Inspection Log

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

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Oshkosh Service Center
625 East County Road Y
Suite 700
Oshkosh, Wisconsin 54901-9731
Telephone 920-424-3050
FAX 920-424-4404
TTY Access via relay - 711

February 10, 2009

KAY CLABAULT
BRIC ASSOCIATES
W228 N745 WESTMOUND DR
WAUKESHA WI 53186

Subject: Conditional Closure Decision With Requirements to Achieve Final Closure
Former Manowske Welding – 1000g Fuel tank, 200 N. Main, Fond du Lac
WDNR BRRTS # 03-20-553033
BRRTS VPLE #06-20-547613

Dear Ms. Clabault:

On January 23, 2009, the Northeast Region (NER) Closure Committee reviewed your request for closure of the case described above. The NER 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 NER Closure Committee has determined that the petroleum and metal contamination on the site from the fuel oil tank and the historic waste 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 (submittal requirements are bolded for convenience):

MONITORING WELLS

The monitoring well (MW-MW-5) at the site will be maintained for further investigation at the Former Georgetown Cleaners site.

GIS REGISTRY & CAP MAINTENANCE

After review of the site specifics, the NER Closure Committee determined the necessity of putting the site on the Remediation and Redevelopment Program's GIS Registry. The specific reasons are summarized below:

- Residual soil and/or waste fill 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 historic waste fill and the state must approve any changes to this barrier
- A passive vapor extraction system must be operated and maintained (this is related to the potential chlorinated vapors from former Georgetown Cleaners)

Information (GIS checklist & packet including Cap Maintenance Plan) that needs to be submitted by your consultant will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm. If your 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 http://dnr.wi.gov/org/water/dwg/3300254.pdf or at the web address listed above for the GIS Registry. It is strongly recommended that you contact the Department for solid waste assistance on any excavation work that may be planned in the future at the property.

HISTORIC FILL EXEMPTION

On October 10, 2006 the Department issued an exemption for redevelopment in this area which is over a historic waste fill area. Several conditions to that exemption still need to be met and are listed as follows:

- **The application included plans to install clay plugs in the utility trenches entering the future Walgreens building. Please submit confirmation that these protections against vapor migration were implemented.**
- **On page 3 of the exemption, Item 2 states "Photo documentation and a written document from the contractor who completed this work shall be submitted to the Department within 30 days of completing the work." Please provide a copy of this documentation to the Department.**

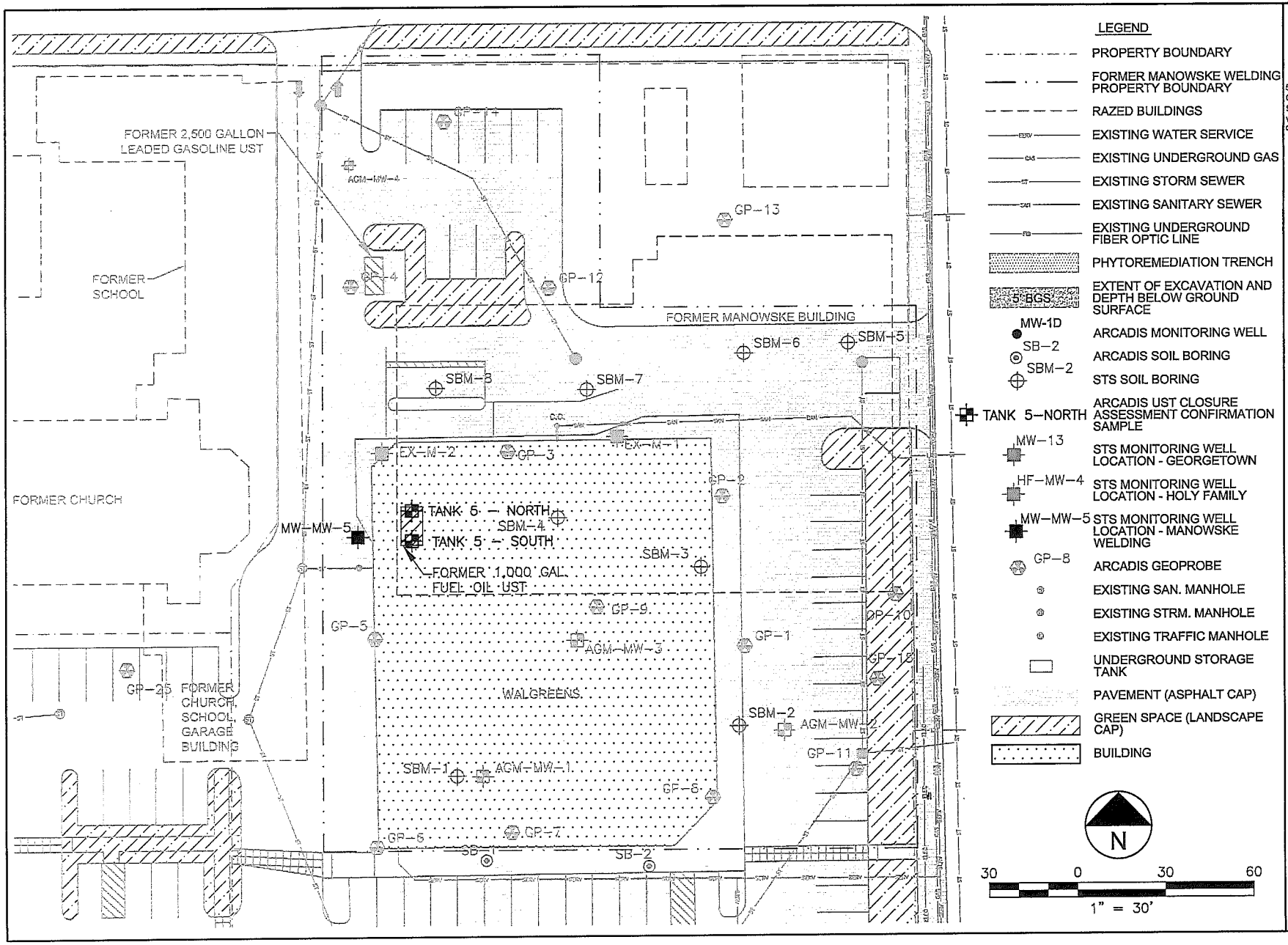
Once the above information has been submitted to the Department, we will retain it for future review regarding the Certificate of Completion under the Voluntary Party Liability Exemption.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact Jennie Easterly at (920) 303-5447.

Sincerely,

Kathleen M. Sylvester, Hydrogeologist
Remediation & Redevelopment Program

cc: Case File – OSH
Michelle Williams – Reinhart, Boerner, VanDeuren (email)
Andrew Mott – STS (email)



STS | AECOM

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Oshkosh, Wisconsin
920.235.0270
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MAINTENANCE CAP PLAN
FORMER MANOWSKE BUILDING
200 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Drawn:	MAS	11/19/2008
Checked:	AGM	11/19/2008
Approved:		
PROJECT NUMBER	200704507	
FIGURE NUMBER	EXHIBIT A	

X:\Projects\200704507\DWG\G200704507-Closure.dwg: 11/19/2008 11:18:36 AM, SIMON, MARGIE, STS.ctb

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary
Bruce Urben, Regional Air & Waste Leader

Plymouth Service Center
1155 Pilgrim Rd
Plymouth, Wisconsin 53073
Telephone 920-892-8756

August 12, 2011

Brian Cummings
MRED CUMMINGS
W228 N745 Westmound Dr
Waukesha, WI 53186

SUBJECT: Certificate of Closure for Property Owned by MRED Cummings Acquisitions LLC
Former Georgetown Cleaners Redevelopment Site and
the Former Manowske Welding Underground Storage Tank, Fond du Lac, WI
WDNR BRRTS ID #06-20-547612 (Georgetown Cleaners) and #06-20-547613 (Manowske Welding)

Dear Mr. Cummings:

The Department of Natural Resources ("the Department") has received your request for issuance of a *Certificate of Completion* for the property owned by MRED Cummings Acquisitions LLC, located at 180 N. Main Street and 200 N. Main Street, Fond du Lac, Wisconsin, which will be referred to herein as "the Property". You have requested that the Department determine whether MRED Cummings Acquisitions LLC has met the requirements under s. 292.15(2), Wis. Stats., for issuance of a *Certificate of Completion.*

The Property subject of this *Certificate of Completion* is real property owned by MRED Cummings Acquisitions LLC, encompassing 1.904 acres and is presently occupied by Walgreens. The property is described as Lot Two (2) of CERTIFIED SURVEY MAP NO. 7110, being all of Lots Thirty-two (32), Thirty-three (33), Thirty-four (34), Thirty-five (35), Forty-eight (48), Forty-nine (49) and Fifty (50); also parts of Lots Thirty (30), Thirty-one (31), Thirty-six (36), Thirty-seven (37), Thirty-eight (38), Thirty-nine (39), Forty (40); part or North-South vacated alley lying between said Lots Thirty (30) thru Thirty-six (36) and Lots Thirty-seven (37) and Fifty (50); part of East-West vacated alley being between said Lots Thirty-seven (37) thru Forty (40) and Lots Forty-eight (48) and Fifty (50); all in Block Twenty-five (25) of the ORIGINAL PLAT OF THE CITY OF FOND DU LAC, located in the Northeast One-quarter (1/4) of the Northeast of the Northeast One-quarter (1/4) and in the Southeast One-quarter (1/4) of the Northeast One-quarter (1/4) in Section Ten (10), in Township Fifteen (15) North, Range Seventeen (17) East, in the City of Fond du Lac, County of Fond du Lac, Wisconsin.

Determination

As you are aware, s. 292.15, Wis. Stats., authorizes the Department to issue a *Certificate of Completion* to a voluntary party that conducts an approved environmental investigation of a property and restores the environment to the extent practicable and minimizes the harmful effects with respect to hazardous substance discharges on or originating from the property. Based on the information received, the Department has determined that the investigation and restoration (to the extent practicable) of the Property is complete and that all the conditions in s. 292.15(2), Wis. Stats., have been met. Attached is the *Certificate of Completion* for this Property.

While the conditions for issuance of a *Certificate of Completion* have been met, a cap consisting of the buildings, parking areas and landscaping must be maintained.

Conclusions

The Department appreciates the work undertaken by MRED CUMMINGS, to investigate and restore to the extent practicable the contamination associated with the Property. The exemption provided by the *Certificate of Completion* applies to any successor or assignee of the MRED CUMMINGS, if the successor or assignee complies with the appropriate conditions, pursuant to s. 292.15(3), Wis. Adm. Code. If you have any questions or concerns regarding this letter or the *Certificate of Completion*, please call me at (920) 892-8756, extension 3025.

Sincerely,

Christine F Lilek

Christine F. Lilek, Hydrogeologist
Remediation & Redevelopment Program

Attachment: *Certificate of Completion*

Cc: Case File – Plymouth Service Center
Michael Prager – RR/3 - (via email)
Annette Weissbach – NER - (via email)
Andrew Mott – AECOM (via email)
Don Gallo – (via email)
Michelle Williams – (via email)
Cathy Burrow – (via email)

State of Wisconsin
Department of Natural Resources

CERTIFICATE OF COMPLETION OF RESPONSE ACTIONS UNDER SECTION 292.15(2)(ae), WIS. STATS.

Whereas, **MRED Cummings Acquisitions LLC** has applied for an exemption from liability under s. 292.15, Wis. Stats., for the **Former Georgetown Cleaners Redevelopment Site** and the **Former Manowske Welding Underground Storage Tank Sites** located at 180 N. Main Street and 200 N. Main Street, Fond du Lac, Wisconsin, 54935. The sites are on the same deed and are further described in the legal description found on Attachment A (hereafter described as the "Property");

Whereas, environmental investigations of the Property have been conducted and the Wisconsin Department of Natural Resources ("WDNR") has determined that environmental contamination exists at the Property;

Whereas, **MRED Cummings Acquisitions LLC** has submitted to the WDNR certain investigation reports and remedial action plans for the Property which comply with the requirements set forth in chs. NR 700-754, Wis. Adm. Code, consisting of the documents and reports listed in Attachment B;

Whereas, in accordance with s. 292.15(2)(ae)1, Wis. Stats., the WDNR has determined that environmental investigations have been conducted which adequately identified and evaluated the nature and extent of the hazardous substance discharges on the Property. The WDNR approved the site investigations on May 16, 2011;

Whereas, the WDNR has determined that historic fill on the Property in the past does not qualify as exempt under s. NR 500.08, Wis. Adm. Code. Therefore, on October 13, 2006, WDNR issued a Conditional Grant of Exemption for Development of a Historic Fill Site, included in Attachment C. If anyone proposes to do any future construction work on the Property, that person would also have to obtain approval for that work from the WDNR under s. NR 506.085, Wis. Adm. Code, prior to initiating any construction on the Property;

Whereas, the Property contains soil contamination that exceeds site-specific and/or generic residual contaminant levels ("RCLs") under ch. NR 720, Wis. Adm. Code and groundwater contamination that exceeds a groundwater quality enforcement standard under ch. NR 140, Wis. Adm. Code. Therefore, the Property will be included on the WDNR's Geographical Information System Database ("the GIS Registry") pursuant to s. 292.12(3), Wis. Stats. **MRED Cummings Acquisitions LLC** has submitted to the WDNR all the information necessary to be included on the GIS Registry pursuant to s. NR 726.05(2)(a)3. and s. NR 726.05(3)(a)4., Wis. Adm. Code;

Whereas, on April 7, 1999 and July 29, 2011, the WDNR issued case closure letters for the Property (Attachment C). The owner of this Property shall adhere to, abide by, and maintain the continuing obligation and other requirements that are specified in the attached state case closure letters and cap maintenance plans. The WDNR requires maintenance of a cover or barrier in order to prevent direct contact with and infiltration through residual soil contamination that might otherwise pose a threat to public health and the environment. The closure letters require that if soil with residual contamination is excavated in the future, the Property owner at the time of excavation must manage the soil in accordance with applicable federal and state laws;

Whereas, the WDNR has determined that the response actions are complete and were based on the Property being used as a commercial facility, office building and parking lot. In the event that the cover or barriers (that currently exists) are removed, the replacement barrier must be equally protective. Because of the residual contamination and certain continuing obligations for this site, before use of this site can be changed to residential use, or use by certain sensitive populations, such as a day care center, school, a senior center, hospital or a similar use, notification of the Department is required at a minimum. Additional sampling and/or cleanup may be required to ensure that the change in use of the site is protective based on future land uses and the residual contamination;

Whereas, if the requirements of this Certificate, the case closure letters or the cap maintenance plans are not followed, or if the land use changes, the WDNR may take actions under ss. 292.11 or 292.12, Wis. Stats., to ensure compliance with the specified requirements, and the person who owns or controls the Property may no longer qualify for the liability protections under s. 292.15, Wis. Stats.;

Whereas, MRED Cummings Acquisitions LLC has paid to WDNR the appropriate insurance fee and has submitted a complete insurance

application form to obtain coverage for the Property under the state's master insurance contract in accordance with s. 292.15(2)(ae)3m., Wis. Stats., and ch. NR 754, Wis. Adm. Code, based on their desire to use natural attenuation to remediate groundwater contamination that exceeds ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standards; and

Whereas, on August 1, 2011, the WDNR determined that response actions necessary to restore the environment were completed at the Property, except with respect to groundwater contaminated with Chlorinated Volatile Organic Compounds (CVOCs) at Georgetown above the ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standards. The WDNR has determined that this groundwater contamination will be brought into compliance through natural attenuation, in accordance with administrative rules promulgated by the WDNR.

Therefore, based upon the information that has been submitted, the WDNR hereby certifies that the response actions set forth in the WDNR approved remedial action plans for the Property and any other necessary response actions have been completed, except with respect to CVOCs contaminated groundwater above ch. NR 140, Wis. Adm. Code, enforcement standards that WDNR has determined will be brought into compliance through natural attenuation, in accordance with rules promulgated by WDNR.

Upon issuance of this Certificate, **MRED Cummings Acquisitions LLC** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to the existence of hazardous substances on or originating from the Property, the release of which occurred prior to the date the WDNR approved the environmental investigation required under s. 292.15(2)(ae)1., Wis. Stats.

However, the person who owns or controls the Property would no longer qualify for this liability exemption if that person fails to maintain or monitor the Property as required by the conditions in this Certificate, s. 292.12, Wis. Stats., administrative rules promulgated by the WDNR and the case closure letters issued on the following dates:

Date	Site
July 29, 2011	Georgetown Cleaners
July 29, 2011	Manowske 1000 gal Fuel Oil Tank
April 7, 1999	Manowske 2500 gal Gasoline Tank

Any discharges of a hazardous substance to or from the Property that occur after the date that the environmental investigations were approved will

be the responsibility of the current Property owner and any other person who possesses or controls that discharge and any person who caused the discharge.

If natural attenuation of contaminated groundwater fails, the insurance coverage under s. 292.15(2)(ae)3m., Wis. Stats., may be used by the state to cover the costs of complying with s. 292.11(2), Wis. Stats., with respect to groundwater quality.

The protection from liability provided under s. 292.15(2), Wis. Stats., does not apply to any person who has obtained a Certificate of Completion by fraud or misrepresentation, or by knowingly failing to disclose material information or under circumstances in which **MRED Cummings Acquisitions LLC** knew or should have known about more discharges of hazardous substances than was revealed by the investigations approved by the WDNR.

Nothing in this Certificate or in s. 292.15, Wis. Stats., affects the authority of the WDNR to exercise any powers or duties under applicable laws other than ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to any release or threatened release of contaminants at the Property, or the right of the WDNR to seek relief available against any person who is not entitled to protection from liability under s. 292.15, Wis. Stats., with respect to such release or threatened release.

SIGNED AND CERTIFIED this 4th day of August, 2011.

Mark F. Giesfeldt

Mark F. Giesfeldt, Director
Bureau for Remediation and Redevelopment
Wisconsin Department of Natural Resources

ATTACHMENT A

LEGAL DESCRIPTION

Former Georgetown Cleaners Redevelopment Site &

Former Manowske Welding Underground Storage Tank Sites

See attached legal description.

13m

Document Number

State Bar of Wisconsin Form 6 - 2003

SPECIAL WARRANTY DEED

Document Name

DOC# 916830

Recorded
May 16, 2008 AT 01:16PM

Patricia Kraus

PATRICIA KRAUS
REGISTER OF DEEDS
FOND DU LAC COUNTY
Fee Amount: $15.00
Transfer Fee: $16,750.00

THIS DEED, made between BRIC (Johnson/Main) Associates, A Wisconsin Limited Partnership ("Grantor," whether one or more), and Waltrust Properties, Inc. ("Grantee," whether one or more). Grantor for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in Fond du Lac County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

The legal description of the property conveyed hereby is set forth on Exhibit A attached hereto and incorporated herein by reference.

Recording Area

Name and Return Address
Richard F. Schmidt, Esq.
Walgreen Co.
104 Wilmot Road, MS 1420
Deerfield, IL 60015

FDL 15-17-10-13-662-00
Parcel Identification Number (PIN)

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

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances arising by, through, or under Grantor, except: for those encumbrances set forth on Exhibit B attached hereto and incorporated herein by reference.

Dated May 14, 2008

BRIC (Johnson/Main) Associates,
A Wisconsin Limited Partnership
By: BRIC (Johnson/Main), Inc.
Its Sole General Partner

* _____ (SEAL)

* _____ (SEAL)

By: _____ (SEAL)
* Brian Cummings, President

AUTHENTICATION

Signature(s) _____

authenticated on _____

* _____

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

THIS INSTRUMENT DRAFTED BY:
Thomas E. Whipp, Esq.

NOTARY PUBLIC ☆ THOMAS E. WHIPP ☆ STATE OF WISCONSIN

ACKNOWLEDGMENT

STATE OF WISCONSIN)
) ss.
WAUKESHA COUNTY)

Personally came before me on May 14, 2008, the above-named Brian Cummings

to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.

Thomas E. Whipp
* Thomas E. Whipp
Notary Public, State of Wisconsin
My Commission (is permanent) (expires: _____)

(Signatures may be authenticated or acknowledged. Both are not necessary.)

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

*Type name below signatures.

omoke 1509 N Prospect Ave Milwaukee, WI 53202-2323
omas Whipp
Phone: (414) 224-0600 Fax: (414) 224-9359 Fond du Lac Wi
Produced with ZipForm™ by RE FormsNet, LLC 18025 Fifteen Mile Road, Clinton Township, Michigan 48035 www.zipform.com

EXHIBIT A TO SPECIAL WARRANTY DEED

GRANTOR: BRIC (Johnson/Main) Associates, A Wisconsin Limited Partnership

GRANTEE: Waltrust Properties, Inc.

Legal Description

PARCEL A:

Lot Two (2) of CERTIFIED SURVEY MAP NO. 7110, being all of Lots Thirty-two (32), Thirty-three (33), Thirty-four(34), Thirty-five (35), Forty-eight (48), Forty-nine (49) and Fifty (50); also part of Lots Thirty (30), Thirty-one (31),Thirty-six (36), Thirty-seven (37), Thirty-eight (38), Thirty-nine (39), Forty (40); part of North-South vacated alley lying between said Lots Thirty (30) thru Thirty-six (36) and Lots Thirty-seven (37) and Fifty (50); part of East-West vacated alley being between said Lots Thirty-seven (37) thru Forty (40) and Lots Forty-eight (48) and Fifty (50); all in Block Twenty-five (25) of the ORIGINAL PLAT OF THE CITY OF FOND DU LAC, located in the Northeast One-quarter (1/4) of the Northeast One-quarter (1/4) and in the Southeast One-quarter (1/4) of the Northeast One-quarter (1/4) in Section Ten (10), in Township Fifteen (15) North, Range Seventeen (17) East, in the City of Fond du Lac, County of Fond du Lac, State of Wisconsin, and recorded in the Office of the Register of Deeds for Fond du Lac County, Wisconsin on September 11, 2006 in Volume 51 of Certified Survey Maps at pages 15 to 15G inclusive, as Document No. 879630.

Parcel B:

Non-exclusive easements contained in a Reciprocal Easement Agreement with covenants, conditions and restrictions recorded on September 15, 2006 as Document No. 879907.

2

EXHIBIT B TO SPECIAL WARRANTY DEED

GRANTOR: BRIC (Johnson/Main) Associates, A Wisconsin Limited Partnership

GRANTEE: Waltrust Properties, Inc.

Exceptions to Warranties

1. The lien of general real estate taxes and special assessments for the year 2008 and thereafter.

2. Reciprocal Easement Agreement with Covenants, Conditions and Restrictions recorded on September 15, 2006 as Document No. 879907.

3. Utility Easement affecting the South 7.5 feet of the premises described in Schedule A hereof as shown on the recorded plat of Certified Survey Map No. 7110.

4. Utility Easement Provision as noted on the recorded plat of Certified Survey Map No. 7110.

5. Unpaid installment on the general real estate taxes for the year 2007 in the sum of $5,869.00, due July 31, 2008.

6. Overhead electric affecting the Northerly portion of the premises described in Schedule A hereof, as shown on an ALTA/ACSM Land Title Survey prepared by MSA Professional Services under a recorded plat of May 24, 2007, as Project No. 2350502.

MSA PROFESSIONAL SERVICES

TRANSPORTATION • MUNICIPAL
DEVELOPMENT • ENVIRONMENTAL

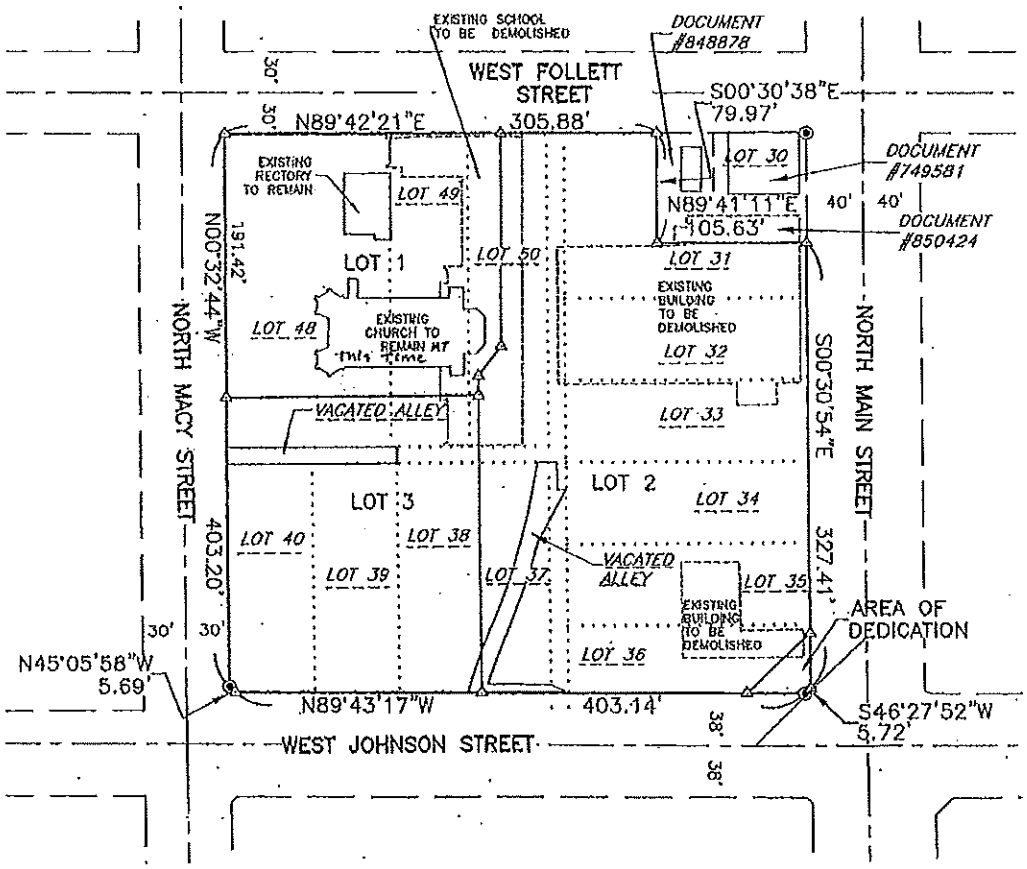
201 Corporate Drive Beaver Dam, WI 53916
920-887-4242 1-800-552-6330 Fax: 920-887-4250

© MSA PROFESSIONAL SERVICES

PROJECT #	2350502
DRAWN BY:	Anne Cook/Ali Buderer
CHECKED BY:	Michael J. Laue
FILE #	2350502\cadd\survey\Survey\csm1.dwg
SHEET #	2 of 8

FOND DU LAC COUNTY CERTIFIED SURVEY MAP

ALL OF LOTS 32, 33, 34, 35, 48, 49 AND 50; ALSO PART OF LOTS 30, 31, 36, 37, 38, 39, 40; PART OF NORTH-SOUTH VACATED ALLEY LYING BETWEEN SAID LOTS 30-36 AND LOT 37 AND 50; PART OF EAST-WEST VACATED ALLEY LYING BETWEEN SAID LOTS 37-40 AND LOTS 48-50; ALL IN BLOCK 25 OF THE ORIGINAL PLAT OF THE CITY OF FOND DU LAC; LOCATED IN THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 AND IN THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4, SECTION 10, TOWN 15 NORTH, RANGE 17 EAST, CITY OF FOND DU LAC, FOND DU LAC COUNTY, WISCONSIN.



SURVEYOR'S SEAL

WISCONSIN
MICHAEL J. LAUE
S-1435
BEAVER DAM, WISCONSIN
LAND SURVEYOR

8/10/06

LEGEND

- ⊕ FOUND CROSS NOTCH MONUMENTS
- △ SET 3/4" X 18" SOLID ROD – 1.50 LBS. /L.F.

N
W E
S

GRAPHIC SCALE
0 50 100
1" = 100 FEET

FIGURE 1

CERTIFIED SURVEY MAP: 7110 VOLUME: 51 PAGE: 15A

ATTACHMENT B

INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS
Former Georgetown Cleaners Redevelopment Site &
Former Manowske Welding Underground Storage Tank Sites

1. Reports prepared by Northern Environmental (Bonestroo), 1203 Storbeck Drive, Waupun, WI 53963.

   a. Site Investigation Report, dated January 15, 1998 for Manowske Welding #03-20-001894 2500 GAL GAS TANK
   b. Remedial Action Report, dated September 4, 1998 for Manowske Welding #03-20-001894 2500 GAL GAS TANK
   c. Closure Request Package, dated March 19, 1999 for Manowske Welding #03-20-001894 2500 GAL GAS TANK
   d. O & M Report, dated March 19, 1999 for Manowske Welding #03-20-001894 2500 GAL GAS TANK

2. Reports from Clayton, (Bureau Veritas Company), 3140 Finley Rd, Downers Grove, IL, 60515

   a. Phase I Environmental Site Assessment, dated October 6, 2005 for Walgreen's Store #10496 NEC of Macy & Johnson Streets #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   b. Phase I Environmental Site Assessment, dated January 17, 2006 for Proposed Walgreen's Store #10496 and Manowske Welding #06-20-547613 MANOWSKE VLPE SITE
   c. Phase II Environmental Site Assessment, dated February 2006 for Proposed Walgreen's Store #10496 NEC of Macy & Johnson Streets #02-20-546625, #06-20-547612, and #06-20-547613 GEORGETOWN DERF & VLPE SITE AND MANOWSKE VLPE SITE
   d. Site Investigation Report, dated April 11, 2006 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   e. Limited Subsurface Investigation, dated May 12, 2006 for Manowske Welding Parcel #06-20-547613 MANOWSKE VLPE SITE

3. Reports from Arcadis, G. E. Plan Modifications

   a. Additional Site Investigation, dated July 2006 for Defining Degree & Extent Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   b. UST Assessment Report, dated January 4, 2007 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   c. Revised Interim Action Plan, dated August 31, 2006 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   d. Interim Action Completion Report, dated December 2006 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   e. Excavation of Waste Fill, dated January 15, 2006 for Manowske Welding #03-20-553033, #06-20-547613 MANOWSKE 1000 GAL FUEL TANK & VLPE SITE
   f. Build on Historic Fill Exemption Request, dated September 20, 2006 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   g. Soil Excavation & Disposal Report, dated January 25, 2007 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   h. Tank Closure Environmental Assessment, dated January 25, 2007 for Manowske Welding #03-20-553033, #06-20-547613 MANOWSKE 1000 GAL FUEL TANK & VLPE SITE

4. Reports from AECOM, 558 North Main St, Oshkosh, WI, 54901

   a. Site Investigation Report, dated December 19, 2006 for Manowske Welding #03-20-553033, #06-20-547613 MANOWSKE 1000 GAL FUEL TANK & VLPE SITE
   b. Closure Request Package, dated December 5, 2008 for Manowske Welding #03-20-553033, #06-20-547613 MANOWSKE 1000 GAL FUEL TANK & VLPE SITE
   c. Conditional Closure (Well Abandonment) dated February 10, 2009 for Manowske Welding #03-20-553033, #06-20-547613 MANOWSKE 1000 GAL FUEL TANK & VLPE SITE
   d. Supplemental SI Report, dated January 22, 2009 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   e. Additional Site Investigation Report, dated August 6, 2009 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   f. Utility Trench Plug Installation Report, dated September 28, 2010 for Georgetown Cleaners #02-20-546625, #06-20-547612 Manowske Welding #06-20-547613 and Holy Family Church Parking Lot #02-20-547886
   g. Parking Lot & Landscape Cover Plan, dated March 31, 2011 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE
   h. Closure Request Package, dated April 11, 2011 for Georgetown Cleaners #02-20-546625, #06-20-547612 GEORGETOWN DERF & VLPE SITE

5. Wisconsin Department of Health Service's Vapor Sampling Data Review, dated April 16, 2010 for Georgetown Cleaners #02-20-546625, #06-20-547612 and Manowske Welding #06-20-547613

ATTACHMENT C

Closure Letter and Cap Maintenance Plan
Conditional Grant of Exemption for Development of a Historic Fill Site

Former Georgetown Cleaners Redevelopment Site &
Former Manowske Welding Underground Storage Tank Sites

Date of Closure	Site
July 29, 2011	Georgetown Cleaners
July 29, 2011	Manowske 1000 gal Fuel Oil Tank
April 7, 1999	Manowske 2500 gal Gasoline Tank
Date of Exemption	
October 13, 2006	Georgetown Cleaners

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary
Bruce Urben, Regional Air & Waste Leader

Plymouth Service Center
1155 Pilgrim Rd
Plymouth, Wisconsin 53073
Phone (920) 892-8756
Fax (920) 892-6638

July 29, 2011

Brian Cummings
MRED CUMMINGS
W228 N745 Westmound Dr
Waukesha, WI 53186

Subject: Final Case Closure with Continuing Obligations
Former Georgetown Cleaners Redevelopment Site,
180 N. Main Street, Fond du Lac, Wisconsin
WDNR BRRTS #02-20-546625

Dear Mr. Cummings:

Regarding the closure request for Former Georgetown Cleaners Redevelopment Site, the Department of Natural Resources (Department) considers this site closed and no further investigation or remediation is required at this time. This final closure decision is based on the correspondence and data provided, and is issued under ch. NR 726, Wisconsin Administrative Code.

The Former Georgetown Cleaners and the adjacent former Manowske Welding are on the same Deed and are both enrolled in the Voluntary Party Liability Exemption Process (VPLE). You will receive a Certificate of Completion for the Deeded Property in a couple of weeks after all closure actions are completed.

On May 25, 2011, the NER Closure Committee reviewed the Closure Request regarding the petroleum and chlorinated solvent contamination from the Former Georgetown Cleaners. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. A conditional closure letter was issued by the Department on June 1, 2011, and documentation was received on July 22, 2011, that the conditions in that letter were met.

This site was most recently used as a dry cleaner facility. Soil and groundwater has been contaminated with chlorinated solvents and petroleum. The contaminated soil on the property and in East Main Street was excavated to the extent practicable. Pavement, phytoremediation trenches, and landscaping completed the remedial action at the site. Via an April 16, 2010 memo, the Department of Health Service stated that no vapor mitigation system is needed. However as part of the new retail building construction, a vapor venting system was voluntarily installed and is being maintained by Walgreens now located on the former Manowske and former Georgetown Cleaners properties. Utility plugs were installed along East Main Street however plug maintenance is also not required as a continuing obligation, because the plugs are the responsibility of the City of Fond du Lac Public Works Department as stated in the Government Right Of Way notification letter dated March 31, 2011. Some contamination of the soil and groundwater remains, and is addressed by the conditions of closure in this letter. Petroleum contamination exists on the former Georgetown Cleaners and the former Manowske welding sites at monitoring well locations MW-7, MW-7D, MW-8, and MW-8A from an off-site source known as Mobile Gas Mart (COMM #54935346075).

The final closure decision was based on the property being used for retail stores and customer parking. This use affected the type of cleanup employed, and the type of continuing obligations required.

While the Department considers this case closed, you and future property owners must comply with the continuing obligations as explained in this letter. Please provide a copy of this letter and any attached maps and maintenance plan to anyone who purchases this property from you.

Continuing Obligations and GIS Registry

The continuing obligations for this site are summarized below:

- Groundwater contamination is present above ch. NR140, Wis. Adm. Code enforcement standards.
- 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.
- Closure is based on specific exposure conditions being maintained. If changes in property use or land use are planned, the Department must be notified, and an assessment must be made of whether the closure is still protective. Additional investigation and/or remedial action may be necessary.

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. 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 below for the GIS Registry.

All site information, impervious cover (parking lot) maintenance plan, is also on file, at the DNR's Oshkosh Service Center, 625 E County Rd Y STE 700, Oshkosh, WI 54901-9731. 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.

Prohibited Activities

Certain activities are prohibited due to a condition of closure which requires maintenance of a barrier intended to limit or prevent contact with or exposure to contamination remaining at the site. Department notification is required before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where parking lot pavement is required as shown on the **attached map (Figure 11 Cover Maintenance)**, unless prior written approval has been obtained from the Department: 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, 7) changing the use of the property so that the tenancy or occupancy of the property would be by certain land uses, such as single or multiple-family residences, a day care, senior center, hospital or for a similar sensitive population.

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

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 the current property owner and any subsequent property owners must adhere. You must pass on both the information about these continuing obligations and the maintenance plan to the next property owner or owners. The Department intends to conduct inspections in the future to ensure that the conditions included in this letter including compliance with **attached maintenance plans** are met.

Residual Groundwater Contamination

Groundwater impacted by tetrachloroethene, trichloroethene, cis-1, 2-dichloroethene, vinyl chloride contamination greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code, is present both on this contaminated property and in the roadway along North Main Street, as shown on the **attached map (Figure 7 GIS GW Map)**. The City of Fond du Lac – Public Works Office has also been notified of the presence of groundwater contamination. Department approval prior to well construction or reconstruction is required for all sites with residual contamination on the GIS Registry.

Residual Soil Contamination

Residual soil contamination remains at the southeast corner of the parking lot and on the edge of the western side of North Main Street as indicated on the **attached map (Figure 2 Soil GIS Map)** and in the information submitted to the Department.

If soil, in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats. and chs. 500 to 536, 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 standards 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 to prevent a direct contact health threat to humans.

Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement, building or other impervious cover that exists in the location shown on the **attached map (Figure 11 Cover Maintenance)** 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.

The **attached maintenance plan and inspection log** are to be kept up-to-date and on-site. Only upon request would it be necessary to submit the inspection log to the Department.

When to Notify the Department about Property Use or Conditions of Closure

In accordance with ss. 292.12 and 292.13, Wis. Stats., you must notify the Department before making any changes to the property that affect or relate to the conditions of closure in this letter. For this case, changed conditions requiring prior notification are:

- Disturbance, construction on, change or removal in whole or part of the pavement that must be maintained over contaminated soil.
- Changes in land use or property use.

Please send written notifications in accordance with the above requirements to Plymouth Service Center, 1155 Pilgrim Rd, Plymouth, WI 53073, to the attention of Christine Lilek, Hydrogeologist.

Fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain a copy at http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf.

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 Christine Lilek at (920) 892-8756, extension 3025.

Sincerely,

Jennifer Borski

Jennifer Borski, Acting Team Supervisor
Northeast Region Remediation & Redevelopment Program

Attachments:

- remaining soil contamination map - Figure 2 Soil GIS Map
- remaining groundwater contamination map - Figure 7 GIS GW Map
- extent of cap map - Figure 11 Cover Maintenance
- maintenance plan
- PUB- RR 819

cc: NER Case File - Plymouth
Andrew Mott – Andrew.mott@aecom.com
Don Gallo – dgallo@reinhartlaw.com,
Michelle Williams – mwilliams@reinhartlaw.com
Cathy Burrow – CF/2
Jessica Coda - RR/5

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary
Bruce Urben, Regional Air & Waste Leader

Plymouth Service Center
1155 Pilgrim Rd
Plymouth, Wisconsin 53073
Phone (920) 892-8756
Fax (920) 892-6638

July 29, 2011

Brian Cummings
MRED CUMMINGS
W228 N745 Westmound Dr
Waukesha, WI 53186

Subject: Final Case Closure with Continuing Obligations
Former Manowske Welding Redevelopment Site,
180 N. Main Street, Fond du Lac, Wisconsin
WDNR BRRTS #03-20-553033

Dear Mr. Cummings:

Regarding the closure request for Former Manowske Welding, the Department of Natural Resources (Department) considers this site closed and no further investigation or remediation is required at this time. This final closure decision is based on the correspondence and data provided, and is issued under ch. NR 726, Wisconsin Administrative Code.

The Former Manowske Welding and the adjacent former Georgetown Cleaners are on the same Deed and are both enrolled in the Voluntary Party Liability Exemption Process (VPLE). You will receive a Certificate of Completion for the Deeded property in a couple of weeks when all closure actions are completed.

Previously on January 23, 2009, the NER Closure Committee reviewed the Closure Request regarding the petroleum and metal contamination on the site from the Former Manowske Welding underground storage tanks and historic waste. A conditional closure letter was issued by the Department on February 10, 2009; however, this case was left open to use monitoring well #MW-MW 5 for the adjacent Georgetown Cleaners investigation and cleanup.

The following conditional closure documentation was received:

- April 27, 2009 (GIS Registry & Pavement Cover Maintenance Plan)
- April 16, 2010 (Department of Health Services memo stating no vapor mitigation system needed*) that the conditions in that letter were met
- August 10, 2010 (Abandonment of monitoring well MW-MW 5),
- September 28, 2010, March 17, 2011 and May 26, 2011 (Utility Trench Plug Installation Reports), and

*Note: *A vapor venting system has been voluntarily installed beneath the newly constructed retail building and is being maintained by Walgreens now located on the former Manowske and former Georgetown Cleaners properties.*

This site was used as a welding, machining and metal structure assembly business from the 1960s to 2005. Soil has been contaminated with petroleum and historical waste metals. The contaminated soil on the property was excavated to the extent practicable. Pavement and landscaping completed the remedial action at the site. A passive venting system was installed under the new retail building. However the Department is not requiring maintenance of this system as a continuing obligation because no contamination was detected under the building. Utility plugs were installed in the utility trenches. Petroleum contamination exists on the former Manowski Welding and the former Georgetown Cleaners sites at monitoring well locations MW-7, MW-7D, MW-8, and MW-8A from an off-site source known as Mobile Gas Mart (COMM #54935346075). Some contaminated soil remains (one sample point on the northwest side of the property) and is addressed by the conditions of closure in this letter.

The final closure decision was based on the property being used for retail purposes and customer parking. This use affected the type of cleanup employed, and the type of continuing obligations required.

While the Department considers this case closed, you and future property owners must comply with the continuing obligations as explained in this letter. Please provide a copy of this letter and any attached maps and maintenance plan to anyone who purchases this property from you.

Continuing Obligations and GIS Registry

The continuing obligations for this site are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- A building, pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier.

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. 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 below for the GIS Registry.

All site information, impervious cover (parking lot) maintenance plan, is also on file at the DNR's Oshkosh Service Center, 625 E County Rd Y STE 700, Oshkosh, WI 54901-9731. 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 site on the GIS Registry web page, visit the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm.

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. The **attached maintenance plan and inspection log** are to be kept up-to-date and on-site. Only upon request should you submit the inspection log to the Department.

When to Notify the Department about Property Use or Conditions of Closure

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, changed conditions requiring prior notification are:

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

Please send written notifications in accordance with the above requirements to Plymouth Service Center, 1155 Pilgrim Rd, Plymouth, WI 53073, to the attention of Christine Lilek, Hydrogeologist.

The attached DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain a copy at http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf.

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 Christine Lilek at (920) 892-8756, extension 3025.

Sincerely,

Jennifer Borski

Jennifer Borski, Acting Team Supervisor
Northeast Region Remediation & Redevelopment Program

Attachments:

- remaining soil contamination map - Figure 3 Residual DRO Soil
- extent of cap map - Figure 11 Cover Maintenance
- maintenance plan
- PUB-RR 819

cc: NER Case File - Plymouth
Andrew Mott – Andrew.mott@aecom.com
Don Gallo – dgallo@reinhartlaw.com
Michelle Williams – mwilliams@reinhartlaw.com
Cathy Burrow – CF/2, Jessica Coda - RR/5

Prohibited Activities

Certain activities are prohibited due to a condition of closure which requires maintenance of a barrier intended to limit or prevent contact with or exposure to contamination remaining at the site. Department notification is required before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where parking lot pavement is required as shown on the **attached map - Figure 11 Cover Maintenance**], 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; and 6) construction or placement of a different building or other structure.

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

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 the current property owner and any subsequent property owners must adhere. You must pass on both the information about these continuing obligations and the maintenance plan to the next property owner or owners. 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.

Residual Soil Contamination

Residual low level soil contamination remains at one soil sample point (Former Tank 5 – South sample), which is below the current Walgreens building on the northwest side of the building as indicated on the **attached map - Figure 3 Residual DRO Soil,** and in the information submitted to the Department of Natural Resources.

If soil in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats. and chs. 500 to 536, 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 standards 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 to prevent a direct contact health threat to humans.

Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the building, pavement, or other impervious cover that exists in the location shown on the **attached map - Figure 11 Cover Maintenance** shall be

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

WISCONSIN DEPT. OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William R. Selbig, Regional Director

Northeast Region Headquarters
1125 N. Military Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-492-5800
FAX 920-492-5913
TDD 920-492-5912

April 7, 1999

Ms. Tudy Reis
Manowske Welding, Inc.
200 North Main Street
Fond du Lac, WI 54935

SUBJECT: Closure of WDNR LUST Case with Groundwater Quality PAL Exemption for Manowske Welding, Inc., 200 N. Main Street, Fond du Lac, WI 54935
BRRTS # 03-20-001894

Dear Ms. Reis:

The Department's Case Closeout Committee in the Northeast Region completed a review of the above referenced contamination case and has approved it for closure. Your case closure letter has the following two significant parts:

1. General case closure criteria.

2. Exemption issued to State Groundwater Quality Standard (NR 140, Wis. Adm. Code).

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

General Case Closure

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

Groundwater Quality Exemption

The most recent groundwater monitoring data at this site indicates an exceedance of the

NR 140 preventive action limit (PAL) for 1,2-dichloroethane (1,2-DCA) at monitoring wells MW1700 and MW1800, & at the sump but compliance with the NR 140 enforcement standard. The Department may grant an exemption pursuant to NR 140.28(2), Wis. Adm. Code, if the following criteria are met:

a) The anticipated increase in the concentration of 1,2-DCA will be minimized to the extent technically and economically feasible.

b) Compliance with the PAL is either not technically or economically feasible.

c) The enforcement standard for 1,2-DCA will not be attained or exceeded at the point of standards application.

d) Any increase in the concentration of 1,2-DCA above background does not present a threat to public health or welfare.

The Department believes that the above criteria have been or will be met because of the remediation that has occurred at this site. Therefore, pursuant to NR 140.28, Wis. Adm. Code, an exemption for the 1,2-DCA PAL is granted to monitoring wells MW1700 and MW1800 & the sump. This letter serves as your exemption. At this time the Department is not requiring any further investigation or other action concerning this specific site.

The Department appreciates the actions you have undertaken to restore the environment at this site. This case will appear as closed on the Department's case tracking system after our receipt of the monitoring well abandonment forms (Form 3300-05B) for all the site's monitoring points and proper soil disposal documentation. If you have questions, please contact me in Green Bay at (920) 492-5921.

Sincerely,

Keld Lauridsen
Hydrogeologist
Remediation and Redevelopment Program

NR 140 Exemption approval _____ 4-12-99
Richard C. Stoll, P.G. (Date)
Regional Hydrogeologist

cc: Stuart J. Gross, Northern Environmental Technologies, Inc.,
1203 Storbeck Drive, Waupun, WI 53963
Steve Karklins - DG/2
Rick Stoll - NER

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

WISCONSIN
DEPT. OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Ronald W. Kazmierczak, Regional Director

Oshkosh Service Center
625 E. County Rd Y, Suite 700
Oshkosh , Wisconsin 54901-9731
Telephone 920-424-3050
FAX 920-424-4404

SENT CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Date: 9/10/06

Kay Clabault
MRED Cummings
W228 N745 Westmound Drive
Waukesha, WI 53186

SUBJECT: Case by Case Exemption for the Development of a Property Where Solid Waste has been Disposed at the former Georgetown Cleaners Property, 180 N. Main Street (BRRTS # 02-20-546625); former Manowske Welding Property at 200 N. Main Street (BRRTS # 02-20-547456); and former Holy Family Church Parking lot at 26 Follett Street (BRRTS # 02-20-547886) in the City of Fond du Lac, (SW ¼, NE ¼, Sec. 10, T15N, R17E) Fond du Lac County, Wisconsin, 54935.

Dear Ms. Kay Clabault:

We have reviewed your request dated September 20, 2006, for a grant of exemption from regulation under s. NR 506.085, Wis. Adm. Code. Based on this evaluation, the Department is issuing this conditional grant of exemption from the prohibitions contained in s. NR 506.085, Wis. Adm. Code. You must comply with the conditions of this grant of exemption in order to maintain the exemption. Documentation that certain conditions have been completed shall be submitted to the Department within 30 days of completing the work. This grant of exemption is limited to the proposed changes described in your application. If you are considering additional changes beyond those described in the application, a new application must be submitted to the department for approval with a new fee.

Please review the information contained in the publication *Development at Historic Fill Sites and Licensed Landfills: Considerations and Potential Problems* PUB-RR-685 to assist you in preventing environmental or safety problems during and after development. We would like to particularly draw your attention to the public safety risk posed by the explosive potential for methane gas, which may be present on a property if decomposing solid waste is present.

You are reminded that this approval does not relieve you of obligations to meet all other applicable federal, state and local permits, as well as zoning and regulatory requirements. If you have any questions concerning this letter, please contact Jennie Easterly at 920-303-5447.

Sincerely,

Bruce Urben
NER Remediation and Redevelopment Team Supervisor
cc: Jennie Easterly – NER Oshkosh, Diane Hammel – NER – Green Bay
John Angeli – City of Fond du Lac

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

CONDITIONAL GRANT OF EXEMPTION
FOR
DEVELOPMENT ON A PROPERTY
WHERE SOLID WASTE HAS BEEN DISPOSED

FINDINGS OF FACT

The Department finds that:

1. BRIC Associates currently owns the property located at 180 North Main Street, 200 North Main Street and 26 Follett Street, Fond du Lac, 54936, Fond du Lac County, Wisconsin.

2. Solid waste has been disposed of at this property and remains at this property.

3. BRIC Associates has submitted a request dated September 20, 2006 for an exemption from the prohibition in NR 506.085, Wis. Adm. Code. The request has been submitted under the seal of a professional engineer relating to the proposed development and the environmental conditions at the property.

4. Based upon the information provided to the Department of Natural Resources ("the Department"), the proposed development at the property is not expected to cause future exceedances of applicable soil and groundwater standards. The proposed Walgreen's building and associated asphalt parking lot and the retail building and associated asphalt parking lot cover all of the solid waste on the property and should prevent any direct contact with the solid waste and reduce/eliminate surface water infiltration through the solid waste.

5. Additional documents considered in review of the exemption request include the following:
   - Email dated September 20, 2006 from James Bannantine at Arcadis to Jennifer Easterly which included the Request for Case by Case Exemption Application Form 4400-226 (signed on 9-20-2006) and summary document which included the building plans.

6. If the conditions set forth below are complied with, the development of the property will not result in environmental pollution as defined in ss. 289.01(8) and 299.01(4), Wis. Stats.

CONCLUSIONS OF LAW

1. The Department has the authority under s. NR 500.08(4), Wis. Adm. Code to issue an exemption from the prohibition in s. NR 506.085, Wis. Adm. Code, if the proposed development will not cause environmental pollution as defined in ss. 289.01(8) and 299.01(4), Wis. Stats.

2. The Department has authority to approve a grant of exemption with conditions if the conditions are necessary to ensure compliance with the applicable provisions of chapters NR 500 to 538, Wis. Adm. Code, or to assure that environmental pollution will not occur.

3. The conditions set forth below are necessary to ensure compliance with the applicable provisions of chapters NR 500 to 538, Wis. Adm. Code, and to assure that environmental pollution will not occur.

4. In accordance with the foregoing, the Department has the authority under s. NR 500.08(4), Wis. Adm. Code, to issue the following conditional grant of exemption.

CONDITIONAL GRANT OF EXEMPTION

The Department hereby issues an exemption to BRIC Associates from the prohibition in s. NR 506.085, Wis. Adm. Code for development on a property which contains solid waste as proposed in the submittal dated February 9, 2006 subject to the following conditions:

1. All excavated solid waste/contaminated soils shall be transported to a licensed landfill for proper disposal. **Documentation that this waste disposed of properly shall be submitted to the Department within 30 days of completing the work.**

2. BRIC Associates shall cover all exposed solid waste as proposed in the submitted development plan with asphalt driveway and concrete building slabs. The earthwork contractor/site owner shall provide documentation that asphalt/building foundations/synthetic lined stormwater basins cover all exposed wastes. This documentation shall be maintained and held by the property owner and shall be provided to the Department. **Photo documentation and a written document from the contractor who completed this work shall be submitted to the Department within 30 days of completing the work.**

3. A portion of this property has been used as a solid waste landfill and its use is restricted to prevent disturbing the integrity of the final cover (cap) or constructing any buildings on the property without written approval from the Department or its successor agency.

4. Water supply regulations in chs. NR811 and 812, Wis. Adm. Code, prohibit the construction of water supply wells within 1200 feet of a waste disposal facility. A special variance is required from the Drinking Water and Groundwater Program within the Department to construct a drinking water well in this 1200-foot setback area. Special well construction standards or water treatment requirements, or well construction prohibitions may apply.

5. No action related to the development of the property may be taken which will cause a significant adverse impact on wetlands as provided in ch. NR 103, Wis. Adm. Code.

6. No action related to the development of the property may be taken which will cause a significant adverse impact on critical habitat areas, as defined in s. NR 500.03(55), Wis. Adm. Code.

7. No action related to the development of the property may be taken which will cause a detrimental effect on any surface water, as defined in s. NR 500.03(62), Wis. Adm. Code.

8. No action related to the development of the property may be taken which will cause a detrimental effect on groundwater, as defined in s. NR 500.03(62), Wis. Adm. Code, or will cause or exacerbate an exceedance of any preventive action limit or enforcement standard at a point of standards application in ch. NR 140, Wis. Adm. Code.

9. No action related to the development of the property may be taken which will cause a migration and concentration of explosive gases in any structures in excess of 25% of the lower explosive limit for such gases at any time. No actions may be taken which will cause a migration and concentration of explosive gases in the soils outside of the limits of solid waste disposal within 200 feet of the property boundary or beyond the property boundary in excess of the lower explosive limit for such gases at any time. No actions may be taken which will cause a migration and concentration of explosive gases in the air outside of the limits of solid waste disposal within 200 feet of the landfill boundary or beyond the landfill property boundary in excess of the lower explosive limit for such gases at any time.

10. No action related to the development of the property may be taken which will cause an emission of any hazardous air contaminant exceeding the limitations for those substances contained in s. NR 445.03, Wis Adm. Code.

11. No action related to the development of the property may be taken which will cause an exceedance of a soil clean up standard in ch. NR 720, Wis. Adm. Code.

12. **This conditional exemption shall transfer with changes in property ownership.** In accordance with s.289.46(2), Stats., any person having or acquiring rights of ownership in land where a solid or hazardous waste disposal facility was previously operated may not undertake any activities on the land which interfere with the closed facility causing a significant threat to public health, safety or welfare. The Department should be contacted to discuss any proposed changes to avoid activities that could violate the statute or the conditions of this exemption.

13. This grant of exemption is limited to the proposed changes described in your application. If you are considering additional changes beyond those described in the application, a new application must be submitted to the department for approval.

The Department reserves the right to require the submittal of additional information and to modify this grant of exemption at any time, if in the Department's opinion, modifications are necessary. Unless specifically noted, the conditions of this grant of exemption do not supersede or replace any previous conditions of approval for this property.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes, administrative rules and case law establish time periods within which requests to review Department decisions must be filed.

For judicial review of a decision pursuant to section 227.52 and 227.53, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

Dated: 9/10/06

DEPARTMENT OF NATURAL RESOURCES
For the Secretary

Bruce Urben
Northeast Region – Green Bay
Remediation and Redevelopment Program

Jennie Easterly
Hydrogeologist
Northeast Region - Oshkosh
Remediation and Redevelopment Program

13/3

Document Number

State Bar of Wisconsin Form 6 - 2003

SPECIAL WARRANTY DEED

Document Name

DOC# 916830

Recorded
May 16, 2008 AT 01:16PM

Patricia Kraus

PATRICIA KRAUS
REGISTER OF DEEDS
FOND DU LAC COUNTY
Fee Amount: $15.00
Transfer Fee: $16,750.00

THIS DEED, made between BRIC (Johnson/Main) Associates, A Wisconsin Limited Partnership ("Grantor," whether one or more), and Waltrust Properties, Inc. ("Grantee," whether one or more). Grantor for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in Fond du Lac County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

The legal description of the property conveyed hereby is set forth on Exhibit A attached hereto and incorporated herein by reference.

Recording Area

Name and Return Address
Richard F. Schmidt, Esq.
Walgreen Co.
104 Wilmot Road, MS 1420
Deerfield, IL 60015

FDL 15-17-10-13-662-00
Parcel Identification Number (PIN)

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

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances arising by, through, or under Grantor, except: for those encumbrances set forth on Exhibit B attached hereto and incorporated herein by reference.

Dated May 14, 2008

BRIC (Johnson/Main) Associates,
A Wisconsin Limited Partnership
By: BRIC (Johnson/Main), Inc.
Its Sole General Partner

* _____ (SEAL)

* _____ (SEAL)

* _____ (SEAL)

By: _____ (SEAL)
* Brian Cummings, President

AUTHENTICATION

Signature(s) _____

authenticated on _____

* _____

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

THIS INSTRUMENT DRAFTED BY:
Thomas E. Whipp, Esq.

NOTARY PUBLIC ☆ THOMAS E. WHIPP ☆ STATE OF WISCONSIN

ACKNOWLEDGMENT

STATE OF WISCONSIN)
) ss.
WAUKESHA COUNTY)

Personally came before me on May 14, 2008, the above-named Brian Cummings _____ to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.

Thomas E. Whipp

* Thomas E. Whipp
Notary Public, State of Wisconsin
My Commission (is permanent) (~~expires:~~ _____)

(Signatures may be authenticated or acknowledged. Both are not necessary.)

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

*Type name below signatures.

wicke 1509 N Prospect Ave Milwaukee, WI 53202-2323 Phone: (414) 224 - 0600 Fax: (414) 224 - 9359 Fond du Lac Wa
omas Whipp

Produced with ZipForm™ by RE FormsNet, LLC 18025 Fifteen Mile Road, Clinton Township, Michigan 48035 www.zipform.com

EXHIBIT A TO SPECIAL WARRANTY DEED

GRANTOR: BRIC (Johnson/Main) Associates, A Wisconsin Limited Partnership

GRANTEE: Waltrust Properties, Inc.

Legal Description

PARCEL A:

Lot Two (2) of CERTIFIED SURVEY MAP NO. 7110, being all of Lots Thirty-two (32), Thirty-three (33), Thirty-four(34), Thirty-five (35), Forty-eight (48), Forty-nine (49) and Fifty (50); also part of Lots Thirty (30), Thirty-one (31),Thirty-six (36), Thirty-seven (37), Thirty-eight (38), Thirty-nine (39), Forty (40); part of North-South vacated alley lying between said Lots Thirty (30) thru Thirty-six (36) and Lots Thirty-seven (37) and Fifty (50); part of East-West vacated alley being between said Lots Thirty-seven (37) thru Forty (40) and Lots Forty-eight (48) and Fifty (50); all in Block Twenty-five (25) of the ORIGINAL PLAT OF THE CITY OF FOND DU LAC, located in the Northeast One-quarter (1/4) of the Northeast One-quarter (1/4) and in the Southeast One-quarter (1/4) of the Northeast One-quarter (1/4) in Section Ten (10), in Township Fifteen (15) North, Range Seventeen (17) East, in the City of Fond du Lac, County of Fond du Lac, State of Wisconsin, and recorded in the Office of the Register of Deeds for Fond du Lac County, Wisconsin on September 11, 2006 in Volume 51 of Certified Survey Maps at pages 15 to 15G inclusive, as Document No. 879630.

Parcel B:

Non-exclusive easements contained in a Reciprocal Easement Agreement with covenants, conditions and restrictions recorded on September 15, 2006 as Document No. 879907.

2

EXHIBIT B TO SPECIAL WARRANTY DEED

GRANTOR: BRIC (Johnson/Main) Associates, A Wisconsin Limited Partnership

GRANTEE: Waltrust Properties, Inc.

Exceptions to Warranties

1. The lien of general real estate taxes and special assessments for the year 2008 and thereafter.

2. Reciprocal Easement Agreement with Covenants, Conditions and Restrictions recorded on September 15, 2006 as Document No. 879907.

3. Utility Easement affecting the South 7.5 feet of the premises described in Schedule A hereof as shown on the recorded plat of Certified Survey Map No. 7110.

4. Utility Easement Provision as noted on the recorded plat of Certified Survey Map No. 7110.

5. Unpaid installment on the general real estate taxes for the year 2007 in the sum of $5,869.00, due July 31, 2008.

6. Overhead electric affecting the Northerly portion of the premises described in Schedule A hereof, as shown on an ALTA/ACSM Land Title Survey prepared by MSA Professional Services under a recorded plat of May 24, 2007, as Project No. 2350502.

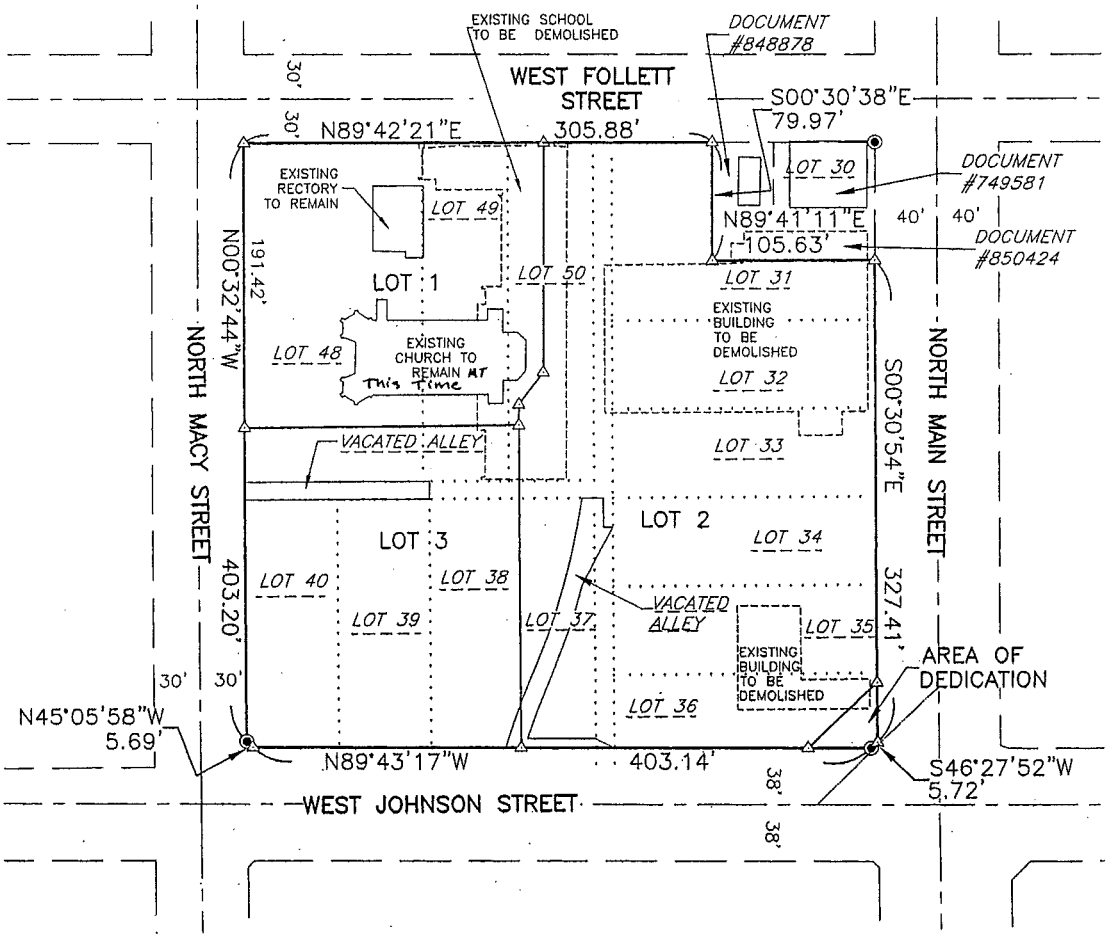
MSA
PROFESSIONAL SERVICES

TRANSPORTATION • MUNICIPAL
DEVELOPMENT • ENVIRONMENTAL
201 Corporate Drive Beaver Dam, WI 53916
920-887-4242 1-800-552-6330 Fax: 920-887-4250
© MSA PROFESSIONAL SERVICES

PROJECT #	2350502
DRAWN BY:	*Anne Cook/Ali Buderer*
CHECKED BY:	*Michael J. Laue*
FILE #	2350502\cadd\survey\Survey\csm1.dwg
SHEET #	2 of 8

FOND DU LAC COUNTY CERTIFIED SURVEY MAP

ALL OF LOTS 32, 33, 34, 35, 48, 49 AND 50; ALSO PART OF LOTS 30, 31, 36, 37, 38, 39, 40; PART OF NORTH-SOUTH VACATED ALLEY LYING BETWEEN SAID LOTS 30-36 AND LOT 37 AND 50; PART OF EAST-WEST VACATED ALLEY LYING BETWEEN SAID LOTS 37-40 AND LOTS 48-50; ALL IN BLOCK 25 OF THE ORIGINAL PLAT OF THE CITY OF FOND DU LAC; LOCATED IN THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 AND IN THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4, SECTION 10, TOWN 15 NORTH, RANGE 17 EAST, CITY OF FOND DU LAC, FOND DU LAC COUNTY, WISCONSIN.



SURVEYOR'S SEAL

WISCONSIN
MICHAEL J. LAUE
S-1435
BEAVER DAM, WISCONSIN
LAND SURVEYOR

8/10/06

LEGEND

- ◉ FOUND CROSS NOTCH MONUMENTS
- △ SET 3/4" X 18" SOLID ROD – 1.50 LBS. /L.F.

N W E S

GRAPHIC SCALE
0 50 100
1" = 100 FEET

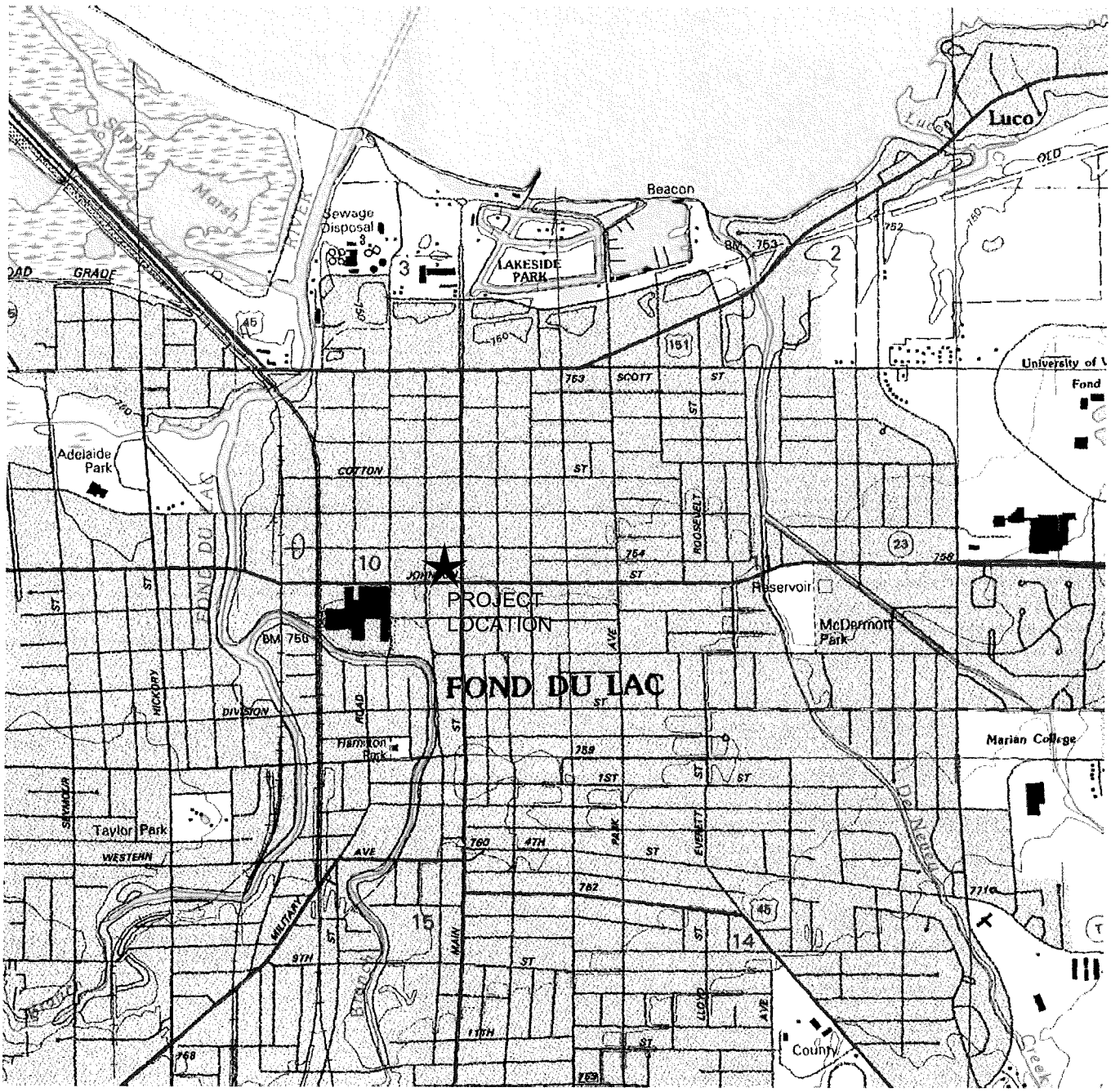
FIGURE 1

CERTIFIED SURVEY MAP: 7110 VOLUME; 51 PAGE: 15A

BRIAN

I, [redacted] Cummings, _____, believe the legal description below accurately describes correct location of the petroleum impacted property (Former Manowske Welding, 200 North Main Street, Fond du Lac, Wisconsin).

Lot Two (2) of CERTIFIED SURVEY MAP NO. 7110, being all of Lots Thirty-two (32), Thirty-three (33), Thirty-four (34), Thirty-five (35), Forty-eight (48), Forty-nine (49) and Fifty (50); also part of Lots Thirty (30), Thirty-one (31), Thirty-six (36), Thirty-seven (37), Thirty-eight (38), Thirty-nine (39), Forty (40); part of North-South vacated alley lying between said Lots Thirty (30) thru Thirty-six (36) and Lots Thirty Seven (37) and Fifty (50); part of East-West vacated alley being between said Lots Thirty-seven (37) thru Forty (40) and Lots Forty-eight (48) and Fifty (50); all in Block Twenty-five (25) of the ORIGINAL PLAT OF THE CITY OF FOND DU LAC, located in the Northeast One-quarter (1/4) of the Northeast One-quarter (1/4) and in the Southeast One-quarter (1/4) of the Northeast One-quarter (1/4) in Section Ten (10), in Township Fifteen (15) North, Range Seventeen (17) East, in the City of Fond du Lac, County of Fond du Lac, State of Wisconsin, and recorded in the Office of the Register of Deeds for Fond du Lac County, Wisconsin on September 11, 2006 in Volume 51 of Certified Survey Maps at pages 15 to 15G inclusive, as Document No. 879630



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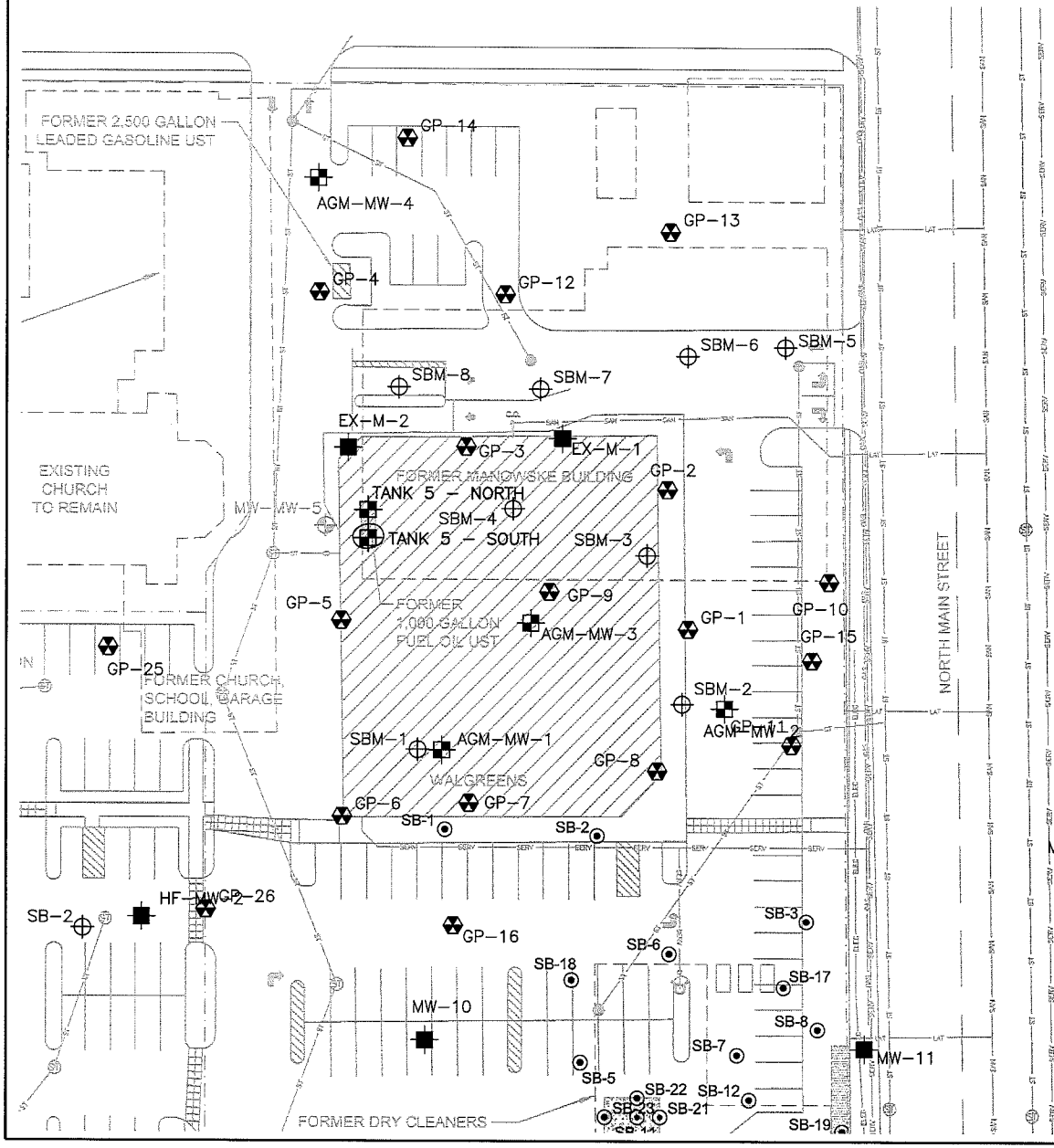
SITE LOCATION MAP
MANOWSKE WELDING
200 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Drawn:	MAS	9/12/2008
Checked:	BAL	9/12/2008
Approved:	BAL	9/12/2008
PROJECT NUMBER	200704507	
FIGURE NUMBER	1	



LEGEND

- PROPERTY BOUNDARY
- AGM-MW-4 — APPROXIMATE LOCATION ARCADIS MONITORING WELL (2006)
- GP-9 — APRROXIMATE LOCATION ARCADIS GEOPROBE (2006)
- SBM-4 — APPROXIMATE LOCATION CLAYTON SOIL BORING (2005)
- EX-M-2 — APPROXIMATE LOCATION ARCADIS SOIL EXCAVATION SIDEWALL SAMPLE (2006)
- EXISTING SAN. MANHOLE
- EXISTING STRM. MANHOLE
- EXISTING TRAFFIC MANHOLE
- RAZED BUILDINGS
- EXISTING WATER SERVICE
- EXISTING UNDERGROUND GAS
- EXISTING STORM SEWER
- EXISTING SANITARY SEWER
- EXISTING UNDERGROUND FIBER OPTIC LINE
- MW-MW-5 — STS MONITORING WELL LOCATION
- APPROXIMATE EXTENT OF RESIDUAL DRO IMPACTS TO SOIL
- SOIL EXCAVATION FOR BUILDING

NOTE:
BASE MAP DERIVED FROM AN ALTA/ASCM DATED 11/30/2005 WITH REVISIONS MADE ON 3/31/2006

MOBIL Q-MART GAS STATION

40 0 40 80
1" = 40'

N

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SAMPLING LOCATIONS
FORMER MANOWSKE WELDING
200 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Drawn:	MAS	9/12/2008
Checked:	BAL	9/12/2008
Approved:		
PROJECT NUMBER	200704507	
FIGURE NUMBER	2	

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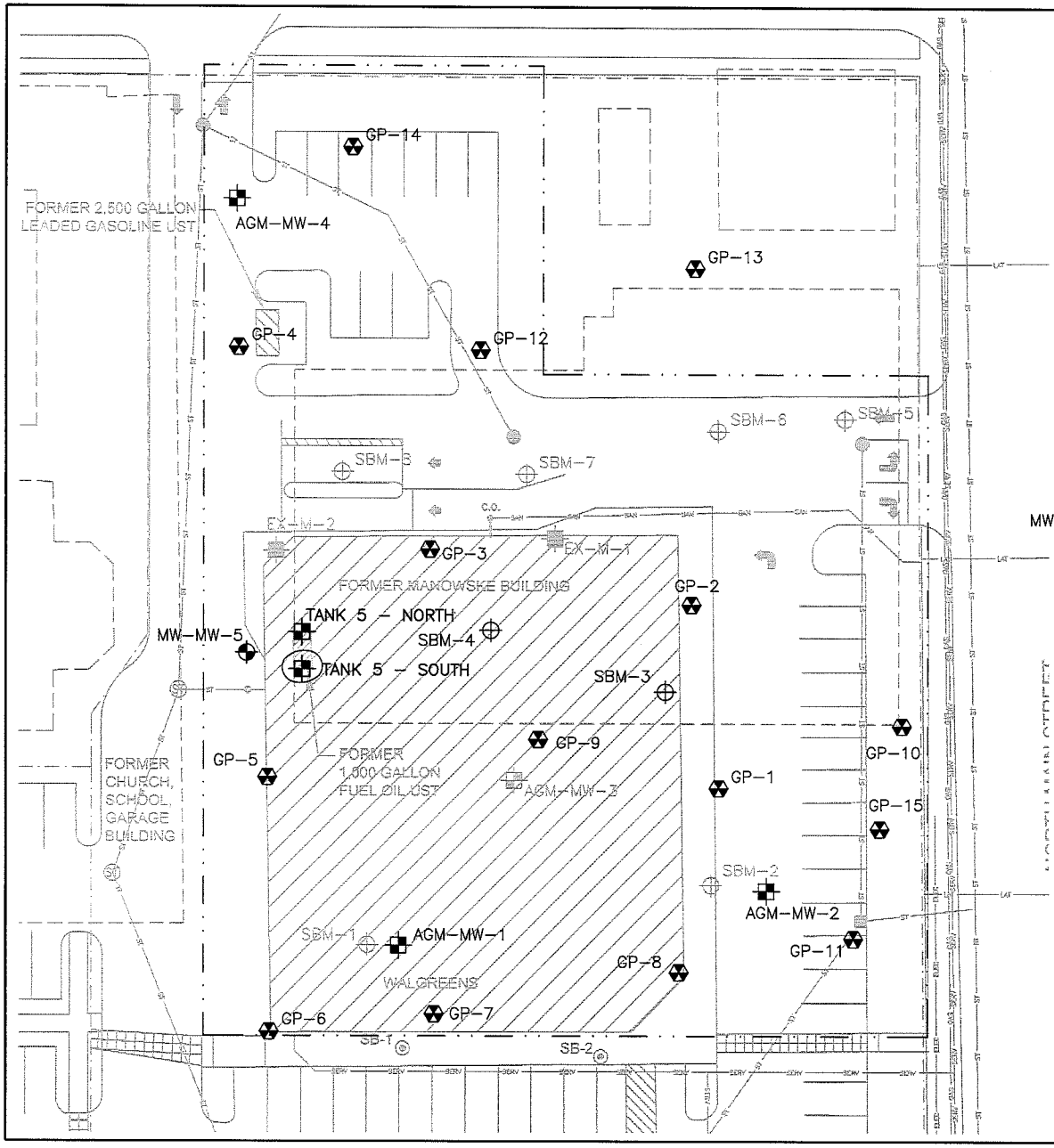

LEGEND

- PROPERTY BOUNDARY
- FORMER MANOWSKE WELDING PROPERTY BOUNDARY
- AGM-MW-4 — APPROXIMATE LOCATION ARCADIS MONITORING WELL (2006)
- AGM-MW-4 — APPROXIMATE LOCATION ARCADIS MONITORING WELL (2006) (EXCEEDS APPLICABLE RCLS)
- GP-9 — APRROXIMATE LOCATION ARCADIS GEOPROBE (2006) (EXCEEDS APPLICABLE RCLS)
- SBM-4 — APPROXIMATE LOCATION CLAYTON SOIL BORING (2005)
- SBM-4 — APPROXIMATE LOCATION CLAYTON SOIL BORING (2005) (EXCEEDS APPLICABLE RCLS)
- EX-M-2 — APPROXIMATE LOCATION ARCADIS SOIL EXCAVATION SIDEWALL SAMPLE (2006)
- MW-MW-5 — STS MONITORING WELL LOCATION (EXCEEDS APPLICABLE RCLS)
- EXISTING SAN. MANHOLE
- EXISTING STRM. MANHOLE
- EXISTING TRAFFIC MANHOLE
- RAZED BUILDINGS
- EXISTING WATER SERVICE
- EXISTING UNDERGROUND GAS
- EXISTING STORM SEWER
- EXISTING SANITARY SEWER
- EXISTING UNDERGROUND FIBER OPTIC LINE
- APPROXIMATE EXTENT OF RESIDUAL DRO IMPACTS TO SOIL
- SOIL EXCAVATION FOR BUILDING

NOTE:
BASE MAP DERIVED FROM AN ALTA/ASCM DATED 11/30/2005 WITH REVISIONS MADE ON 3/31/2006

30 0 30 60
1" = 30'

N

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SAMPLING LOCATIONS AND RCL EXCEEDANCES
FORMER MANOWSKE WELDING
200 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Drawn:	MAS	9/12/2008
Checked:	BAL	9/12/2008
Approved:		
PROJECT NUMBER	200704507	
FIGURE NUMBER	3	

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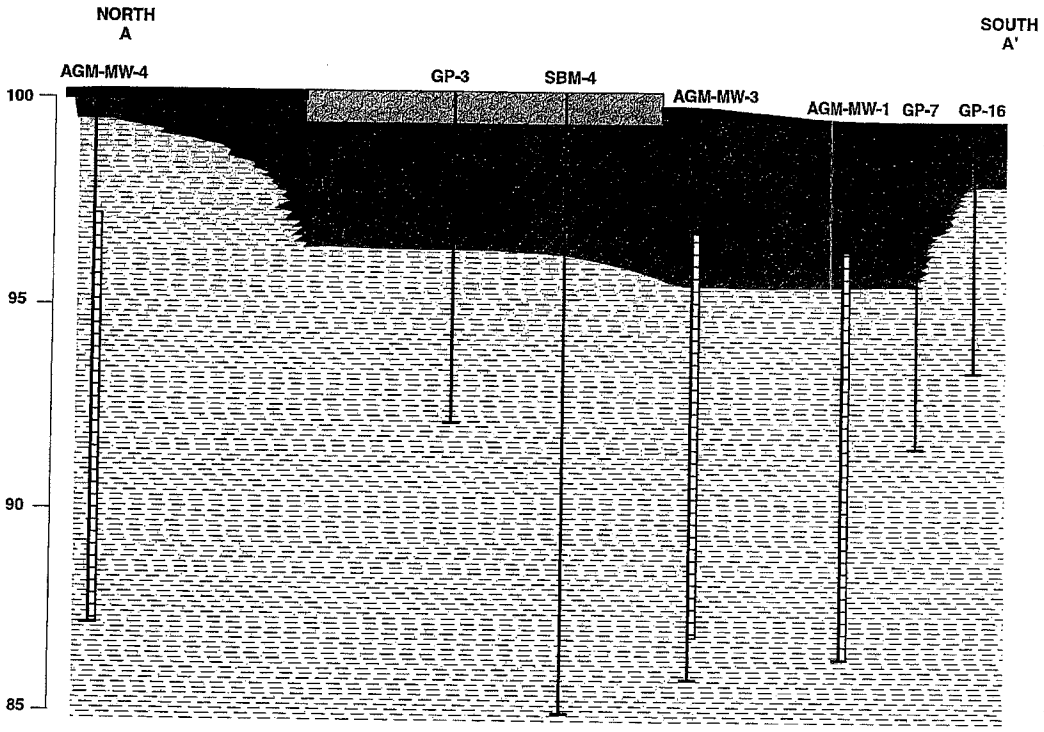
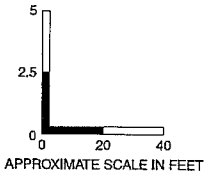


LEGEND

- ASPHALT
- CONCRETE
- FILL - Dark brown to black sandy gravel and clayey silt with brick and wood debris.
- SILTY CLAY - Dark brown to yellowish brown clay with some silt and trace sand.
- EXTENT OF FILL MATERIAL EXCAVATED DURING REDEVELOPMENT ACTIVITIES

Refer to Figure 2 for plan view of cross-section location.



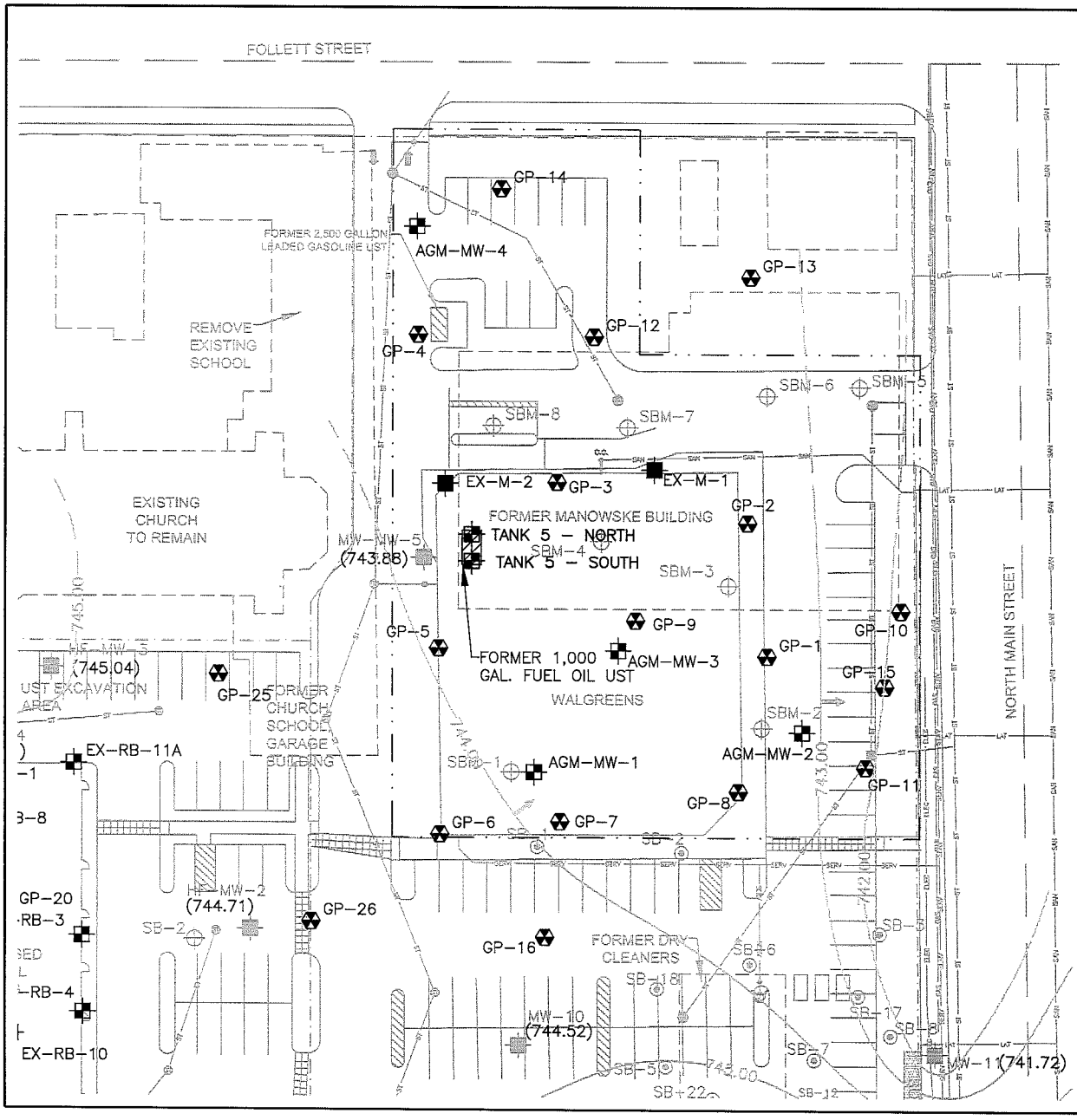
ARCADIS

GEOLOGIC CROSS-SECTION A-A'

MANOWSKE WELDING
FOND DU LAC, WISCONSIN

FIGURE
4

DRAFTER: LMB | APPROVED: | CHECKED: BJM | DRAWING: XSEC_NORTHSOUTH.AI | FILE NO.: GRAPHICS | PN: MREDCUMMWI1138\FONDULAC | DWG DATE: 23OCT06



LEGEND

- PROPERTY BOUNDARY
- FORMER MANOWSKE WELDING PROPERTY BOUNDARY
- RAZED BUILDINGS
- EXISTING WATER SERVICE
- EXISTING UNDERGROUND GAS
- EXISTING STORM SEWER
- EXISTING SANITARY SEWER
- EXISTING UNDERGROUND FIBER OPTIC LINE
- PHYTOREMEDIATION TRENCH
- 5' BGS — EXTENT OF EXCAVATION AND DEPTH BELOW GROUND SURFACE
- MW-1D — ARCADIS MONITORING WELL
- TANK 5–NORTH — ARCADIS UST CLOSURE ASSESSMENT CONFIRMATION SAMPLE
- MW-13 — STS MONITORING WELL LOCATION - GEORGETOWN
- HF-MW-4 — STS MONITORING WELL LOCATION - HOLY FAMILY
- MW-MW-5 — STS MONITORING WELL LOCATION - MANOWSKE WELDING
- SBM-2 — CLAYTON SOIL BORING (2005)
- SB-2 — ARCADIS SOIL BORING
- GP-8 — ARCADIS GEOPROBE
- EXISTING SAN. MANHOLE
- EXISTING STRM. MANHOLE
- EXISTING TRAFFIC MANHOLE
- UNDERGROUND STORAGE TANK
- GROUNDWATER CONTOUR
- APPROXIMATE GROUNDWATER CONTOUR
- GROUNDWATER FLOW DIRECTION
- (743.5) — GROUNDWATER ELEVATION IN FEET (4/8/2008)

NOTE: GROUNDWATER ELEVATION IS RELATIVE TO USGS DATUM. SOME OF THE WELLS USED TO DETERMINE THE GROUNDWATER CONTOURS ARE LOCATED OUTSIDE OF THE VIEWING AREA OF THIS FIGURE.

N

40 0 40 80

1" = 40'

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GROUNDWATER CONTOUR MAP
FORMER MANOWKSE WELDING
200 NORTH MAIN STREET
FOND DU LAC, WISCONSIN

Drawn:	MAS	11/19/2008
Checked:	AGM	11/19/2008
Approved:		
PROJECT NUMBER	200704507	
FIGURE NUMBER	FIGURE 5	

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TABLE 1
SOIL ANALYTICAL RESULTS
FORMER MANOWSKE WELDING
FOND DU LAC, WISCONSIN
STS PROJECT NO. 200704507

	Former Manowske Welding					
	Generic RCLs			NR 746 Soil	MW-MW-5	
	Direct Contact Pathway		Groundwater	Screening	2 - 4' (Fill)	6 - 8' (Native)
Parameters	Non-Industrial	Industrial	Pathway	Levels	9/26/2007	9/26/2007
VOCs (µg/kg)						
Benzene	1,100 [B]	--	5.5 [B]	8,500	<25	<25
Bromobenzene	--	--	--	--	<25	<25
Bromodichloromethane	--	--	--	--	<25	<25
Bromoform	--	--	--	--	<25	<25
sec-Butylbenzene	--	--	--	--	<25	<25
tert-Butylbenzene	--	--	--	--	<25	<25
n-Butylbenzene	--	--	--	--	<25	<25
Carbon tetrachloride	--	--	--	--	<25	<25
Chloroform	--	--	--	--	<25	<25
Chlorobenzene	--	--	--	--	<25	<25
Chloroethane	--	--	--	--	<25	<25
Chloromethane	--	--	--	--	<25	<25
2-Chlorotoluene	--	--	--	--	<25	<25
4-Chlorotoluene	--	--	--	--	<25	<25
1,2-Dibromo-3-chloropropane	--	--	--	--	<25	<25
1,2-Dibromoethane	--	--	--	--	<25	<25
1,3-Dichlorobenzene	--	--	--	--	<25	<25
1,4-Dichlorobenzene	--	--	--	--	<25	<25
1,2-Dichloroethane	540 [B]	--	4.9 [B]	600	<25	<25
1,2-Dichlorobenzene	--	--	--	--	<25	<25
1,1-Dichloroethene	--	--	--	--	<25	<25
cis-1,2-Dichloroethene	--	--	--	--	<25	<25
Dichlorodifluoromethane	--	--	--	--	<25	<25
trans-1,2-Dichloroethene	--	--	--	--	<25	<25
1,2-Dichloropropane	--	--	--	--	<25	<25
1,1-Dichloroethane [D]	--	--	394	--	<25	40 "J"
1,3-Dichloropropane	--	--	--	--	<25	<25
2,2-Dichloropropane	--	--	--	--	<25	<25
Diisopropyl ether	--	--	--	--	<25	<25
Ethylbenzene	--	--	2,900 [B]	4,600	<25	<25
Hexachlorobutadiene	--	--	--	--	<25	<25
Isopropylbenzene	--	--	--	--	<25	<25
p-Isopropyltoluene	--	--	--	--	<25	<25
Methylene chloride	--	--	--	--	<25	<25
Methyl-tert-butyl-ether	--	--	--	--	<25	<25
Naphthalene	--	--	--	2,700	<25	<25
n-Propylbenzene	--	--	--	--	<25	<25
1,1,2,2-Tetrachloroethane	--	--	--	--	<25	<25
1,1,1,2-Tetrachloroethane	--	--	--	--	<25	<25
Tetrachloroethene	--	--	--	--	<25	<25
Toluene	--	--	1,500 [B]	38,000	<25	<25
1,2,3-Trichlorobenzene	--	--	--	--	<25	<25
1,2,4-Trichlorobenzene	--	--	--	--	<25	<25
1,1,1-Trichloroethane	--	--	--	--	<25	<25
1,1,2-Trichloroethane	--	--	--	--	<25	<25
1,2,4-Trimethylbenzene	--	--	--	83,000	<25	<25
Trichloroethene	--	--	--	--	<25	<25
1,3,5-Trimethylbenzene	--	--	--	11,000	<25	<25
Vinyl chloride	--	--	--	--	<25	<25
Xylenes, total	--	--	4,100 [B]	42,000	<75	<75
PAHs (µg/kg) [C]						
Acenaphthene	900,000	60,000,000	38,000	--	<7.2	<7.2
Acenaphthylene	18,000	360,000	700	--	<7.0	<7.0
Anthracene	5,000,000	300,000,000	3,000,000	--	<14	<14
Benzo(a)anthracene	88	3,900	17,000	--	34 "J"	<15
Benzo(a)pyrene	8.8	390	48,000	--	**37 "J"** [A]	<15
Benzo(b)fluoranthene	88	3,900	360,000	--	55	<8.1
Benzo(ghi)perylene	1,800	39,000	6,800,000	--	20.4 "J"	<14
Benzo(k)fluoranthene	880	39,000	870,000	--	16.7 "J"	<11
Chrysene	8,800	390,000	37,000	--	52	<13
Dibenzo(a,h,)anthracene	8.8	390	38,000	--	<11	<11
Fluroanthene	600,000	40,000,000	500,000	--	86	<13
Fluorene	600,000	40,000,000	100,000	--	<8.5	<8.5
Indeno(1,2,3-cd)pyrene	88	3,900	680,000	--	17.7 "J'	<10
1-Methylnaphthalene	1,100,000	70,000,000	23,000	--	<13	<13
2-Methylnaphthalene	600,000	40,000,000	20,000	--	<17	<17
Naphthalene	20,000	110,000	400	--	<12	<12
Phenanthrene	18,000	390,000	1,800	--	29.1 "J"	<15
Pyrene	500,000	30,000,000	8,700,000	--	89	<13

Notes:

VOCs = Volatile Organic Compounds

PAHs = Polynuclear Aromatic Hydrocarbons

[A] Parameter exceeds Suggested PAH RCLs for Non-Industrial Direct Contact.

[B] Generic RCL is established under NR 720 or NR 746

[C] Suggested Generic RCLs provided in *Soil Cleanup Levels for PAHs Interim Guidance*, WDNR RR-5 1997

[D] Generic RCL calculated utilizing the US EPA Soil Screening Guidance for Chemicals Website calculator

-- No Generic RCL established.

Generic RCLs not included in Wisconsin Administrative Code or Guidance are calculated from the US EPA Soil Screening Level Web Page and the default values contained in Determining Residual Contaminant Levels *using the EPA Soil Screening Level Web Site* WDNR PUB-RR-682 on September 13, 2008

Table 2. Summary of VOC Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	NR 720 GW Pathway	NR746 SSL	SBM-1 (16-18') 02/06/06	SBM-2 (8-10') 02/06/06	SBM-3 (3-4') 02/07/06	SBM-4 (8-10') 02/07/06	SBM-5 (10-12') 02/07/06	SBM-6 (4-6') 02/07/06
VOC (ug/kg)								
Benzene	5.5	8,500	<53	<56	<85	<54	<65	<60
n-Butylbenzene	--	--	NA	NA	NA	NA	NA	NA
s-Butylbenzene	--	--	NA	NA	NA	NA	NA	NA
Ethylbenzene	2,900	4,600	<53	<56	<85	<54	<65	<60
Isopropylbenzene	--	--	<270	<280	<430	<270	<320	<300
p-Isopropyltoluene	--	--	NA	NA	NA	NA	NA	NA
Naphthalene	--	--	<330	<280	<430	<270	<320	<300
n-Propylbenzene	--	--	NA	NA	NA	NA	NA	NA
Tetrachloroethene	--	--	NA	NA	NA	NA	NA	NA
Toluene	1,500	38,000	<110	<110	<170	<110	<130	<120
1,2,4-Trimethylbenzene	--	83,000	<110	<110	<170	<110	<130	<120
1,3,5-Trimethylbenzene	--	11,000	<110	<110	<170	<110	<130	<120
Xylene, o	4,100*	42,000*	<53	<56	<85	<54	<65	<60
Xylenes, m + p	4,100*	42,000*	<110	<110	<170	<110	<130	<120

* RCL is for Xylenes, total.

Bold Value exceeds the NR 720 GW Pathway.

Value Value exceeds NR 746 SSL.

GW Groundwater

µg/kg Micrograms per kilogram.

NA Not analyzed.

NR720 WDNR NR 720 Groundwater Pathway Residual Contaminant Levels (RCLs).

NR746 WDNR NR 746 Soil Screening Levels (SSLs).

Q Concentration between limit of detection and limit of quantitation.

VOCs Volatile Organic Compounds

* SAMPLED FROM FILL SOILS

Table 2. Summary of VOC Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	NR 720 GW Pathway	NR746 SSL	SBM-7 (7-8') 02/07/06	SBM-8 (8-10') 02/07/06	GP-1 (2-4')★ 06/22/06	GP-1 (4-6') 06/22/06	GP-2 (2-4')★ 06/22/06	GP-2 (6-8') 06/22/06	GP-3 (2-4')★ 06/22/06
VOC (ug/kg)									
Benzene	5.5	8,500	<64	<53	<25	<25	<25	<25	<25
n-Butylbenzene	--	--	NA	NA	<25	<25	<25	<25	<25
s-Butylbenzene	--	--	NA	NA	<25	<25	<25	<25	<25
Ethylbenzene	2,900	4,600	<64	<53	<25	<25	<25	<25	<25
Isopropylbenzene	--	--	<320	<270	<25	<25	<25	<25	<25
p-Isopropyltoluene	--	--	NA	NA	<25	<25	<25	<25	<25
Naphthalene	--	--	<320	<270	<25	<25	<25	<25	<25
n-Propylbenzene	--	--	NA	NA	<25	<25	<25	<25	<25
Tetrachloroethene	--	--	NA	NA	<25	<25	<25	<25	<25
Toluene	1,500	38,000	<130	<110	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	--	83,000	<130	<110	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	--	11,000	<130	<110	<25	<25	<25	<25	<25
Xylene, o	4,100*	42,000*	<64	<53	<25	<25	<25	<25	<25
Xylenes, m + p	4,100*	42,000*	<130	<110	<50	<50	<50	<50	<50

* RCL is for Xylenes, total.

Bold Value exceeds the NR 720 GW Pathway.

Value Value exceeds NR 746 SSL.

GW Groundwater

µg/kg Micrograms per kilogram.

NA Not analyzed.

NR720 WDNR NR 720 Groundwater Pathway Residual Contaminant Levels (RCLs).

NR746 WDNR NR 746 Soil Screening Levels (SSLs).

Q Concentration between limit of detection and limit of quantitation.

VOCs Volatile Organic Compounds

★ SAMPLED FROM FILL SOILS

Table 2. Summary of VOC Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	NR 720 GW Pathway	NR746 SSL	GP-3 (4-6') 06/22/06	GP-4 (2-4')* 06/22/06	GP-4 (4-6') 06/22/06	GP-4 (6-8') 06/22/06	GP-5 (2-4)* 06/27/06	GP-5 (4-6) 06/27/06	GP-6 (2-4')* 06/22/06	GP-6 (4-6') 06/22/06
VOC (ug/kg)										
Benzene	5.5	8,500	<25	**250**	**1,000 Q**	**<200**	<25	<25	<25	<25
n-Butylbenzene	--	--	<25	<50	<620	<200	<25	<25	<25	<25
s-Butylbenzene	--	--	<25	150 Q	1600 Q	730	<25	<25	<25	<25
Ethylbenzene	2,900	4,600	<25	570	***36,000***	***7,000***	<25	<25	<25	<25
Isopropylbenzene	--	--	<25	230	3,300	900	<25	<25	<25	<25
p-Isopropyltoluene	--	--	<25	270	2,700	930	<25	<25	<25	<25
Naphthalene	--	--	<25	1,500	14,000	4,800	<25	<25	<25	<25
n-Propylbenzene	--	--	<25	1,100	15,000	4,400	<25	<25	<25	<25
Tetrachloroethene	--	--	<25	<50	<620	<200	<25	<25	<25	<25
Toluene	1,500	38,000	<25	<50	**4,500**	<200	<25	<25	<25	<25
1,2,4-Trimethylbenzene	--	83,000	<25	10,000	*110,000*	30,000	<25	<25	<25	<25
1,3,5-Trimethylbenzene	--	11,000	<25	2,400	*32,000*	8,800	<25	<25	<25	<25
Xylene, o	4,100*	42,000*	<25	130 Q	***43,000***	4,900	<25	<25	<25	<25
Xylenes, m + p	4,100*	42,000*	<50	**10,000**	***120,000***	**24,000**	<50	<50	<50	<50

* RCL is for Xylenes, total.

Bold Value exceeds the NR 720 GW Pathway.

Value Value exceeds NR 746 SSL.

GW Groundwater

µg/kg Micrograms per kilogram.

NA Not analyzed.

NR720 WDNR NR 720 Groundwater Pathway Residual Contaminant Levels (RCLs).

NR746 WDNR NR 746 Soil Screening Levels (SSLs).

Q Concentration between limit of detection and limit of quantitation.

VOCs Volatile Organic Compounds

* SAMPLED FROM FILL SOILS

Table 2. Summary of VOC Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	NR 720 GW Pathway	NR746 SSL	GP-7 (2-4')★ 06/22/06	GP-7 (6-8') 06/22/06	GP-8 (2-4')★ 06/22/06	GP-8 (4-6') 06/22/06	GP-9 (2-4')★ 06/22/06	GP-9 (4-6')★ 06/22/06	GP-10 (2-4')★ 06/22/06	GP-10 (4-6') 06/22/06
VOC (ug/kg)										
Benzene	5.5	8,500	<25	<25	<25	<25	<25	<25	<25	<25
n-Butylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25	<25
s-Butylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25	<25
Ethylbenzene	2,900	4,600	<25	<25	<25	<25	<25	<25	<25	<25
Isopropylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25	<25
p-Isopropyltoluene	--	--	<25	<25	<25	<25	<25	<25	<25	<25
Naphthalene	--	--	<25	<25	<25	<25	<25	<25	<25	<25
n-Propylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25	<25
Tetrachloroethene	--	--	<25	<25	<25	<25	<25	<25	<25	<25
Toluene	1,500	38,000	<25	<25	<25	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	--	83,000	<25	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	--	11,000	<25	<25	<25	<25	<25	<25	<25	<25
Xylene, o	4,100*	42,000*	<25	<25	<25	<25	<25	<25	<25	<25
Xylenes, m + p	4,100*	42,000*	<50	<50	<50	<50	<50	<50	<50	<50

* RCL is for Xylenes, total.
Bold Value exceeds the NR 720 GW Pathway.
Value Value exceeds NR 746 SSL.
GW Groundwater
µg/kg Micrograms per kilogram.
NA Not analyzed.
NR720 WDNR NR 720 Groundwater Pathway Residual Contaminant Levels (RCLs).
NR746 WDNR NR 746 Soil Screening Levels (SSLs).
Q Concentration between limit of detection and limit of quantitation.
VOCs Volatile Organic Compounds

★ SAMPLED FROM FILL SOILS

Table 2. Summary of VOC Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	NR 720 GW Pathway	NR746 SSL	GP-11 (2-4')* 06/22/06	GP-11 (4-6') 06/22/06	GP-12 (4-6') 06/22/06	GP-12 (6-8') 06/22/06	GP-13 (2-4')* 06/22/06	GP-13 (4-6') 06/22/06	GP-14 (2-4') 06/22/06
VOC (ug/kg)									
Benzene	5.5	8,500	<25	<25	<25	<25	<25	<25	<25
n-Butylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25
s-Butylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25
Ethylbenzene	2,900	4,600	<25	<25	<25	<25	<25	<25	<25
Isopropylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25
p-Isopropyltoluene	--	--	<25	<25	<25	<25	<25	<25	<25
Naphthalene	--	--	<25	<25	<25	<25	<25	<25	<25
n-Propylbenzene	--	--	<25	<25	<25	<25	<25	<25	<25
Tetrachloroethene	--	--	<25	<25	<25	<25	<25	<25	<25
Toluene	1,500	38,000	<25	<25	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	--	83,000	<25	<25	<25	<25	52 Q	<25	<25
1,3,5-Trimethylbenzene	--	11,000	<25	<25	<25	<25	<25	<25	<25
Xylene, o	4,100*	42,000*	<25	<25	<25	<25	<25	<25	<25
Xylenes, m + p	4,100*	42,000*	<50	<50	<50	<50	89 Q	<50	<50

* RCL is for Xylenes, total.
Bold Value exceeds the NR 720 GW Pathway.
Value Value exceeds NR 746 SSL.
GW Groundwater
µg/kg Micrograms per kilogram.
NA Not analyzed.
NR720 WDNR NR 720 Groundwater Pathway Residual Contaminant Levels (RCLs).
NR746 WDNR NR 746 Soil Screening Levels (SSLs).
Q Concentration between limit of detection and limit of quantitation.
VOCs Volatile Organic Compounds

* SAMPLED FROM FILL SOILS

Table 2. Summary of VOC Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	NR 720 GW Pathway	NR746 SSL	GP-14 (4-6') 06/22/06	GP-15 (2-4')★ 06/22/06	GP-15 (4-6') 06/22/06	AGM-MW-1 (0-2)★ 06/27/06	AGM-MW-1 (4-6) 06/27/06	AGM-MW-2 (0-2)★ 06/27/06
VOC (ug/kg)								
Benzene	5.5	8,500	<25	<25	<25	<25	<25	<25
n-Butylbenzene	--	--	<25	<25	<25	<25	<25	<25
s-Butylbenzene	--	--	<25	<25	<25	<25	<25	<25
Ethylbenzene	2,900	4,600	<25	<25	<25	<25	<25	<25
Isopropylbenzene	--	--	<25	<25	<25	<25	<25	<25
p-Isopropyltoluene	--	--	<25	<25	<25	<25	<25	<25
Naphthalene	--	--	<25	<25	<25	<25	<25	<25
n-Propylbenzene	--	--	<25	<25	<25	<25	<25	<25
Tetrachloroethene	--	--	<25	<25	<25	<25	<25	<25
Toluene	1,500	38,000	<25	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	--	83,000	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	--	11,000	<25	<25	<25	<25	<25	<25
Xylene, o	4,100*	42,000*	<25	<25	<25	<25	<25	<25
Xylenes, m + p	4,100*	42,000*	<50	<50	<50	<50	<50	<50

* RCL is for Xylenes, total.
Bold Value exceeds the NR 720 GW Pathway.
Value Value exceeds NR 746 SSL.
GW Groundwater
µg/kg Micrograms per kilogram.
NA Not analyzed.
NR720 WDNR NR 720 Groundwater Pathway Residual Contaminant Levels (RCLs).
NR746 WDNR NR 746 Soil Screening Levels (SSLs).
Q Concentration between limit of detection and limit of quantitation.
VOCs Volatile Organic Compounds
★ SAMPLED FROM FILL SOILS

Table 2. Summary of VOC Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	NR 720 GW Pathway	NR746 SSL	AGM-MW-2 (2-4)* 06/27/06	AGM-MW-4 (2-4)* 06/27/06	AGM-MW-4 (4-6) 06/27/06	TB 06/22/06	EX-M-1 09/20/06	EX-M-2 09/20/06	TB 09/20/06
VOC (ug/kg)									
Benzene	5.5	8,500	<25	<25	<25	<25	<25	<25	<25
n-Butylbenzene	--	--	<25	460	<25	<25	<25	<25	<25
s-Butylbenzene	--	--	<25	130	<25	<25	<25	<25	<25
Ethylbenzene	2,900	4,600	<25	<25	<25	<25	<25	<25	<25
Isopropylbenzene	--	--	<25	130	<25	<25	<25	<25	<25
p-Isopropyltoluene	--	--	<25	<25	<25	<25	<25	<25	<25
Naphthalene	--	--	<25	1,000	<25	<25	<25	<25	<25
n-Propylbenzene	--	--	<25	640	<25	<25	<25	<25	<25
Tetrachloroethene	--	--	<25	<25	<25	<25	59 Q	61 Q	<36
Toluene	1,500	38,000	<25	<25	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	--	83,000	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	--	11,000	<25	<25	<25	<25	<25	<25	<25
Xylene, o	4,100*	42,000*	<25	<25	<25	<25	<25	<25	<25
Xylenes, m + p	4,100*	42,000*	<50	<50	<50	<50	<50	<50	<50

* RCL is for Xylenes, total.
Bold Value exceeds the NR 720 GW Pathway.
Value Value exceeds NR 746 SSL.
GW Groundwater
µg/kg Micrograms per kilogram.
NA Not analyzed.
NR720 WDNR NR 720 Groundwater Pathway Residual Contaminant Levels (RCLs).
NR746 WDNR NR 746 Soil Screening Levels (SSLs).
Q Concentration between limit of detection and limit of quantitation.
VOCs Volatile Organic Compounds
* SAMPLED FROM FILL SOILS

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Table 2. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID				SBM-1 (16-18')	SBM-2 (8-10')	SBM-3 (3-4')*	SBM-4 (8-10')	SBM-5 (10-12')
Sample Date	DC IND	DC NON-IND	GW Pathway	02/06/06	02/06/06	02/07/06	02/07/06	02/07/06
PAHs (ug/kg)								
Acenaphthene	60,000,000	900,000	38,000	<330	<330	<330	<330	<330
Acenaphthylene	360,000	18,000	700	<330	<330	<330	<330	<330
Anthracene	300,000,000	5,000,000	3,000,000	<330	<330	<330	<330	<330
Benzo(a)anthracene	3,900	88	17,000	<8.7	<8.7	500	<8.7	<8.7
Benzo(a)pyrene	390	9	48,000	<15	<15	**400**	<15	<15
Benzo(b)fluoranthene	3,900	88	360,000	<11	<11	450	<11	<11
Benzo(ghi)perylene	39,000	1,800	6,800,000	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	39,000	880	870,000	<11	<11	370	<11	<11
Chrysene	390,000	8,800	37,000	<100	<100	530	<100	<100
Dibenz(a,h)anthracene	390	9	38,000	<20	<20	140	<20	<20
Fluoranthene	40,000,000	600,000	500,000	<330	<330	1100	<330	<330
Fluorene	40,000,000	600,000	100,000	<140	<140	<140	<140	<140
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	<29	<29	380	<29	<29
1-Methylnaphthalene	70,000,000	1,100,000	23,000	NA	NA	NA	NA	NA
2-Methylnaphthalene	40,000,000	600,000	20,000	<330	<330	<330	<330	<330
Naphthalene	110,000	20,000	400	NA	<330	<330	<330	<330
Phenanthrene	390,000	18,000	1,800	<330	<330	510	<330	<330
Pyrene	30,000,000	500,000	8,700,000	<180	<180	1,000	<180	<180
Metals (mg/kg)								
Arsenic	1.6	0.039	--	NA	NA	NA	NA	NA
Barium	--	--	--	NA	NA	NA	NA	NA
Cadmium	510	8	--	NA	NA	NA	NA	NA
Chromium	200	14	--	NA	NA	NA	NA	NA
Lead	500	50	--	NA	NA	NA	NA	NA
Mercury	--	--	--	NA	NA	NA	NA	NA
Selenium	--	--	--	NA	NA	NA	NA	NA
Silver	--	--	--	NA	NA	NA	NA	NA

Value exceeds the DC IND RCL.
Value exceeds the DC NON-IND RCL.

Bold Value exceeds the Groundwater (GW) Pathway RCL.
DC IND WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway WDNR proposed and NR 720 groundwater pathway RCLs.
Q Concentration between limit of detection and limit of quantitation.
* SAMPLED FROM FILL SOILS

µg/kg Micrograms per kilogram.
mg/kg Milligrams per kilogram.
NA Not analyzed.
RCL Residual Contaminant Level.

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Table 2 Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	SBM-6 (4-6') 02/07/06	SBM-7 (7-8') 02/07/06	SBM-8 (8-10') 02/07/06	GP-1 (2-4')* 06/22/06	GP-1 (4-6') 06/22/06	GP-2 (2-4')* 06/22/06
PAHs (ug/kg)									
Acenaphthene	60,000,000	900,000	38,000	<330	<330	<330	36	<3.6	56
Acenaphthylene	360,000	18,000	700	<330	<330	<330	29	7.3 Q	430
Anthracene	300,000,000	5,000,000	3,000,000	<330	<330	<330	180	15	650
Benzo(a)anthracene	3,900	88	17,000	<8.7	<8.7	<8.7	300	110	640
Benzo(a)pyrene	390	9	48,000	<15	<15	<15	290	110	580
Benzo(b)fluoranthene	3,900	88	360,000	<11	<11	<11	270	91	510
Benzo(ghi)perylene	39,000	1,800	6,800,000	NA	NA	NA	150	76	340
Benzo(k)fluoranthene	39,000	880	870,000	<11	<11	<11	270	90	480
Chrysene	390,000	8,800	37,000	<100	<100	<100	330	110	600
Dibenz(a,h)anthracene	390	9	38,000	<20	<20	<20	60	20	92
Fluoranthene	40,000,000	600,000	500,000	<330	<330	<330	670	180	1600
Fluorene	40,000,000	600,000	100,000	<140	<140	<140	63	<4.2	420
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	<29	<29	<29	140	67	310
1-Methylnaphthalene	70,000,000	1,100,000	23,000	NA	NA	NA	8.7 Q	<3.7	130
2-Methylnaphthalene	40,000,000	600,000	20,000	<330	<330	<330	9.2 Q	<3.8	240
Naphthalene	110,000	20,000	400	<330	<330	<330	14 Q	<4.9	**670**
Phenanthrene	390,000	18,000	1,800	<330	<330	<330	740	22	**2,100**
Pyrene	30,000,000	500,000	8,700,000	<180	<180	<180	690	180	1,400
Metals (mg/kg)									
Arsenic	1.6	0.039	--	NA	NA	NA	4.8	3.4	4.6
Barium	--	--	--	NA	NA	NA	220	110	210
Cadmium	510	8	--	NA	NA	NA	0.45	0.45	0.76
Chromium	200	14	--	NA	NA	NA	55	28	37
Lead	500	50	--	NA	NA	NA	16	8.2	71
Mercury	--	--	--	NA	NA	NA	0.1	0.015	0.18
Selenium	--	--	--	NA	NA	NA	<1.2	<0.99	<1.1
Silver	--	--	--	NA	NA	NA	<0.36	<0.29	<0.34

	Value exceeds the DC IND RCL.	µg/kg	Micrograms per kilogram.
	Value exceeds the DC NON-IND RCL.	mg/kg	Milligrams per kilogram.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.	NA	Not analyzed.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.	RCL	Residual Contaminant Level.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.		
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.		
Q	Concentration between limit of detection and limit of quantitation.		
*	SAMPLED FROM FILL SOILS		

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Table 2 Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	GP-2 (6-8') 06/22/06	GP-3 (2-4')* 06/22/06	GP-3 (4-6') 06/22/06	GP-4 (2-4')* 06/22/06	GP-4 (4-6') 06/22/06	GP-4 (6-8') 06/22/06	GP-5 (2-4)* 06/27/06
PAHs (ug/kg)										
Acenaphthene	60,000,000	900,000	38,000	<3.6	9.7 Q	<4	<16	<15	<3.7	<4.0
Acenaphthylene	360,000	18,000	700	<3.5	40	<3.9	<16	<14	<3.6	<3.9
Anthracene	300,000,000	5,000,000	3,000,000	<4.3	67	<4.8	<19	<18	<4.4	<4.8
Benzo(a)anthracene	3,900	88	17,000	<6.5	160	<7.2	<29	<27	<6.6	<7.2
Benzo(a)pyrene	390	9	48,000	<3.5	220	<3.9	<16	<14	<3.6	<3.9
Benzo(b)fluoranthene	3,900	88	360,000	<3.4	240	<3.8	<15	<14	<3.5	<3.8
Benzo(ghi)perylene	39,000	1,800	6,800,000	<4.3	95	<4.8	<19	<18	<4.4	<4.8
Benzo(k)fluoranthene	39,000	880	870,000	<3.7	240	<4.1	<17	<15	<3.8	<4.1
Chrysene	390,000	8,800	37,000	<5.3	200	<5.9	<24	<22	<5.4	<5.9
Dibenz(a,h)anthracene	390	9	38,000	<3.4	30	<3.7	<15	<14	<3.4	<3.7
Fluoranthene	40,000,000	600,000	500,000	<3.5	290	<3.9	<16	<14	<3.6	<3.9
Fluorene	40,000,000	600,000	100,000	<4.2	16 Q	<4.6	<18	<17	<4.2	<4.6
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	<3.1	86	<3.4	<14	<13	<3.1	<3.4
1-Methylnaphthalene	70,000,000	1,100,000	23,000	<3.7	11 Q	<4.1	960	1,100	280	<4.1
2-Methylnaphthalene	40,000,000	600,000	20,000	<3.8	13 Q	<4.2	2,200	2,500	420	<4.2
Naphthalene	110,000	20,000	400	<4.9	51	<5.4	**1,300**	**1,400**	250	<5.4
Phenanthrene	390,000	18,000	1,800	<3.6	190	<4	<16	<15	<3.6	<4.0
Pyrene	30,000,000	500,000	8,700,000	<3	370	<3.3	<13	<12	<3	<3.3
Metals (mg/kg)										
Arsenic	1.6	0.039	--	5.9	2.2 Q	4.3	14	3.8	3.4 Q	4.8
Barium	--	--	--	120	180	120	180	190	130	240
Cadmium	510	8	--	0.53	0.67	0.51	0.47	0.67	0.55	0.34
Chromium	200	14	--	27	29	37	33	40	32	44
Lead	500	50	--	6.2	12	7.4	30	11	6.6	11
Mercury	--	--	--	0.012	0.12	0.016	0.035	0.016	0.012	0.03
Selenium	--	--	--	<0.99	<1.2	<1.1	<1.1	<1	<1	<1.1
Silver	--	--	--	<0.29	<0.34	<0.32	<0.32	<0.3	<0.3	<0.32

	Value exceeds the DC IND RCL.
	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

* SAMPLED FROM FILL SOILS

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Table 2. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	GP-5 (4-6) 06/27/06	GP-6 (2-4')* 06/22/06	GP-6 (4-6') 06/22/06	GP-7 (2-4')* 06/22/06	GP-7 (6-8') 06/22/06	GP-8 (2-4')* 06/22/06	GP-8 (4-6') 06/22/06
PAHs (ug/kg)										
Acenaphthene	60,000,000	900,000	38,000	<3.7	<4.1	<3.9	97 Q	<3.6	<4.2	<3.9
Acenaphthylene	360,000	18,000	700	<3.6	<4	<3.8	200	<3.5	<4	<3.8
Anthracene	300,000,000	5,000,000	3,000,000	<4.5	<4.9	6.2 Q	310	<4.4	<5	<4.6
Benzo(a)anthracene	3,900	88	17,000	<6.6	<7.3	16 Q	660	<6.5	22 Q	<6.9
Benzo(a)pyrene	390	9	48,000	<3.6	<3.9	17	1,500	<3.5	21	<3.7
Benzo(b)fluoranthene	3,900	88	360,000	<3.5	<3.9	16	1,400	<3.4	16	<3.7
Benzo(ghi)perylene	39,000	1,800	6,800,000	<4.5	<4.9	8.4 Q	1,100	<4.4	11 Q	<4.6
Benzo(k)fluoranthene	39,000	880	870,000	<3.8	<4.2	17	1,300	<3.8	15	<4
Chrysene	390,000	8,800	37,000	<5.5	<6	19 Q	1,600	<5.4	25	<5.7
Dibenz(a,h)anthracene	390	9	38,000	<3.5	<3.8	<3.6	230	<3.4	<3.9	<3.6
Fluoranthene	40,000,000	600,000	500,000	<3.6	<4	30	3,500	<3.5	29	<3.8
Fluorene	40,000,000	600,000	100,000	<4.3	<4.7	<4.5	240	<4.2	<4.8	<4.5
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	<3.2	<3.5	7.6 Q	830	<3.1	9.0 Q	<3.3
1-Methylnaphthalene	70,000,000	1,100,000	23,000	<3.8	<4.2	<4	300	<3.7	<4.2	<3.9
2-Methylnaphthalene	40,000,000	600,000	20,000	<3.9	4.7 Q	<4.1	180	<3.8	<4.4	<4.1
Naphthalene	110,000	20,000	400	<5.0	<5.5	16 Q	270	<4.9	<5.6	<5.2
Phenanthrene	390,000	18,000	1,800	<3.7	<4.1	12 Q	**4,500**	<3.6	8.8 Q	<3.8
Pyrene	30,000,000	500,000	8,700,000	<3.1	<3.4	29	4,600	<3	42	<3.2
Metals (mg/kg)										
Arsenic	1.6	0.039	--	3.6	6	3.2 Q	1.26	2.8 Q	5.8	2.6 Q
Barium	--	--	--	140	230	150	340	110	290	66
Cadmium	510	8	--	0.55	0.62	0.45	1.6	0.48	0.7	0.45
Chromium	200	14	--	30	44	36	32	33	60	32
Lead	500	50	--	8.5	10	7.8	330	8.2	14	5.9
Mercury	--	--	--	0.015	0.028	0.014	0.51	0.012	0.062	0.021
Selenium	--	--	--	<1.0	<1.1	<1.1	1.3 Q	<0.99	<1.1	<1.1
Silver	--	--	--	<0.30	<0.33	<0.32	<0.35	<0.29	<0.33	<0.31

	Value exceeds the DC IND RCL.
	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.
*	SAMPLED FROM FILL SOILS

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

ARCADIS

Table 2. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID				GP-9 (2-4')*	GP-9 (4-6')*	GP-10 (2-4')	GP-10 (4-6')	GP-11 (2-4')*	GP-11 (4-6')
Sample Date	**DC IND**	**DC NON-IND**	**GW Pathway**	**06/22/06**	**06/22/06**	**06/22/06**	**06/22/06**	**06/22/06**	**06/22/06**
PAHs (ug/kg)									
Acenaphthene	60,000,000	900,000	38,000	7.3 Q	<3.8	<3.7	<3.6	<3.8	<3.6
Acenaphthylene	360,000	18,000	700	80	<3.7	<3.6	<3.5	14	<3.5
Anthracene	300,000,000	5,000,000	3,000,000	84	6.2 Q	<4.4	<4.3	18	<4.4
Benzo(a)anthracene	3,900	88	17,000	270	19 Q	7.0 Q	<6.4	67	<6.5
Benzo(a)pyrene	390	9	48,000	310	16	7.4 Q	<3.5	80	<3.5
Benzo(b)fluoranthene	3,900	88	360,000	270	16	7.4 Q	<3.4	68	<3.4
Benzo(ghi)perylene	39,000	1,800	6,800,000	230	16	6.0 Q	<4.3	54	<4.4
Benzo(k)fluoranthene	39,000	880	870,000	310	19	6.7 Q	<3.7	69	<3.7
Chrysene	390,000	8,800	37,000	310	17 Q	7.5 Q	<5.3	87	<5.3
Dibenz(a,h)anthracene	390	9	38,000	70	13	<3.4	<3.3	15	<3.4
Fluoranthene	40,000,000	600,000	500,000	470	14	9.2 Q	<3.5	130	<3.5
Fluorene	40,000,000	600,000	100,000	10 Q	<4.4	<4.2	<4.1	4.8 Q	<4.2
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	180	15	5.1 Q	<3	49	<3.1
1-Methylnaphthalene	70,000,000	1,100,000	23,000	8.1 Q	<3.9	<3.7	<3.7	7.1 Q	<3.7
2-Methylnaphthalene	40,000,000	600,000	20,000	10 Q	<4	<3.9	<3.8	5.9 Q	<3.8
Naphthalene	110,000	20,000	400	14 Q	<5.2	<5	<4.9	11 Q	<4.9
Phenanthrene	390,000	18,000	1,800	200	7.5 Q	4.9 Q	<3.6	98	<3.6
Pyrene	30,000,000	500,000	8,700,000	540	15	11	<3	170	3.1 Q
Metals (mg/kg)									
Arsenic	1.6	0.039	--	21	4.6	4.1	3.6	4.1	3.8
Barium	--	--	--	430	200	200	90	160	150
Cadmium	510	8	--	1.3	0.76	0.52	0.57	0.78	0.57
Chromium	200	14	--	42	42	48	34	38	30
Lead	500	50	--	440	12	11	6.7	54	5.9
Mercury	--	--	--	0.27	0.026	0.039	0.016	0.2	0.013
Selenium	--	--	--	2.3 Q	<1	<1	<0.98	<1	<0.99
Silver	--	--	--	0.69 Q	<0.31	<0.3	<0.29	<0.31	<0.29

	Value exceeds the DC IND RCL.
	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.
*	SAMPLED FROM FILL NOT SOILS

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

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Table 2. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	GP-12 (4-6') 06/22/06	GP-12 (6-8') 06/22/06	GP-13 (2-4')* 06/22/06	GP-13 (4-6') 06/22/06	GP-14 (2-4') 06/22/06	GP-14 (4-6') 06/22/06
PAHs (ug/kg)									
Acenaphthene	60,000,000	900,000	38,000	11 Q	<3.7	39	<3.5	<3.9	<3.6
Acenaphthylene	360,000	18,000	700	<4.5	<3.6	13	<3.4	<3.8	<3.5
Anthracene	300,000,000	5,000,000	3,000,000	12 Q	<4.4	110	<4.2	10 Q	<4.3
Benzo(a)anthracene	3,900	88	17,000	16 Q	<6.5	180	<6.3	34	<6.4
Benzo(a)pyrene	390	9	48,000	13 Q	<3.5	170	<3.4	42	<3.5
Benzo(b)fluoranthene	3,900	88	360,000	19	<3.5	150	<3.3	42	<3.4
Benzo(ghi)perylene	39,000	1,800	6,800,000	<5.5	<4.4	70	<4.2	34	<4.3
Benzo(k)fluoranthene	39,000	880	870,000	17	<3.8	160	<3.6	43	<3.7
Chrysene	390,000	8,800	37,000	23	<5.4	190	<5.2	53	<5.3
Dibenz(a,h)anthracene	390	9	38,000	<4.3	<3.4	32	<3.3	8.0 Q	<3.3
Fluoranthene	40,000,000	600,000	500,000	32	<3.6	360	<3.4	59	<3.5
Fluorene	40,000,000	600,000	100,000	9.1 Q	<4.2	46	<4	<4.5	<4.1
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	71	<3.1	73	<3	28	<3
1-Methylnaphthalene	70,000,000	1,100,000	23,000	11 Q	6.7 Q	28	<3.6	14	<3.6
2-Methylnaphthalene	40,000,000	600,000	20,000	13 Q	16	50	<3.7	18	<3.8
Naphthalene	110,000	20,000	400	18 Q	12 Q	47	<4.7	14 Q	<4.8
Phenanthrene	390,000	18,000	1,800	62	<3.6	380	<3.5	33	<3.6
Pyrene	30,000,000	500,000	8,700,000	80	<3	340	<2.9	67	<3
Metals (mg/kg)									
Arsenic	1.6	0.039	--	2.9 Q	3.9	25	3.1 Q	3.7	3.1
Barium	--	--	--	150	110	730	48	130	110
Cadmium	510	8	--	1.1	0.63	1.7	0.52	0.49	0.48
Chromium	200	14	--	13	32	75	27	26	29
Lead	500	50	--	120	6.7	980	5.8	17	5.9
Mercury	--	--	--	1.7	0.0089	4	0.012	0.027	0.014
Selenium	--	--	--	<1.3	<1	1.7 Q	<0.96	<1.1 N	<0.98
Silver	--	--	--	0.99 Q	<0.3	0.76 Q	<0.28	<0.32	<0.29

	Value exceeds the DC IND RCL.
	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

* SAMPLED FROM FILL SOILS

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Table 3. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	GP-15 (2-4')* 06/22/06	GP-15 (4-6') 06/22/06	GP-16 (2-4')* 07/27/06	GP-16 (4-6') 07/27/06	AGM-MW-1 (0-2)* 06/27/06
PAHs (ug/kg)								
Acenaphthene	60,000,000	900,000	38,000	26 Q	<3.6	<3.7	<4.0	24
Acenaphthylene	360,000	18,000	700	17 Q	<3.5	<3.6	<3.9	28
Anthracene	300,000,000	5,000,000	3,000,000	74	<4.3	<4.5	<4.8	60
Benzo(a)anthracene	3,900	88	17,000	370	<6.4	11	<7.2	160
Benzo(a)pyrene	390	9	48,000	510	6.1 Q	10	<3.9	240
Benzo(b)fluoranthene	3,900	88	360,000	490	5.4 Q	9.5	<3.8	230
Benzo(ghi)perylene	39,000	1,800	6,800,000	370	5.7 Q	<4.5	<4.8	160
Benzo(k)fluoranthene	39,000	880	870,000	410	6.5 Q	9.6	<4.1	210
Chrysene	390,000	8,800	37,000	490	6.9 Q	12	<5.9	250
Dibenz(a,h)anthracene	390	9	38,000	110	<3.3	17	<3.7	45
Fluoranthene	40,000,000	600,000	500,000	1200	14	22	<3.9	560
Fluorene	40,000,000	600,000	100,000	30 Q	<4.1	<4.3	<4.6	43
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	320	4.0 Q	18	<3.4	140
1-Methylnaphthalene	70,000,000	1,100,000	23,000	28 Q	<3.7	<3.8	<4.1	29
2-Methylnaphthalene	40,000,000	600,000	20,000	34 Q	<3.8	<3.9	<4.2	33
Naphthalene	110,000	20,000	400	30 Q	<4.9	<5.1	<5.4	46
Phenanthrene	390,000	18,000	1,800	590	6.3 Q	11	<4.0	420
Pyrene	30,000,000	500,000	8,700,000	1100	14	20	<3.3	730
Metals (mg/kg)								
Arsenic	1.6	0.039	--	2.7 Q	7.1	NA	NA	9.2
Barium	--	--	--	50	81	NA	NA	270
Cadmium	510	8	--	0.4	0.47	NA	NA	4.3
Chromium	200	14	--	12	26	NA	NA	14
Lead	500	50	--	35	6.4	NA	NA	450
Mercury	--	--	--	0.026	0.015	NA	NA	0.48
Selenium	--	--	--	<0.86	<0.98	NA	NA	1.1 Q
Silver	--	--	--	<0.25	<0.29	NA	NA	<0.30

	Value exceeds the DC IND RCL.
	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

* SAMPLED FROM FILL SOILS

Table 3. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	AGM-MW-1 (4-6) 06/27/06	AGM-MW-2 (0-2)* 06/27/06	AGM-MW-2 (2-4) 06/27/06
PAHs (ug/kg)						
Acenaphthene	60,000,000	900,000	38,000	<3.9	<3.1	<3.6
Acenaphthylene	360,000	18,000	700	<3.8	<3.0	<3.5
Anthracene	300,000,000	5,000,000	3,000,000	<4.7	<3.7	<4.4
Benzo(a)anthracene	3,900	88	17,000	<7.0	<5.5	<6.5
Benzo(a)pyrene	390	9	48,000	<3.8	4.9 Q	<3.5
Benzo(b)fluoranthene	3,900	88	360,000	<3.7	3.2 Q	<3.4
Benzo(ghi)perylene	39,000	1,800	6,800,000	<4.7	3.8 Q	<4.4
Benzo(k)fluoranthene	39,000	880	870,000	<4.0	<3.2	<3.7
Chrysene	390,000	8,800	37,000	<5.8	6.0 Q	<5.3
Dibenz(a,h)anthracene	390	9	38,000	<3.6	<2.8	<3.4
Fluoranthene	40,000,000	600,000	500,000	<3.8	3.9 Q	<3.5
Fluorene	40,000,000	600,000	100,000	<4.5	<3.5	<4.2
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	<3.3	<2.6	<3.1
1-Methylnaphthalene	70,000,000	1,100,000	23,000	<4.0	<3.1	<3.7
2-Methylnaphthalene	40,000,000	600,000	20,000	<4.1	<3.2	<3.8
Naphthalene	110,000	20,000	400	<5.3	<4.1	<4.9
Phenanthrene	390,000	18,000	1,800	<3.9	4.9 Q	<3.6
Pyrene	30,000,000	500,000	8,700,000	<3.2	5.9 Q	<3.0
Metals (mg/kg)						
Arsenic	1.6	0.039	--	5.1	<0.87	4.1
Barium	--	--	--	140	1.9	140
Cadmium	510	8	--	0.42	<0.052	0.32
Chromium	200	14	--	37	1.8	32
Lead	500	50	--	11	1.0 Q	8.1
Mercury	--	--	--	0.034	<0.0016	0.018
Selenium	--	--	--	<1.1	<0.84	<0.99
Silver	--	--	--	<0.32	<0.25	<0.29

	Value exceeds the DC IND RCL.
	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.
*	SAMPLED FROM FILL SOILS

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

ARCADIS

Table 2. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	GP-15 (2-4') 06/22/06	GP-15 (4-6') 06/22/06	GP-16 (2-4') 07/27/06	GP-16 (4-6') 07/27/06	AGM-MW-1 (0-2)* 06/27/06
PAHs (ug/kg)								
Acenaphthene	60,000,000	900,000	38,000	26 Q	<3.6	<3.7	<4.0	24
Acenaphthylene	360,000	18,000	700	17 Q	<3.5	<3.6	<3.9	28
Anthracene	300,000,000	5,000,000	3,000,000	74	<4.3	<4.5	<4.8	60
Benzo(a)anthracene	3,900	88	17,000	370	<6.4	11	<7.2	160
Benzo(a)pyrene	390	9	48,000	510	6.1 Q	10	<3.9	240
Benzo(b)fluoranthene	3,900	88	360,000	490	5.4 Q	9.5	<3.8	230
Benzo(ghi)perylene	39,000	1,800	6,800,000	370	5.7 Q	<4.5	<4.8	160
Benzo(k)fluoranthene	39,000	880	870,000	410	6.5 Q	9.6	<4.1	210
Chrysene	390,000	8,800	37,000	490	6.9 Q	12	<5.9	250
Dibenz(a,h)anthracene	390	9	38,000	110	<3.3	17	<3.7	45
Fluoranthene	40,000,000	600,000	500,000	1200	14	22	<3.9	560
Fluorene	40,000,000	600,000	100,000	30 Q	<4.1	<4.3	<4.6	43
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	320	4.0 Q	18	<3.4	140
1-Methylnaphthalene	70,000,000	1,100,000	23,000	28 Q	<3.7	<3.8	<4.1	29
2-Methylnaphthalene	40,000,000	600,000	20,000	34 Q	<3.8	<3.9	<4.2	33
Naphthalene	110,000	20,000	400	30 Q	<4.9	<5.1	<5.4	46
Phenanthrene	390,000	18,000	1,800	590	6.3 Q	11	<4.0	420
Pyrene	30,000,000	500,000	8,700,000	1100	14	20	<3.3	730
Metals (mg/kg)								
Arsenic	1.6	0.039	--	27 Q	7.1	NA	NA	9.2
Barium	--	--	--	50	81	NA	NA	270
Cadmium	510	8	--	0.4	0.47	NA	NA	4.3
Chromium	200	14	--	12	26	NA	NA	14
Lead	500	50	--	35	6.4	NA	NA	450
Mercury	--	--	--	0.026	0.015	NA	NA	0.48
Selenium	--	--	--	<0.86	<0.98	NA	NA	1.1 Q
Silver	--	--	--	<0.25	<0.29	NA	NA	<0.30

	Value exceeds the DC IND RCL.	µg/kg	Micrograms per kilogram.
	Value exceeds the DC NON-IND RCL.	mg/kg	Milligrams per kilogram.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.	NA	Not analyzed.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.	RCL	Residual Contaminant Level.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.		
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.		
Q	Concentration between limit of detection and limit of quantitation.		
*	SAMPLED FROM FILL SOILS		

Table 2. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	AGM-MW-1 (4-6)* 06/27/06	AGM-MW-2 (0-2)* 06/27/06	AGM-MW-2 (2-4)* 06/27/06
PAHs (ug/kg)						
Acenaphthene	60,000,000	900,000	38,000	<3.9	<3.1	<3.6
Acenaphthylene	360,000	18,000	700	<3.8	<3.0	<3.5
Anthracene	300,000,000	5,000,000	3,000,000	<4.7	<3.7	<4.4
Benzo(a)anthracene	3,900	88	17,000	<7.0	<5.5	<6.5
Benzo(a)pyrene	390	9	48,000	<3.8	4.9 Q	<3.5
Benzo(b)fluoranthene	3,900	88	360,000	<3.7	3.2 Q	<3.4
Benzo(ghi)perylene	39,000	1,800	6,800,000	<4.7	3.8 Q	<4.4
Benzo(k)fluoranthene	39,000	880	870,000	<4.0	<3.2	<3.7
Chrysene	390,000	8,800	37,000	<5.8	6.0 Q	<5.3
Dibenz(a,h)anthracene	390	9	38,000	<3.6	<2.8	<3.4
Fluoranthene	40,000,000	600,000	500,000	<3.8	3.9 Q	<3.5
Fluorene	40,000,000	600,000	100,000	<4.5	<3.5	<4.2
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	<3.3	<2.6	<3.1
1-Methylnaphthalene	70,000,000	1,100,000	23,000	<4.0	<3.1	<3.7
2-Methylnaphthalene	40,000,000	600,000	20,000	<4.1	<3.2	<3.8
Naphthalene	110,000	20,000	400	<5.3	<4.1	<4.9
Phenanthrene	390,000	18,000	1,800	<3.9	4.9 Q	<3.6
Pyrene	30,000,000	500,000	8,700,000	<3.2	5.9 Q	<3.0
Metals (mg/kg)						
Arsenic	1.6	0.039	--	5.1	<0.87	4.1
Barium	--	--	--	140	1.9	140
Cadmium	510	8	--	0.42	<0.052	0.32
Chromium	200	14	--	37	1.8	32
Lead	500	50	--	11	1.0 Q	8.1
Mercury	--	--	--	0.034	<0.0016	0.018
Selenium	--	--	--	<1.1	<0.84	<0.99
Silver	--	--	--	<0.32	<0.25	<0.29

(shaded)	Value exceeds the DC IND RCL.
(outlined)	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.
*	SAMPLED FROM FILL SOILS

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

Table 2. Summary of PAH and Metal Soil Analytical Results and Comparison to Applicable WDNR Soil Criteria, Manowske Welding Property, Fond du Lac, Wisconsin.

Sample ID Sample Date	DC IND	DC NON-IND	GW Pathway	AGM-MW-4 (2-4)[a] 06/27/06	AGM-MW-4 (4-6) 06/27/06	EX-M-1 09/20/06	EX-M-2 09/20/06
PAHs (ug/kg)							
Acenaphthene	60,000,000	900,000	38,000	<3.6	<3.6	<4.3	< 4.1
Acenaphthylene	360,000	18,000	700	<3.5	<3.5	9.4	< 4.0
Anthracene	300,000,000	5,000,000	3,000,000	<4.3	<4.3	18	< 4.9
Benzo(a)anthracene	3,900	88	17,000	<6.4	<6.5	60	< 7.3
Benzo(a)pyrene	390	9	48,000	<3.5	<3.5	78	4.1
Benzo(b)fluoranthene	3,900	88	360,000	<3.4	<3.4	71	< 3.9
Benzo(ghi)perylene	39,000	1,800	6,800,000	<4.3	<4.3	61	< 4.9
Benzo(k)fluoranthene	39,000	880	870,000	<3.7	<3.7	88	< 4.2
Chrysene	390,000	8,800	37,000	<5.3	<5.3	77	< 6.0
Dibenz(a,h)anthracene	390	9	38,000	<3.3	<3.4	15	< 3.8
Fluoranthene	40,000,000	600,000	500,000	<3.5	<3.5	110	9.0
Fluorene	40,000,000	600,000	100,000	<4.1	<4.2	7.1	< 4.7
Indeno(1,2,3-cd)pyrene	3,900	88	680,000	<3.0	<3.1	54	< 3.5
1-Methylnaphthalene	70,000,000	1,100,000	23,000	150	<3.7	20	7.8
2-Methylnaphthalene	40,000,000	600,000	20,000	330	<3.8	26	15
Naphthalene	110,000	20,000	400	<4.8	<4.9	48	8.4
Phenanthrene	390,000	18,000	1,800	<3.6	<3.6	89	12
Pyrene	30,000,000	500,000	8,700,000	<3.0	<3.0	110	7.6
Metals (mg/kg)							
Arsenic	1.6	0.039	--	2.4 Q	1.5 Q	5.6	2.8
Barium	--	--	--	120	97	390	190
Cadmium	510	8	--	0.33	0.42	0.91	0.37
Chromium	200	14	--	27	25	14	34
Lead	500	50	--	7.9	6.9	230	18
Mercury	--	--	--	0.015	0.013	0.12	0.065
Selenium	--	--	--	<0.98	<0.99	<1.2	<1.1
Silver	--	--	--	<0.29	<0.29	<0.35	<0.33

	Value exceeds the DC IND RCL.
	Value exceeds the DC NON-IND RCL.
Bold	Value exceeds the Groundwater (GW) Pathway RCL.
DC IND	WDNR proposed and NR 720 industrial direct contact RCLs.
DC NON-IND	WDNR proposed and NR 720 non-industrial direct contact RCLs.
GW Pathway	WDNR proposed and NR 720 groundwater pathway RCLs.
Q	Concentration between limit of detection and limit of quantitation.

µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
RCL	Residual Contaminant Level.

a SAMPLED FROM FILL SOILS

ARCADIS

Table 3 Summary of Monitoring Well Groundwater Analytical Results, Manowske Welding Property, Fond du Lac, Wisconsin.

Well ID Sample Date	PAL	ES	AGM-MW-1 8/22/2006	AGM-MW-2 8/22/2006	AGM-MW-3 8/22/2006
PAHs (µg/L)					
1-Methylnaphthalene	NE	NE	0.034 Q	0.043	0.013 Q
2-Methylnaphthalene	NE	NE	0.058	0.06	0.028 Q
Acenaphthene	NE	NE	0.013 Q	0.023 Q	0.010 Q
Acenaphthylene	NE	NE	<0.0087	<0.0086	0.011 Q
Anthracene	600	3,000	0.012 Q	<0.012	0.052
Benzo(a)anthracene	NE	NE	0.046 Q	<0.017	0.34
Benzo(a)pyrene	0.02	0.2	0.072	<0.019	0.49
Benzo(b)fluoranthene	0.02	0.2	0.079	<0.017	0.49
Benzo(g,h,i)perylene	NE	NE	0.064 Q	<0.02	0.41
Benzo(k)fluoranthene	NE	NE	0.066 Q	<0.02	0.41
Chrysene	0.02	0.2	0.072	<0.02	0.45
Dibenz(a,h)anthracene	NE	NE	<0.02	<0.02	0.094
Fluoranthene	80	400	0.18	<0.016	1.2 D
Fluorene	80	400	<0.0097	<0.0096	0.021 Q
Indeno(1,2,3-cd)pyrene	NE	NE	0.050 Q	<0.02	0.33
Naphthalene	8	40	0.14 B	0.29 B	0.046 B
Phenanthrene	NE	NE	0.088	<0.012	0.59 D
Pyrene	50	250	0.14	<0.015	0.93 D

Concentration exceeds the WDNR NR 140 Preventive Action Limit.
Concentration exceeds the WDNR NR 140 Enforcement Standard.

B Concentration between limit of detection and the reporting limit.
D Concentration from diluted analysis.
µg/L Micrograms per liter.
NA Not analyzed.
NE Not established.
PAH Polynuclear Aromatic Hydrocarbons.
Q Concentration between limit of detection and limit of quantitation.

TABLE 4
GROUNDWATER ANALYTICAL RESULTS
MANOWSKE WELDING
FOND DU LAC, WISCONSIN
STS PROJECT NO. 200704507

Parameters	NR 140 Standards ES	NR 140 Standards PAL	MW-MW-5 11/13/07	MW-MW-5 4/8/08
VOCs (µg/L)				
Benzene	**5.0**	0.5	<0.47	<0.24
1,2-Dichloroethane	**5.0**	0.5	<0.45	<0.41
1,1-Dichloroethane	**850**	85	21.6	17.6
Ethylbenzene	**700**	140	<0.38	<0.35
1,1,1-Trichloroethane	**200**	40	<0.5	0.41 "J"
1,2,4-Trimethylbenzene[1]	**480**	96	<1.2	<0.51
1,3,5-Trimethylbenzene[1]	**480**	96	<0.37	<0.23
Xylenes, -m & -p[2]	**10,000**	1000	<0.67	<1.0
PAHs (µg/L)				
Benzo(a)anthracene	--	--	<0.015	<0.017
Benzo(a)pyrene	**0.2**	0.02	<0.015	<0.016
Benzo(b)fluoranthene	**0.2**	0.02	<0.014	<0.01
Benzo(ghi)perylene	--	--	<0.015	<0.02
Benzo(k)fluoranthene	--	--	<0.023	<0.023
Chrysene	**0.2**	0.02	<0.016	<0.02
Dibenzo(a,h,)anthracene	--	--	<0.015	<0.012
Fluroanthene	**400**	80	<0.015	<0.016
Indeno(1,2,3-cd)pyrene	--	--	<0.014	<0.013
Naphthalene	**100**	*10*	<0.015	<0.015
Phenanthrene	--	--	<0.017	<0.017
Pyrene	**250**	50	<0.015	<0.016

Notes:
VOCs = Volatile Organic Compounds
PAHs = Polynuclear Aromatic Hydrocarbons
[1] Standards are for 1,2,4- and 1,3,5-Trimethylbenzene combined.
[2] Standards are for Total Xylenes (-m, -p and -o).
Bold value = NR 140 Enforcement Standard Exceedance
Underline value = NR 140 WAC Preventive Action Limit Exceedance
-- No NR 140 ES or PAL established.

TABLE 5
FIELD DATA - GROUNDWATER
HOLY FAMILY / MANOWSKE
STS PROJECT NO. 200704507

Well I.D.	Date	Ground Surface Elevation (Feet)	TPVC Elevation (Feet)	Screen Interval (Feet bgs)	Screen Interval Elevation (Feet)	Depth to Water below TPVC (Feet)	Groundwater Elevation (Feet)	Temp (C)	pH (Units)	Conductivity (umhos/cm)
MM-MW-5	11/13/07	750.45	750.13	5-15	745.45-735.45	7.65	742.48	14.1	7.43	1715
						6.25	743.88	--	--	--
HF-MW-1	11/13/07	749.20	748.81	5-15	744.2-734.20	7.99	740.82	15.4	6.82	--
	4/8/08					4.41	744.40	--	--	--
	8/1/08					4.61	744.20	19.4	7.06	2000
HF-MW-2	11/13/07	748.80	748.45	5-15	743.80-733.80	5.12	743.33	14.9	7.16	2770
	4/8/08					3.74	744.71	--	--	--
	8/1/08					7.00	741.45	--	7.14	3.81
HF-MW-3	11/13/07	749.32	748.94	5-15	744.32-734.32	4.39	744.55	14.6	7.39	1795
	4/8/08					3.90	745.04	--	--	--
	8/1/08					3.68	745.26	--	7.34	1763
HF-MW-4	11/13/07	749.38	748.98	5-15	744.38-733.88	4.67	744.31	14.7	7.19	2110
	4/8/08					4.20	744.78	--	--	--
	8/1/08					4.05	744.93	--	7.06	2.51
HF-MW-5	11/14/07	748.59	748.42	5-15	743.59-733.59	14.15	734.27	12.8	7.22	3.40 m/s
	4/8/08					3.70	744.72	--	--	--
	8/1/08					2.24	746.18	--	7.97	4.97
GP-28	11/14/07	--	--	--	--	10.74	--	--	--	--
GP-29	11/14/07	--	--	--	--	7.41	--	--	--	--
GP-30	11/14/07	--	--	--	--	6.30	--	--	--	--

Notes:
-- = Not Sampled