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

GIS REGISTRY (Cover Sheet)

Form 4400-280 (R 7/12)

Source Property Information

CLOSURE DATE: Nov 19, 2012

BRRTS #: **02-36-000620** (No Dashes)

FID #: 436035050

ACTIVITY NAME: Mirro Co Plt #10

DATCP #:

PROPERTY ADDRESS: 1616 Wollmer St

PECFA#:

MUNICIPALITY: Manitowoc

PARCEL ID #: 052-000-144-000.00

***WTM COORDINATES:**

X: **706487** Y: **405135**

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

WTM COORDINATES REPRESENT:

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

Please check as appropriate: (BRRTS Action Code)

Contaminated Media:

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

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

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

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

Continuing Obligations:

- [ ] 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)*

Note: *Comments will not print out.*

Monitoring Wells:

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

( ) Yes (●) No ( ) N/A

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

PLEASE ASSEMBLE IN THIS ORDER

GIS Registry Checklist

Form 4400-245 (R 8/11)

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

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

BRRTS #: 02-36-000620 *(No Dashes)* PARCEL ID #: 052-000-144-000.00

ACTIVITY NAME: Mirro CO PLT #10 WTM COORDINATES: X: 706487 Y: 405135

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

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

SOURCE LEGAL DOCUMENTS

- [x] **Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
  Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*
- [ ] **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map *for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map.* (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

  Figure #: **Title:**
- [x] **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

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

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

- [x] **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.
  Note: *Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.*

  Figure #: 1 **Title: Site Location**
- [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 #: Figure 2&3 **Title: Sampling & Monitoring Locations, Former Naphtha Sump Site**
- [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 #: 5 **Title: Estimated Extent of Residual VOC Compounds in Soil**

BRRTS #: 02-36-000620 ACTIVITY NAME: Mirro CO PLT #10

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 #: 6 **Title: A-A' Cross Section**

Figure #: 7 **Title: B-B' Cross Section**

☒ **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 #: F9 **Title: PAL and ES Exceedance Area**

☒ **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 #: 11 **Title: June 2007 Groundwater Elevation Contours - Shallow Wells**

Figure #: 12 **Title: March 2009 Groundwater Elevation Contours - Shallow Wells**

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, 1a **Title: Hydraulic Probe Soil Analytical Results, Soil Analytical Results**

☒ **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 #: 2, 3 **Title: Groundwater Analytical Results, Summary of Historical Groundwater 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 #: 4 **Title: Depth to Groundwater Measurements**

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 #: 2a **Title: Missing Well Locations**

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

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

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

BRRTS #: 02-36-000620 ACTIVITY NAME: Mirro CO PLT #10

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: 1

☒ **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.*

☐ **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map *for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map.* (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

Figure #: **Title:**

☒ **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: 2

State of Wisconsin
Department of Natural Resources
http://dnr.wi.gov

Impacted Off-Source Property Information

Form 4400-246 (R 3/08)

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

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

BRRTS #: 02-36-000620

ACTIVITY NAME: MIRRO CO PLT #10

ID	Off-Source Property Address	Parcel Number	WTM X	WTM Y
A	S 16th St	05281940303000	706480	405150
B	500 S 16th St	05281940302000	706550	405178
C				
D				
E				
F				
G				
H				
I				

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

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

November 19, 2012

sent via email on 11/20/12 to Kristin.jones@newellco.com

Kristin Jones
Senior Environmental and Regulatory Counsel
Newell Rubbermaid Inc.
3 Glenlake Parkway
Atlanta, GA 30328

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Former Mirro #10, 1616 Wollmer Street, Manitowoc, Wisconsin
WDNR BRRTS Activity #: 02-36-000620

Dear Ms. Jones:

The Department of Natural Resources (DNR) considers the former Mirro #10 site closed, with continuing obligations. No further investigation or remediation is required at this time. However, you and future property owners must comply with the continuing obligations as explained in the conditions of closure in this letter. The property owner, BFM, LLC is receiving a copy of this letter. Please read over this letter closely to ensure that interested parties comply with all conditions and other on-going requirements. Provide this letter and any attached maintenance plan to anyone who purchases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under ch. NR 726, Wisconsin Administrative Code. The Northeast Region Closure Committee reviewed the request for closure on September 24, 2012. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. A conditional closure letter was issued by the DNR on September 26, 2012. On November 13, 2012, the Department received the following documents confirming that the conditions for finalizing closure have been met:

- A check in the amount of $200 for entering the site on the DNR's Soil GIS registry
- Abandonment forms for the following monitoring wells.

EW-1	MW-3	MW-4	MW-5	MW-11	PZ-11
MW-12	PZ-12	MW-14	PZ-14	MW-16	MW-17
MW-21	MW-22	MW-23	MW-24	MW-25	

The site was operated by Mirro Company and Newell Rubbermaid from 1914 to 2003 for the manufacturing of aluminum, stainless steel, and steel cookware and bake ware. In addition from 1940 to 1953, battery casings, shell casings, and link belts were manufactured for the US Navy. In 2003, the property was sold to BFM LLC, however Newell Rubbermaid retained environmental liability for the naphtha parts washing area (BBRTS 02-36-506563, closed 10/30/06) and the chlorinated solvent

contamination. The current property owner, BFM LLC, leases the facility to Manitowoc Composites LLC., who manufactures Spouting, Plastics and, Glass Fiber Reinforced products. The Property is zoned industrial. This letter pertains to the chlorinated solvent contamination located primarily between the former Mirro plant building and northwest toward the Manitowoc River. The conditions of closure and continuing obligations required were based on the property being used for Industrial purposes.

Continuing Obligations

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

1. Groundwater contamination is present above ch. NR 140, Wis. Adm. Code enforcement standards.
2. Residual soil contamination exists that must be properly managed should it be excavated or removed.
3. One monitoring wells and eight electrode wells were not located and must be properly filled and sealed if found.
4. Remaining soil contamination could result in vapor intrusion if future construction activities occur. If new building construction is planned, vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that conditions are protective of the new use.

GIS Registry

This site will be listed on the Remediation and Redevelopment (R&R) Program's internet accessible Geographic Information System (GIS) Registry, to provide notice of residual contamination and of any continuing obligations. DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at http://dnr.wi.gov/topic/wells/documents/3300254.pdf or at the web address listed below for the GIS Registry.

All site information is also on file at the Northeast Regional DNR office, at 2984 Shawano Avenue in Green Bay. This letter and information that was submitted with your closure request application, 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://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2.

Closure Conditions

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

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

Groundwater contamination greater than enforcement standards (ES) is present both on this contaminated property and off this contaminated property, as shown on the **attached Figure 9** (solid

line showing ES exceedance area). Affected property owners were notified of the presence of groundwater contamination. If the current property owner intends to construct a new well, or reconstruct an existing well, he or she will need prior DNR approval.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)

Soil contamination remains as indicated on the **attached Figure 5** (boring locations SB-6, SB-9, SB-10, SB-14, SB-15, SB-19, SB-21, SB-23, PZ-11). If soil in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner 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.

Monitoring Wells that could not be Properly Filled and Sealed (ch. NR 141, Wis. Adm. Code)

Monitoring well MW-15 and eight (8) missing electrode wells located as shown on **attached Figure 2a**, could not be properly filled and sealed because they were missing due to site re-grading and other redevelopment activities. The consultant made a reasonable effort to locate the wells and to determine whether they were properly filled and sealed, but was unsuccessful. The property owner may be held liable for any problems associated with the monitoring wells if they create a conduit for contaminants to enter groundwater. If the monitoring well or any of the electrode wells are found, the then current owner of the property on which the well is located is required to notify the DNR, to properly fill and seal the well and submit the required documentation to the DNR.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats.)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. If installed, vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Chlorinated solvents remain in soil and groundwater within the areas identified on the **attached Figures 5 and 9**, at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. Currently the building and property is used for industrial purposes. Therefore, before a building is expanded or constructed, the property owner must notify the DNR. Vapor mitigation technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR concurs that conditions at the property are protective of the new use.

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

Please send written notifications in accordance with the above requirements to the DNR's R&R office at 2984 Shawano Avenue, Green Bay Wisconsin, to the attention of the Regional Environmental Program Associate.

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

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact Annette Weissbach at 920-662-5165 or email at annette.weissbach@wisconsin.gov.

Sincerely,

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

Attachments (all prepared by SEH, Project NERUB070100):

- Figure 9 remaining groundwater contamination map, dated 8/7/12
- Figure 5 remaining soil contamination map, dated 7/19/11
- Figure 2a missing monitoring well location map, dated 8/7/12

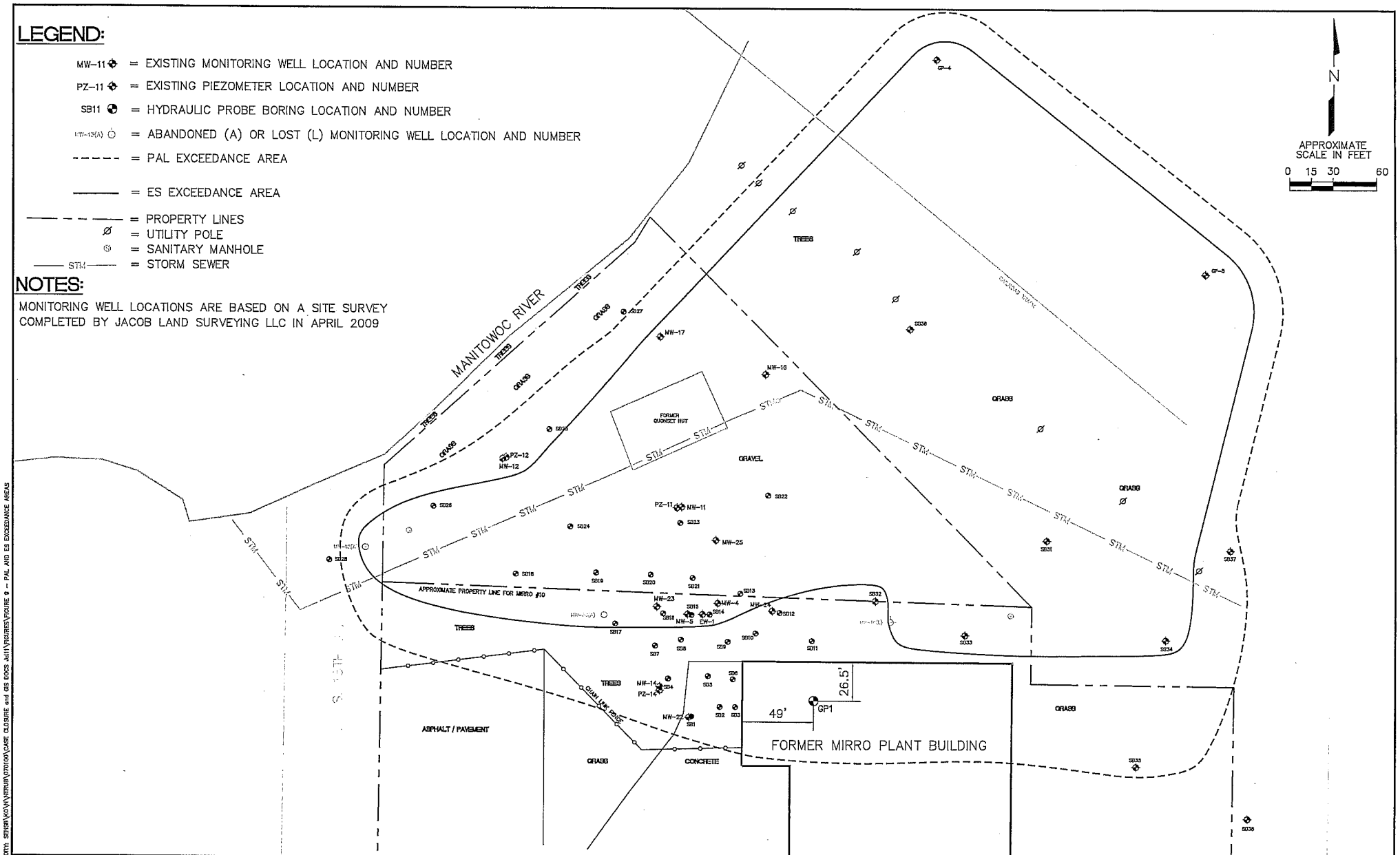
e-cc: Peter Allie – BFM LLC
Jason Martin – SEH
Hudson Green Jr. – Patriot Environmental Management LLC

LEGEND:

- MW-11 = EXISTING MONITORING WELL LOCATION AND NUMBER
- PZ-11 = EXISTING PIEZOMETER LOCATION AND NUMBER
- SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER
- MW-13(A) = ABANDONED (A) OR LOST (L) MONITORING WELL LOCATION AND NUMBER
- = PAL EXCEEDANCE AREA
- = ES EXCEEDANCE AREA
- = PROPERTY LINES
- = UTILITY POLE
- = SANITARY MANHOLE
- STM = STORM SEWER

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/18/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11
2	08/07/12	ADD GP1	MW	08/12			JM	08/12

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 9
PAL AND ES
EXCEEDANCE AREAS

PROJ. NO. NERUB070100
DATE 08/07/12

DRAWING DIRECTORY: S:\HSR\KO\VA\VERUB\070100\CASE CLOSURE and GS DOCS July11\FIGURES\FIGURE 9 - PAL AND ES EXCEEDANCE AREAS

LEGEND:

= EXISTING MONITORING WELL LOCATION AND NUMBER

= EXISTING PIEZOMETER LOCATION AND NUMBER

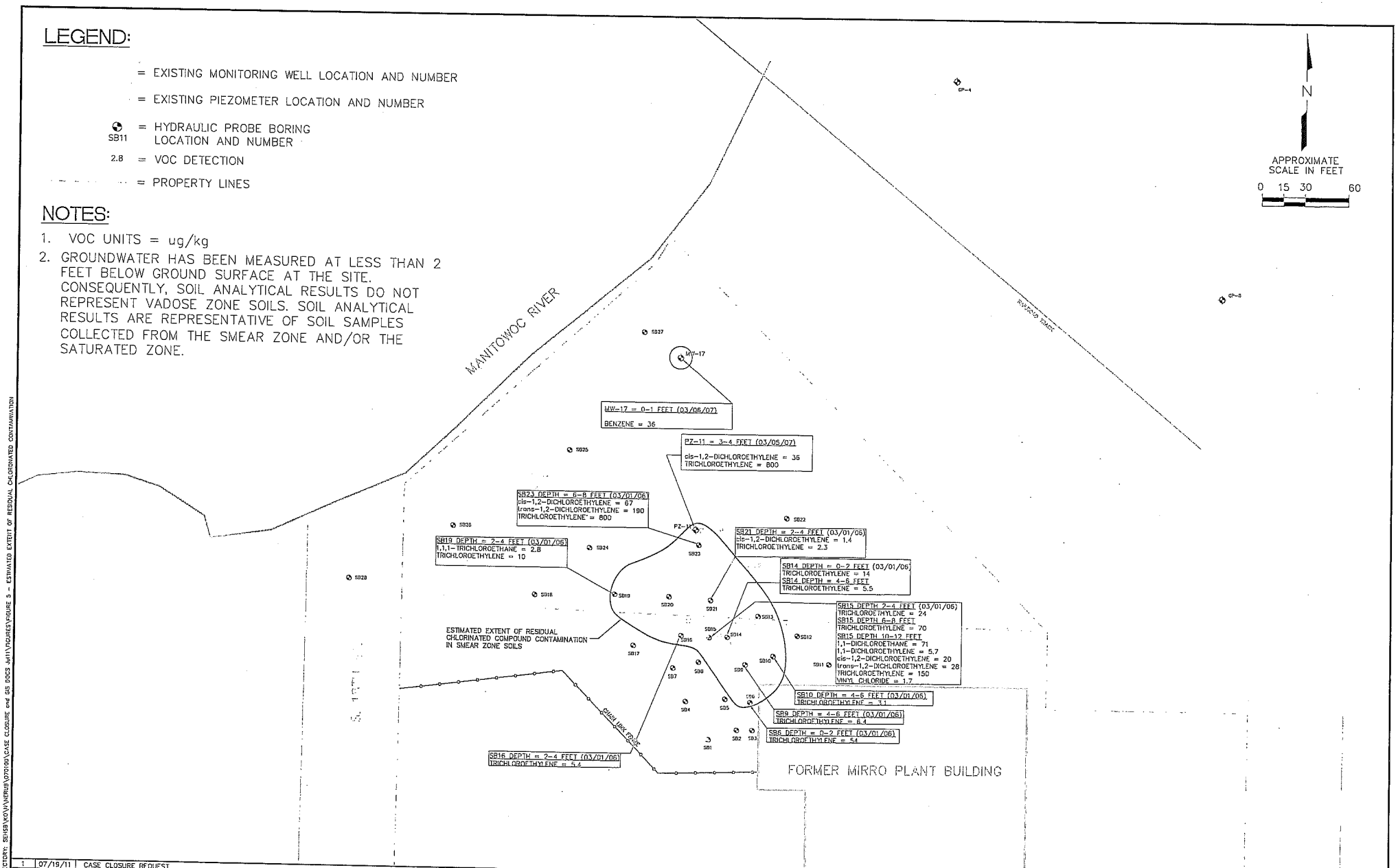
SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER

2.8 = VOC DETECTION

= PROPERTY LINES

NOTES:

1. VOC UNITS = ug/kg
2. GROUNDWATER HAS BEEN MEASURED AT LESS THAN 2 FEET BELOW GROUND SURFACE AT THE SITE. CONSEQUENTLY, SOIL ANALYTICAL RESULTS DO NOT REPRESENT VADOSE ZONE SOILS. SOIL ANALYTICAL RESULTS ARE REPRESENTATIVE OF SOIL SAMPLES COLLECTED FROM THE SMEAR ZONE AND/OR THE SATURATED ZONE.



NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	QC CHECK
1	07/19/11	CASE CLOSURE REQUEST	RJH 07/11	RJH 07/11	JM 07/11

CFH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 5
ESTIMATED EXTENT OF RESIDUAL VOC COMPOUNDS IN SOIL

PROJ. NO. NERUB070100
DATE

5

13

DRAWING DIRECTORY: S:\SBK\KO\W\NERUB\070100\CASE CLOSURE and GIS DOCS\MXD\FIGURES\FIGURE 5 - ESTIMATED EXTENT OF RESIDUAL CHLORINATED CONTAMINATION

LEGEND:

MW-11 = EXISTING MONITORING WELL LOCATION AND NUMBER

PZ-11 = EXISTING PIEZOMETER LOCATION AND NUMBER

SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER

MW-12(A) = ABANDONED (A) OR LOST (L) MONITORING WELL LOCATION AND NUMBER

= PROPERTY LINES

= PROTON REDUCTION ELECTRODE WELL (IMPROPERLY ABANDONED)

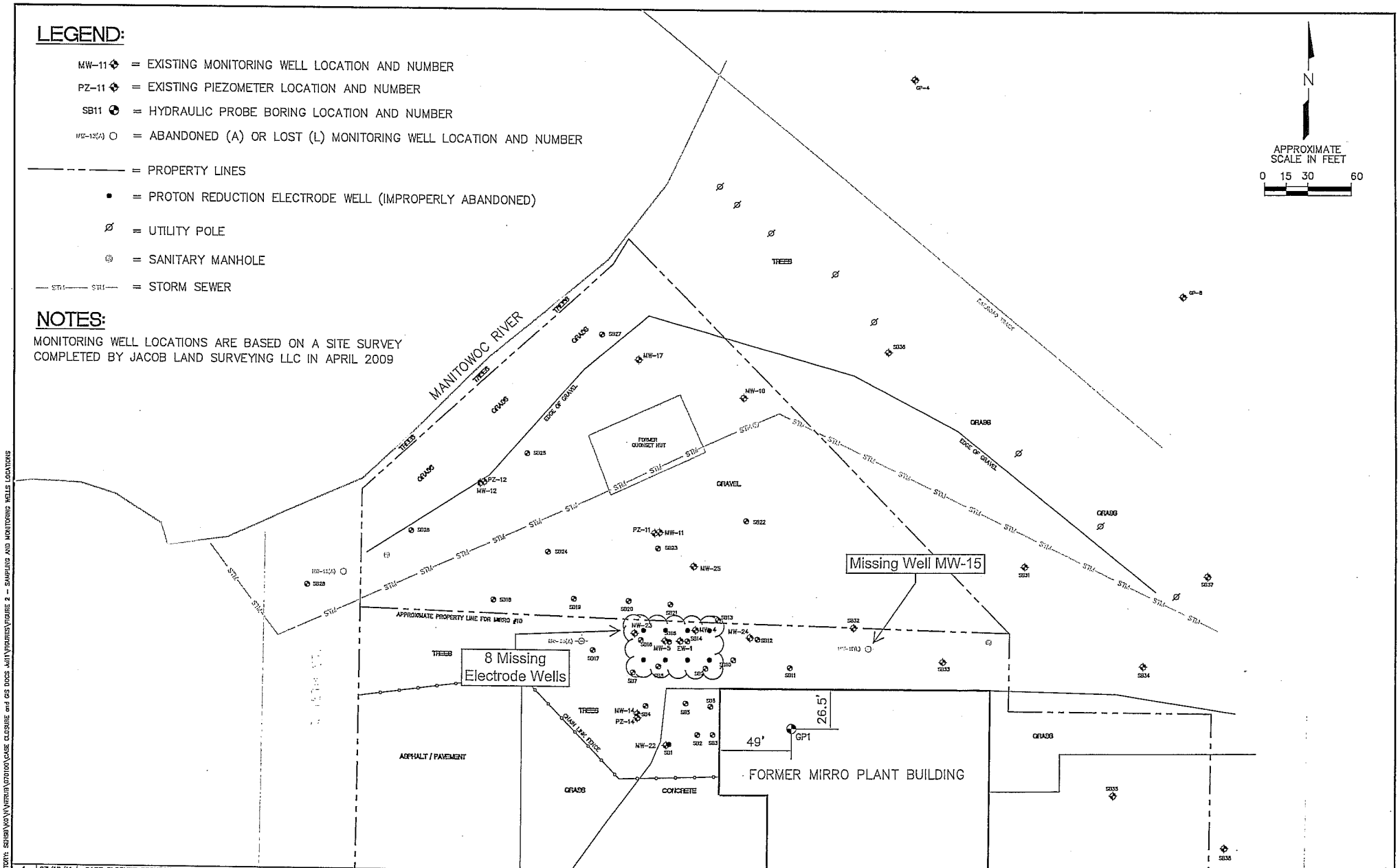
= UTILITY POLE

= SANITARY MANHOLE

STM = STORM SEWER

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/18/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11
2	08/07/12	UPDATED CASE CLOSURE REQUEST	MW	08/12			JM	08/12

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

Missing wells Locations

PROJ. NO. NERUB070100

DATE

2a / 13

DRAWING DIRECTORY: S:\GIS\KA\N\NERUB\V070100\CASE CLOSURE and GIS DOCS ARH\FIGURES\FIGURE 2 - SAMPLING AND MONITORING WELLS LOCATIONS

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

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

WISCONSIN
DEPT. OF NATURAL RESOURCES

September 26, 2012

sent via email to Kristin.jones@newellco.com

Kristin Jones
Senior. Environmental and Regulatory Counsel
Newell Rubbermaid Inc.
3 Glenlake Parkway
Atlanta, GA 30328

Subject: Conditional Closure Decision,
with Requirements to Achieve Final Closure
Former Mirro #10, 1616 Wollmer Street, Manitowoc, Wisconsin
WDNR BRRTS Activity # 02-36-000620

Dear Ms. Jones:

On September 24, 2012, 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 chlorinated volatile organic compound contamination on the site from the historic use and probable spillage of trichloroethylene 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:

SOIL GIS REGISTRY FEE

The NER Closure Committee reviewed the soil analytical results presented in Figure 5 in relation to the groundwater elevations in Table 4 and concluded that residual contamination remains above the high water table elevation and therefore the site will be placed on the GIS registry for residual soil contamination as well as residual groundwater contamination. Please submit a check in the amount $200 for the Soil GIS registry fee.

MONITORING WELL ABANDONMENT

The monitoring wells at the site must be properly abandoned (filled and sealed) in accordance with ch. NR 141, Wis. Adm. Code. Monitoring Well MW-15 and the former electrode well network were not able to be located and will be noted on the GIS registry. Appropriate notification to the property owner regarding these missing wells has been made.

Documentation of proper well abandonment must be submitted to me on Form 3300-005, found at http://dnr.wi.gov/org/water/dwg/forms/3300005.pdf or provided by the Department of Natural Resources.

When the above conditions have been satisfied, please submit the well abandonment forms and GIS registry fee to verify that applicable conditions have been met, and your case will be closed.

Your site will be listed on the DNR's Remediation and Redevelopment GIS Registry. Information that was submitted with your closure request application will be included on the GIS Registry. To review the site on the GIS Registry web page, visit the RR Sites Map page at: http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2.

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

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 20-662-5165 or email at annette.weissbach@wisconsin.gov.

Sincerely,

Annette Weissbach

Annette Weissbach
Project Manager
Remediation & Redevelopment Program

e-cc: Peter Allie – BFM LLC
Jason Martin – SEH
Hudson Green Jr. – Patriot Environmental Management LLC

STATE BAR OF WISCONSIN FORM 6 – 2000

SPECIAL WARRANTY DEED

Document Number

This Deed, made between Newell Operating Company, a Delaware corporation, Grantor, and BFM, LLC, a Wisconsin limited liability company, Grantee.

Grantor, for a valuable consideration, conveys and warrants to Grantee the following described real estate in Manitowoc County, State of Wisconsin (the "Property") (if more space is needed, please attach addendum):

PLEASE SEE ATTACHED ADDENDUM AT "A".

Commonly known as 1616 Wollmer St., Manitowoc, Wisconsin.

Together with all appurtenant rights, title and interests.

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

PLEASE SEE ATTACHED ADDENDUM AT "B".

Recording Area

Name and Return Address

Terence P. Fox, Esq.
Kummer, Lambert & Fox
927 S. 8th Street, #304
Manitowoc, WI 54221-1180

052-000-144-000.00
Parcel Identification Number (PIN)
This is not homestead property.

Dated as of this 30th day of December, 2003.

NEWELL OPERATING COMPANY

By: D Matschullat
* Dale L. Matschullat
Its: Vice President and General Counsel

*_____

AUTHENTICATION

Signature(s) _____ authenticated this _____ day of _____, _____.

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

THIS INSTRUMENT WAS DRAFTED BY
Schiff Hardin & Waite
One Westminster Place
Lake Forest, IL 60045
Attn: Nathan A. Engel

"OFFICIAL SEAL"
DONNA J. YEAGER
Notary Public, State of Illinois
My Commission Expires 7/23/2007

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

ACKNOWLEDGMENT

STATE OF ILLINOIS)
) ss.
Stephenson County)

Personally came before me this 30th day of December, 2003, the above named Vice President and General Counsel to me known to be the person who executed the foregoing instrument and acknowledged the same.

Donna J. Yeager
* Donna J. Yeager
Notary Public, State of Illinois
My Commission is permanent. (If not, state expiration date:_____.)
7-23-2007

*Names of persons signing in any capacity must be typed or printed below their signature.

ADDENDUM TO SPECIAL WARRANTY DEED

A. Legal Description

All of Block 143 and 144 including the vacated South 17th Street which lies between Blocks 143 and 144 in the original Plat of the City of Manitowoc, Manitowoc County, Wisconsin. Also, a tract of land which lies South of a straight line (not extended) drawn between 2 points as follows:

Point A - a point on the East boundary of South 18th Street in the City of Manitowoc extended Northerly, which point is 42 feet North of the North boundary line of the vacated alley formerly lying North of Blocks 143 and 144 in the City of Manitowoc.

Point B - a point on a line drawn parallel to and 158 feet Southwesterly from the center line of South Water Street extended Northwesterly, which point is 27 feet North of the North boundary line of said vacated alley, the Western and Eastern boundaries of the tract shall be straight lines drawn South from Points A & B, above described respectively, to the North boundary lines of said Blocks 143 and 144, being a part of Government Lot 6 in the Southeast 1/4 of Section 19 and a part of the Northwest 1/4 Northeast 1/4, Section 30, all in Township 19 North, Range 24 East, in the City of Manitowoc, Manitowoc County, Wisconsin. Subject to all easements, agreements, covenants and restrictions of record or established by statute; easement granted rights and easements, if any, in and to any and all railroad switches, sidetracks, spur tracks and rights of way located upon or appurtenant to the subject premises; right to the maintenance and use of a 6 inch water line which is installed below the surface of vacated South 17th Street lying between Lots 5 through 17, Block 143 and Lots 6 through 18, Block 144 and continuing in a Westerly direction through Lots 5 and 7, Block 143, and also an 8 inch storm sewer installed under the surface of vacated South 17th Street from the Northerly edge of Wollmer Street to the building located on the real estate described in this paragraph 3.

B. Title Exceptions

1. Special taxes or assessments, if any, payable with the taxes levied or to be levied for the current and subsequent years.

2. Liens, hook-up charges or fees, deferred charges, reserve capacity assessments, impact fees, or other charges or fees due payable on the development or improvement of the Property, whether assessed or charged before or after the date hereof.

3. Public or private rights, if any, of such portion of the Property as may be presently used, laid out or dedicated in any manner whatsoever for street, highway and/or alley purposes

4. Encroachments, overlaps, boundary line disputes, and any other matters which would be disclosed by an accurate survey and inspection of the Property.

5. Easements or claims of easements not shown by the public records.

6. Any claim of adverse possession or prescriptive easement.

7. General taxes for the year 2003 and subsequent years.

8. Easements recorded in the office of the Register of Deeds for Manitowoc County, Wisconsin on January 16, 1981, in Volume 660, at Page 523, as Document No. 562823.

* * *

I, Louis Meschede, assert to the best of my knowledge that the following legal description describes the property located at 1616 Wollmer Street in Manitowoc, Wisconsin, which is applicable to the Wisconsin Department of Natural Resources Bureau of Remediation and Redevelopment Tracking System site number 02-36-000620 (Mirro Co Plant #10). I also assert that no other properties in the vicinity, other than the one described below, are associated with the former Mirro Plant #10 property.

Louis Meschede

Louis Meschede, Director, Global Sustainability and Environment
Newell Rubbermaid, Inc.

9-8-09
Date

Property Legal Description:
All of Block 143 and 144 including the vacated South 17th Street which lies between Blocks 143 and 144 in the original Plat of the City of Manitowoc, Manitowoc County, Wisconsin. Also, a tract of land which lies South of a straight line (not extended) drawn between 2 points as follows:

Point A – a point on the East boundary of South 18th Street in the City of Manitowoc extended Northerly, which point is 42 feet North of the North boundary line of the vacated alley formerly lying North of Blocks 143 and 144 in the City of Manitowoc.

Point B – a point on a line drawn parallel to and 158 feet Southwesterly from the center line of South Water Street extended Northwesterly, which point is 27 feet North of the North boundary line of said vacated alley, the Western and Eastern boundaries of the tract shall be straight lines drawn South from Points A & B, above described respectively, to the North boundary lines of said Blocks 143 and 144, being a part of Government Lot 6 in the Southeast ¼ of Section 19 and a part of the Northwest ¼ Northeast ¼, Section 30, all in Township 19 North, Range 24 East, in the City of Manitowoc, Manitowoc County, Wisconsin. Subject to all easements, agreements, covenants and restrictions of record or established by statute; easement granted rights and easements, if any, in and to any and all railroad switches, sidetracks, spur tracks and rights of way located upon or appurtenant to the subject premises; right to the maintenance and use of a 6 inch water line which is installed below the surface of vacated South 17th Street lying between Lots 5 through 17, Block 143 and Lots 6 through 18, Block 144 and continuing in a Westerly direction through Lots 5 and 7, Block 143, and also an 8 inch storm sewer installed under the surface of vacated South 17th Street from the Northerly edge of Wollmer Street to the building located on the real estate described in this paragraph 3.

Parcel Identification Number:
052-000-144-000.00

REPRODUCED FROM

USGS MANITOWOC QUADRANGLE

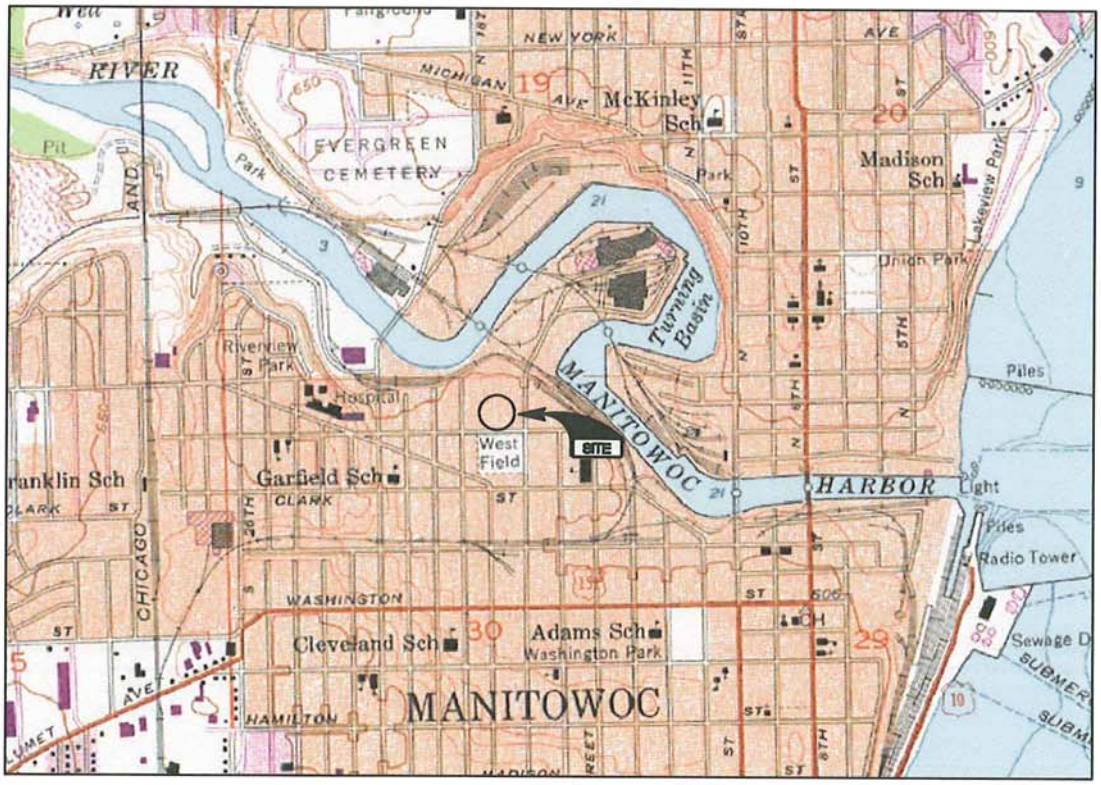
WISCONSIN – MANITOWOC CO. 7.5 MINUTE SERIES

1973

N

SCALE IN FEET

0 500 1000 2000



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		FIELD REVIEW		QC CHECK	
1	07/18/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11			JM	07/11

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 1

SITE LOCATION

PROJ. NO. NERUB070100

DATE 07/18/11

1 / 13

DRAWING DIRECTORY: SEHSB\KO\N\NERUB\070100\CASE CLOSURE and GIS DOCS Jul11\FIGURES\FIGURE 1 – SITE LOCATION

LEGEND:

MW-11 = EXISTING MONITORING WELL LOCATION AND NUMBER

PZ-11 = EXISTING PIEZOMETER LOCATION AND NUMBER

SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER

MW-13(A) = ABANDONED (A) OR LOST (L) MONITORING WELL LOCATION AND NUMBER

= PROPERTY LINES

= PROTON REDUCTION ELECTRODE WELL (IMPROPERLY ABANDONED)

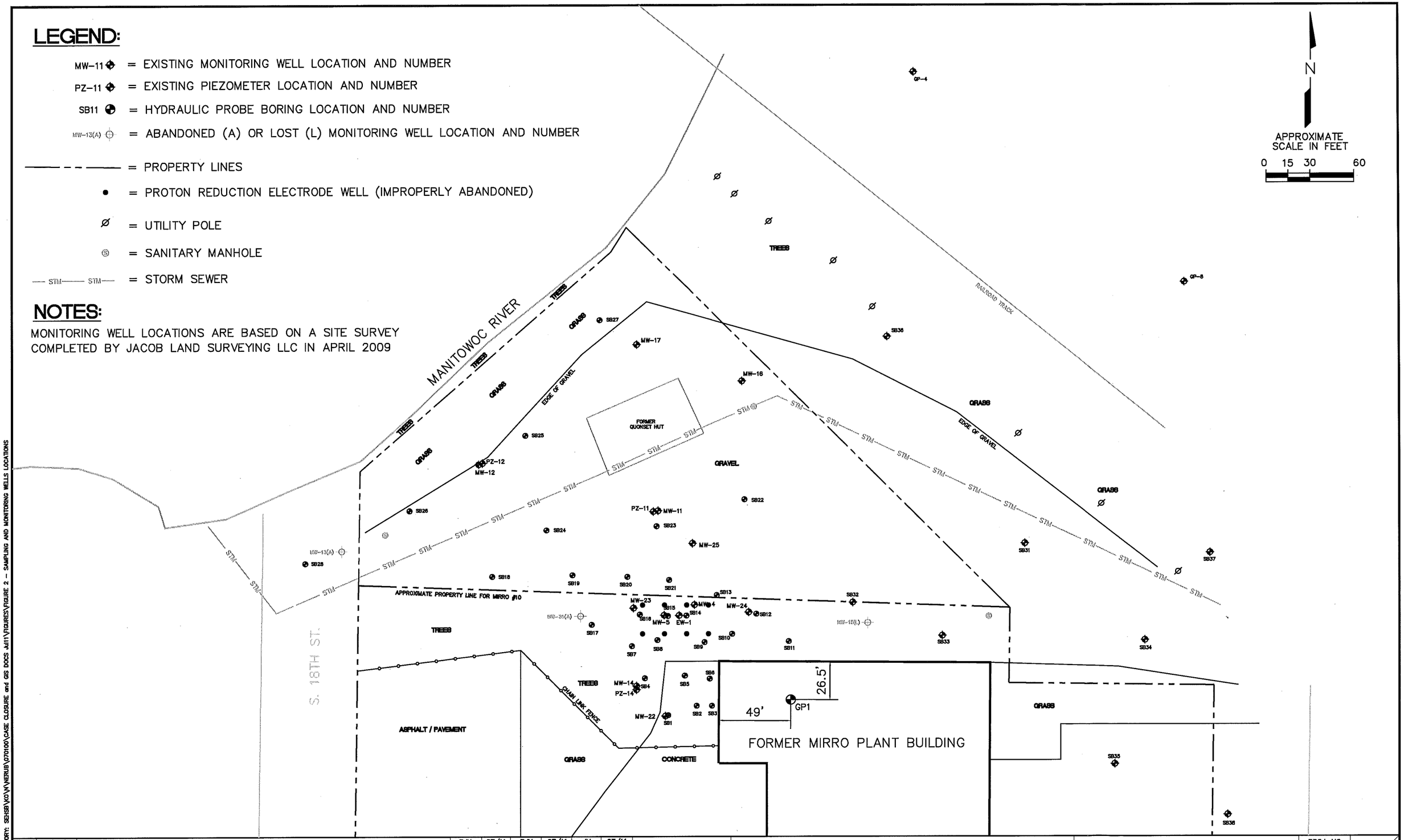
= UTILITY POLE

= SANITARY MANHOLE

STM = STORM SEWER

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/18/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11
2	08/07/12	UPDATED CASE CLOSURE REQUEST	MW	08/12			JM	08/12

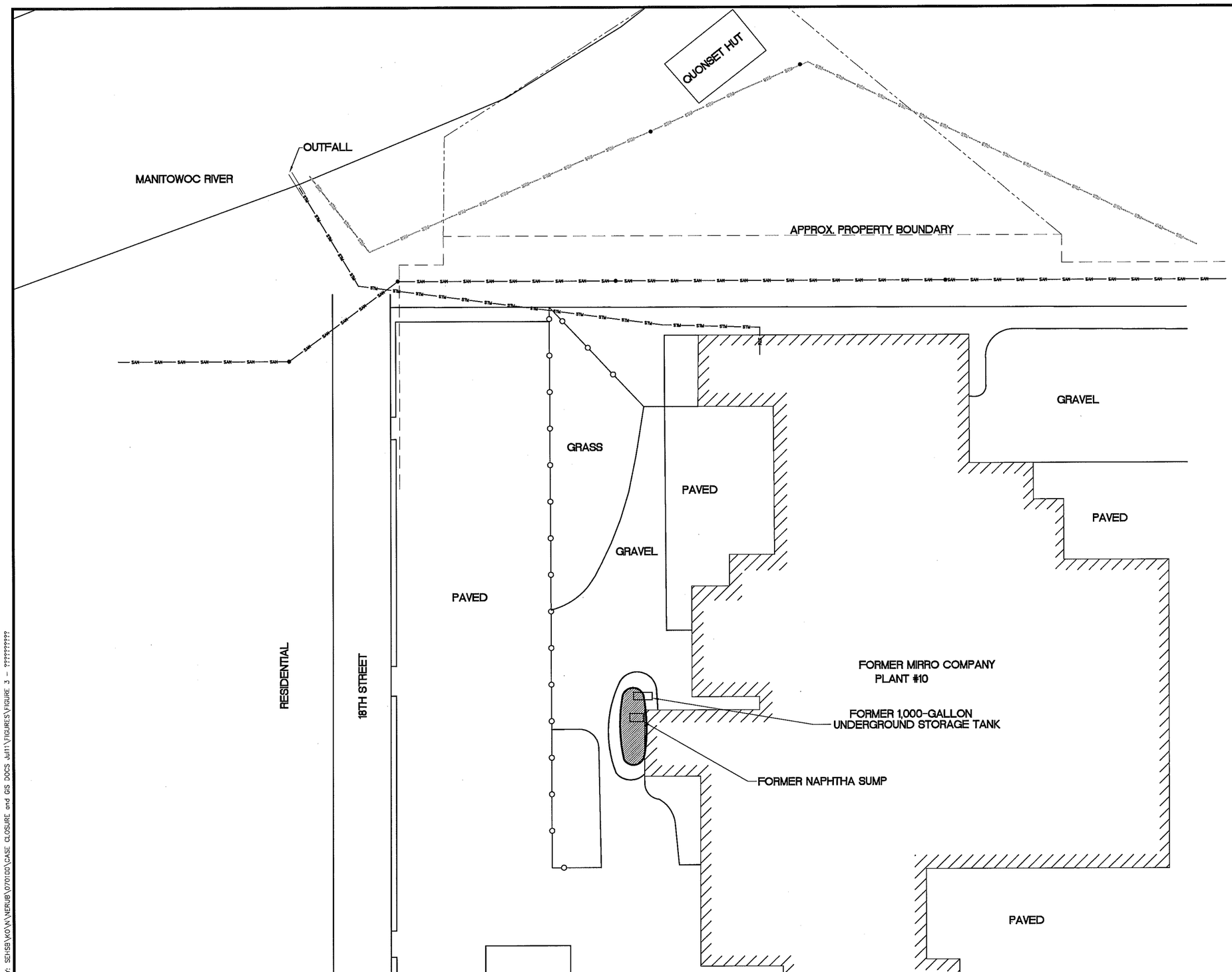
SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 2
SAMPLING AND MONITORING WELLS LOCATIONS

PROJ. NO. NERUB070100
DATE 08/07/12

DRAWING DIRECTORY: SEHSB1\KO\W\NERUB\070100\CASE CLOSURE and GIS DOCS JUL11\FIGURES\FIGURE 2 - SAMPLING AND MONITORING WELLS LOCATIONS



N

APPROXIMATE SCALE IN FEET

0 20 40 80

LEGEND:

= APPROX. EXTENT OF MARGINALLY IMPACTED SOIL ABOVE WATER TABLE

= APPROX. EXTENT OF HIGHLY IMPACTED SOIL ABOVE WATER TABLE

= APPROX. LOCATION OF STORM SEWER LINE

= APPROX. LOCATION OF SANITARY SEWER LINE

= APPROX. LOCATION OF FENCE LINE

= APPROX. MANHOLE LOCATION

MW-3 = MONITORING WELL LOCATION AND NUMBER

GP-10 = GEOPROBE BORING LOCATION AND NUMBER

EW-2 = EXTRACTION WELL LOCATION AND NUMBER

= GROUNDWATER FLOW DIRECTION BASED ON SHAW CLOSURE ASSESSMENT REPORT (2003)

NOTES:

SITE FEATURES AND LOCATIONS ARE APPROXIMATE AND HAVE NOT BEEN VERIFIED BY SEH.

GEOPROBES INSTALLED BY HSI GEOTRANS:
GP-1,2,3,3A,4,4A,5,6,7,8,9,10,11,12,13

WELLS INSTALLED BY HSI GEOTRANS:
EW-1,EW-2,MW-1,MW-2,MW-3,MW-4,MW-5

WELLS INSTALLED BY ENVIROGEN:
MW-21,MW-22,MW-23,MW-24,MW-25,MW-30

ADDITIONAL NOTE:

BASE MAP DEVELOPED FROM SHAW CLOSURE ASSESSMENT REPORT (2003), CITY OF MANITOWOC SURVEY MAP, AND THE FOLEY COMPANY STORM SEWERS FIGURE (1983).

NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/19/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 3
FORMER NAPHTHA SUMP SITE

PROJ. NO. NERUB070100
DATE 07/19/11

3 / 11

DRAWING DIRECTORY: SEHSB\KO\N\NERUB\070100\CASE CLOSURE and GIS DOCS July1\FIGURES\FIGURE 3 - ????????

LEGEND:

MW-11 = EXISTING MONITORING WELL LOCATION AND NUMBER

PZ-11 = EXISTING PIEZOMETER LOCATION AND NUMBER

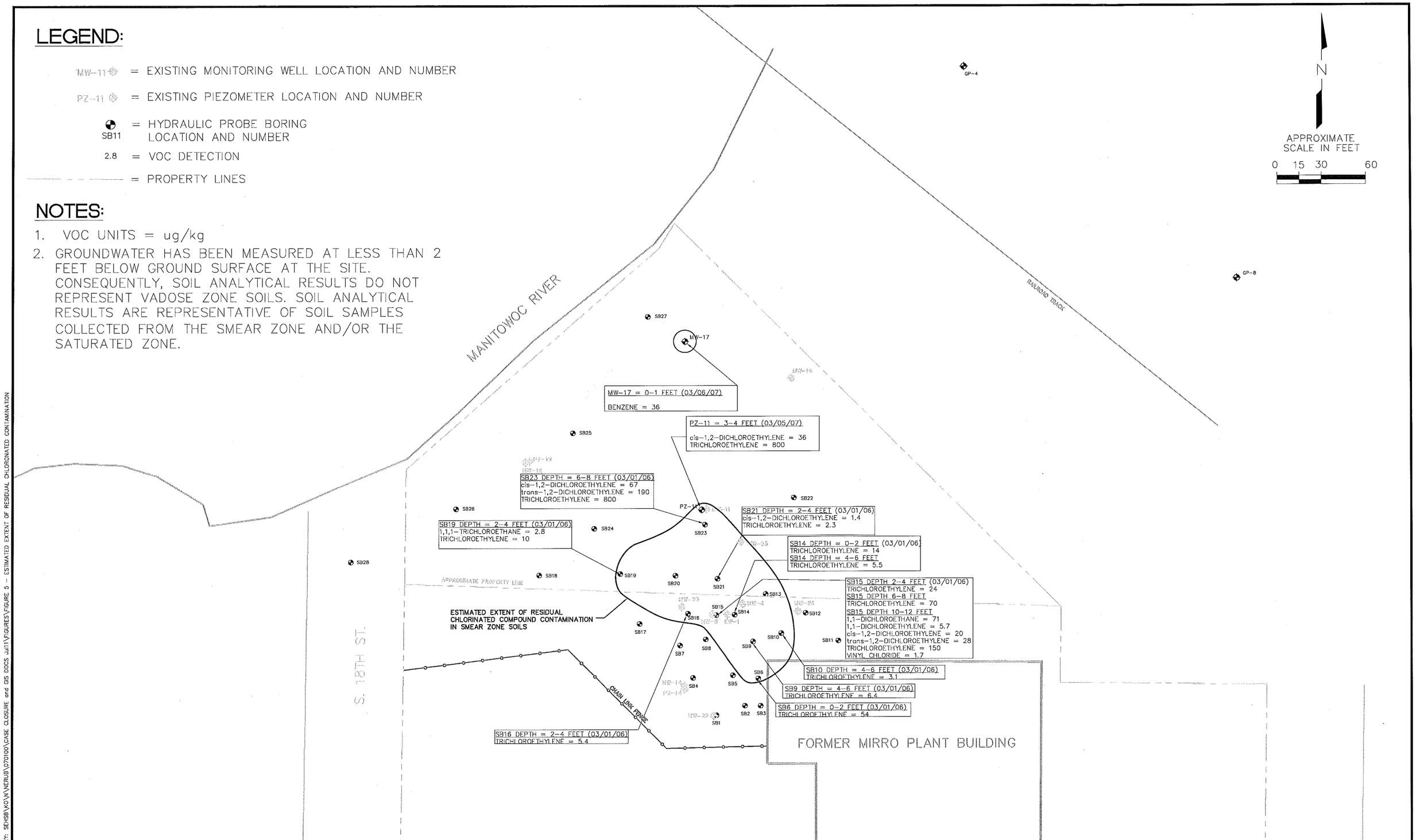
SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER

2.8 = VOC DETECTION

= PROPERTY LINES

NOTES:

1. VOC UNITS = ug/kg
2. GROUNDWATER HAS BEEN MEASURED AT LESS THAN 2 FEET BELOW GROUND SURFACE AT THE SITE. CONSEQUENTLY, SOIL ANALYTICAL RESULTS DO NOT REPRESENT VADOSE ZONE SOILS. SOIL ANALYTICAL RESULTS ARE REPRESENTATIVE OF SOIL SAMPLES COLLECTED FROM THE SMEAR ZONE AND/OR THE SATURATED ZONE.



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/19/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11

SEH

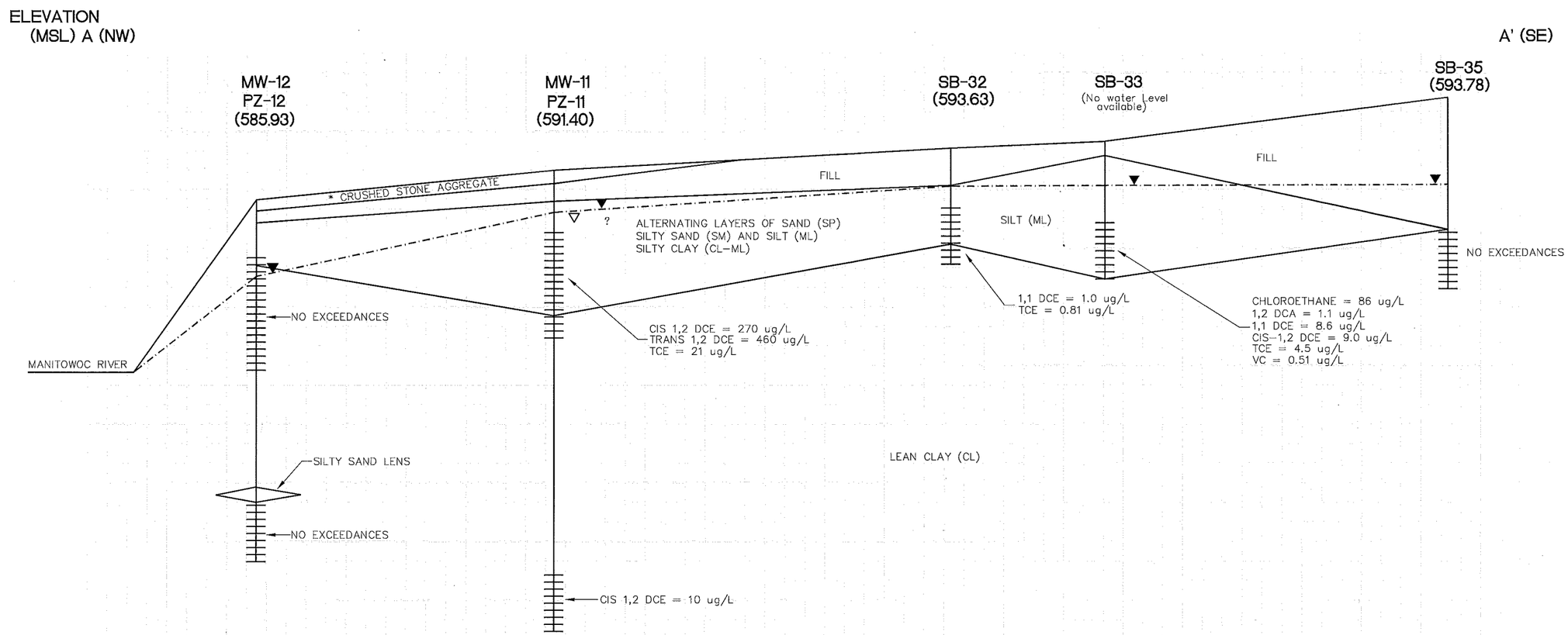
CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 5
ESTIMATED EXTENT OF RESIDUAL VOC COMPOUNDS IN SOIL

PROJ. NO. NERUB070100
DATE 07/19/11

5 / 13

DRAWING DIRECTORY: SEHSB\KO\N\NERUB\070100\CASE CLOSURE and GIS DOCS Jul11\FIGURES\FIGURE 5 - ESTIMATED EXTENT OF RESIDUAL CHLORINATED CONTAMINATION



LEGEND:

-·-▼-·- SHALLOW GROUNDWATER SURFACE ELEVATION BASED ON 6/22/2010 MEASUREMENTS

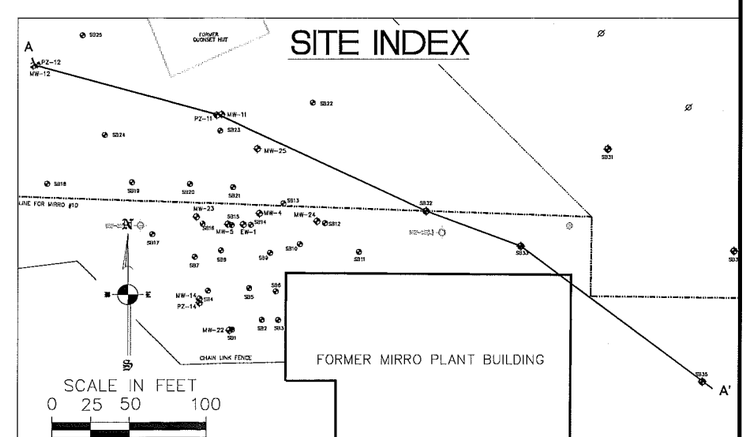
NOTE:

PAL AND ES EXCEEDANCES FOR MW-12, PZ-12, MW-11 AND PZ-11 FROM 9/04/2008 SAMPLING ROUND. PAL AND ES EXCEEDANCES FOR SB-32, SB-33 AND SB-35 FROM 6/22/2010 SUBSURFACE INVESTIGATION. SCREENED INTERVAL FOR SB-33 REMOVED AFTER SAMPLING.

ELEVATIONS ARE REFERENCED TO NAVD 83 DATUM ORIGINALLY AT THE NGS MONUMENT STAMPED S88 AT THE NORTHWEST CORNER OF THE RAILWAY BRIDGE, APPROXIMATELY 540' NORTH OF THE MIRRO PLANT BUILDING. MONUMENT ELEVATION = 591.54'

* CRUSHED STONE AGGREGATE PLACED BY CONTRACTOR AT THE DIRECTION OF BFM, LLC BETWEEN 10/15/07 – 2/19/08.

HORIZONTAL
SCALE IN FEET
0 12.5 25 50



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/19/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 6
A-A' CROSS SECTION

PROJ. NO. NERUB070100
DATE 07/19/11
6 / 13

DRAWING DIRECTORY: SEHSB\KO\N\NERUB\070100\CASE CLOSURE and GIS DOCS JULI1\FIGURES\FIGURE 6 - A-A' CROSS SECTION

LEGEND:

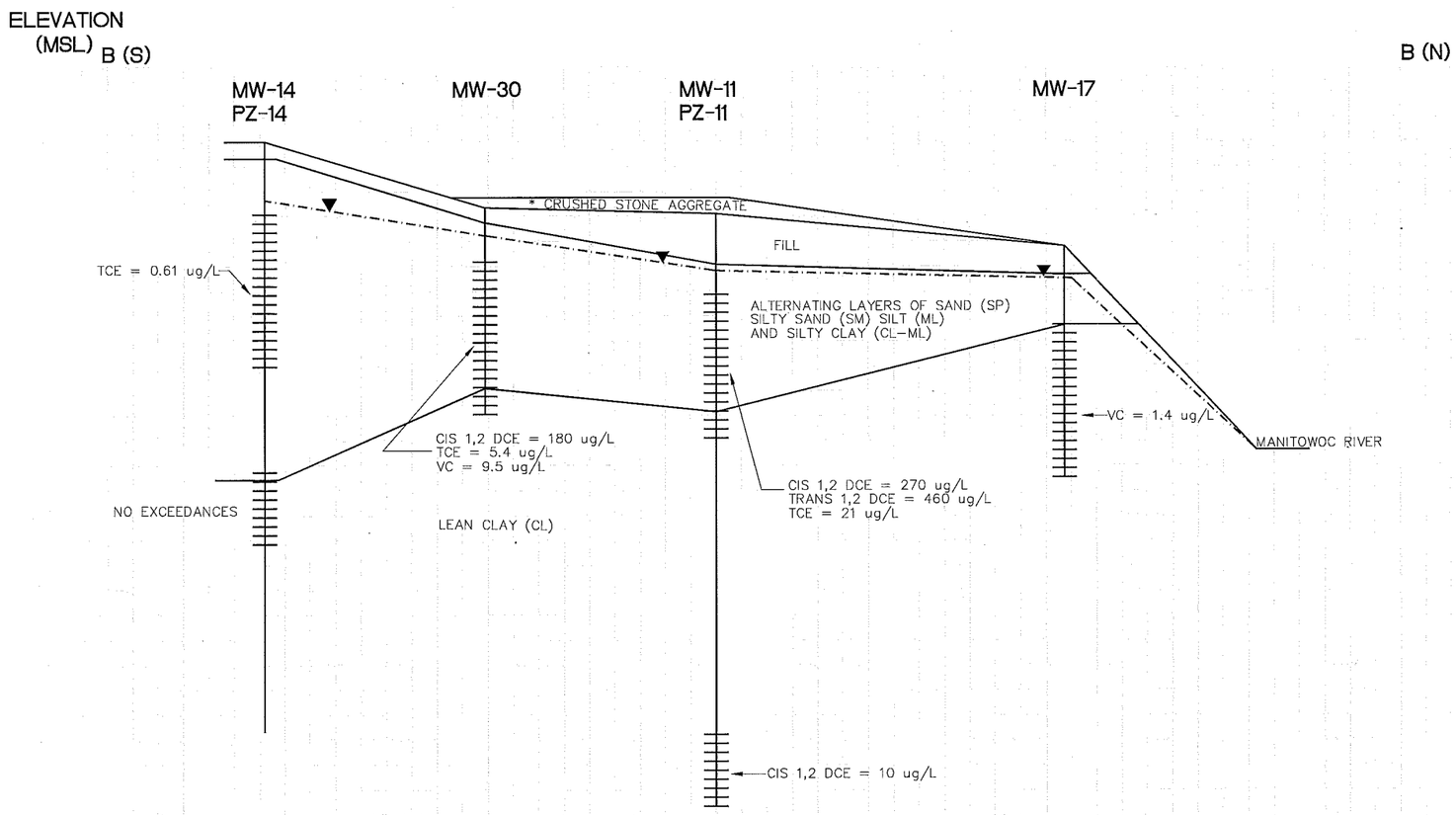
SHALLOW GROUNDWATER SURFACE ELEVATION BASED ON 3/19/2009 MEASUREMENTS

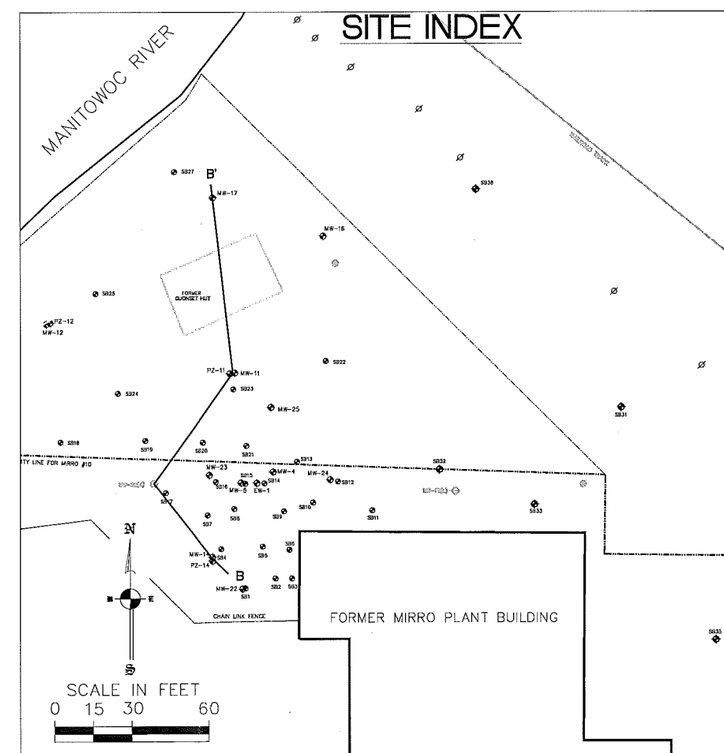
NOTES:

PAL AND ES EXCEEDANCES FROM 9/04/2008 SAMPLING ROUND.

ELEVATIONS ARE REFERENCED TO NAVD 83 DATUM ORIGINALLY AT THE NGS MONUMENT STAMPED S88 AT THE NORTHWEST CORNER OF THE RAILWAY BRIDGE, APPROXIMATELY 540' NORTH OF THE MIRRO PLANT BUILDING. MONUMENT ELEVATION = 591.54'

* CRUSHED STONE AGGREGATE PLACED BY CONTRACTOR AT THE DIRECTION OF BFM, LLC BETWEEN 10/15/07 – 2/19/08.





HORIZONTAL SCALE IN FEET
0 12.5 25 50

NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/19/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 7
B-B' CROSS SECTION

PROJ. NO. NERUB070100
DATE 07/19/11

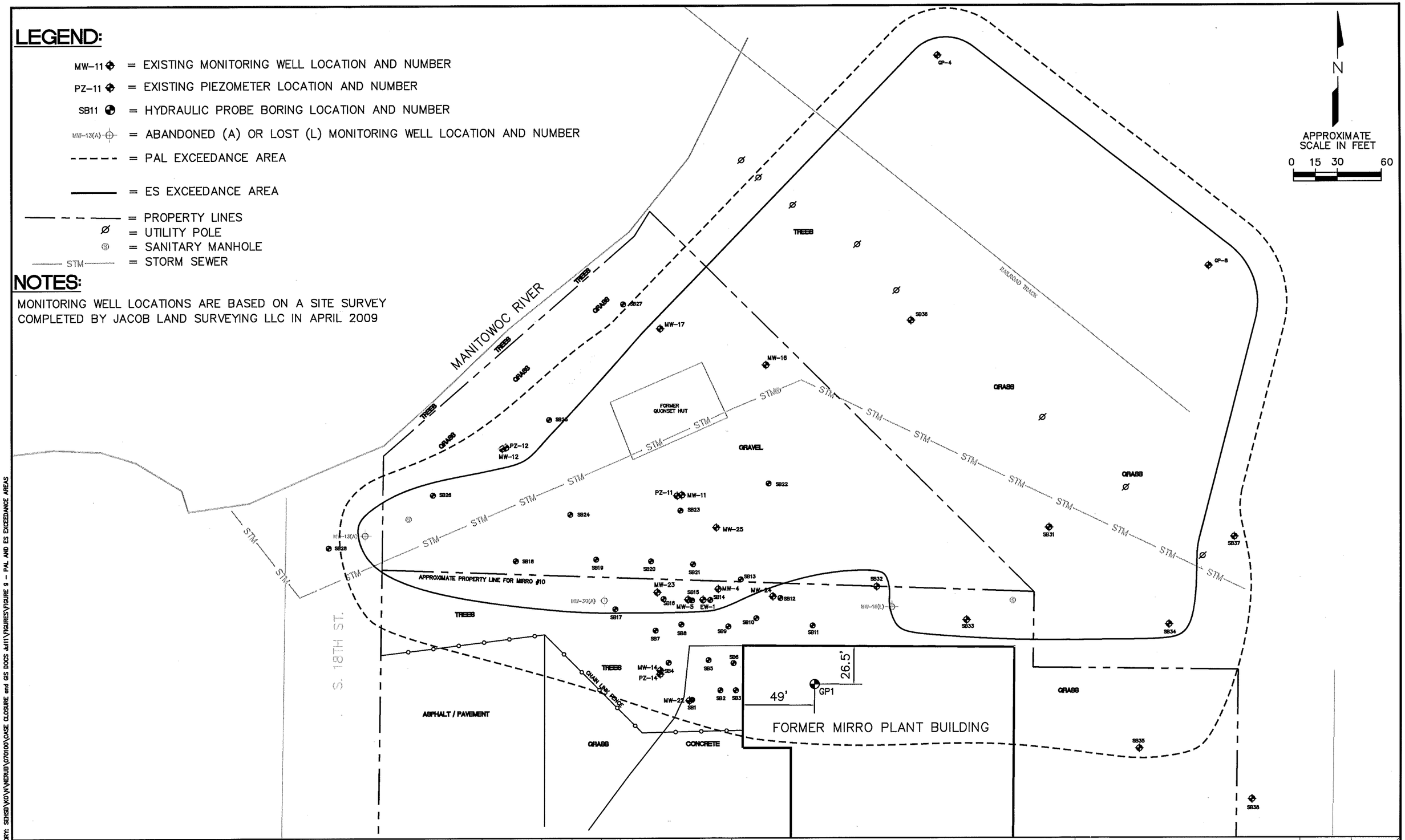
DRAWING DIRECTORY: SEHSS\KO\W\NERUB\070100\CASE CLOSURE and GIS DOCS Jul11\FIGURES\FIGURE 7 – B-B' CROSS SECTION

LEGEND:

- MW-11 = EXISTING MONITORING WELL LOCATION AND NUMBER
- PZ-11 = EXISTING PIEZOMETER LOCATION AND NUMBER
- SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER
- MW-13(A) = ABANDONED (A) OR LOST (L) MONITORING WELL LOCATION AND NUMBER
- = PAL EXCEEDANCE AREA
- = ES EXCEEDANCE AREA
- = PROPERTY LINES
- = UTILITY POLE
- = SANITARY MANHOLE
- STM = STORM SEWER

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/18/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11
2	08/07/12	ADD GP1	MW	08/12			JM	08/12

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 9
PAL AND ES EXCEEDANCE AREAS

PROJ. NO. NERUB070100
DATE 08/07/12

DRAWING DIRECTORY: S:\HSS\KO\W\NERUB\070100\CASE CLOSURE and GIS DOCS JJ11\FIGURES\FIGURE 9 - PAL AND ES EXCEEDANCE AREAS

LEGEND:

592 = GROUNDWATER CONTOUR BASED ON WATER LEVELS MEASURED IN JUNE 2007. CONTOUR INTERVAL = 2 FEET/FEET.

= SEH MONITORING WELL LOCATION AND NUMBER (INSTALLED MARCH, 2007)

= SEH PIEZOMETER LOCATION AND NUMBER (INSTALLED MARCH, 2007)

MW-24 = EXISTING MONITORING WELL LOCATION AND NUMBER

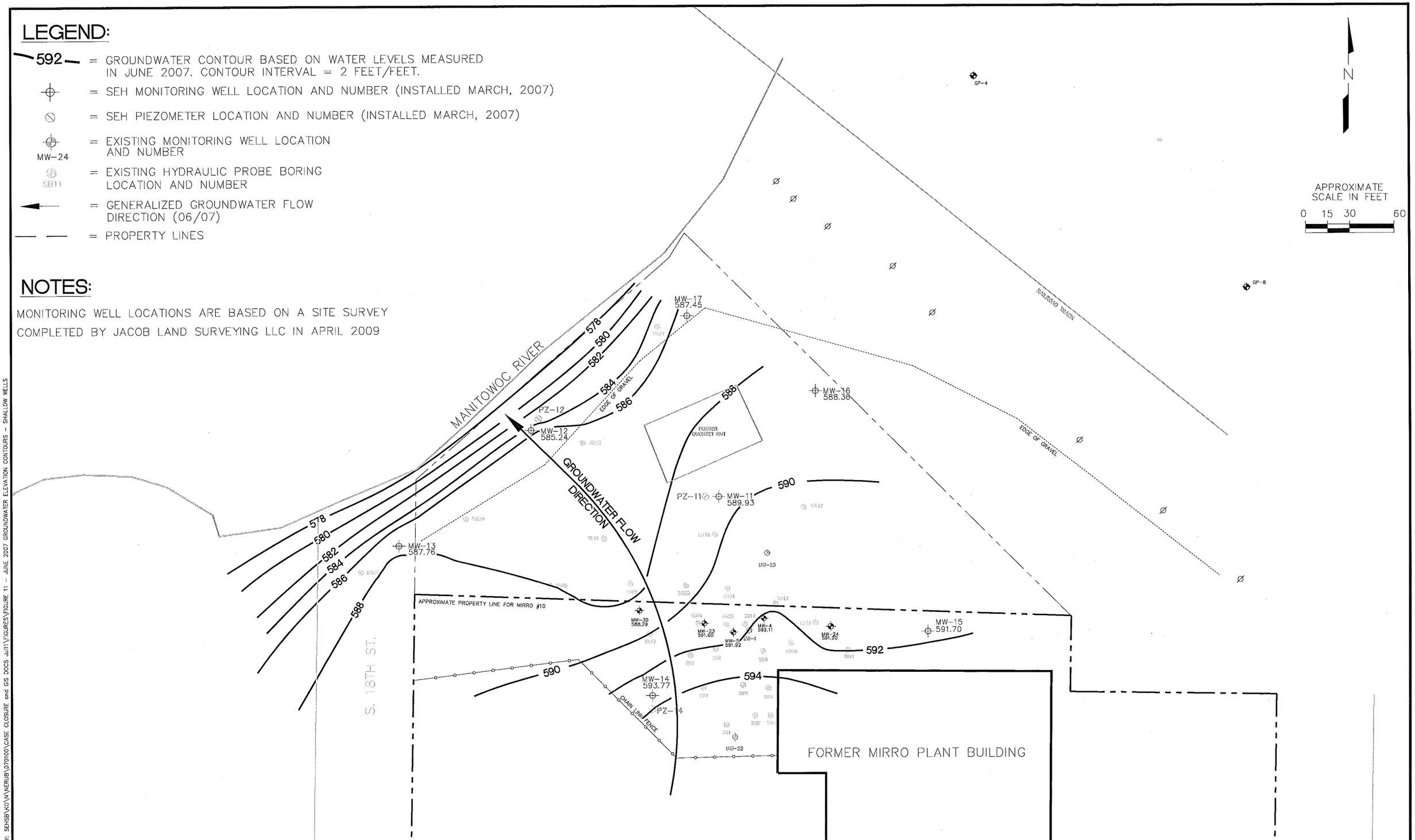
SB11 = EXISTING HYDRAULIC PROBE BORING LOCATION AND NUMBER

= GENERALIZED GROUNDWATER FLOW DIRECTION (06/07)

= PROPERTY LINES

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/19/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 11
JUNE 2007 GROUNDWATER ELEVATION CONTOURS - SHALLOW WELLS

PROJ. NO. NERUB070100
DATE 07/19/11

11 / 13

DRAWING DIRECTORY: SEHSB\K0\N\NERUB\070100\CASE CLOSURE and GIS DOCS Jul11\FIGURES\FIGURE 11 - JUNE 2007 GROUNDWATER ELEVATION CONTOURS - SHALLOW WELLS

LEGEND:

589.50 = GROUNDWATER CONTOUR BASED ON WATER LEVELS MEASURED IN MARCH 2009. CONTOUR INTERVAL = 0.5 FOOT/FOOT.

MW-11 = EXISTING MONITORING WELL LOCATION AND NUMBER

= EXISTING PIEZOMETER LOCATION AND NUMBER

MW-13(A) = ABANDONED (A) OR LOST (L) MONITORING WELL LOCATION AND NUMBER

= GENERALIZED GROUNDWATER FLOW DIRECTION (03/09)

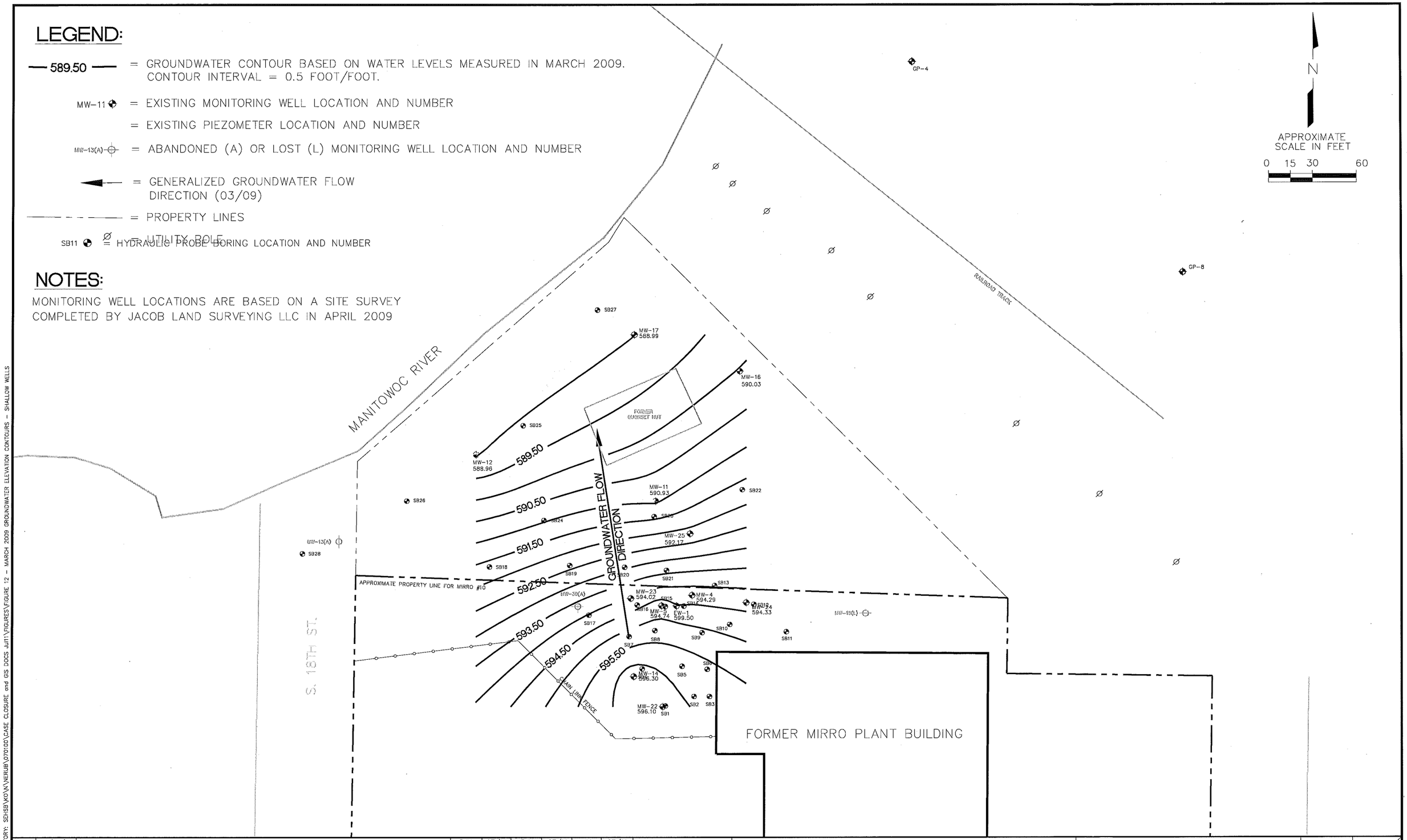
= PROPERTY LINES

= UTILITY POLE

SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/19/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 12
MARCH 2009 GROUNDWATER ELEVATION CONTOURS - SHALLOW WELLS

PROJ. NO. NERUB070100
DATE 07/19/11

12 / 13

DRAWING DIRECTORY: S:\HSG\KO\N\NERUB\070100\CASE CLOSURE and GS DOCS JUL11\FIGURES\FIGURE 12 - MARCH 2009 GROUNDWATER ELEVATION CONTOURS - SHALLOW WELLS

Table 1
Hydraulic Probe Soil Analytical Results
Former Mirro Plant #10
Manitowoc, Wisconsin

Analytical Parameters	Generic RCLs in Soil	Boring Number/Depth (ft)/Date																																
		SB-1	SB-1	SB-2	SB-3	SB-3	SB-3 split	SB-4	SB-4	SB-5	SB-5	SB-6	SB-6	SB-6 split	SB-7	SB-7	SB-8	SB-8	SB-10	SB-11	SB-12	SB-14	SB-14	SB-15	SB-15	SB-15	SB-15	SB-16	SB-17	SB-18	SB-19	SB-21	SB-23	SB-23
		2-4'	6-8'	4-6'	2-4'	4-5'	4-5'	0-2'	4-6'	2-4'	4-6'	0-2'	4-5'	4-5'	2-4'	4-6'	6-8'	4-6'	4-6'	2-4'	4-6'	0-2'	4-5'	2-4'	6-8'	10-12'	12-14'	2-4'	4-5'	4-6'	2-4'	2-4'	0-2'	6-8'
		2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	2/28/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06	3/1/06
VOCs[1] (ug/kg)																																		
Benzene	5.5	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Bromobenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Bromodichloromethane	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
n-Butylbenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
sec-Butylbenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	100	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
tert-Butylbenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Carbon Tetrachloride	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chlorobenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chlorodibromomethane	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloroethane	NSE	--	--	--	--	--	<64	--	--	--	--	--	--	<57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloroform	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloromethane	NSE	--	--	--	--	--	<64	--	--	--	--	--	--	<57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
o-Chlorotoluene	NSE	--	--	--	--	--	<64	--	--	--	--	--	--	<57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
p-Chlorotoluene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dibromo-3-chloropropane	NSE	--	--	--	--	--	<64	--	--	--	--	--	--	<57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dibromoethane	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichlorobenzene	NSE	--	--	--	--	--	<36	--	--	--	--	--	--	<34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,3-Dichlorobenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,4-Dichlorobenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Dichlorodifluoromethane	NSE	--	--	--	--	--	<64	--	--	--	--	--	--	<57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1-Dichloroethane	NSE	<1.0	<1.0	<1.0	<1.0	<7.0	<32	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<28	<1.0	<1.0	<1.0	<1.0	<1.0	<0.1	3.1	<1.0	<1.0	<1.0	<1.0	71	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2-Dichloroethane	4.9	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1-Dichloroethylene	NSE	<1.0	<1.0	<1.0	<1.0	<7.0	<32	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<28	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	5.7	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
cis-1,2-Dichloroethylene	NSE	<1.0	<1.0	<1.0	<1.0	<7.0	<32	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<28	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	20	<1.0	<1.0	<1.0	<1.0	<1.0	1.4	<1.0	67
trans-1,2-Dichloroethylene	NSE	<1.0	<1.0	<1.0	<1.0	<7.0	<32	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<28	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	28	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	190
1,2-Dichloropropane	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,3-Dichloropropane	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
2,2-Dichloropropane	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	2,900	--	--	--	--	--	<32	--	--	--	--	--	--	58	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Hexachlorobutadiene	NSE	--	--	--	--	--	<45	--	--	--	--	--	--	<40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Isopropylbenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	54	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Isopropyl Ether	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
p-Isopropyltoluene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	150	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Methyl tert Butyl Ether	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Methylene Chloride	NSE	--	--	--	--	--	<64	--	--	--	--	--	--	<57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Naphthalene	NSE	--	--	--	--	--	<64	--	--	--	--	--	--	2,200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
n-Propylbenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	100	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Tetrachloroethylene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Toluene	1,500	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2,3-Trichlorobenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2,4-Trichlorobenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,1,1-Trichloroethane	NSE	<1.0	3.2	<1.0	<1.0	<7.0	<32	<1.0	<1.0	<1.0	3.4	<1.0	<1.0	<28	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	2.8	<1.0	<1.0	<1.0
1,1,2-Trichloroethane	NSE	--	--	--	--	--	<45	--	--	--	--	--	--	<40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Trichloroethylene	NSE	<1.0	<1.0	<1.0	<1.0	<7.0	<32	<1.0	<1.0	<1.0	<1.0	54	<1.0	<28	<1.0	<1.0	<1.0	6.4	3.1	<1.0	<1.0	14	5.5	24	70	150	<1.0	5.4	<1.0	<1.0	10	2.3	<1.0	800
Trichlorofluoromethane	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	<28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2,4-Trimethylbenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	950	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,3,5-Trimethylbenzene	NSE	--	--	--	--	--	<32	--	--	--	--	--	--	430	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Vinyl Chloride	NSE	<2.0	<3.0	<2.0	<2.0	<13	<45	<2.0	<2.0	<2.0	<3.0	<2.0	<2.0	<40	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<3.0	<2.0	<2.0	<3.0	<3.0	1.7	<3.0	<2.0	<2.0	<3.0	<2.0	<3.0	<2.0	<2.0
Total Xylenes	4,100	--	--	--	--	--	<110	--	--	--	--	--	--	280	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

NSE = No standard established
BDL = Below laboratory detection limit
RCL = Residual Contaminant Level, ch. NR 720
-- = Not analyzed for
0.0 = Exceeds ch. NR 720 soil cleanup standards
[1] = VOC list is not complete: VOCs not listed are BDL
Compiled by: BAL Checked by: MFR
Q:\SKO\Neenah\060103\Soil Analytical Results.xls

Table 1a
Soil Analytical Results

Analytical Parameters	Generic RCLs[2] or SSLs in Soil	Boring No./Depth (ft)/Date						
		PZ-11	PZ-12	MW-13	PZ-14	MW-15	MW-16	MW-17
		3-4	1-2	2-3	2-3	4-5	4-5	0-1
		3/5/07	3/6/07	3/6/07	3/7/07	3/7/07	3/5/07	3/6/07
VOCs[1] (µg/kg)								
Benzene	5.5	<29 S	<29	<29	<29	<27	<30	**74**
cis-1,2-Dichloroethylene	27*	**36**	<29	<29	<29	<27	<30	<32
trans-1,2-Dichloroethylene	49*	48 S	<29	<29	<29	<27	<30	<32
Ethylbenzene	2900	<29	<29	<29	<29	<27	<30	64
Naphthalene	NSE	<59	<58	<58	<59	<53	<60	230
n-Propylbenzene	NSE	<29	<29	<29	<29	<27	<30	34
Toluene	1500	<29	<29	<29	<29	<27	<30	320
Trichloroethylene	3.7*	**36** S	<29	<29	<29	<27	<30	<32
1,2,4-Trimethylbenzene	NSE	<29	<29	<29	<29	<27	<30	150
1,3,5-Trimethylbenzene	NSE	<29	<29	<29	<29	<27	<30	38
Total Xylenes	4100	<100	<98	<99	<100	<91	<100	520

NSE = No standard established
BDL = Below laboratory detection limit
RCL = Residual cleanup level
SSL - Soil screening level
36 = Exceeds ch. NR 720 RCL or USEPA SSL
* = SSLs for soil to groundwater migration pathway were calculated using the U.S.EPA soil screening level website and WDNR Publication RR-682 dated January 11, 2002

S = Soil sample collected from the saturated zone or the smear zone, which is affected by seasonally high groundwater

[1] = VOC list is not complete; VOCs not listed are BDL
[2] = Generic RCLs were obtained from s. NR 720.09(4) Table 1 and are basedon protection of groundwater
Compiled by: JEG Checked by: RJH

P:\KO\N\Nerub\Common\Manitowoc\Soil Analytical Results.xls

Table 2
Groundwater Analytical Results

Analytical Parameters	NR 140 Standards		Well Number / Sampling Date															
			EW-1				MW-4						MW-5					
	ES	PAL	6/14/07	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10
Elevation Data																		
Top of PVC3	–	–	595.10	595.10	595.32	–	600.52	600.52	600.52	600.52	595.60	–	600.71	600.71	600.71	600.71	595.29	–
Top of Screen	–	–	594.85	594.85	595.07	–	595.12	595.12	595.12	595.12	595.41	–	595.41	595.41	595.41	595.41	596.82	–
Bottom of Screen	–	–	564.85	564.85	565.07	–	585.12	585.12	585.12	585.12	585.41	–	585.41	585.41	585.41	585.41	586.20	–
Groundwater	–	–	NM	NM	594.50	595.32	592.36	592.11	592.06	NM	594.29	594.72	592.13	591.92	591.93	NM	594.79	NM
VOCs[1] (µg/l)																		
Benzene	5.0	0.5	<0.20	–	–	–	<0.20	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	–	–
n-Butylbenzene	NSE	NSE	<0.20	–	–	–	<0.20	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	–	–
Chloroethane	400	80	<1.0	–	–	–	<1.0	<1.0	<1.0	<1.0	–	–	<1.0	<1.0	<1.0	<1.0	–	–
1,1-Dichloroethane	850	85	0.85	–	–	–	4.6	7.2	11	4.1	–	–	<0.50	0.98	1.2	0.72	–	–
1,2-Dichloroethane	5.0	0.5	<0.50	–	–	–	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
1,1-Dichloroethylene	7.0	0.7	<0.50	–	–	–	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
cis-1,2-Dichloroethylene	70	7	10	–	–	–	3.3	5.5	12	1.4	–	–	0.76	0.79	<0.50	<0.50	–	–
trans-1,2-Dichloroethylene	100	20	2.2	–	–	–	2.7	2.4	5.2	<0.50	–	–	1.2	<0.50	<0.50	<0.50	–	–
Ethylbenzene	700	140	<0.50	–	–	–	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
Isopropylbenzene	NSE	NSE	<0.20	–	–	–	<0.20	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	–	–
Naphthalene	100	10	<0.25	–	–	–	<0.25	<0.25	<0.25	<0.25	–	–	<0.25	<0.25	<0.25	<0.25	–	–
n-Propylbenzene	NSE	NSE	<0.50	–	–	–	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
Toluene	1,000	200	<0.20	–	–	–	<0.20	<0.20	<0.20	<0.50	–	–	<0.20	<0.20	<0.20	<0.50	–	–
Total Trimethylbenzenes	480	96	<0.40	–	–	–	<0.40	<0.40	<0.40	<0.40	–	–	<0.40	<0.40	<0.40	<0.40	–	–
1,2,4-Trichlorobenzene	70	14	<0.25	–	–	–	<0.25	<0.25	<0.25	<0.25	–	–	<0.25	<0.25	<0.25	<0.25	–	–
1,1,1-Trichloroethane	200	40	1.3	–	–	–	0.53	<0.50	<0.50	2.0	–	–	1.3	1.6	2.1	2.0	–	–
Trichloroethylene	5.0	0.5	**24**	–	–	–	**7.5**	**8.4**	**9.2**	**17**	–	–	**48**	**45**	**51**	**61**	–	–
Vinyl Chloride	0.2	0.02	<0.20	–	–	–	<0.20	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	–	–
Total Xylenes	10,000	1,000	<0.50	–	–	–	1.8	<0.50	<0.50	<0.50	–	–	1.6	<0.50	<0.50	<0.50	–	–
Total Alkalinity ($CaCO_3$) (µg/l)	NSE	100,000[2]	–	–	–	–	–	–	310,000	–	–	–	–	310,000	–	–	–	–
Chloride (µg/l)	250,000	125,000	–	–	–	–	–	–	2,800	–	–	–	–	4,800	–	–	–	–
Ethane (µg/l)	NSE	NSE	–	–	–	–	–	–	<14.0	–	–	–	–	28	–	–	–	–
Ethene (µg/l)	NSE	NSE	–	–	–	–	–	–	<11.0	–	–	–	–	<11.0	–	–	–	–
Iron[4] (µg/l)	300	150	**860**	–	–	–	–	**500**	–	–	–	–	–	**1,140**	–	–	–	–
Manganese (µg/l)	50	25	–	–	–	–	–	–	**430**	–	–	–	–	3.9	–	–	–	–
Methane (µg/l)	NSE	NSE	–	–	–	–	–	–	<15.0	–	–	–	–	<15.0	–	–	–	–
Nitrates (N+N) (µg/l)	10,000	2,000	–	–	–	–	–	–	<100	–	–	–	–	<100	–	–	–	–
Sulfate (µg/l)	250,000	125,000	–	–	–	–	–	–	41,000	–	–	–	–	16,000	–	–	–	–
Total Organic Carbon (µg/l)	NSE	1,000[2]	–	–	–	–	–	–	7,680	–	–	–	–	810	–	–	–	–

Table 2 (Continued)
Groundwater Analytical Results

Analytical Parameters	NR 140 Standards		Well Number / Sampling Date																				
			MW-11						PZ-11						MW-12								
	ES	PAL	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10	3/8/07	3/8/07	6/14/07	6/14/07	11/15/07	11/15/07	9/4/08	3/19/09	6/23/10
Elevation Data																							
Top of PVC3			598.87	598.87	598.87	598.87	595.10	–	589.74	589.74	589.74	589.74	594.89	–	593.28	–	593.28	–	593.28	–	593.28	592.50	–
Top of Screen			590.97	590.97	590.97	590.97	590.67	–	560.74	560.74	560.74	560.74	582.49	–	585.38	–	585.38	–	585.38	–	585.38	585.10	–
Bottom of Screen			580.97	580.97	580.97	580.97	580.67	–	555.74	555.74	555.74	555.74	577.49	–	575.38	–	575.38	–	575.38	–	575.38	575.10	–
Groundwater	–	–	589.50	589.93	590.06	NM	590.93	591.40	571.99	587.43	587.09	NM	587.33	588.01	585.93	–	585.24	–	585.38	–	NM	588.96	587.55
VOCs[1] (µg/l)																Dup		Dup		Dup			
Benzene	5.0	0.5	<0.20	<0.20	<2.0	<2.0	–	–	<0.80	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	–	–
n-Butylbenzene	NSE	NSE	<0.20	<0.20	<2.0	<2.0	–	–	<0.80	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	–	–
Chloroethane	400	80	<1.0	<1.0	<10	<10	–	–	<4.0	<1.0	<1.0	<1.0	–	–	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	–	–
1,1-Dichloroethane	850	85	1.1	<0.50	<5.0	<5.0	–	–	<2.0	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	–	–
1,2-Dichloroethane	5.0	0.5	<0.50	<0.50	<0.50	<5.0	–	–	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	–	–
1,1-Dichloroethylene	7.0	0.7	<0.50	<0.50	<5.0	<5.0	–	–	<2.0	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	–	–
cis-1,2-Dichloroethylene	70	7	**220**	**310**	**520**	**270**	–	–	**140**	53	14	10	–	–	3.8	3.7	2.4	1.1	<0.50	<0.50	<0.50	–	–
trans-1,2-Dichloroethylene	100	20	**530**	**630**	**850**	**460**	–	–	30	27	1.0	5.9	–	–	<0.50	<0.50	1.7	<0.50	<0.50	<0.50	<0.50	–	–
Ethylbenzene	700	140	<0.50	<0.50	<5.0	<5.0	–	–	<2.0	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	–	–
Isopropylbenzene	NSE	NSE	<0.20	<0.20	<2.0	<2.0	–	–	<0.80	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	–	–
Naphthalene	100	10	<0.25	<0.25	<2.5	<2.5	–	–	2.6	<0.25	<0.25	<0.25	–	–	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	–	–
n-Propylbenzene	NSE	NSE	<0.50	<0.50	<5.0	<5.0	–	–	<2.0	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	–	–
Toluene	1,000	200	<0.20	<0.20	<2.0	<0.50	–	–	1.0	<0.20	<0.20	<0.50	–	–	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.50	–	–
Total Trimethylbenzenes	480	96	0.26	<0.40	<4.0	<4.0	–	–	6.5	<0.40	<0.40	<0.40	–	–	0.26	0.26	<0.40	<0.40	<0.40	<0.40	<0.40	–	–
1,2,4-Trichlorobenzene	70	14	<0.25	<0.25	<0.25	<2.5	–	–	<0.25	<0.25	<0.25	<0.25	–	–	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	–	–
1,1,1-Trichloroethane	200	40	<0.50	<0.50	<5.0	<5.0	–	–	<2.0	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	–	–
Trichloroethylene	5.0	0.5	**55**	**16**	<2.0	**21**	–	–	1.3	1.0	<0.20	0.36	–	–	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	–	–
Vinyl Chloride	0.2	0.02	**0.37**	<0.20	<2.0	<2.0	–	–	<0.80	<0.20	<0.20	<0.20	–	–	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	–	–
Total Xylenes	10,000	1,000	5.7	<0.50	<5.0	<5.0	–	–	2.4	0.91	<0.50	<0.50	–	–	<0.50	<0.50	1.2	<0.50	<0.50	<0.50	<0.50	–	–
Total Alkalinity ($CaCO_3$) (µg/l)	NSE	100,000[2]	–	500,000	390,000	–	–	–	–	240,000	200,000	–	–	–	–	–	**450,000**	–	420,000	–	–	–	–
Chloride (µg/l)	250,000	125,000	–	20,000	18,000	–	–	–	–	33,000	36,000	–	–	–	–	–	**23,000**	–	43,000	–	–	–	–
Ethane (µg/l)	NSE	NSE	–	<14.0	<14.0	–	–	–	–	<14.0	<14.0	–	–	–	–	–	<14.0	–	<14.0	–	–	–	–
Ethene (µg/l)	NSE	NSE	–	<11.0	<11.0	–	–	–	–	<11.0	<11.0	–	–	–	–	–	<11.0	–	<11.0	–	–	–	–
Iron[4] (µg/l)	300	150	–	**1,120**	–	–	–	–	–	30	–	–	–	–	–	–	**1,620**	–	–	–	–	–	–
Manganese (µg/l)	50	25	–	**92**	**150**	–	–	–	–	46	**320**	–	–	–	–	–	**42**	–	**170**	–	–	–	–
Methane (µg/l)	NSE	NSE	–	<15.0	<15.0	–	–	–	–	<15.0	22	–	–	–	–	–	<15.0	–	<15.0	–	–	–	–
Nitrates (N+N) (µg/l)	10,000	2,000	–	<100	<100	–	–	–	–	130	<100	–	–	–	–	–	**150**	–	160	–	–	–	–
Sulfate (µg/l)	250,000	125,000	–	52,000	58,000	–	–	–	–	30,000	26,000	–	–	–	–	–	**36,000**	–	38,000	–	–	–	–
Total Organic Carbon (µg/l)	NSE	1,000[2]	–	1,540	7,920	–	–	–	–	2,410	7,350	–	–	–	–	–	**1,750**	–	8,340	–	–	–	–

Table 2 (Continued)
Groundwater Analytical Results

Analytical Parameters	NR 140 Standards		Well Number / Sampling Date											
			PZ-12							MW-13				
	ES	PAL	3/8/07	6/14/07	11/15/07	9/4/08	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08	10/15/08
Elevation Data														
Top of PVC3			593.45	593.45	593.45	593.45	--	592.58	--	594.88	594.88	594.88	594.88	Well was abandoned following damage during site grading
Top of Screen			567.35	567.35	567.35	567.35	--	566.98	--	586.98	586.98	586.98	586.98	
Bottom of Screen			562.35	562.35	562.35	562.35	--	561.98	--	576.98	576.98	576.98	576.98	
Groundwater	--	--	576.76	584.89	584.64	NM	--	586.05	585.93	587.62	587.76	587.46	NM	
VOCs[1] (µg/l)							Dup							
Benzene	5.0	0.5	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	<0.20	
n-Butylbenzene	NSE	NSE	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	<0.20	
Chloroethane	400	80	<1.0	<1.0	<1.0	<1.0	<1.0	--	--	1.7	<1.0	<1.0	1.5	
1,1-Dichloroethane	850	85	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	21	18	20	20	
1,2-Dichloroethane	5.0	0.5	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	0.58	<0.50	
1,1-Dichloroethylene	7.0	0.7	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	0.58	<0.50	
cis-1,2-Dichloroethylene	70	7	<0.50	1.3	<0.50	<0.50	<0.50	--	--	23	26	23	14	
trans-1,2-Dichloroethylene	100	20	<0.50	2.2	<0.50	<0.50	<0.50	--	--	2.0	3.3	1.6	1.3	
Ethylbenzene	700	140	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	1.5	1.0	0.56	<0.50	
Isopropylbenzene	NSE	NSE	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	<0.20	
Naphthalene	100	10	<0.25	<0.25	<0.25	<0.25	<0.25	--	--	<0.25	<0.25	<0.25	<0.25	
n-Propylbenzene	NSE	NSE	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	<0.50	
Toluene	1,000	200	0.23	<0.20	<0.20	<0.50	<0.50	--	--	<0.20	<0.20	<0.20	<0.50	
Total Trimethylbenzenes	480	96	0.70	<0.40	<0.40	<0.40	<0.40	--	--	<0.40	<0.40	<0.40	<0.40	
1,2,4-Trichlorobenzene	70	14	<0.25	<0.25	<0.25	<0.25	<0.25	--	--	<0.25	<0.25	<0.25	<0.25	
1,1,1-Trichloroethane	200	40	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	32	18	14	21	
Trichloroethylene	5.0	0.5	0.21	<0.20	<0.20	<0.20	<0.20	--	--	2.6	2.6	3.4	2.8	
Vinyl Chloride	0.2	0.02	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	**1.4**	**0.73**	**1.2**	**1.6**	
Total Xylenes	10,000	1,000	1.1	2.3	<0.50	<0.50	<0.50	--	--	1.2	1.6	<0.50	<0.50	
Total Alkalinity ($CaCO_3$) (µg/l)	NSE	100,000[2]	--	270,000	220,000	--	--	--	--	--	460,000	400,000	--	
Chloride (µg/l)	250,000	125,000	--	29,000	31,000	--	--	--	--	--	8,500	26,000	--	
Ethane (µg/l)	NSE	NSE	--	<14.0	<14.0	--	--	--	--	--	16	<14.0	--	
Ethene (µg/l)	NSE	NSE	--	<11.0	<11.0	--	--	--	--	--	<11.0	<11.0	--	
Iron[4] (µg/l)	300	150	--	**610**	--	--	--	--	--	--	**680**	--	--	
Manganese (µg/l)	50	25	--	**220**	**240**	--	--	--	--	--	**77**	**76**	--	
Methane (µg/l)	NSE	NSE	--	<15.0	<15.0	--	--	--	--	--	<15.0	<15.0	--	
Nitrates (N+N) (µg/l)	10,000	2,000	--	<100	180	--	--	--	--	--	<100	<100	--	
Sulfate (µg/l)	250,000	125,000	--	130,000	120,000	--	--	--	--	--	52,000	40,000	--	
Total Organic Carbon (µg/l)	NSE	1,000[2]	--	2,370	8,450	--	--	--	--	--	1,550	7,010	--	

Table 2 (Continued)
Groundwater Analytical Results

Analytical Parameters	NR 140 Standards		Well Number / Sampling Date																	
			MW-14							PZ-14							MW-15			
	ES	PAL	3/8/07	6/14/07	11/15/07	2/19/08	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	2/19/08	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08
Elevation Data																				Well was buried during site grading and cannot be located
Top of PVC3			602.89	602.89	602.89	602.89	602.89	602.78	--	603.60	603.60	603.60	603.60	603.60	603.49	--	601.43	601.43	601.43	
Top of Screen			595.19	595.19	595.19	595.19	595.19	595.03	--	578.60	578.60	578.60	578.60	578.60	578.49	--	593.23	593.23	593.23	
Bottom of Screen			585.19	585.19	585.19	585.19	585.19	585.03	--	573.60	573.60	573.60	573.60	573.60	573.39	--	583.23	583.23	583.23	
Groundwater	--	--	593.60	593.77	593.47	NM	593.79	596.30	595.38	590.62	590.69	590.39	NM	590.62	591.35	591.78	591.57	591.70	591.43	
VOCs[1] (µg/l)																				
Benzene	5.0	0.5	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	
n-Butylbenzene	NSE	NSE	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	
Chloroethane	400	80	<1.0	<1.0	<1.0	<1.0	<1.0	--	--	<1.0	<1.0	<1.0	<1.0	<1.0	--	--	2.1	<1.0	3.7	
1,1-Dichloroethane	850	85	20	0.69	<0.50	<0.50	<0.50	--	--	<0.50	1.1	1.4	1.6	4.0	--	--	4.1	2.3	3.6	
1,2-Dichloroethane	5.0	0.5	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	3.6	
1,1-Dichloroethylene	7.0	0.7	1.5	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	
cis-1,2-Dichloroethylene	70	7	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	0.69	4.4	1.2	
trans-1,2-Dichloroethylene	100	20	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	0.53	<0.50	<0.50	<0.50	--	--	0.58	7.9	1.4	
Ethylbenzene	700	140	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	
Isopropylbenzene	NSE	NSE	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	
Naphthalene	100	10	<0.25	<0.25	<0.25	<0.25	<0.25	--	--	<0.25	<0.25	<0.25	<0.25	<0.25	--	--	<0.25	<0.25	<0.25	
n-Propylbenzene	NSE	NSE	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	
Toluene	1,000	200	0.36	<0.20	<0.20	<0.20	<0.50	--	--	<0.20	<0.20	<0.20	<0.20	<0.50	--	--	<0.20	<0.20	<0.20	
Total Trimethylbenzenes	480	96	0.60	<0.40	<0.40	<0.40	<0.40	--	--	<0.40	<0.40	<0.40	<0.40	<0.40	--	--	<0.40	<0.40	<0.40	
1,2,4-Trichlorobenzene	70	14	<0.25	<0.25	0.31	<0.25	<0.25	--	--	<0.25	<0.25	<0.25	<0.25	<0.25	--	--	<0.25	<0.25	<0.25	
1,1,1-Trichloroethane	200	40	20	4.6	<0.50	<0.50	1.4	--	--	<0.50	<0.50	<0.50	<0.50	<0.50	--	--	28	20	23	
Trichloroethylene	5.0	0.5	**20**	3.0	<0.20	<0.20	0.61	--	--	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	**23**	**13**	**18**	
Vinyl Chloride	0.2	0.02	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	<0.20	<0.20	--	--	<0.20	<0.20	<0.20	
Total Xylenes	10,000	1,000	1.9	0.68	<0.50	<0.50	<0.50	--	--	<0.50	0.82	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	
Alkalinity (µg/l)	NSE	100,000[2]	--	460,000	380,000	130,000	--	--	--	--	400,000	390,000	520,000	--	--	--	--	430,000	430,000	
Chloride (µg/l)	250,000	125,000	--	45,000	11,000	4,200	--	--	--	--	190,000	180,000	190,000	--	--	--	--	6,000	11,000	
Ethane (µg/l)	NSE	NSE	--	<14.0	<14.0	<14.0	--	--	--	--	25	<14.0	<14.0	--	--	--	--	22	<14.0	
Ethene (µg/l)	NSE	NSE	--	<11.0	<11.0	<11.0	--	--	--	--	<11.0	<11.0	<11.0	--	--	--	--	<11.0	<11.0	
Iron[4] (µg/l)	300	150	--	1.56	--	**870**	--	--	--	--	**700**	--	**970**	--	--	--	--	**490**	--	
Manganese (µg/l)	50	25	--	**93**	**58**	22	--	--	--	--	**160**	**89**	**90**	--	--	--	--	30	27	
Methane (µg/l)	NSE	NSE	--	<15.0	<15.0	<15.0	--	--	--	--	<15.0	<15.0	25.1	--	--	--	--	<15.0	<15.0	
Nitrates (N+N) (µg/l)	10,000	2,000	--	650	320	620	--	--	--	--	<100	140	<100	--	--	--	--	150	150	
Sulfate (µg/l)	250,000	125,000	--	21,000	29,000	5,600	--	--	--	--	58,000	56,000	66,000	--	--	--	--	74,000	29,000	
Total Organic Carbon (µg/l)	NSE	1,000[2]	--	1,920	10,200	1,870	--	--	--	--	1,610	5,280	1,590	--	--	--	--	<500	5,790	

Table 2 (Continued)
Groundwater Analytical Results

Analytical Parameters	NR 140 Standards		Well Number / Sampling Date											
			MW-16						MW-17					
	ES	PAL	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10
Elevation Data														
Top of PVC3			596.23	596.23	596.23	596.23	593.44	–	594.31	594.31	594.31	594.31	592.75	–
Top of Screen			588.53	588.53	588.53	588.53	588.05	–	586.31	586.31	586.31	586.31	586.01	–
Bottom of Screen			578.53	578.53	578.53	578.53	578.05	–	576.31	576.31	576.31	576.31	576.01	–
Groundwater	–	–	588.54	588.36	588.51	NM	590.03	590.19	587.79	587.45	587.59	NM	588.99	589.16
VOCs[1] (µg/l)														
Benzene	5.0	0.5	<0.20	<0.20	<0.20	<0.20	–	–	0.34	<0.20	<0.20	<0.20	–	–
n-Butylbenzene	NSE	NSE	<0.20	<0.20	<0.20	<0.20	–	–	0.29	<0.20	<0.20	<0.20	–	–
Chloroethane	400	80	<1.0	<1.0	<1.0	<1.0	–	–	<1.0	<1.0	<1.0	<1.0	–	–
1,1-Dichloroethane	850	85	3.5	2.3	4.4	2.8	–	–	0.72	1.1	0.6	0.67	–	–
1,2-Dichloroethane	5.0	0.5	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
1,1-Dichloroethylene	7.0	0.7	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
cis-1,2-Dichloroethylene	70	7	3.0	4.6	5.1	4.0	–	–	<0.50	1.5	<0.50	<0.50	–	–
trans-1,2-Dichloroethylene	100	20	<0.50	4.8	<0.50	<0.50	–	–	<0.50	2.6	<0.50	<0.50	–	–
Ethylbenzene	700	140	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
Isopropylbenzene	NSE	NSE	<0.20	<0.20	<0.20	<0.20	–	–	**9.7**	**12**	0.56	<0.20	–	–
Naphthalene	100	10	0.55	<0.25	<0.25	<0.25	–	–	0.87	<0.25	<0.25	<0.25	–	–
n-Propylbenzene	NSE	NSE	<0.50	<0.50	<0.50	<0.50	–	–	0.72	0.8	<0.50	<0.50	–	–
Toluene	1,000	200	<0.20	<0.20	<0.20	<0.50	–	–	0.41	<0.20	<0.20	<0.50	–	–
Total Trimethylbenzenes	480	96	1.50	<0.40	<0.40	<0.40	–	–	2.96	1.79	<0.40	<0.40	–	–
1,2,4-Trichlorobenzene	70	14	<0.25	<0.25	<0.25	<0.25	–	–	<0.25	<0.25	<0.25	<0.25	–	–
1,1,1-Trichloroethane	200	40	<0.50	<0.50	<0.50	<0.50	–	–	<0.50	<0.50	<0.50	<0.50	–	–
Trichloroethylene	5.0	0.5	0.29	0.31	0.23	0.29	–	–	<0.20	<0.20	<0.20	<0.20	–	–
Vinyl Chloride	0.2	0.02	**0.88**	**1.0**	**2.0**	**2.4**	–	–	<0.20	**0.7**	**1.3**	**1.4**	–	–
Total Xylenes	10,000	1,000	8.8	0.55	<0.50	<0.50	–	–	**890**	**1,100**	**93**	<0.50	–	–
Alkalinity (µg/l)	NSE	100,000[2]	–	480,000	390,000	–	–	–	–	**490,000**	**460,000**	–	–	–
Chloride (µg/l)	250,000	125,000	–	160,000	190,000	–	–	–	–	**130,000**	**96,000**	–	–	–
Ethane (µg/l)	NSE	NSE	–	<14.0	<14.0	–	–	–	–	<14.0	<14.0	–	–	–
Ethene (µg/l)	NSE	NSE	–	<11.0	<11.0	–	–	–	–	<11.0	<11.0	–	–	–
Iron[4] (µg/l)	300	150	–	**2,230**	–	–	–	–	–	**470**	–	–	–	–
Manganese (µg/l)	50	25	–	**210**	**220**	–	–	–	–	**370**	**530**	–	–	–
Methane (µg/l)	NSE	NSE	–	<15.0	62	–	–	–	–	**270**	**1780**	–	–	–
Nitrates (N+N) (µg/l)	10,000	2,000	–	<100	<100	–	–	–	–	<100	<100	–	–	–
Sulfate (µg/l)	250,000	125,000	–	72,000	57,000	–	–	–	–	**15,000**	**8,400**	–	–	–
Total Organic Carbon (µg/l)	NSE	1,000[2]	–	2,670	7,420	–	–	–	–	**4,640**	**12,200**	–	–	–

Table 2 (Continued)
Groundwater Analytical Results

Analytical Parameters	NR 140 Standards		Well Number / Sampling Date																
			MW-23						MW-24						MW-30				
	ES	PAL	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08	3/19/09	6/23/10	3/8/07	6/14/07	11/15/07	9/4/08	10/15/08
Elevation Data																			
Top of PVC3			599.96	599.96	599.96	599.96	595.15	--	600.22	600.22	600.22	600.22	595.72	--	599.63	599.63	599.63	599.63	Well was abandoned following damage during site grading
Top of Screen			594.66	594.66	594.66	594.66	594.45	--	594.92	594.92	594.92	594.92	594.84	--	593.73	593.73	593.73	593.73	
Bottom of Screen			584.66	584.66	584.66	584.66	584.45	--	584.92	584.92	584.92	584.92	584.84	--	583.73	583.73	583.73	583.73	
Groundwater	--	--	592.16	591.60	591.70	NM	594.02	594.65	592.23	591.20	592.31	NM	594.33	594.61	588.24	588.29	588.08	NM	
VOCs[1] (µg/l)																			
Benzene	5.0	0.5	<0.20	<0.20	<0.20	--	--	--	<0.20	<0.20	<0.20	<0.20	--	--	<1.0	<0.20	<0.40	<0.40	
n-Butylbenzene	NSE	NSE	<0.20	<0.20	<0.20	--	--	--	<0.20	<0.20	<0.20	<0.20	--	--	<1.0	<0.20	<0.40	<0.40	
Chloroethane	400	80	<1.0	<1.0	<1.0	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	<5.0	<1.0	<2.0	<2.0	
1,1-Dichloroethane	850	85	<0.50	<0.50	<0.50	--	--	--	4.6	2.5	3.0	<0.50	--	--	4.2	4.8	6.1	5.7	
1,2-Dichloroethane	5.0	0.5	<0.50	<0.50	<0.50	--	--	--	<0.50	<0.50	<0.50	<0.50	--	--	<0.50	<0.50	<0.50	<1.0	
1,1-Dichloroethylene	7.0	0.7	<0.50	<0.50	<0.50	--	--	--	<0.50	<0.50	<0.50	<0.50	--	--	<2.5	<0.50	<1.0	<1.0	
cis-1,2-Dichloroethylene	70	7	<0.50	<0.50	<0.50	--	--	--	1.4	<0.50	<0.50	<0.50	--	--	**160**	**160**	**200**	**180**	
trans-1,2-Dichloroethylene	100	20	0.87	<0.50	<0.50	--	--	--	2.4	<0.50	<0.50	<0.50	--	--	32	29	22	18	
Ethylbenzene	700	140	<0.50	<0.50	<0.50	--	--	--	<0.50	<0.50	<0.50	<0.50	--	--	<2.5	<0.50	<1.0	<1.0	
Isopropylbenzene	NSE	NSE	<0.20	<0.20	<0.20	--	--	--	<0.20	<0.20	<0.20	<0.20	--	--	<1.0	<0.20	<0.40	<0.40	
Naphthalene	100	10	<0.25	<0.25	<0.25	--	--	--	<0.25	<0.25	<0.25	<0.25	--	--	<1.2	<0.25	<0.50	<0.50	
n-Propylbenzene	NSE	NSE	<0.50	<0.50	<0.50	--	--	--	<0.50	<0.50	<0.50	<0.50	--	--	<2.5	<0.50	<1.0	<1.0	
Toluene	1,000	200	<0.20	<0.20	<0.20	--	--	--	<0.20	<0.20	<0.20	<0.50	--	--	<1.0	<0.20	<0.40	<1.0	
Total Trimethylbenzenes	480	96	<0.40	<0.40	<0.40	--	--	--	<0.40	<0.40	<0.40	<0.40	--	--	<2.0	<0.40	<0.80	<0.80	
1,2,4-Trichlorobenzene	70	14	<0.25	<0.25	<0.25	--	--	--	<0.25	<0.25	<0.25	<0.25	--	--	<0.25	<0.25	<0.25	<0.50	
1,1,1-Trichloroethane	200	40	1.0	<0.50	<0.50	--	--	--	<0.50	<0.50	<0.50	<0.50	--	--	<2.5	<0.50	<1.0	1.8	
Trichloroethylene	5.0	0.5	**41**	**49**	**23**	--	--	--	1.5	0.88	1.1	0.21	--	--	3.4	2.6	2.5	**5.4**	
Vinyl Chloride	0.2	0.02	<0.20	<0.20	<0.20	--	--	--	<0.20	<0.20	<0.20	<0.20	--	--	<1.0	**9.7**	**22**	**9.5**	
Total Xylenes	10,000	1,000	1.4	<0.50	<0.50	--	--	--	2.8	<0.50	<0.50	<0.50	--	--	17	<0.50	<1.0	<1.0	
Alkalinity (µg/l)	NSE	100,000[2]	--	--	330,000	--	--	--	--	--	--	--	--	--	--	420,000	--	--	
Chloride (µg/l)	250,000	125,000	--	--	3,400	--	--	--	--	--	--	--	--	--	--	16,000	--	--	
Ethane (µg/l)	NSE	NSE	--	--	<14.0	--	--	--	--	--	--	--	--	--	--	21	--	--	
Ethene (µg/l)	NSE	NSE	--	--	<11.0	--	--	--	--	--	--	--	--	--	--	<11.0	--	--	
Iron[4] (µg/l)	300	150	--	**540**	--	--	--	--	--	**650**	--	--	--	--	--	210	--	--	
Manganese (µg/l)	50	25	--	--	**220**	--	--	--	--	--	--	--	--	--	--	38	--	--	
Methane (µg/l)	NSE	NSE	--	--	<15.0	--	--	--	--	--	--	--	--	--	--	<15.0	--	--	
Nitrates (N+N) (µg/l)	10,000	2,000	--	--	<100	--	--	--	--	--	--	--	--	--	--	<100	--	--	
Sulfate (µg/l)	250,000	125,000	--	--	18,000	--	--	--	--	--	--	--	--	--	--	32,000	--	--	
Total Organic Carbon (µg/l)	NSE	1,000[2]	--	--	5,800	--	--	--	--	--	--	--	--	--	--	830	--	--	

Table 2 (continued)
Groundwater Analytical Results

Analytical Parameters	NR 140 Standards		Well Number / Sampling Date													
			SB-31		SB-32		SB-33		SB-34		SB-35		SB-36		SB-37	
			Landmark	TestAmerica	Landmark	TestAmerica	Landmark	TestAmerica	Landmark	TestAmerica	Landmark	TestAmerica	Landmark	TestAmerica	Landmark	TestAmerica
	ES	PAL	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10	6/22/10
Elevation Data								ground elev		ground elev						
Groundwater	--	--	--	591.53	--	593.63	--	--	--	--	--	593.78	--	589.32	--	589.48
VOCs[1] (µg/l)																
Benzene	5.0	0.5	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2
n-Butylbenzene	NSE	NSE	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2
Chloroethane	400	80	BDL	<1.0	BDL	3.2	**590**	86	BDL	<1.0	BDL	<1.0	BDL	<1.0	BDL	<1.0
1,1-Dichloroethane	850	85	2.6	3.8	5.8	6.6	4.4	4.3	2.4	1.9	BDL	<0.5	BDL	<0.5	0.75	<0.5
1,2-Dichloroethane	5.0	0.5	BDL	<0.5	BDL	<0.5	1.1	1.1	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
1,1-Dichloroethylene	7.0	0.7	BDL	0.81	0.85	1.0	4.8	**8.6**	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
cis-1,2-Dichloroethylene	70	7	BDL	2.7	0.5	0.61	7.3	9.0	0.68	0.51	2.3	2.6	0.79	1.3	BDL	<0.5
trans-1,2-Dichloroethylene	100	20	BDL	<0.5	BDL	<0.5	1.9	2.6	0.72	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
Ethylbenzene	700	140	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
Isopropylbenzene	NSE	NSE	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2	BDL	<0.2
Naphthalene	100	10	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25
n-Propylbenzene	NSE	NSE	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
Tetrachloroethene	5.0	0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	1.2	0.98	BDL	<0.5	BDL	<0.5	BDL	<0.5
Toluene	1,000	200	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
Total Trimethylbenzenes	480	96	BDL	<0.4	BDL	<0.4	BDL	<0.4	BDL	<0.4	BDL	<0.4	BDL	<0.4	BDL	<0.4
1,2,4-Trichlorobenzene	70	14	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25	BDL	<0.25
1,1,1-Trichloroethane	200	40	BDL	<0.5	4.4	4.0	BDL	<0.5	2.4	1.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
Trichloroethylene	5.0	0.5	3.4	4.5	0.74	0.81	BDL	4.5	**7.5**	**6.8**	BDL	<0.2	BDL	<0.2	0.57	0.31
Vinyl Chloride	0.2	0.02	**4.7**	**6.5**	BDL	<0.2	**0.28**	**0.51**	BDL	<0.2	BDL	<0.2	**1.9**	**9.4**	BDL	<0.2
Total Xylenes	10,000	1,000	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5	BDL	<0.5
Alkalinity (µg/l)	NSE	100,000[2]	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloride (µg/l)	250,000	125,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethane (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethene (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Iron[4] (µg/l)	300	150	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Manganese (µg/l)	50	25	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Methane (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Nitrates (N+N) (µg/l)	10,000	2,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Sulfate (µg/l)	250,000	125,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Organic Carbon (µg/l)	NSE	1,000[2]	--	--	--	--	--	--	--	--	--	--	--	--	--	--

NSE = No standard established
BDL = Below laboratory detection limit
Dup = Duplicate groundwater sample results
[1] = VOC list is not complete; VOCs not listed are BDL
NM = Not Measured
-- = Not analyzed for
Bold = Exceeds ch. NR 140 Enforcement Standard (ES)
Underline = Exceeds ch. NR 140 Preventive Action Limit (PAL)
[2] = PAL concentration indicates minimum increase over background concentration of indicated parameter - background concentration has not yet been defined for this site.
[3] = Top of PVC casing elevations for historical data were obtained with a GPS handheld instrument. More accurate elevations were obtained from site monitoring wells during a suvey completed by Jacob Land Surveying in 2009. Elevations are referenced to the USGS North American Vertical datum of 1988.
[4] = Iron concentrations determined by SEH using field instrumentation.
Compiled by: JEG (3&6/2007, 9/2008) LPF (11/2007&2/2008) JEG (6/2010) Checked by: RJH (3/2007) FJM (6&11/2007, 2&9/2008, 6/2010)
p:\KO\N\Nerub\070100\Reports&Specs\misc\GW Analytical Results.xlsx

Table 3
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well EW-1

Date	3/18/97	5/5/97	9/16/98	12/17/98	3/16/99	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	1/17/06	ES	PAL
Alkalinity, ppm	NS	NS	260	260	230	300	260	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Chloride, ppm	NS	NS	18	30	52	50	69	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Dissolved Oxygen, ppm	NS	NS	3.47	5.16	4.87	1.79	5.42	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
ORP, mV	NS	NS	80.6	74.2	130.4	112.7	138.4	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Nitrate, ppm	NS	NS	0.98	0.25	0.19	2	0.68	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Sulfate, ppm	NS	NS	39	54	58	48	81	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
TOC, ppm	NS	NS	6.4	2.1	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Iron, ppm	NS	NS	<0.019	<0.019	<0.024	<0.027	<0.027	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Manganese, ppm	NS	NS	0.012	0.057	0.015	0.0046	0.11	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Methane	NS	NS	NA	<0.5	NA	NA	<1.0	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NAS	NAS
Benzene	NS	NS	<0.10	<0.10	<0.10	<0.27	<0.27	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	5	0.5
Ethylbenzene	<0.38	<0.38	<0.25	<0.25	<0.25	<0.32	<0.32	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	700	140
Toluene	<0.39	<0.39	<0.10	<0.10	<0.10	<0.27	<0.27	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	1000	200
1,1-Dichloroethane	0.29	0.82	0.75	1.3	0.91	1.5	2	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	850	85
cis-1,2-Dichloroethene	4.6	*32*	*7.1*	*18*	*7.2*	*8.2*	*37*	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	70	7
trans-1,2-Dichloroethene	7	*39*	7.4	19	9.2	9.2	*24*	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	100	20
Tetrachloroethene	NS	NS	<0.25	<0.25	<0.25	<0.43	<0.43	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	5	0.5
1,1,1-Trichloroethane	<0.28	<0.28	0.88	1.1	<0.25	1.4	1.6	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	200	40
1,1,2-Trichloroethane	NS	NS	<0.25	<0.25	<0.25	<0.61	<0.61	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	5	0.5
Trichloroethene	**14**	**78**	**32**	**43**	**18**	**51**	**48**	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	5	0.5
1,2,4-Trimethylbenzene	<0.32	<0.32	<0.10	<0.10	<0.10	<0.22	<0.22	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	480	96
1,3,5-Trimethylbenzene	<0.33	<0.33	<0.10	<0.10	<0.10	<0.27	<0.27	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS		
Vinyl Chloride	NS	NS	<0.25	<0.25	<0.25	<0.20	<0.20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	0.2	0.02
Xylenes	<1.1	<1.1	<0.25	<0.25	<0.25	<0.67	<0.67	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	10,000	1000

Table 3 (Continued)
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well MW-4

Date	9/16/98	12/17/98	3/16/99	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	1/17/06	ES	PAL
Alkalinity, ppm	310	340	270	320	240	320	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Chloride, ppm	3.1	<5.0	51	43	33	NA	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Dissolved Oxygen, ppm	1.46	0.87	3.27	0.47	0.87	0.95	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
ORP, mV	71.6	141.1	127.1	90.4	156.1	261	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Nitrate, ppm	0.59	<0.017	0.11	<0.017	0.061	<0.02	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Sulfate, ppm	24	33	61	79	140	120	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
TOC, ppm	5.3	2	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Iron, ppm	<0.019	<0.019	<0.024	0.058	<0.027	<0.139	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Manganese, ppm	0.018	0.07	0.011	0.018	0.019	<0.017	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Methane	NA	<0.5	NA	NA	<10	<0.5	NS	NS	NS	NS	NS	NS	NS	NS	NA	NAS	NAS
Benzene	<0.10	<0.10	<0.31	<0.27	<0.27	<0.39	NS	NS	NS	NS	NS	NS	NS	NS	<0.20	5	0.5
Ethylbenzene	<0.25	<0.25	<0.26	<0.32	<0.32	<0.40	NS	NS	NS	NS	NS	NS	NS	NS	<0.50	700	140
Toluene	<0.10	<0.10	<0.48	<0.27	<0.27	<0.37	NS	NS	NS	NS	NS	NS	NS	NS	<0.20	1000	200
1,1-Dichloroethane	<0.25	<0.25	<0.43	<0.35	<0.35	<0.35	NS	NS	NS	NS	NS	NS	NS	NS	6.0	850	85
cis-1,2-Dichloroethene	<0.25	3.3	1.3	4.1	4	*11*	NS	NS	NS	NS	NS	NS	NS	NS	5.6	70	7
trans-1,2-Dichloroethene	<0.25	6.3	2.9	**7.4**	**8.3**	*23*	NS	NS	NS	NS	NS	NS	NS	NS	5.8	100	20
Tetrachloroethene	<0.25	<0.25	<0.42	<0.43	<0.43	<0.34	NS	NS	NS	NS	NS	NS	NS	NS	<0.50	5	0.5
1,1,1-Trichloroethane	<0.25	<0.25	<0.28	<0.30	<0.30	<0.54	NS	NS	NS	NS	NS	NS	NS	NS	<0.50	200	40
1,1,2-Trichloroethane	<0.25	<0.25	<0.69	<0.61	<0.61	<0.46	NS	NS	NS	NS	NS	NS	NS	NS	<0.25	5	0.5
Trichloroethene	**16**	**28**	**11**	**20**	**20**	**17**	NS	NS	NS	NS	NS	NS	NS	NS	**8.4**	5	0.5
1,2,4-Trimethylbenzene	<0.10	<0.10	3.5	<0.22	<0.22	<0.4	NS	NS	NS	NS	NS	NS	NS	NS	<0.20	480	96
1,3,5-Trimethylbenzene	<0.10	<0.10	0.95	<0.27	<0.27	<0.63	NS	NS	NS	NS	NS	NS	NS	NS	<0.20		
Vinyl Chloride	<0.25	<0.25	<0.48	<0.20	<0.20	<0.2	NS	NS	NS	NS	NS	NS	NS	NS	<0.20	0.2	0.02
Xylenes	<0.25	<0.25	0.46	<0.67	<0.67	<1.43	NS	NS	NS	NS	NS	NS	NS	NS	<0.50	10,000	1000

Table 3 (Continued)
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well MW-5

Date	12/17/98	3/16/99	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	6/12/03	9/17/03	12/18/03	3/31/04	7/22/04	1/17/06	ES	PAL
Alkalinity, ppm	240	240	290	280	180	190	220	268	176	163	260	320	270	190	250	270	170	250	NA	NAS	NAS
Chloride, ppm	71	79	120	97	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Dissolved Oxygen, ppm	0.5	0.57	4.7	0.32	8.12	3.12	0.96	5.88	5.01	4.76	3.91	4.85	5.47	NA	NA	NA	NA	NA	NA	NAS	NAS
ORP, mV	127.4	44.7	33.8	127.5	316	-59.8	115.9	70.6	193.2	168.3	15.4	244.1	-33.7	NA	NA	NA	NA	NA	NA	NAS	NAS
Nitrate, ppm	<0.017	<0.017	0.38	<0.037	1.7	0.39	0.038	0.24	<0.023	0.3	<0.050	0.064	0.62	0.26	<0.057	0.11	0.65	<0.063	NA	NAS	NAS
Sulfate, ppm	36	48	34	34	58	40	33	83	27	21	51	65	74	26	77	51	38	27	NA	NAS	NAS
TOC, ppm	1.8	1.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Iron, ppm	<0.019	0.053	0.36	<0.027	<0.139	<0.139	<0.139	<0.139	<0.139	<0.055	<0.0050	<0.061	<0.061	<18	<18	<18	<18	<7.5	NA	NAS	NAS
Manganese, ppm	0.056	0.15	0.18	0.091	<0.017	<0.017	<0.017	<0.017	<0.017	<0.01	<0.002	<0.0012	<0.0012	<0.21	0.57	<0.21	<0.21	<0.41	NA	NAS	NAS
Methane	<0.5	NA	NA	<10	<0.5	NA	<0.5	NA	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Benzene	<0.10	<1.0	<1.4	<1.4	<0.39	<1.1	<1.1	<1.1	<2.2	<0.08	<0.25	<0.25	<0.25	<0.41	<0.41	<0.41	<0.41	<0.41	<0.20	5	0.5
Ethylbenzene	<0.25	<2.5	<1.6	<1.6	<0.40	<1.1	<1.1	<1.1	<2.5	<0.08	<0.53	<0.53	<0.53	<0.54	<0.54	<0.54	<0.54	<0.54	<0.50	700	140
Toluene	<0.10	<1.0	<1.4	<1.4	<0.37	<2.1	<2.1	<2.1	<3.2	<0.08	<0.84	<0.84	<0.84	<0.67	<0.67	<0.67	<0.67	<0.67	<0.20	1000	200
1,1-Dichloroethane	10	10	17	30	1.6	<1.2	<1.2	<1.2	<2.9	<0.15	12	25	34	<0.75	1.6	1.2	<0.75	1.2	2.2	850	85
cis-1,2-Dichloroethene	**120**	**120**	**140**	*64*	2.7	<1.1	<1.1	<1.1	<2.7	<0.11	*13*	*20*	*22*	<0.83	<0.83	<0.83	<0.83	<0.83	5.0	70	7
trans-1,2-Dichloroethene	**230**	**290**	**240**	**130**	5.4	<1.3	<1.3	<1.3	<3.0	0.28	18	*37*	*43*	<0.89	0.89	<0.89	<0.89	<0.89	3.6	100	20
Tetrachloroethene	<0.25	<2.5	<2.1	<2.1	<0.34	<1.1	<1.1	<1.3	<2.5	<0.15	<0.63	<0.63	<0.63	<0.45	<0.45	<0.45	<0.45	<0.45	<0.50	5	0.5
1,1,1-Trichloroethane	<0.25	<2.5	<1.5	<1.5	0.7	<1.3	<1.3	<1.3	<2.9	0.4	1.6	1.4	1.5	<0.90	3.8	2.4	<0.90	1.8	1.3	200	40
1,1,2-Trichloroethane	<0.25	<2.5	<3.0	<3.0	<0.46	<1.1	<1.1	<1.1	<2.6	<0.19	<0.50	<0.50	<0.50	<0.42	<0.42	<0.42	<0.42	<0.42	<0.25	5	0.5
Trichloroethene	**545**	**420**	**680**	**380**	**57**	**44**	**78**	**52**	**41**	**22**	**74**	**80**	**110**	**20**	**150**	**78**	**20**	**66**	**43**	5	0.5
1,2,4-Trimethylbenzene	<0.10	4.6	<1.1	<1.1	<0.4	<1.3	<1.3	<1.3	<2.1	<0.11	<0.69	<0.69	<0.69	<0.97	<0.97	<0.97	<0.97	<0.97	<0.20	480	96
1,3,5-Trimethylbenzene	<0.10	1	<1.4	<1.4	<0.63	<1.7	<1.7	<1.7	<3.6	<0.08	<0.64	<0.64	<0.64	<0.83	<0.83	<0.83	<0.83	<0.83	<0.20		
Vinyl Chloride	**1.1**	<2.5	**2.2**	**1.4**	<0.2	<1.3	<1.3	<1.3	<0.6	<0.16	**0.36**	**0.42**	<0.11	<0.18	<0.18	<0.18	<0.18	<0.18	<0.20	0.2	0.02
Xylenes	<0.25	6.8	<3.3	<3.3	<1.43	<3.5	<3.5	<3.5	<7.1	<0.34	<1.83	<1.83	<1.83	2.63	<2.63	<2.63	<2.63	<2.63	<0.50	10,000	1000

Table 3 (Continued)
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well MW-22

Date	9/17/98	12/18/98	3/16/99	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	9/17/03	12/18/03	3/31/04	7/22/04	1/17/06	ES	PAL
Alkalinity, ppm	NA	270	130	230	340	NS	NS	240	394	194	332	400	390	370	340	320	270	300	NA	NAS	NAS
Chloride, ppm	NA	210	100	140	130	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Dissolved Oxygen, ppm	NA	4.54	10.78	7.6	3.71	NS	NS	6.4	6.49	6.9	8.14	5.41	4.98	3.71	NA	NA	NA	NA	NA	NAS	NAS
ORP, mV	NA	42.6	134.6	166.6	142	NS	NS	251.9	51.3	275.1	154.1	19.3	230.5	-35.3	NA	NA	NA	NA	NA	NAS	NAS
Nitrate, ppm	NA	0.83	1.4	1.4	1.4	NS	NS	1.2	1.4	0.89	1.4	2.9	2.9	2.2	1.7	4.5	1.9	1	NA	NAS	NAS
Sulfate, ppm	NA	28	29	18	28	NS	NS	13	24	12	19	31	30	33	18	30	15	19	NA	NAS	NAS
TOC, ppm	NA	2.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Iron, ppm	NA	0.023	<0.024	0.089	<0.027	NS	NS	<0.139	<0.139	<0.139	<0.055	<0.0050	<0.061	<0.061	48	130	<18	<7.5	NA	NAS	NAS
Manganese, ppm	NA	0.041	0.012	0.0025	0.00035	NS	NS	<0.017	<0.017	<0.017	<0.01	<0.002	<0.0012	<0.0012	1.6	6	<0.21	1	NA	NAS	NAS
Methane	NA	<0.5	NA	NA	<10	NS	NS	<0.5	<0.5	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Benzene	<0.20	<0.10	<0.10	<0.27	<0.54	NS	NS	<0.21	<1.1	<0.43	<0.08	<0.25	<0.25	<0.50	<0.41	<0.41	<0.41	<0.41	<0.20	5	0.5
Ethylbenzene	<0.50	<0.25	<0.25	<0.32	<0.64	NS	NS	<0.22	<1.1	<0.49	<0.08	<0.53	<0.53	<1.1	<0.54	<0.54	<0.54	<0.54	<0.50	700	140
Toluene	<0.20	<0.10	<0.10	<0.27	<0.54	NS	NS	<0.41	<2.1	<0.63	<0.08	<0.84	<0.84	<1.7	<0.67	<0.67	<0.67	<0.67	<0.20	1000	200
1,1-Dichloroethane	<0.50	1.7	<0.25	<0.35	1.4	NS	NS	<0.24	<1.2	<0.57	<0.12	<0.87	1.1	1.9	<0.75	<0.75	<0.75	<0.75	<0.50	850	85
cis-1,2-Dichloroethene	<0.50	<0.25	<0.25	<0.28	<0.56	NS	NS	<0.21	<1.1	<0.53	<0.11	<0.81	<0.81	<1.6	<0.83	<0.83	<0.83	<0.83	<0.50	70	7
trans-1,2-Dichloroethene	<0.50	<0.25	<0.25	<0.79	<1.6	NS	NS	<0.25	<1.3	<0.59	<0.11	<0.80	<0.80	<1.6	<0.89	<0.89	<0.89	<0.89	<0.50	100	20
Tetrachloroethene	<0.50	<0.25	<0.25	<0.43	<0.86	NS	NS	<0.22	<1.1	<0.49	<0.15	<0.63	<0.63	<1.3	<0.45	<0.45	<0.45	<0.45	<0.50	5	0.5
1,1,1-Trichloroethane	*140*	**240**	9	30	**220**	NS	NS	28	*100*	12	32	*100*	*140*	**210**	36	*42*	11	35	26	200	40
1,1,2-Trichloroethane	*1*	*1.8*	<0.25	<0.61	*1.5*	NS	NS	<0.22	<1.1	<0.52	<0.19	*0.66*	*0.62*	*1.1*	<0.42	<0.42	<0.42	<0.42	<0.25	5	0.5
Trichloroethene	*3*	**5.5**	*0.56*	*0.81*	*5*	NS	NS	0.38	<1.2	<0.73	*1*	*3.6*	*4*	**7.5**	*1.2*	*1.3*	<0.48	*1.2*	*0.84*	5	0.5
1,2,4-Trimethylbenzene	<0.20	<0.10	3.2	<0.22	<0.44	NS	NS	<0.26	<1.3	<0.42	<0.11	<0.57	<0.69	<1.4	<0.97	<0.97	<0.97	<0.97	<0.20	480	96
1,3,5-Trimethylbenzene	<0.20	<0.10	0.8	<0.27	<0.54	NS	NS	<0.34	<1.7	<0.72	<0.08	<0.64	<0.64	<1.3	<0.83	<0.83	<0.83	<0.83	<0.20		
Vinyl Chloride	<0.50	<0.25	<0.25	<0.20	<0.40	NS	NS	<0.25	<1.3	<0.12	<0.16	<0.11	<0.11	<0.22	<0.18	<0.18	<0.18	<0.18	<0.20	0.2	0.02
Xylenes	<0.50	6.2	<0.25	<0.67	<1.34	NS	NS	<0.69	<3.5	<1.45	<0.34	<1.83	<1.83	<3.7	<2.63	<2.63	<2.63	<2.63	<0.50	10,000	1000

Table 3 (Continued)
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well MW-23

Date	12/18/98	3/16/99	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	6/12/03	9/17/03	12/18/03	3/31/04	7/22/04	1/17/06	ES	PAL
Alkalinity, ppm	320	230	220	290	310	250	260	346	280	227	370	350	320	240	290	300	200	280	NA	NAS	NAS
Chloride, ppm	83	45	9.6	7.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Dissolved Oxygen, ppm	0.54	1.13	3.97	1.21	6.69	0.75	1.55	0.78	0.99	0.74	0.49	1.05	1.02	NA	NA	NA	NA	NA	NA	NAS	NAS
ORP, mV	36.1	129.9	118	78.5	296	-50.3	-34	36.11	99.1	-23	-47.1	213.1	-40.8	NA	NA	NA	NA	NA	NA	NAS	NAS
Nitrate, ppm	<0.017	0.054	2.1	1.4	0.39	0.075	0.11	0.039	<0.023	0.11	<0.050	0.044	<0.057	0.5	<0.057	0.094	0.70	<0.063	NA	NAS	NAS
Sulfate, ppm	54	98	83	90	66	56	64	49	81	50	34	34	39	77	52	69	75	55	NA	NAS	NAS
TOC, ppm	2.3	2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Iron, ppm	<0.019	<0.024	0.033	0.063	<0.139	<0.139	0.18	<0.139	<0.139	0.1	0.042	<0.061	<0.061	<18	<18	<19	<18	44	NA	NAS	NAS
Manganese, ppm	0.15	<0.0086	0.005	0.028	0.025	<0.017	0.044	<0.017	<0.017	0.042	0.038	0.05	0.17	30	2.3	0.35	0.77	29	NA	NAS	NAS
Methane	<0.5	NA	NA	<10	1.1	NA	<0.5	<0.5	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Benzene	<0.10	<0.10	<0.27	<0.27	<2.0	<1.1	<1.1	<1.1	<2.2	<0.08	<0.25	<0.25	<0.25	<0.41	<0.41	<0.41	<0.82	<0.41	<0.20	5	0.5
Ethylbenzene	<0.25	<0.25	<0.32	<0.32	<2.0	<1.1	<1.1	<1.1	<2.5	<0.08	<0.53	<0.53	<0.53	<0.54	<0.54	<0.54	<0.54	<0.54	<0.50	700	140
Toluene	<0.10	<0.10	<0.27	<0.27	<1.9	<2.1	<2.1	<2.1	<3.2	<0.08	<0.84	<0.84	<0.84	<0.67	<0.67	<0.67	<0.67	<0.67	1.3	1000	200
1,1-Dichloroethane	2.1	0.31	<0.35	0.45	<1.8	<1.2	<1.2	2.4	<2.9	<0.15	5.7	9	10	<0.75	<0.75	1	<0.75	<0.75	<0.50	850	85
cis-1,2-Dichloroethene	5.8	0.58	<0.28	<0.28	2	<1.1	<1.1	1.8	<2.7	<0.11	*11*	*18*	*22*	<0.83	1.3	1.6	<0.83	<0.83	<0.50	70	7
trans-1,2-Dichloroethene	16	1.4	<0.79	<0.79	<2.2	<1.3	<1.3	4.1	<3.0	<0.11	*28*	*59*	*71*	<0.89	3.6	5.2	<0.89	<0.89	0.64	100	20
Tetrachloroethene	<0.25	<0.25	<0.43	<0.43	<1.7	<1.1	<1.1	<1.1	<2.5	<0.15	<0.63	<0.63	<0.63	<0.45	<0.45	<0.45	<0.45	<0.45	<0.50	5	0.5
1,1,1-Trichloroethane	2.8	<0.25	2	3	<2.7	<1.3	1.4	<1.3	<2.9	1.6	1.7	1.6	1.9	<0.90	2.7	1.6	<0.90	1.3	1.0	200	40
1,1,2-Trichloroethane	<0.25	<0.25	<0.61	<0.61	<2.3	<1.1	<1.1	<1.1	<2.6	<0.19	<0.50	<0.50	<0.50	<0.42	<0.42	<0.42	<0.42	<0.42	<0.25	5	0.5
Trichloroethene	**140**	**28**	**47**	**69**	**110**	**47**	**73**	**130**	**52**	**45**	**140**	**150**	**150**	**24**	**93**	**57**	**27**	**57**	**71**	5	0.5
1,2,4-Trimethylbenzene	<0.10	<0.10	<0.22	<0.22	<2	<1.3	<1.3	<1.3	<2.1	<0.11	<0.69	<0.69	<0.69	<0.97	<0.97	<0.97	<0.97	<0.97	<0.20	480	96
1,3,5-Trimethylbenzene	<0.10	<0.10	<0.27	<0.27	<3.2	<1.7	<1.7	<1.7	<3.6	<0.08	<0.64	<0.64	<0.64	<0.83	<0.83	<0.83	<0.83	<0.83	<0.20		
Vinyl Chloride	<0.25	<0.25	<0.20	<0.20	<1	<1.3	<1.3	<1.3	<0.6	<0.16	<0.11	*0.18*	**0.28**	<0.18	<0.18	<0.18	<0.18	<0.18	<0.20	0.2	0.02
Xylenes	7.4	<0.25	<0.67	<0.67	<7.2	<3.5	<3.5	<3.5	<7.1	<0.34	<1.83	<1.83	<1.83	<2.63	<2.63	<2.63	<2.63	<2.63	<0.50	10,000	1000

Table 3 (Continued)
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well MW-24

Date	9/17/98	12/18/98	3/16/99	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	6/12/03	9/17/03	12/18/03	3/31/04	7/22/04	1/17/06	ES	PAL
Alkalinity, ppm	NA	270	230	310	260	240	310	420	419	335	355	330	380	290	370	300	410	380	400	NA	NAS	NAS
Chloride, ppm	NA	11	23	28	16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Dissolved Oxygen, ppm	NA	0.39	3.28	0.76	2.16	2.64	1.63	1.52	3.48	3.11	1.06	0.97	1.49	5.11	NA	NA	NA	NA	NA	NA	NAS	NAS
ORP, mV	NA	1.5	138.1	56	102.5	279	-37.6	79	87.5	141.3	276.9	18.5	263.3	-31.6	NA	NA	NA	NA	NA	NA	NAS	NAS
Nitrate, ppm	NA	<0.017	1	0.13	0.41	<0.02	<0.02	<0.02	0.033	<0.023	<0.05	<0.050	0.03	<0.057	<0.047	<0.057	0.054	<0.063	<0.063	NA	NAS	NAS
Sulfate, ppm	NA	57	49	40	37	100	110	83	80	69	51	65	51	65	100	63	69	110	76	NA	NAS	NAS
TOC, ppm	NA	1.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Iron, ppm	NA	0.029	<0.024	<0.027	<0.027	<0.139	<0.139	<0.139	<0.139	<0.139	<0.055	<0.0050	<0.061	<0.061	<18	<18	<18	<18	<0.75	NA	NAS	NAS
Manganese, ppm	NA	0.2	0.01	0.026	0.0018	<0.017	<0.017	<0.017	<0.017	<0.017	0.028	0.012	<0.0012	<0.0012	<0.21	29	0.57	3.6	<0.41	NA	NAS	NAS
Methane	NA	7.9	NA	NA	<10	<0.5	NA	<0.5	<0.5	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Benzene	<0.10	<0.10	<0.10	<0.27	<0.27	<0.39	<0.21	<0.21	<0.21	<0.43	<0.08	<0.25	<0.25	<0.25	<0.41	<0.41	<0.41	<0.41	<0.41	<0.20	5	0.5
Ethylbenzene	<0.25	0.52	<0.25	<0.32	<0.32	<0.40	<0.22	<0.22	<0.22	<0.49	<0.08	<0.53	<0.53	<0.53	<0.54	<0.54	<0.54	<0.54	<0.54	<0.50	700	140
Toluene	<0.10	<0.10	<0.10	<0.27	<0.27	<0.37	<0.41	<0.41	<0.41	<0.63	<0.08	<0.84	<0.84	<0.84	<0.67	<0.67	<0.67	<0.67	<0.67	<0.20	1000	200
1,1-Dichloroethane	<0.25	0.32	<0.25	<0.35	0.71	<0.35	0.37	4.1	6.1	7.4	3.7	6.2	3.9	2.9	1.4	8.5	2.8	<0.75	2.2	4.8	850	85
cis-1,2-Dichloroethene	<0.25	1	<0.25	<0.28	<0.28	0.85	<0.21	1.9	<0.21	<0.53	<0.11	<0.81	<0.81	<0.81	<0.83	<0.83	<0.83	<0.83	<0.83	<0.50	70	7
trans-1,2-Dichloroethene	<0.25	2.1	<0.25	<0.79	<0.79	<0.43	<0.25	<0.25	<0.25	<0.59	<0.11	<0.80	<0.80	<0.80	<0.89	<0.89	<0.89	<0.89	>0.89	<0.50	100	20
Tetrachloroethene	<0.25	<0.25	<0.25	<0.43	<0.43	<0.34	<0.22	<0.22	<0.22	<0.49	<0.15	<0.63	<0.63	<0.63	<0.45	<0.45	<0.45	<0.45	<0.45	<0.50	5	0.5
1,1,1-Trichloroethane	<0.25	<0.25	<0.25	<0.30	<0.30	<0.54	<0.26	<0.26	0.41	2.2	1.6	<0.65	<0.65	0.86	1	1.2	<0.90	<0.90	<0.90	<0.50	200	40
1,1,2-Trichloroethane	<0.25	<0.25	<0.25	<0.61	<0.61	<0.46	<0.22	<0.22	<0.22	<0.52	<0.19	<0.50	<0.50	<0.50	<0.42	<0.42	<0.42	<0.42	<0.42	<0.25	5	0.5
Trichloroethene	*4.3*	**5.8**	*1.1*	*0.67*	*0.87*	<0.46	<0.24	<0.24	<0.24	<0.73	<0.13	*0.81*	<0.39	<0.39	<0.48	*0.98*	<0.48	<0.48	<0.48	*1.4*	5	0.5
1,2,4-Trimethylbenzene	<0.10	<0.10	3.1	<0.22	<0.22	<0.4	<0.26	<0.26	<0.26	<0.42	<0.11	<0.69	<0.69	<0.69	<0.97	<0.97	<0.97	<0.97	<0.97	<0.20	480	96
1,3,5-Trimethylbenzene	<0.10	<0.10	0.68	<0.27	<0.27	<0.63	<0.34	<0.34	<0.34	<0.72	<0.08	<0.64	<0.64	<0.64	<0.83	<0.83	<0.83	<0.83	<0.83	<0.20		
Vinyl Chloride	<0.25	<0.25	<0.25	<0.20	<0.20	<0.2	<0.25	<0.25	<0.25	<1.0	<0.16	<0.11	<0.11	<0.11	<0.18	<0.18	<0.18	<0.18	<0.18	<0.20	0.2	0.02
Xylenes	<0.25	9.4	<0.25	<0.67	<0.67	<1.43	<0.69	<0.69	<0.69	<1.45	<0.34	<1.83	<1.83	<1.83	<2.63	<2.63	<2.63	<2.63	<2.63	<0.50	10,000	1000

Table 3 (Continued)
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well MW-25

Date	12/18/98	4/14/99	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	6/12/03	9/17/03	12/18/03	3/31/04	7/22/04	1/17/06	ES	PAL
Alkalinity, ppm	320	460	410	310	NS	NS	450	437	485	480	390	330	310	420	300	440	460	410	NA	NAS	NAS
Chloride, ppm	35	41	38	26	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Dissolved Oxygen, ppm	0.28	0.45	0.47	0.48	NS	NS	0.53	0.28	0.14	0.44	0.31	0.37	0.57	NA	NA	NA	NA	NA	NA	NAS	NAS
ORP, mV	-69.7	-20.1	-21.1	-13.1	NS	NS	83.8	1.1	49.2	30.9	-25.1	10.2	-40.7	NA	NA	NA	NA	NA	NA	NAS	NAS
Nitrate, ppm	<0.017	<0.017	0.069	<0.037	NS	NS	<0.02	<0.02	<0.023	<0.05	<0.25	0.052	<0.057	<0.047	<0.057	0.12	0.15	<0.063	NA	NAS	NAS
Sulfate, ppm	110	120	160	180	NS	NS	400	290	310	230	310	160	130	210	160	46	220	280	NA	NAS	NAS
TOC, ppm	2.1	2.4	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Iron, ppm	1.1	1.6	1.2	1.5	NS	NS	0.23	0.54	<0.139	0.49	0.48	0.98	0.98	150	310	280	200	93	NA	NAS	NAS
Manganese, ppm	0.26	0.33	0.44	0.35	NS	NS	1.1	1	0.14	1.2	0.67	0.44	0.54	730	330	970	1200	770	NA	NAS	NAS
Methane	8	NA	NA	13	NS	NS	18	20	26	11	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Benzene	<0.10	<0.27	<0.27	<0.27	NS	NS	<0.21	<0.21	<0.43	<0.43	<0.25	<0.25	<0.25	<0.41	<0.41	<0.41	<0.41	<0.41	<0.20	5	0.5
Ethylbenzene	0.5	<0.32	<0.32	<0.32	NS	NS	<0.22	<0.22	<0.49	<0.49	<0.53	<0.53	<0.53	<0.54	<0.54	<0.54	<0.54	<0.54	<0.50	700	140
Toluene	<0.10	<0.27	<0.27	<0.27	NS	NS	<0.41	<0.41	<0.63	<0.63	<0.84	<0.84	<0.84	<0.67	<0.67	<0.67	<0.67	<0.67	<0.20	1000	200
1,1-Dichloroethane	1.3	<0.43	<0.35	0.5	NS	NS	0.33	6.1	<0.57	<0.57	<0.87	<0.87	<0.87	<0.75	1.3	<0.75	<0.75	<0.75	<0.50	850	85
cis-1,2-Dichloroethene	**145**	*52*	*39*	**74**	NS	NS	1.4	<0.21	<0.53	<0.53	*22*	*27*	*23*	<0.83	*26*	<0.83	<0.83	*13*	*20*	70	7
trans-1,2-Dichloroethene	**420**	**170**	**110**	**200**	NS	NS	3.1	<0.25	<0.59	<0.59	*40*	*64*	*53*	<0.89	*46*	<0.89	<0.89	*22*	*55*	100	20
Tetrachloroethene	<0.25	<0.43	<0.43	<0.43	NS	NS	<0.22	<0.22	<0.49	<0.49	<0.63	<0.63	<0.63	<0.45	<0.45	<0.45	<0.45	<0.45	<0.50	5	0.5
1,1,1-Trichloroethane	<0.25	<0.30	<0.30	<0.30	NS	NS	<0.26	0.41	<0.57	<0.57	<0.65	<0.65	<0.65	<0.90	<0.90	<0.90	<0.90	<0.90	<0.50	200	40
1,1,2-Trichloroethane	<0.25	<0.61	<0.61	<0.61	NS	NS	<0.22	<0.22	<0.52	<0.52	<0.50	<0.50	<0.50	<0.42	<0.42	<0.42	<0.42	<0.42	<0.25	5	0.5
Trichloroethene	**10**	*3.1*	*2.7*	*2.7*	NS	NS	*1.1*	*1.3*	<0.73	<0.73	*1.9*	*1.6*	*2.5*	*0.6*	*3.5*	<0.48	<0.48	*3.5*	**10**	5	0.5
1,2,4-Trimethylbenzene	<0.10	<0.22	<0.22	<0.22	NS	NS	<0.26	<0.26	<0.42	<0.42	<0.69	<0.69	<0.69	<0.97	<0.97	<0.97	<0.97	<0.97	<0.20	480	96
1,3,5-Trimethylbenzene	<0.10	<0.27	<0.27	<0.27	NS	NS	<0.34	<0.34	<0.72	<0.72	<0.64	<0.64	<0.64	<0.83	<0.83	<0.83	<0.83	<0.83	<0.20		
Vinyl Chloride	<0.25	<0.20	<0.20	<0.20	NS	NS	<0.25	<0.25	<0.12	<0.12	<0.11	<0.11	<0.11	<0.18	<0.18	<0.18	<0.18	<0.18	<0.20	0.2	0.02
Xylenes	8.3	<0.67	<0.67	<0.67	NS	NS	<0.69	<0.69	<1.45	<1.45	<1.83	<1.83	<1.83	<2.63	<2.63	<2.63	<2.63	<2.63	<0.50	10,000	1000

Table 3 (Continued)
Summary of Historical Groundwater Analytical Results
Chlorinated Area - Well MW-30

Date	7/21/99	12/9/99	3/13/01	7/5/01	9/26/01	12/27/01	4/8/02	6/18/02	10/2/02	1/7/03	3/11/03	6/12/03	9/17/03	12/18/03	3/31/04	7/22/04	1/17/06	ES	PAL
Alkalinity, ppm	NA	370	360	330	270	386	318	349	370	350	330	370	390	350	330	350	NA	NAS	NAS
Chloride, ppm	NA	46	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Dissolved Oxygen, ppm	NA	1.54	2.44	1.03	1.66	1.77	1.94	2.03	1.1	1.76	1.53	NA	NA	NA	NA	NA	NA	NAS	NAS
ORP, mV	NA	205.7	247	-77.6	-17.7	41.1	178.3	104.1	-65	157	-38.6	NA	NA	NA	NA	NA	NA	NAS	NAS
Nitrate, ppm	NA	0.084	<0.02	0.072	<0.02	0.037	<0.023	<0.05	<0.050	0.04	<0.057	<0.047	<0.057	<0.047	<0.063	<0.063	NA	NAS	NAS
Sulfate, ppm	NA	53	57	67	56	62	95	54	73	60	59	59	50	56	83	53	NA	NAS	NAS
TOC, ppm	NA	4.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Iron, ppm	NA	<0.027	<0.139	<0.139	<0.139	<0.139	<0.139	<0.055	<0.005	<0.061	0.1	<18	<18	<19	<18	<7.5	NA	NAS	NAS
Manganese, ppm	NA	0.015	0.028	0.021	0.032	<0.017	<0.017	<0.01	0.03	0.033	0.078	<0.21	8.6	4.9	1.7	2.7	NA	NAS	NAS
Methane	NA	19	9.7	NA	26	6	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NAS	NAS
Benzene	<0.54	<2.7	<3.9	<2.1	<2.1	<4.2	<4.3	<0.8	<1.2	<1.2	<1.2	<0.41	<0.82	<2.0	<0.41	<1.0	<0.20	5	0.5
Ethylbenzene	<0.64	<3.2	<4.0	<2.2	<2.2	<4.4	<4.9	<0.8	<2.6	<2.6	<2.6	<0.54	<1.1	<2.7	<0.54	<1.4	<0.50	700	140
Toluene	<0.54	<2.7	<3.7	<4.1	<4.1	<8.2	<6.3	<0.8	<4.2	<4.2	<4.2	<0.67	<1.3	<3.4	<0.67	<1.7	<0.20	1000	200
1,1-Dichloroethane	2.1	<3.5	<3.5	2.6	2.4	<4.8	<5.7	2	<4.3	<4.3	4.9	1.8	4.8	<3.8	1.5	10	10	850	85
1,1-Dichloroethene	NHD	NHD	NHD	NHD	NHD	NHD	NHD	NHD	<2.8	<2.8	<2.8	<0.57	*1.5*	<2.8	<0.57	<1.4	*1.4*	7	0.7
cis-1,2-Dichloroethene	**270**	**580**	**740**	**600**	**650**	**780**	**100**	**200**	**640**	**610**	**680**	3.9	**400**	**510**	2.1	**360**	**340**	70	7
trans-1,2-Dichloroethene	*44*	**120**	**170**	**170**	**110**	**170**	17	*39*	**170**	**160**	**180**	<0.89	*92*	**130**	<0.89	*91*	**110**	100	20
Tetrachloroethene	<0.86	<4.3	<3.4	<2.2	<2.2	<4.4	<4.9	<1.5	<3.1	<3.1	<3.2	<0.45	<0.90	<2.2	<0.45	<1.1	<0.50	5	0.5
1,1,1-Trichloroethane	3.7	3.8	<5.4	<2.6	<2.6	<5.2	<5.7	<1.4	<3.2	<3.2	<3.2	2.4	2.3	<4.5	<0.90	<2.2	<0.50	200	40
1,1,2-Trichloroethane	<1.2	<6.1	<4.6	<2.2	<2.2	<4.4	<5.2	<1.9	<2.5	<2.5	<2.5	<0.42	<0.84	<2.1	<0.42	<1.0	<0.25	5	0.5
Trichloroethene	**5.3**	**6**	<4.6	<2.4	<2.4	<4.8	<7.3	*4.7*	<1.9	<1.9	*2*	*2.9*	*4.9*	<2.4	*2.3*	*3.5*	*2.4*	5	0.5
1,2,4-Trimethylbenzene	<0.44	<2.2	<4	<2.6	<2.6	<5.2	<4.2	<1.1	<3.4	<3.4	<3.4	<0.97	<1.9	<4.8	<0.97	<2.4	<0.20	480	96
1,3,5-Trimethylbenzene	<0.54	<2.7	<6.3	<3.4	<3.4	<6.8	<7.2	<0.8	<3.2	<3.2	<3.2	<0.83	<1.7	<4.1	<0.83	<2.1	<0.20		
Vinyl Chloride	**13**	**8.1**	<2	<2.5	**27**	<5	<1.2	<1.6	**7.5**	**6.3**	**4.2**	<0.18	**17**	<0.90	<0.18	**6.5**	**11**	0.2	0.02
Xylenes	<1.34	<0.67	<14.3	<6.9	<6.9	<13.8	<14.5	<3.3	<9.1	<9.1	<9.1	<2.63	<5.3	<13.1	<2.63	<6.6	<0.50	10,000	1000

All results are in parts per billion (ppb) except as shown
BOLD indicates exceedance of the NR 140 enforcement standard (ES)
Italics indicates exceedance of NR 140 preventive action limit (PAL)
NA - Not Analyzed for this analyte
NS - Not Sampled
NAS - No Applicable Standard for this analyte
ppm - parts per million
ORP - Oxidation Reduction Potential
TOC - Total Organic Carbon
Sample results dated prior to 1998 were collected by HSI Geotrans, sample results dated 1998 through 2004 were collected by Envirogen/Shaw, sample results dated 2006 were collected by SEH.

p:\KO\N\Nerub\070100\Reports&Specs\misc\GW Analytical Results_Historical.xlsx

Table 4
Depth To Groundwater Measurements
Former Mirro #10

Well ID	*2007 Ground Surface**	3/8/07		6/14/07		11/15/07		*2008 - 2010 Ground Surface**	9/4/08		3/19/09		6/23/10	
		GW Elevation	GW Depth	GW Elevation	GW Depth	GW Elevation	GW Depth		GW Elevation	GW Depth	GW Elevation	GW Depth	GW Elevation	GW Depth
EW-1	599.95	NM	NM	NM	NM	NM	NM	596.06	NM	NM	594.50	1.56	595.32	0.74
MW-4	598.12	592.36	5.76	592.11	6.01	592.06	6.06	596.12	NM	NM	594.29	1.83	594.72	1.40
MW-5	598.41	592.13	6.28	591.92	6.49	591.93	6.48	595.97	NM	NM	594.79	1.18	NM	NM
MW-11	595.97	589.50	6.47	589.93	6.04	590.06	5.91	595.16	NM	NM	590.93	4.23	591.40	3.76
MW-12	590.38	585.93	4.45	585.24	5.14	585.38	5.00	592.62	NM	NM	588.96	3.66	587.55	5.07
MW-13	591.98	587.62	4.36	587.76	4.22	587.46	4.52	A	A	A	A	A	A	A
MW-14	600.19	593.60	6.59	593.77	6.42	593.47	6.72	599.91	593.79	6.12	596.30	3.61	595.38	4.53
MW-15	598.23	591.57	6.66	591.70	6.53	591.43	6.80	L	L	L	L	L	L	L
MW-16	593.53	588.54	4.99	588.36	5.17	588.51	5.02	593.29	NM	NM	590.03	3.26	590.19	3.10
MW-17	591.31	587.79	3.52	587.45	3.86	587.59	3.72	592.86	NM	NM	588.99	3.87	589.16	3.70
MW-23	597.66	592.16	5.50	591.60	6.06	591.70	5.96	595.83	NM	NM	594.02	1.81	594.65	1.18
MW-24	597.92	592.23	5.69	591.20	6.72	592.31	5.61	596.22	NM	NM	594.33	1.89	594.61	1.61
MW-30	596.73	588.24	8.49	588.29	8.44	588.08	8.65	A	A	A	A	A	A	A

*Ground surface elevations represent the ground elevation at each monitoring well before (2007) and after (2008-2010) the site grading conducted in 2008.
GW - Groundwater
Depths and elevations measured in feet
NM - Not Measured
A - Well Abandoned
L - Well Lost

LEGEND:

MW-11 = EXISTING MONITORING WELL LOCATION AND NUMBER

PZ-11 = EXISTING PIEZOMETER LOCATION AND NUMBER

SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER

MW-13(A) = ABANDONED (A) OR LOST (L) MONITORING WELL LOCATION AND NUMBER

= PROPERTY LINES

= PROTON REDUCTION ELECTRODE WELL (IMPROPERLY ABANDONED)

= UTILITY POLE

= SANITARY MANHOLE

STM = STORM SEWER

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009

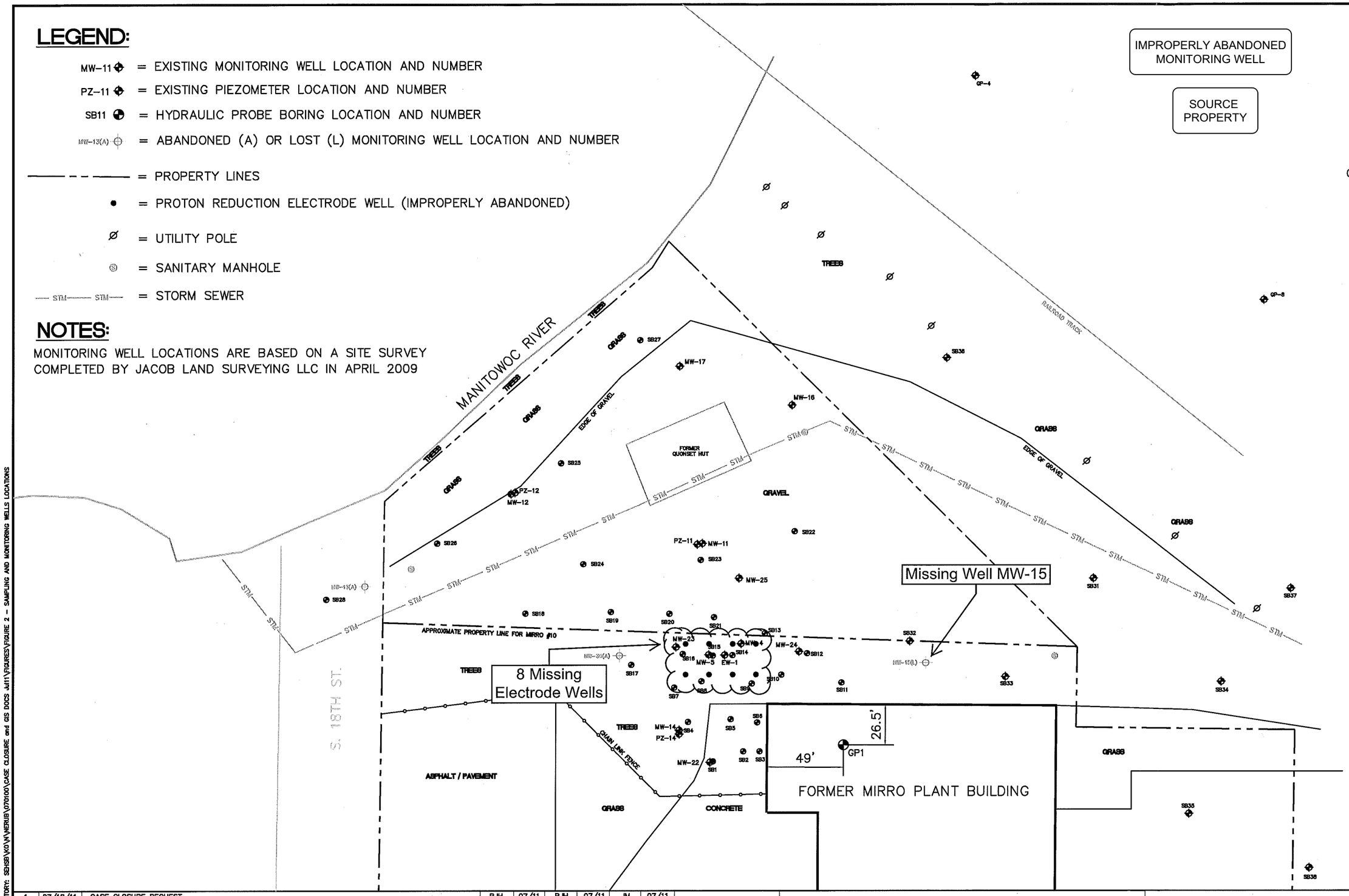
IMPROPERLY ABANDONED MONITORING WELL

SOURCE PROPERTY

N

APPROXIMATE SCALE IN FEET

0 15 30 60



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	07/18/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11
2	08/07/12	UPDATED CASE CLOSURE REQUEST	MW	08/12			JM	08/12

SEH

CASE CLOSURE REQUEST
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

Missing wells Locations

PROJ. NO. NERUB070100

DATE 08/07/12

2a

13

DRAWING DIRECTORY: SEHSR\KO\W\NERUB\070100\CASE CLOSURE and GIS DOCS Jul11\FIGURES\FIGURE 2 - SAMPLING AND MONITORING WELLS LOCATIONS

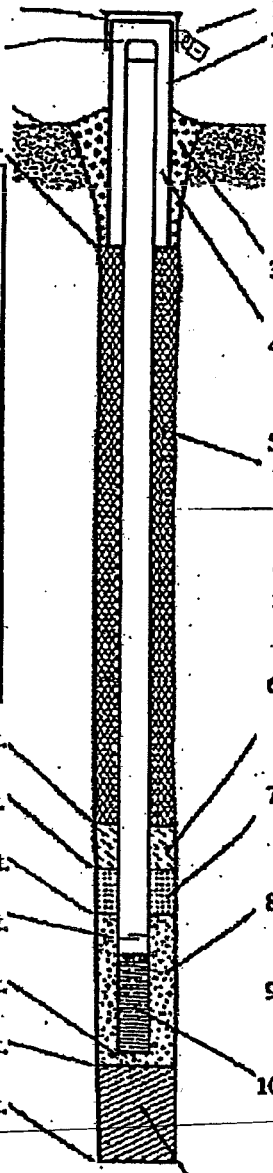
IMPROPERLY ABANDONED MONITORING WELL

SOURCE PROPERTY

d/Wastewater ☐ Waste Management ☐
Remediation/Redevelopment ☐ Other ☐ _____

MONITORING WELL CONSTRUCTI(
Form 4400-113A Rev. 7-98

Facility/Project Name: MIRRO PLANT #10	Local Grid Location of Well: _____ ft. ☐N. ☐S. _____ ft. ☐E. ☐W.	Well Name: MW-15
Facility License, Permit or Monitoring No.	Local Grid Origin ☐ (estimated: ☐) or Well Location ☐ Lat. ___° ___' ___" Long. ___° ___' ___" or	Wis. Unique Well No. / DNR Well ID No.
Facility ID	St. Plane _____ ft. N, _____ ft. E. S/C/N	Date Well Installed: 03/07/2007 (m m d d y y y y)
Type of Well: Well Code ___/___	Section Location of Waste/Source: ___1/4 of ___1/4 of Sec. ___, T. ___ N, R. ___ ☐E ☐W	Well Installed By: Name (first, last) and Fir: Todd Fields, Tetra Tech, Inc.
Distance from Waste/Source _____ ft. / Enf. Stds. Apply ☐	Location of Well Relative to Waste/Source: u ☐ Upgradient, s ☐ Sidegradient, d ☐ Downgradient, n ☐ Not Known	Gov. Lot Number: _____



A. Protective pipe, top elevation _____ ft. MSL

B. Well casing, top elevation _____ ft. MSL

C. Land surface elevation _____ ft. MSL

D. Surface seal, bottom _____ ft. MSL or 1.0 ft.

12. USCS classification of soil near screen:
GP ☐ GM ☐ GC ☐ GW ☐ SW ☐ SP ☐
SM ☑ SC ☐ ML ☑ MH ☐ CL ☐ CH ☐
Bedrock ☐

13. Sieve analysis performed? ☐ Yes ☑ No

14. Drilling method used: Rotary ☐ 50; Hollow Stem Auger ☑ 41; Other ☐

15. Drilling fluid used: Water ☐ 02; Air ☐ 01; Drilling Mud ☐ 03; None ☑ 99

16. Drilling additives used? ☐ Yes ☑ No

Describe _____

17. Source of water (attach analysis, if required):

E. Bentonite seal, top _____ ft. MSL or 3.0 ft.

F. Fine sand, top _____ ft. MSL or 4.0 ft.

G. Filter pack, top _____ ft. MSL or 4.5 ft.

H. Screen joint, top _____ ft. MSL or 5.0 ft.

I. Well bottom _____ ft. MSL or 15.0 ft.

J. Filter pack, bottom _____ ft. MSL or 15.0 ft.

K. Borehole, bottom _____ ft. MSL or 15.0 ft.

L. Borehole, diameter 8.2 in.

M. O.D. well casing 2.40 in.

N. I.D. well casing 2.00 in.

1. Cap and lock? ☑ Yes ☐ No

2. Protective cover pipe:
a. Inside diameter: 4.0 in.
b. Length: 7.0 ft.
c. Material: Steel ☑ 04; Other ☐
d. Additional protection? ☐ Yes ☑ No
If yes, describe: _____

3. Surface seal: Bentonite ☑ 30; Concrete ☐ 01; Other ☐

4. Material between well casing and protective pipe: Bentonite ☑ 30; Other ☐

5. Annular space seal: a. Granular/Chipped Bentonite ☑ 33
b. ___ Lbs/gal mud weight . . . Bentonite-sand slurry ☐ 35
c. ___ Lbs/gal mud weight . . . . . Bentonite slurry ☐ 31
d. ___ % Bentonite . . . . . Bentonite-cement grout ☐ 50
e. _____ Ft^3 volume added for any of the above
f. How installed: Tremie ☐ 01; Tremie pumped ☐ 02; Gravity ☑ 08

6. Bentonite seal: a. Bentonite granules ☐ 33
b. ☐1/4 in. ☑3/8 in. ☐1/2 in. Bentonite chips ☑ 32
c. _____ Other ☐

7. Fine sand material: Manufacturer, product name & mesh size
a. 45-55 Red Flint
b. Volume added 1/2 bag ft^3

8. Filter pack material: Manufacturer, product name & mesh size
a. 80-120 Red Flint
b. Volume added 5 bags ft^3

9. Well casing: Flush threaded PVC schedule 40 ☑ 23; Flush threaded PVC schedule 80 ☐ 24; Other ☐

10. Screen material: Flush threaded PVC Sch 40
a. Screen type: Factory cut ☑ 11; Continuous slot ☐ 01; Other ☐
b. Manufacturer Dietrich
c. Slot size: 0.010 in.
d. Slotted length: ___ ft.

11. Backfill material (below filter pack): None ☑ 14; Other ☐

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature: John P. Seuff | Firm: SEH Inc.

Please complete both Forms 4400-113A and 4400-113B and return them to the appropriate DNR office and bureau. Completion of these reports is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file these forms may result in a forfeiture of between $10 and $25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on these forms is not intended to be used for any other purpose. NOTE: See the instructions for more information, including where the completed forms should be sent.

IMPROPERLY ABANDONED MONITORING WELL

SOURCE PROPERTY

SEH **MEMORANDUM**

TO: File

FROM: Jason Martin, SEH

DATE: August 7, 2012

RE: Improperly Abandoned Electrode Wells – Former Mirro Plant #10, Manitowoc, WI
WDNR BRRTS # 02-36-000620 SEH No. ANERUB0701.00 Task 16

On behalf of Newell Rubbermaid Inc. (Newell), Short Elliott Hendrickson Inc. (SEH®) is providing in this memo information regarding the improperly abandoned electrode wells located at the Former Mirro #10 site building.

In December 2000, a proton reduction groundwater remediation system (consisting of eight electrode wells) began operating outside the northwest corner of the Former Mirro #10 site building and continued operating for more than 18 months. According to Shaw (previous engineering consultant), the system reduced the concentration of chlorinated compounds, primarily TCE in groundwater. After chlorinated compound concentrations stabilized, the system was shut down and the control panel removed. However, the eight electrode wells were not removed from the site and were lost during site grading activities conducted in 2008. Therefore, these wells are considered improperly abandoned.

No data regarding the eight electrode wells was documented by Shaw other than their general location depicted on a site map provided by Shaw to the Wisconsin Department of Natural Resources (WDNR). The approximate location of these eight electrode wells is indicated on Figure 2 of the GIS Registry Packet. SEH has not utilized the electrode wells for any of the investigation activities completed since 2006.

SDP/FJM
p:\ko\n\nerub\070100\case closure and gis docs aug12\updated gis packet\electrode well note\electrode well memo_08-07-12.docx

IMPROPERLY ABANDONED MONITORING WELL

SOURCE PROPERTY

SEH

Building a Better World for All of Us™

July 20, 2012

RE: Former Mirro #10 Chlorinated Solvent Site, Manitowoc, Wisconsin
Notification of Improperly Abandoned Electrode Remediation Wells
WDNR BRRTS # 02-36-000620
SEH No. NERUB0701 16.00

BFM, LLC
100 Maritime Drive
Manitowoc, WI 54220

To Whom it may Concern:

On behalf of Newell Rubbermaid Inc. (Newell), Short Elliott Hendrickson Inc. (SEH®) is providing this notification to meet the Wisconsin Department of Natural Resources (WDNR) requirements related to lost and improperly abandoned monitoring wells. As you know, site grading activities completed in 2009 by BFM, LLC resulted in burial and damage to several monitoring wells. Although many of the monitoring wells were found and successfully repaired, two of the most severely damaged wells had to be abandoned and one monitoring well (MW-15) could not be relocated. In addition, eight electrode remediation wells installed in this area also could not be relocated. The approximate location of these wells is shown on the attached figure. WDNR considers these electrode wells as improperly abandoned monitoring wells and requires that they be included on the geographic information system (GIS) Registry of Closed Remediation Sites. The WDNR GIS Registry of Closed Remediation Sites can be accessed on the internet at http://dnr.wi.gov/topic/Brownfields/rrsm.html. If any of these electrode wells are found at any time in the future, the owner of the property where these improperly abandoned wells are located is required to abandon the electrode wells in accordance with ch. NR 141, Wisconsin Administrative Code. This requirement will carry through for future owners of the property until the wells are found and properly abandoned.

If you have any questions about this notification or if you need additional information, please contact me at 920.287.0678 or you may email me at jmartin@sehinc.com.

Sincerely,

SHORT ELLIOTT HENDRICKSON INC.

Jason Martin, PE, CHMM
Project Manager

KEA/SDP/FJM
c: Kristin Jones, Newell Rubbermaid, Inc.
Annette Weissbach, WDNR
Hudson Green Jr., Patriot Environmental Management LLC
p:\ko\n\nerub\070100\case closure and gis docs aug12\mirro10 electrode notification letter_07-20-12.doc

IMPROPERLY ABANDONED MONITORING WELL

SOURCE PROPERTY

LEGEND:

- = EXISTING MONITORING WELL LOCATION AND NUMBER
- = EXISTING PIEZOMETER LOCATION AND NUMBER
- SB11 = HYDRAULIC PROBE BORING LOCATION AND NUMBER
- MW-13(A) = ABANDONED (A) OR LOST (L) MONITORING WELL LOCATION AND NUMBER
- 1 ug/L = ISOCONCENTRATION LINES – TOTAL VOLATILE ORGANIC COMPOUND USING MOST RECENT DATA AT EACH POINT
- = PROPERTY LINES
- = UTILITY POLE
- = SANITARY MANHOLE
- = STORM SEWER
- = PROTON REDUCTION ELECTRODE WELL
- .67 ug/L = PAL EXCEEDANCE
- 1.4 ug/L = ES EXCEEDANCE

NOTES:

MONITORING WELL LOCATIONS ARE BASED ON A SITE SURVEY COMPLETED BY JACOB LAND SURVEYING LLC IN APRIL 2009

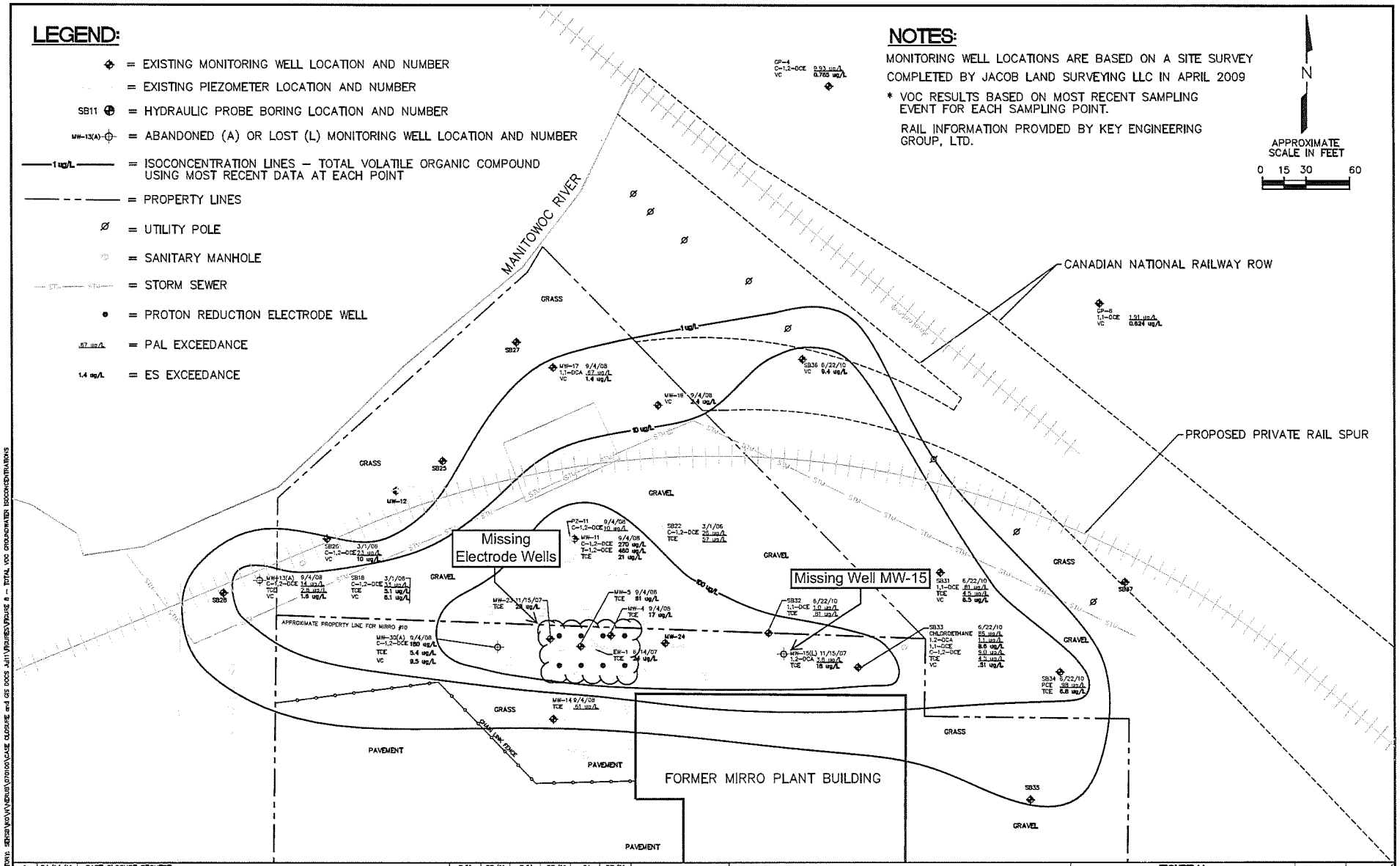
* VOC RESULTS BASED ON MOST RECENT SAMPLING EVENT FOR EACH SAMPLING POINT.

RAIL INFORMATION PROVIDED BY KEY ENGINEERING GROUP, LTD.

N

APPROXIMATE SCALE IN FEET

0 15 30 60



NO.	DATE	ISSUE/REVISIONS	DRAWN BY		DESIGN		QC CHECK	
1	04/14/11	CASE CLOSURE REQUEST	RJH	07/11	RJH	07/11	JM	07/11
2	03/14/12	CASE CLOSURE REQUEST SUPPLEMENT	MMW	03/12			JM	03/12

SEH

CASE CLOSURE REQUEST SUPPLEMENT
FORMER MIRRO PLANT #10
MANITOWOC, WISCONSIN

FIGURE 14
GROUNDWATER
VOC CONCENTRATIONS

PROJ. NO. NERUB070100
DATE 03/14/12

14

13

DRAWING DIRECTORY: SERVER\VOL\VIVENDUS\D7010\CASE CLOSURE and GIS DOCS JJ11\FIGURES\FIGURE 8 - TOTAL VOC GROUNDWATER ISOCONCENTRATIONS

SEH

SOURCE PROPERTY

September 9, 2009

RE: Former Mirro #10 Chlorinated Solvent Site, Manitowoc, Wisconsin
Notification of on site Groundwater Contamination
WDNR BRRTS # 02-36-000620
SEH No. NERUB0701 14.00

VIA CERTIFIED MAIL

BFM, LLC
100 Maritime Drive
Manitowoc, WI 54220

To Whom it may Concern:

On behalf of Newell Rubbermaid Inc. (Newell), Short Elliott Hendrickson Inc. (SEH®) is sending you this letter to meet the notification requirements of chapter NR 726 Wisconsin Administrative Code. You may be aware that groundwater contamination is present on the former Mirro #10 property that you own at 1616 Wollmer Street (Parcel # 052-000-144-000.00). The levels of chlorinated compound contamination in the shallow groundwater on your property are above the state groundwater enforcement standards found in chapter NR 140, Wisconsin Administrative Code. However, the groundwater contaminant plume has been found to present no threat to public health, safety, welfare and the environment. In addition, groundwater monitoring data indicates that the plume is stable or receding and will naturally degrade over time. Allowing natural attenuation to complete the groundwater cleanup at the former Mirro #10 property and on your property will meet the requirements for case closure that are found in chapter NR 726, Wisconsin Administrative Code. We will be requesting that the Wisconsin Department of Natural Resources (WDNR) accept natural attenuation as the final remedy for this site and grant case closure. Closure means that the WDNR will not be requiring any further investigation, groundwater monitoring or cleanup actions to be taken, other than the reliance on natural attenuation. The WDNR publication #RR-671, "What Landowners Should Know: Information about Using Natural Attenuation to Clean up Contaminated Groundwater" is available from the WDNR by calling 608.267.3859 or visiting http://www.dnr.state.wi.us/org/aw/rr/archives/pubs/RR671.pdf.

The WDNR will not review the closure request for at least 30 days after the date of this letter. You may contact the WDNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the WDNR that is relevant to this closure request, you should mail that information to: Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313.

If this case is closed, all properties within the site boundaries where groundwater contamination exceeds chapter NR 140 groundwater enforcement standards will be listed on the WDNR's geographic information system (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps showing the location of properties in Wisconsin where groundwater contamination above chapter NR 140 enforcement standards was found at the time that the case was closed. This GIS Registry will be available to the general public on the WDNR's internet web site. Please review the legal

SOURCE PROPERTY

description for your property that is included at the bottom of this letter, and notify me within the next 30 days if the legal description is incorrect.

Once the Department makes a decision on the closure request, it will be documented in a letter. If the Department grants closure, you may obtain a copy of the closure letter by requesting a copy from SEH, by writing to the WDNR address given above or by accessing the WDNR GIS Registry of Closed Remediation Sites on the internet at http://dnr.wi.gov/org/aw/rr/gis/index.htm. A copy of the closure letter will be included as part of the site file on the GIS Registry of Closed Remediation Sites. After the residual chlorinated compounds have degraded over time through the natural attenuation process and are found to be below the WDNR groundwater enforcement standards, you may request that WDNR remove your property from the GIS Registry.

If you or any subsequent property owners wish to construct or reconstruct a well on your property described below, special well construction standards may be necessary to protect the well from the residual groundwater contamination. Any well driller who proposes to construct a well on this property in the future will first need to obtain approval from a regional water supply specialist in WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet, or may be accessed through the GIS Registry web address in the preceding paragraph.

If you have any questions about this notification or if you need additional information, please contact me during the day at 920.452.6603 or you may email me at jmartin@sehinc.com.

Sincerely,

SHORT ELLIOTT HENDRICKSON INC.

Jason Martin

Jason Martin, PE, CHMM
Project Manager

KEA//FJM
c: Louis Meschede, Newell Rubbermaid, Inc.
Annette Weissbach, WDNR
Hudson Green Jr., Patriot Environmental Management LLC
p:\ko\n\nerub\070100\case closure and gis docs\offsitenotification\mirro 10 on site notification letter.doc

Legal Description for BFM, LLC Property (Tax Parcel ID #052-000-144-000.00) located at 1616 Wollmer Street, Manitowoc, Manitowoc County, Wisconsin:

All of Block 143 and 144 including the vacated South 17th Street which lies between Blocks 143 and 144 in the original Plat of the City of Manitowoc, Manitowoc County, Wisconsin. Also, a tract of land which lies South of a straight line (not extended) drawn between 2 points as follows:

Point A – a point on the East boundary of South 18th Street in the City of Manitowoc extended Northerly, which point is 42 feet North of the North boundary line of the vacated alley formerly lying North of Blocks 143 and 144 in the City of Manitowoc.

SOURCE PROPERTY

Point B – a point on a line drawn parallel to and 158 feet Southwesterly from the center line of South Water Street extended Northwesterly, which point is 27 feet North of the North boundary line of said vacated alley, the Western and Eastern boundaries of the tract shall be straight lines drawn South from Points A & B, above described respectively, to the North boundary lines of said Blocks 143 and 144, being a part of Government Lot 6 in the Southeast ¼ of Section 19 and a part of the Northwest ¼ Northeast ¼, Section 30, all in Township 19 North, Range 24 East, in the City of Manitowoc, Manitowoc County, Wisconsin. Subject to all easements, agreements, covenants and restrictions of record or established by statute; easement granted rights and easements, if any, in and to any and all railroad switches, sidetracks, spur tracks and rights of way located upon or appurtenant to the subject premises; right to the maintenance and use of a 6 inch water line which is installed below the surface of vacated South 17th Street lying between Lots 5 through 17, Block 143 and Lots 6 through 18, Block 144 and continuing in a Westerly direction through Lots 5 and 7, Block 143, and also an 8 inch storm sewer installed under the surface of vacated South 17th Street from the Northerly edge of Wollmer Street to the building located on the real estate described in this paragraph 3.

UNITED STATES POSTAL SERVICE

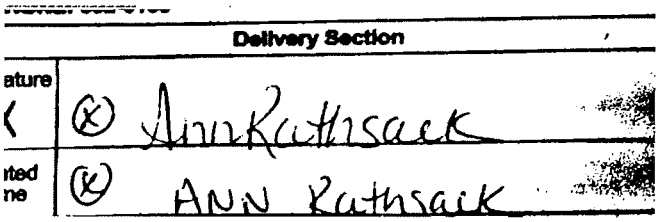
SOURCE PROPERTY

Date: 09/15/2009

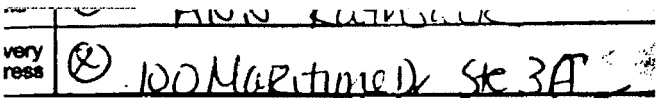
Jason Martin:

The following is in response to your 09/15/2009 request for delivery information on your Certified Mail(TM) item number 7009 0820 0000 5412 1788. The delivery record shows that this item was delivered on 09/10/2009 at 12:20 PM in MANITOWOC, WI 54220. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

State of Wisconsin
Department of Natural Resources
http://dnr.wi.gov

Impacted Off-Source Property Information

Form 4400-246 (R 3/08)

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

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

BRRTS #: 02-36-000620

ACTIVITY NAME: MIRRO CO PLT #10

ID	Off-Source Property Address	Parcel Number	WTM X	WTM Y
A	S 16th St	05281940303000	706480	405150
B	500 S 16th St	05281940302000	706550	405178
C				
D				
E				
F				
G				
H				
I				

SEH

Building a Better World
for All of Us™

OFF-SOURCE
A
PROPERTY

OFF-SOURCE
B
PROPERTY

July 20, 2012

RE: Former Mirro #10 Chlorinated Solvent Site,
Manitowoc, Wisconsin
Notification of Off-Site Groundwater
Contamination
WDNR BRRTS # 02-36-000620
SEH No. NERUB0701 16.00

VIA CERTIFIED MAIL

City Centre, LLC
100 Maritime Drive, Suite 3C
Manitowoc, WI 54220

To Whom it may Concern:

On behalf of Newell Rubbermaid Inc. (Newell), Short Elliott Hendrickson Inc. (SEH®) is sending you this letter to meet the notification requirements of chapter NR 726 Wisconsin Administrative Code. You may be aware that groundwater contamination originating on the former Mirro #10 property to the south at 1616 Wollmer Street has migrated onto your properties located on S. 16th Street (Parcels # 052-819-403-030.00 and # 052-819-403-020.00). The levels of chlorinated compound contamination in the shallow groundwater on your property are above the state groundwater enforcement standards found in chapter NR 140, Wisconsin Administrative Code. However, the groundwater contaminant plume has been found to present no threat to public health, safety, welfare and the environment. In addition, groundwater monitoring data indicates that the plume is stable or receding and will naturally degrade over time. Allowing natural attenuation to complete the groundwater cleanup at the former Mirro #10 property and on your properties will meet the requirements for case closure that are found in chapter NR 726, Wisconsin Administrative Code. We will be requesting that the Wisconsin Department of Natural Resources (WDNR) accept natural attenuation as the final remedy for this site and grant case closure. Closure means that the WDNR will not be requiring any further investigation, groundwater monitoring or cleanup actions to be taken, other than the reliance on natural attenuation. The WDNR publication #RR-671, "What Landowners Should Know: Information about Using Natural Attenuation to Clean up Contaminated Groundwater" is available from the WDNR by calling 608.267.3859 or visiting http://dnr.wi.gov/files/PDF/pubs/rr/RR671.pdf.

Chlorinated volatile organic compounds (CVOC) contamination in soil and groundwater has migrated onto your properties. While vapors are not of concern at this time, they may pose a health issue if buildings are constructed on these properties in the future. If a property owner intends to construct a building to be occupied, the property owner will need to first notify the Department of Natural Resources (DNR). Vapor control technologies may be required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR concurs that conditions at the property are protective of the new use. In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare, and the environment at the site.

OFF-SOURCE
A
PROPERTY

OFF-SOURCE
B
PROPERTY

Since the source of the groundwater contamination is not on your property, neither you nor any subsequent owner of your properties will be held responsible for investigation or cleanup of this groundwater contamination, as long as you and any subsequent owners comply with the requirements of section 292.13, Wisconsin Statutes, including allowing access to your properties for environmental investigation or cleanup, if access is required. To obtain a copy of the WDNR's publication #RR-589, "Fact Sheet 10: Off-Site Contamination – How Does It Affect My Property?," you may call 608.267.3859 or visit http://dnr.wi.gov/files/PDF/pubs/rr/RR589.pdf.

The WDNR will not review the closure request for at least 30 days after the date of this letter. As an affected property owner, you have a right to contact the WDNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the WDNR that is relevant to this closure request, you should mail that information to: Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313.

If this case is closed, all properties within the site boundaries where groundwater contamination exceeds chapter NR 140 groundwater enforcement standards will be listed on the WDNR's geographic information system (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps showing the location of properties in Wisconsin where groundwater contamination above chapter NR 140 enforcement standards was found at the time that the case was closed. This GIS Registry will be available to the general public on the WDNR's internet web site. Please review the legal description for your property that is included at the bottom of this letter, and notify me within the next 30 days if the legal description is incorrect.

Once the Department makes a decision on the closure request, it will be documented in a letter. If the Department grants closure, you may obtain a copy of the closure letter by requesting a copy from SEH, by writing to the WDNR address given above or by accessing the WDNR GIS Registry of Closed Remediation Sites on the internet at http://dnr.wi.gov/topic/Brownfields/rrsm.html. A copy of the closure letter will be included as part of the site file on the GIS Registry of Closed Remediation Sites. After the residual chlorinated compounds have degraded over time through the natural attenuation process and are found to be below the WDNR groundwater enforcement standards, you may request that WDNR remove your property from the GIS Registry.

If you or any subsequent property owners wish to construct or reconstruct a well on your properties described below, special well construction standards may be necessary to protect the well from the residual groundwater contamination. Any well driller who proposes to construct a well on these properties in the future will first need to obtain approval from a regional water supply specialist in WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet, or may be accessed through the GIS Registry web address in the preceding paragraph.

If you have any questions about this notification or if you need additional information, please contact me during the day at 920.287.0678 or you may email me at jmartin@sehinc.com.

OFF-SOURCE
A
PROPERTY

OFF-SOURCE
B
PROPERTY

Sincerely,

SHORT ELLIOTT HENDRICKSON INC.

Jason Martin, PE, CHMM
Project Manager

KEA/SDP/FJM
c: Kristin Jones, Newell Rubbermaid, Inc.
Annette Weissbach, WDNR
Hudson Green Jr., Patriot Environmental Management LLC
p:\ko\n\nerub\070100\case closure and gis docs aug12\mirro10 off site notification letter_citycentre_07-20-12.doc

Legal Description for City Centre, LLC Property (Tax Parcel ID #052-819-403-030.00) located on S. 16th Street, Manitowoc, Manitowoc County, Wisconsin:

PART OF G.L. 6 REC. V. 255 P. 535 S. 19 T. 19 R. 24.

Legal Description for City Centre, LLC Property (Tax Parcel ID #052-819-403-020.00) located on S. 16th Street, Manitowoc, Manitowoc County, Wisconsin:

PART OF G.L. 6 REC. V. 142 P. 305 S. 19 T. 19 R. 24.

OFF-SOURCE
A
PROPERTY

OFF-SOURCE
B
PROPERTY

English Customer Service USPS Mobile Register / Sign In

USPS.COM

Search USPS.com or Track Packages

Quick Tools Ship a Package Send Mail Manage Your Mail Shop Business Solutions

Track & Confirm

GET EMAIL UPDATES PRINT DETAILS

YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
70112970000033255650	First-Class Mail®	Delivered	July 23, 2012, 9:41 am	MANITOWOC, WI 54220	**Expected Delivery By:** July 23, 2012 Certified Mail™ Return Receipt Electronic
		Dispatched to Sort Facility	July 20, 2012, 6:26 pm	SHEBOYGAN, WI 53081	
		Acceptance	July 20, 2012, 4:37 pm	SHEBOYGAN, WI 53081	

Check on Another Item

What's your label (or receipt) number?

Find

LEGAL
Privacy Policy ›
Terms of Use ›
FOIA ›
No FEAR Act EEO Data ›

ON USPS.COM
Government Services ›
Buy Stamps & Shop ›
Print a Label with Postage ›
Customer Service ›
Site Index ›

ON ABOUT.USPS.COM
About USPS Home ›
Newsroom ›
Mail Service Updates ›
Forms & Publications ›
Careers ›

OTHER USPS SITES
Business Customer Gateway ›
Postal Inspectors ›
Inspector General ›
Postal Explorer ›

Copyright© 2012 USPS. All Rights Reserved.

OFF-SOURCE
A
PROPERTY

OFF-SOURCE
B
PROPERTY

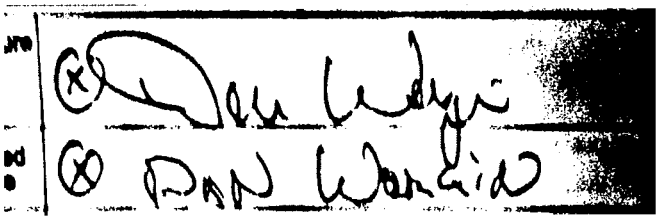
UNITED STATES
POSTAL SERVICE.

Date: 07/31/2012

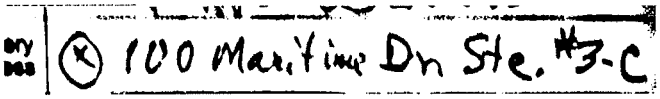
STEVE PLACHINSKI:

The following is in response to your 07/31/2012 request for delivery information on your Certified Mail(TM) item number 7011 2970 0000 3325 5650. The delivery record shows that this item was delivered on 07/23/2012 at 09:41 AM in MANITOWOC, WI 54220. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

OFF-SOURCE A PROPERTY

OFF-SOURCE B PROPERTY

868565

STATE BAR OF WISCONSIN FORM 1-1982

WARRANTY DEED

VOL 1470 PAGE 730

This Deed, made between The Manitowoc Company Inc., (f/k/a Manitowoc Shipbuilding, Inc. and Manitowoc Ship Building Corporation and Manitowoc Ship Building Company), Grantor and City Centre, L.L.C., a Wisconsin limited liability company, Grantee,

RECEIPT# 10309
$14.00 DEED

STATE OF WISCONSIN
MANITOWOC COUNTY
PRESTON JONES
REGISTER OF DEEDS
RECEIVED FOR RECORD
28 DEC 2000 3:33:50 PM

Witnesseth, That the said Grantor, for a valuable consideration of one dollar ($1.00) and other good and valuable consideration conveys to Grantee the following described real estate in Manitowoc County, State of Wisconsin:

RETURN TO:
Chris Allie
City Centre, L.L.C.
980 Maritime Drive Ste. 6
Manitowoc WI 54220 14 + 1950.00

Tax Parcel No. 52-819-403-020.00, 52-819-403-030.00, 52-000-147-020.00 & 52-000-145-000.00 W-7

See Exhibit A attached hereto and made a part hereof.

TRANSFER FEE $ 7950.00

This is not homestead property

Together with all and singular the hereditaments and appurtenances thereunto belonging;
And Grantor warrants that the title is good, indefeasible in fee simple and free and clear of encumbrances except recorded restrictions, covenants, easements of record and all applicable zoning ordinances, and will warrant and defend the same.

Dated this 27th day of December 2000

The Manitowoc Company Inc.

Terry D. Growcock (SEAL) _____ (SEAL)

By: Terry D. Growcock
Its: President & CEO

Maurice D. Jones (SEAL) _____ (SEAL)

By: Maurice D. Jones
Its: Secretary

AUTHENTICATION

Signature(s) Terry D. Growcock

authenticated this 27th day of December, 2000

Maurice D. Jones

TITLE: MEMBER STATE BAR OF WISCONSIN
(If not, authorized by §(4,6)706.06, Wis. Stats)

THIS INSTRUMENT WAS DRAFTED BY

Attorney Marvin P. Ripp

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

ACKNOWLEDGEMENT

State of Wisconsin } SS:
Manitowoc County

Personally came before me this 27th day of December, 2000, the above named Maurice D. Jones, Secretary of The Manitowoc Company, Inc. to me known to be the person(s) who executed the foregoing instrument and acknowledge the same.

Terry Jayne Kunesh
Notary Public Manitowoc County, Wis.
My Commission is permanent.
If not, state expiration date: 5/5/02

*Names of persons signing in any capacity should be typed or printed below their signatures,

WARRANTY DEED

STATE BAR OF WISCONSIN FORM No. 1--1982

FA Form MAT078/APT022 Revised 5/11/99

OFF-SOURCE
A
PROPERTY

OFF-SOURCE
B
PROPERTY

Exhibit A

PARCEL 1:

A tract of land located in Government Lot Numbered Six (6), Section Numbered Nineteen (19), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, in the City of Manitowoc, Manitowoc County, Wisconsin, also located in Blocks Lettered F, H, I, J, O and P in the Improvement Company's Subdivision and described as follows:

Commencing at the intersection of the West right of way of South 16th Street and the section line, thence S.87°08'20"E. along said section line 328.26 feet to the combined pierhead and bulkhead line, thence N.32°11'19"E. along said pierhead/bulkhead line 237.88 feet, thence N.28°04'52"E. along said pierhead/bulkhead line 162.90 feet, thence N.65°44'24"E. along said pierhead/bulkhead line 77.32 feet, thence N.40°08'10"E. along said pierhead/bulkhead line 62.02 feet, thence N.62°24'55"E. along said pierhead/bulkhead line 186.95 feet, thence N.80°05'24"E. along said pierhead/bulkhead line 52.12 feet to a point 25 feet measured radially Northeasterly from the centerline of the Wisconsin Central Railroad tracks, the point of real beginning, thence continue N.80°05'24"E. along said pierhead/bulkhead line 135.34 feet, thence S.81°55'07"E. along said pierhead/bulkhead line 374.61 feet, thence N.33°50'36"E. along said pierhead/bulkhead line 680.64 feet, thence N.23°04'44"W. along said pierhead/bulkhead line 262.73 feet, thence N.44°57'44"W. along said pierhead/bulkhead line 226.50 feet, thence N.58°33'44"W. along said pierhead/bulkhead line 165.56 feet, thence N.89°32'00"W. along said pierhead/bulkhead line 509.00 feet, thence S.52°18'45"W. along said pierhead/bulkhead line 787.49 feet to a point 25 feet measured radially Northeasterly of said centerline of the Wisconsin Central Railroad tracks, also being a point on the 979.93 foot radius curve to the right, thence Southeasterly along the arc of said curve which is 25 feet Northeasterly of and parallel to said railroad centerline 881.38 feet (chord S.50°03'28"E., 829.30 feet) to the point of real beginning.

PARCEL 2:

A tract of land located in Government Lot Numbered Six (6), Section Numbered Nineteen (19), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, in the City of Manitowoc, Manitowoc County, Wisconsin, also located in Blocks A, B, C, D, E, G and L in the Improvement Company's Subdivision, and the Lueps Island Subdivision and described as follows:

Commencing at the intersection of the West right of way of South 16th Street and the section line, thence S.87°08'20"E. along said section line 292.46 feet to the point of real beginning, thence continue S.87°08'20"E. along said section line 35.80 feet to the combined pierhead and bulkhead line, thence N.32°11'19"E. along said pierhead/bulkhead line 237.88 feet, thence N.28°04'52"E. along said pierhead/bulkhead line 162.90 feet, thence N.65°44'24"E. along said pierhead/bulkhead line 77.32 feet, thence N.40°08'10"E. along said pierhead/bulkhead line 62.02 feet, thence N.62°24'55"E. along said pierhead/bulkhead line 186.95 feet to a point 25 feet measured radially Southwesterly of the centerline of the Wisconsin Central Railroad tracks, also being a point on a 929.93 foot radius curve to the left, thence Northwesterly along the arc of said curve, which is 25 feet Southwesterly of and parallel to said railroad centerline 859.58 feet, (chord N.51°33'47"W., 851.97 feet) to said pierhead/bulkhead line, thence S.46°28'20"W. along said pierhead/bulkhead line 184.66 feet, thence S.40°17'57"W. along said pierhead/bulkhead line 316.72 feet, thence S.33°10'26"W. along said pierhead/bulkhead line 205.10 feet to a point 75 feet Northeasterly of the Wisconsin Central Railroad centerline, thence S.50°27'53"E. along a line parallel to said railroad centerline 759.10 feet to the point of real beginning.

PARCEL 3:

A tract of land located in Government Lot Numbered Six (6), Section Numbered Nineteen (19), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, in the City of Manitowoc, Manitowoc County, Wisconsin, also located in the Improvement Company's Subdivision and the Lueps Island Subdivision and described as follows:

Commencing at the intersection of the West right of way of South 16th Street and the section line, thence S.87°08'20"E. along said section line 230.75 feet to the point of real beginning, thence continue S.87°08'20"E. along said section line 61.71 feet to a point 75 feet Northeasterly of the Wisconsin Central Railroad centerline, thence N.50°27'53"W. along a line parallel to said railroad centerline 759.10 feet to the combined pierhead/bulkhead line, thence S.33°10'26"W. along said pierhead/bulkhead line, 60.37 feet to a point 15 feet Northeasterly of said railroad centerline, thence S.50°27'53"E. along a line parallel to said railroad centerline 94.34 feet, thence S.57°22'03"E. 193.03 feet, thence S.50°27'53"E. along a line parallel to said railroad centerline 417.03 feet to the point of real beginning.

PARCEL 4:

A tract of land located in Government Lot Numbered Six (6), Section Numbered Nineteen (19), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, in the City of Manitowoc, Manitowoc County, Wisconsin and described as follows:

Commencing at the intersection of the West right of way of South 16th Street and the section line, thence N.00°51'40"E. along said right of way 27.75 feet, thence N.87°26'10"W. 140.42 feet, thence N.44°12'20"W. 280.80 feet to the point of real beginning, thence continue N.44°12'20"W. 92.00 feet to the combined pierhead/bulkhead line, thence N.31°53'20"E. along said pierhead/bulkhead line 104.06 feet, thence S.50°27'53"E. along a line parallel to the Wisconsin Central Railroad 304.43 feet, thence S.34°24'07"W. 9.95 feet to a point on a 369.76 foot radius curve to the left, thence Northwesterly along the arc of said curve 228.92 feet (chord N.77°43'58"W., 225.28 feet) to the point of real beginning.

PARCEL 5:

A tract of land located in Government Lot Numbered Six (6), Section Numbered Nineteen (19), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, in the City of Manitowoc, Manitowoc County, Wisconsin and described as follows:

Commencing at the intersection of the West right of way of South 16th Street and the section line, thence N.00°51'40"E. along said right of way 27.75 feet, to the point of real beginning, thence continue N.00°51'40"E. along said right of way 35.76 feet, thence N.46°16'42"W. 93.58 feet to a point on a 347.54 foot radius curve to the left, thence Northwesterly along the arc of said curve 235.96 feet, (chord N.74°53'20"W., 231.45 feet), thence S.44°12'20"E., 215.50 feet, thence S.87°26'10"E., 140.42 feet to the point of real beginning.

PARCEL 6:

A tract of land located in Government Lot Numbered Six (6), and in the Southeast Quarter (SE1/4) of the Southwest Quarter (SW1/4) of Section Numbered Nineteen (19), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, in the City of Manitowoc, Manitowoc County, Wisconsin and described as follows:

Commencing at the intersection of the West right of way of South 16th Street and the section line, thence N.00°51'40"E. along said right of way 27.75 feet, thence N.87°26'10"W. 140.42 feet to the point of real beginning, thence continue N.87°26'10"W. 446.90 feet to the East right of way of South 18th Street, thence N.00°58'55"E. along said right of way 77.56 feet to the combined pierhead and bulkhead line, thence N.48°53'52"E. along said pierhead/bulkhead line 231.81 feet, thence N.31°53'20"E. along said pierhead/bulkhead line 20.18 feet, thence S.44°12'20"E. 372.80 feet to the point of real beginning.

PARCEL 7:

Lots Numbered One (1), Two (2), Three (3), Four (4), Five (5), Six (6), Seven (7), Eight (8), Nine (9), Ten (10), Eleven (11), Twelve (12), Thirteen (13), Fourteen (14) and Fifteen (15) of Block Numbered One Hundred Forty-five (145) and Lots Numbered One (1) and Two (2) of Block Numbered One Hundred Forty-six (146) in the City of Manitowoc, according to the Recorded Plat thereof, known as the Original Plat of said City of Manitowoc, Manitowoc County, Wisconsin, and adjacent vacated South 15th Street lying between said Blocks 145 and 146 of the said Original Plat.

PARCEL 8:

A tract of land located in Lots Numbered Ten (10) Eleven (11), Twelve (12), Thirteen (13) and Fourteen (14) of Block Numbered One Hundred Twenty-three (123), Lots Numbered One (1), Two (2), Three (3), Four (4), Five (5), Six (6) and Seven (7) of Block Numbered One Hundred Forty-seven (147) and Lots Numbered One (1), Two (2), Three (3), Four (4), Five (5), Six (6), Seven (7), Eight (8), Nine (9) and Ten (10) of Block Numbered One Hundred Eighty-seven (187), vacated South 15th Street and vacated South 14th Street in the City of Manitowoc, according to the Recorded Plat thereof, known as the Original Plat of said City of Manitowoc, Manitowoc County, Wisconsin, and described as follows:

Commencing at the Southerly most corner of Lot 10 of said Block 187, thence N.57°21'46"E. along the Easterly line of said Lot 10, 215.81 feet to the point of real beginning, thence continue N.57°21'46"E. along said Easterly line 20.14 feet to the combined pierhead and bulkhead line, thence N.39°52'10"W. along said pierhead/bulkhead line 775.40 feet, thence N.45°28'44"W. along said pierhead/bulkhead line 150.66 feet, thence N53°57'17"W. along said pierhead/bulkhead line 445.38 feet, thence N.15°43'42"W. along said pierhead/bulkhead line 38.16 feet to the section line, thence N.87°08'20"W. along said section line 74.33 feet, thence S.50°49'58"E. 427.36 feet to the point of curvature of a 1,637.28 foot radius curve to the right, thence Southeasterly along the arc of said curve 307.54 feet, (chord S.45°27'06"E., 307.09 feet) thence S.40°04'14"E. 492.73 feet, thence S.46°55'14"E., 225.10 feet to the point of real beginning.

SEH

Building a Better World
for All of Us™

RIGHT-OF-WAY

July 20, 2012

RE: Former Mirro #10 Chlorinated Solvent Site,
Manitowoc, Wisconsin
Notification of Right-of-Way Groundwater Contamination
WDNR BRRTS # 02-36-000620
SEH No. NERUB0701 16.00

VIA CERTIFIED MAIL

Greg Minikel
Deputy Dir. of Public Works / City Engineer
900 Quay Street
Manitowoc, WI 54220

Mr. Minikel:

On behalf of Newell Rubbermaid Inc. (Newell), Short Elliott Hendrickson Inc. (SEH®) is sending you this letter to meet the notification requirements of chapter NR 726 Wisconsin Administrative Code. You may be aware that groundwater contamination originating on the former Mirro #10 property to the south at 1616 Wollmer Street has migrated into the South 18th Street right-of-way located just south of the Manitowoc River (west of Parcel # 052-819-403-030.00 and east of Parcel # 052-000-142-050.00). The levels of chlorinated compound contamination (specifically Vinyl Chloride) in the shallow groundwater in the right-of-way are above the state groundwater enforcement standards found in chapter NR 140, Wisconsin Administrative Code. However, the groundwater contaminant plume has been found to present no threat to public health, safety, welfare and the environment. In addition, groundwater monitoring data indicates that the plume is stable or receding and will naturally degrade over time. Allowing natural attenuation to complete the groundwater cleanup at the former Mirro #10 property and in the S. 18th Street right-of-way will meet the requirements for case closure that are found in chapter NR 726, Wisconsin Administrative Code. We will be requesting that the Wisconsin Department of Natural Resources (WDNR) accept natural attenuation as the final remedy for this site and grant case closure. Closure means that the WDNR will not be requiring any further investigation, groundwater monitoring or cleanup actions to be taken, other than the reliance on natural attenuation. The WDNR publication #RR-671, "What Landowners Should Know: Information about Using Natural Attenuation to Clean up Contaminated Groundwater" is available from the WDNR by calling 608.267.3859 or visiting http://dnr.wi.gov/files/PDF/pubs/rr/RR671.pdf.

Chlorinated volatile organic compounds (CVOC) contamination in soil and groundwater has migrated into the S. 18th Street right-of-way. While vapors are not of concern at this time, they may pose a health issue if buildings are constructed within the right-of-way in the future. If a property owner intends to construct a building to be occupied, the property owner will need to first notify the Department of Natural Resources (DNR). Vapor control technologies may be required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR concurs that conditions at the property are protective of the new use. In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to

RIGHT-OF-WAY

ensure the continued protection of public health, safety, welfare, and the environment at the site.

Since the source of the groundwater contamination is not in the S. 18th Street right-of-way, neither you nor any subsequent owner of the right-of-way property will be held responsible for investigation or cleanup of this groundwater contamination, as long as you and any subsequent owners comply with the requirements of section 292.13, Wisconsin Statutes, including allowing access to your properties for environmental investigation or cleanup, if access is required. To obtain a copy of the WDNR's publication #RR-589, "Fact Sheet 10: Off-Site Contamination – How Does It Affect My Property?," you may call 608.267.3859 or visit http://dnr.wi.gov/files/PDF/pubs/rr/RR589.pdf.

The WDNR will not review the closure request for at least 30 days after the date of this letter. As an affected party, you have a right to contact the WDNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the WDNR that is relevant to this closure request, you should mail that information to: Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313.

If this case is closed, all properties within the site boundaries where groundwater contamination exceeds chapter NR 140 groundwater enforcement standards will be listed on the WDNR's geographic information system (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps showing the location of properties in Wisconsin where groundwater contamination above chapter NR 140 enforcement standards was found at the time that the case was closed. This GIS Registry will be available to the general public on the WDNR's internet web site. Please review the legal description for your property that is included at the bottom of this letter, and notify me within the next 30 days if the legal description is incorrect.

Once the Department makes a decision on the closure request, it will be documented in a letter. If the Department grants closure, you may obtain a copy of the closure letter by requesting a copy from SEH, by writing to the WDNR address given above or by accessing the WDNR GIS Registry of Closed Remediation Sites on the internet at http://dnr.wi.gov/topic/Brownfields/rrsm.html. A copy of the closure letter will be included as part of the site file on the GIS Registry of Closed Remediation Sites. After the residual chlorinated compounds have degraded over time through the natural attenuation process and are found to be below the WDNR groundwater enforcement standards, you may request that WDNR remove your property from the GIS Registry.

If you or any subsequent right-of-way property owners wish to construct or reconstruct a well in the right-of-way, special well construction standards may be necessary to protect the well from the residual groundwater contamination. Any well driller who proposes to construct a well in the right-of-way in the future will first need to obtain approval from a regional water supply specialist in WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet, or may be accessed through the GIS Registry web address in the preceding paragraph.

If you have any questions about this notification or if you need additional information, please contact me during the day at 920.287.0678 or you may email me at jmartin@sehinc.com.

RIGHT-OF-WAY

Sincerely,

SHORT ELLIOTT HENDRICKSON INC.

Jason Martin, PE, CHMM
Project Manager

KEA/SDP/FJM
c: Kristin Jones, Newell Rubbermaid, Inc.
Annette Weissbach, WDNR
Hudson Green Jr., Patriot Environmental Management LLC
p:\ko\n\nerub\070100\case closure and gis docs aug12\mirro10 row notification letter_manitowoc_07-20-12.doc

South 18th Street right-of-way is directly south of the Manitowoc River and between the following properties:

Legal Description for City Centre, LLC Property (Tax Parcel ID #052-819-403-030.00) located on S. 16th Street, Manitowoc, Manitowoc County, Wisconsin (east of S. 18th St. right-of-way):

PART OF G.L. 6 REC. V. 255 P. 535 S. 19 T. 19 R. 24.

Legal Description for City Centre, LLC Property (Tax Parcel ID #052-000-142-050.00) located on S. 18th Street, Manitowoc, Manitowoc County, Wisconsin (west of S. 18th St. right-of-way):

ALL OF LOTS 1-2-3-4 & 5 BLK 142 & PARCEL N. OF BLK. 142 & S. OF MTWC RIVER BEING PART OF SW 1/4 S. 19-19-24 ALL AS DESC. V.527 P.384

RIGHT-OF-WAY

Track & Confirm

GET EMAIL UPDATES PRINT DETAILS

YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
70112970000033255643	First-Class Mail®	Delivered	July 23, 2012, 9:17 am	MANITOWOC, WI 54220	**Expected Delivery By:** July 23, 2012 Certified Mail™ Return Receipt Electronic
		Dispatched to Sort Facility	July 20, 2012, 6:26 pm	SHEBOYGAN, WI 53081	
		Acceptance	July 20, 2012, 4:36 pm	SHEBOYGAN, WI 53081	

Check on Another Item

What's your label (or receipt) number?

Find

Copyright© 2012 USPS. All Rights Reserved.

RIGHT-OF-WAY

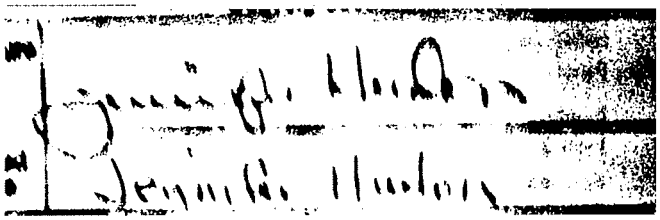
UNITED STATES POSTAL SERVICE

Date: 07/31/2012

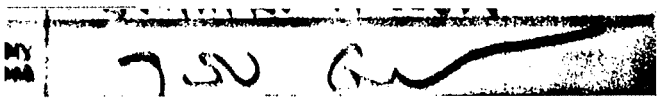
STEVE PLACHINSKI:

The following is in response to your 07/31/2012 request for delivery information on your Certified Mail(TM) item number 7011 2970 0000 3325 5643. The delivery record shows that this item was delivered on 07/23/2012 at 09:17 AM in MANITOWOC, WI 54220. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

SEH

Building a Better World
for All of Us™

RIGHT-OF-WAY

July 20, 2012

RE: Former Mirro #10 Chlorinated Solvent Site,
Manitowoc, Wisconsin
Notification of Right-of-Way Groundwater Contamination
WDNR BRRTS # 02-36-000620
SEH No. NERUB0701 16.00

VIA CERTIFIED MAIL

Brian Hayden, PG
Manager – Environmental Operations
Canadian National Railroad
P.O. Box 509
Two Harbors, MN 55616

Mr. Hayden:

On behalf of Newell Rubbermaid Inc. (Newell), Short Elliott Hendrickson Inc. (SEH®) is sending you this letter to meet the notification requirements of chapter NR 726 Wisconsin Administrative Code. You may be aware that groundwater contamination originating on the former Mirro #10 property to the south at 1616 Wollmer Street has migrated into the railroad right-of-way located at S. 16th Street (Parcel # 052-819-403-020.00). The levels of chlorinated compound contamination (specifically Vinyl Chloride) in the shallow groundwater in the right-of-way are above the state groundwater enforcement standards found in chapter NR 140, Wisconsin Administrative Code. However, the groundwater contaminant plume has been found to present no threat to public health, safety, welfare and the environment. In addition, groundwater monitoring data indicates that the plume is stable or receding and will naturally degrade over time. Allowing natural attenuation to complete the groundwater cleanup at the former Mirro #10 property and in the railroad right-of-way will meet the requirements for case closure that are found in chapter NR 726, Wisconsin Administrative Code. We will be requesting that the Wisconsin Department of Natural Resources (WDNR) accept natural attenuation as the final remedy for this site and grant case closure. Closure means that the WDNR will not be requiring any further investigation, groundwater monitoring or cleanup actions to be taken, other than the reliance on natural attenuation. The WDNR publication #RR-671, "What Landowners Should Know: Information about Using Natural Attenuation to Clean up Contaminated Groundwater" is available from the WDNR by calling 608.267.3859 or visiting http://dnr.wi.gov/files/PDF/pubs/rr/RR671.pdf.

Chlorinated volatile organic compounds (CVOC) contamination in soil and groundwater has migrated into the railroad right-of-way. While vapors are not of concern at this time, they may pose a health issue if buildings are constructed within the right-of-way in the future. If a property owner intends to construct a building to be occupied, the property owner will need to first notify the Department of Natural Resources (DNR). Vapor control technologies may be required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR concurs that conditions at the property are protective of the new use. In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to

RIGHT-OF-WAY

ensure the continued protection of public health, safety, welfare, and the environment at the site.

Since the source of the groundwater contamination is not in the railroad right-of-way, neither you nor any subsequent owner of the right-of-way property will be held responsible for investigation or cleanup of this groundwater contamination, as long as you and any subsequent owners comply with the requirements of section 292.13, Wisconsin Statutes, including allowing access to your properties for environmental investigation or cleanup, if access is required. To obtain a copy of the WDNR's publication #RR-589, "Fact Sheet 10: Off-Site Contamination – How Does It Affect My Property?," you may call 608.267.3859 or visit http://dnr.wi.gov/files/PDF/pubs/rr/RR589.pdf.

The WDNR will not review the closure request for at least 30 days after the date of this letter. As an affected party, you have a right to contact the WDNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the WDNR that is relevant to this closure request, you should mail that information to: Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313.

If this case is closed, all properties within the site boundaries where groundwater contamination exceeds chapter NR 140 groundwater enforcement standards will be listed on the WDNR's geographic information system (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps showing the location of properties in Wisconsin where groundwater contamination above chapter NR 140 enforcement standards was found at the time that the case was closed. This GIS Registry will be available to the general public on the WDNR's internet web site. Please review the legal description for your property that is included at the bottom of this letter, and notify me within the next 30 days if the legal description is incorrect.

Once the Department makes a decision on the closure request, it will be documented in a letter. If the Department grants closure, you may obtain a copy of the closure letter by requesting a copy from SEH, by writing to the WDNR address given above or by accessing the WDNR GIS Registry of Closed Remediation Sites on the internet at http://dnr.wi.gov/topic/Brownfields/rrsm.html. A copy of the closure letter will be included as part of the site file on the GIS Registry of Closed Remediation Sites. After the residual chlorinated compounds have degraded over time through the natural attenuation process and are found to be below the WDNR groundwater enforcement standards, you may request that WDNR remove your property from the GIS Registry.

If you or any subsequent right-of-way property owners wish to construct or reconstruct a well in the right-of-way, special well construction standards may be necessary to protect the well from the residual groundwater contamination. Any well driller who proposes to construct a well in the right-of-way in the future will first need to obtain approval from a regional water supply specialist in WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet, or may be accessed through the GIS Registry web address in the preceding paragraph.

If you have any questions about this notification or if you need additional information, please contact me during the day at 920.287.0678 or you may email me at jmartin@sehinc.com.

RIGHT-OF-WAY

Sincerely,

SHORT ELLIOTT HENDRICKSON INC.

Jason Martin, PE, CHMM
Project Manager

KEA/SDP/FJM
c: Kristin Jones, Newell Rubbermaid, Inc.
Annette Weissbach, WDNR
Hudson Green Jr., Patriot Environmental Management LLC
p:\ko\n\nerub\070100\case closure and gis docs aug12\mirro10 row notification letter_cnr_07-20-12.doc

Railroad right-of-way is within the following property:

Legal Description for City Centre, LLC Property (Tax Parcel ID #052-819-403-020.00) located on S. 16th Street, Manitowoc, Manitowoc County, Wisconsin:

PART OF G.L. 6 REC. V. 142 P. 305 S. 19 T. 19 R. 24.

RIGHT-OF-WAY

Track & Confirm

GET EMAIL UPDATES PRINT DETAILS

YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
70112970000033255667	First-Class Mail®	Delivered	July 30, 2012, 2:01 pm	TWO HARBORS, MN 55616	**Expected Delivery By:** July 23, 2012 Certified Mail™ Return Receipt Electronic
		Notice Left	July 23, 2012, 8:48 am	TWO HARBORS, MN 55616	
		Arrival at Unit	July 23, 2012, 7:06 am	TWO HARBORS, MN 55616	
		Depart USPS Sort Facility	July 23, 2012	DULUTH, MN 55806	
		Processed at USPS Origin Sort Facility	July 23, 2012, 12:43 am	DULUTH, MN 55806	
		Dispatched to Sort Facility	July 20, 2012, 6:26 pm	SHEBOYGAN, WI 53081	
		Acceptance	July 20, 2012, 4:38 pm	SHEBOYGAN, WI 53081	

Check on Another Item

What's your label (or receipt) number?

Find

Copyright© 2012 USPS. All Rights Reserved.

RIGHT-OF-WAY

UNITED STATES POSTAL SERVICE

Date: 07/31/2012

STEVE PLACHINSKI:

The following is in response to your 07/31/2012 request for delivery information on your Certified Mail(TM) item number 7011 2970 0000 3325 5667. The delivery record shows that this item was delivered on 07/30/2012 at 02:01 PM in TWO HARBORS, MN 55616. The scanned image of the recipient information is provided below.

Signature of Recipient: Brian Hayden

Address of Recipient: PO 509

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service