

GIS REGISTRY INFORMATION

SITE NAME: Bickford Facility - Site A (former)

BRRTS #: 03-45-519577 **FID # (if appropriate):** NA

COMMERCE # (if appropriate): _____

CLOSURE DATE: _____

STREET ADDRESS: 820 Hyland Ave.

CITY: Kaukauna

SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection): X= 658431 Y= 425672

CONTAMINATED MEDIA: Groundwater Soil Both

OFF-SOURCE GW CONTAMINATION >ES: Yes No

IF YES, STREET ADDRESS 1: _____

GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL): Yes No

IF YES, STREET ADDRESS 1: _____

GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

CONTAMINATION IN RIGHT OF WAY: Yes No

DOCUMENTS NEEDED:

- Closure Letter, and any conditional closure letter or denial letter issued
- Copy of any maintenance plan referenced in the final closure letter.
- Copy of (soil or land use) deed notice *if any required as a condition of closure*
- Copy of most recent deed, including legal description, for all affected properties
- Certified survey map or relevant portion of the recorded plat map (*if referenced in the legal description*) for all affected properties
- County Parcel ID number, *if used for county*, for all affected properties
- Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.
- Detailed Site Map(s) for all affected properties, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.
- Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)
- Tables of Latest Soil Analytical Results (no shading or cross-hatching)
- Isoconcentration map(s), *if required for site investigation (SI)* (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. **If not available, include the latest extent of contaminant plume map.**
- GW: Table of water level elevations, with sampling dates, and free product noted if present**
- GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)**
- SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour**
- Geologic cross-sections, if required for SI.** (8.5x14" if paper copy)
- RP certified statement that legal descriptions are complete and accurate**
- Copies of off-source notification letters (if applicable)**
- Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW)**

x
x
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na



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Northeast Region Headquarters
1125 N. Military Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-492-5800
FAX 920-492-5913
TTY Access via relay - 711

July 5, 2007

GLH LLC.
ATTN: Larry Paulson
3155 W. Big Beaver Rd
Troy, MI 48007-5084

SUBJECT: Final Case Closure with Land Use Limitations or Conditions
Former Bickford Facility, Site A, 820 Hyland Ave., Kaukauna, WI
WDNR BRRTS Activity #: 03-45-519577

Dear Mr. Paulson:

On December 22, 2004, the Department's Northeast Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On January 19, 2005, you were notified that the Closure Committee had granted conditional closure to this case.

On June 27, 2007 the Department received correspondence indicating that you have complied with the requirements of closure. Based on the correspondence and data provided, it appears that your case meets the requirements of ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time.

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

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement and building foundation that currently exists in the location shown on the attached map shall be maintained in compliance with **the attached maintenance plan** in order to 1) prevent direct contact with residual soil contamination that might otherwise pose a threat to human health and 2) to inhibit surface water infiltration through contaminated soil that may result in exceedances of NR 140 Groundwater Standards. 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 residual contamination remains. If sampling confirms that contamination is present

the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

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

Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If your property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://www.dnr.state.wi.us/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Tom Sturm at 715-526-4230.

Sincerely,



Bruce G. Urben

Northeast Remediation & Redevelopment Team Supervisor

cc: Troy Ribble – Fourfourteen LLC, W6867 Manitowoc Rd., Menasha, WI 54952
Mark Rabbe – Key Engineering Group, 735 N. Water St., Suite 1000, Milwaukee, WI 53202
Tom Sturm - Shawano



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Shawano Office
647 Lakeland Rd.
Shawano, Wisconsin 54166
Telephone 715-524-2183
FAX 715-524-3214

January 19, 2005

Ms Elizabeth Sitterly
Giddings and Lewis LLC
142 Doty St.
Fond Du Lac, WI 54936-0590

COPY

Subject: Conditional Case Closure with NR 140 Exemption
Former Bickford Facility, Site A, Kaukauna, Wisconsin
WDNR BRRTS # 03-45-519577

Dear Ms. Sitterly:

On December 22, 2004, the Northeast Region Closure Committee reviewed your request for closure of the case described above. The Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the committee has determined that the petroleum contamination on the site from the underground tank at Site A on the Bickford Property appears to have been investigated and remediated to the extent practicable under site conditions. Your case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code and will be closed if the following conditions are satisfied:

GIS REGISTRY

This site will be listed on the GIS Registry of Closed Remediation Sites on our public web site. State Statute ch 292.55 and Wisconsin Administrative Code NR149 require that a \$200 fee be submitted to maintain this web site. Please submit this fee in a check made out to the Department of Natural Resources.

MONITORING WELL ABANDONMENT

The monitoring wells at the site must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to me on Form 3300-5B found at www.dnr.state.wi.us/org/water/dwg/gw/ or provided by the Department of Natural Resources. If some of the wells associated with Site A are to be used with the investigation of Site B or C, you should inform me that they will be utilized for this purpose and will not be abandoned at this time.

WASTE AND SOIL PILE REMOVAL

Any remaining waste and/or soil piles generated as part of site investigation or remediation activities must be removed from the site and disposed of or treated in accordance with Department of Natural Resources' rules. Please send a letter advising me that any remaining waste and/or soil piles have been removed once that work is completed.

DEED RESTRICTION FOR CONTAMINATED SOIL

To close this site, the Department requires a deed restriction be signed and recorded to address

the issue of the remaining soil contamination associated with the site. The purpose of the restriction is to maintain a surface barrier over the remaining soil contamination to prevent it from impacting human health and the environment.

Please submit the following:

1. A copy of the current property deed with the name of the current owner and a property description or attached certified survey map
2. A maintenance plan, signed by the current owner, describing how the cap will be inspected, maintained and repaired if necessary. The plan will be attached to the deed document.

I will draft the restriction based on this and other file information and return it to you. The current owner must sign the document for filing at the Outagamie County Register of Deeds office. A copy must be returned to me indicating it has been filed. Please be aware that if a deed restriction is recorded for the wrong property because of an inaccurate legal description that you have provided, you will be responsible for recording corrected documents at the Register of Deeds Office to correct the problem.

When the above conditions have been satisfied, please submit a letter to let me know that applicable conditions have been met, and your case will be closed. Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the registry. To review the sites on the GIS Registry web page, visit <http://gomapout.dnr.state.wi.us/org/at/et/geo/gwur/index.htm>

PAL EXEMPTION

Recent groundwater monitoring data at this site indicates possible exceedances (due to laboratory detection limits greater than the standard) of the NR 140 preventive action limit (PAL) for benzo (a) pyrene at MW-2 and MW-5 at, but compliance with the NR 140 enforcement standard. The Department may grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, if all of the following criteria are met:

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

Based on the information you provided, the Department believes that the above criteria have been or will be met due to the remedial actions taken at the site. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for benzo(a)pyrene at MW-2 and MW-5 and. This letter serves as your exemption.

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

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

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 715-526-4230.

Sincerely,

A handwritten signature in black ink that reads "Tom Sturm". The signature is written in a cursive, slightly slanted style.

Tom Sturm
Hydrogeologist
Remediation and Redevelopment Program
Email – Thomas.Sturm@dnr.state.wi.us

cc: Bill Phelps, DG/2
Dennis Pelczar-Key Engineering Group, 735 North Water St. Milwaukee, WI 53202

CAP MAINTENANCE PLAN

This *Cap Maintenance Plan* shall be applicable to the parcel of Property depicted on the Figure included as Exhibit 1, and a copy of this *Cap Maintenance Plan* shall be maintained on file in the offices of the owner of the Property, GLH, LLC. or its successor(s) in interest (the "Owner"), and any company that is retained to manage the Property on behalf of the Owner (the "Property Manager").

The Cap on the Property includes the following: (1) buildings, (2) a minimum of 3-inches of asphalt or concrete pavement (3) a minimum of 6-inches of clean soil or gravel (soil cover).

ANNUAL INSPECTION

Inspect paved and unpaved areas of the Property to ensure that the integrity of the soil cover in the unpaved areas is maintained and that no significant fissures or cracks develop in the paved areas.

Prepare a brief inspection report that documents the date of the inspection, the individual(s) conducting the inspection, any observed disturbance of the soil cover in the unpaved areas, and any significant cracking observed in the paved areas. Maintain a copy of the inspection report, with a copy of this *Cap Maintenance Plan*, to be made available to representatives of the Wisconsin Department of Natural Resources (WDNR), upon reasonable request.

REPAIR CAPPED AREAS

If, during the annual inspection, the soil cover in unpaved areas is observed to have been disturbed or significant cracking is observed in paved areas, the Owner shall arrange to have repairs made to such areas, in a manner consistent with this *Cap Maintenance Plan*. Such repairs shall be carried out within a reasonable period of time.

MODIFICATION TO CAPPED AREAS

The following steps shall be taken if Owner plans to remove, replace or repair pavement or perform activities that would penetrate below the Cap into the contaminated soils below the Cap (i.e., install or replace trees, shrubs, fencing, retaining walls or buildings):

- The contractor performing the work shall be provided with a copy of this *Cap Maintenance Plan* and shall prepare a *Health and Safety Plan (HASP)*, to protect workers from exposure to contaminated soils.
- Separate excavated clean soils (or granular layer materials where they exist beneath the paved area) so that they may be replaced upon completion of the work. Excavation into the contaminated soils beneath the Cap shall be conducted in accordance with the *HASP*, and any excavated contaminated soils shall be segregated and kept on site, in conformance with the requirements of Chapter NR 718, Wisconsin Administrative Code, until completion of the work.
- Upon completion of the work, place previously excavated contaminated soils back into the excavation, but only to the extent such replacement does not interfere with the replacement and maintenance of the Cap, and does not constitute a violation of Wisconsin hazardous waste management law (Chapter 291, Wisconsin Statutes).

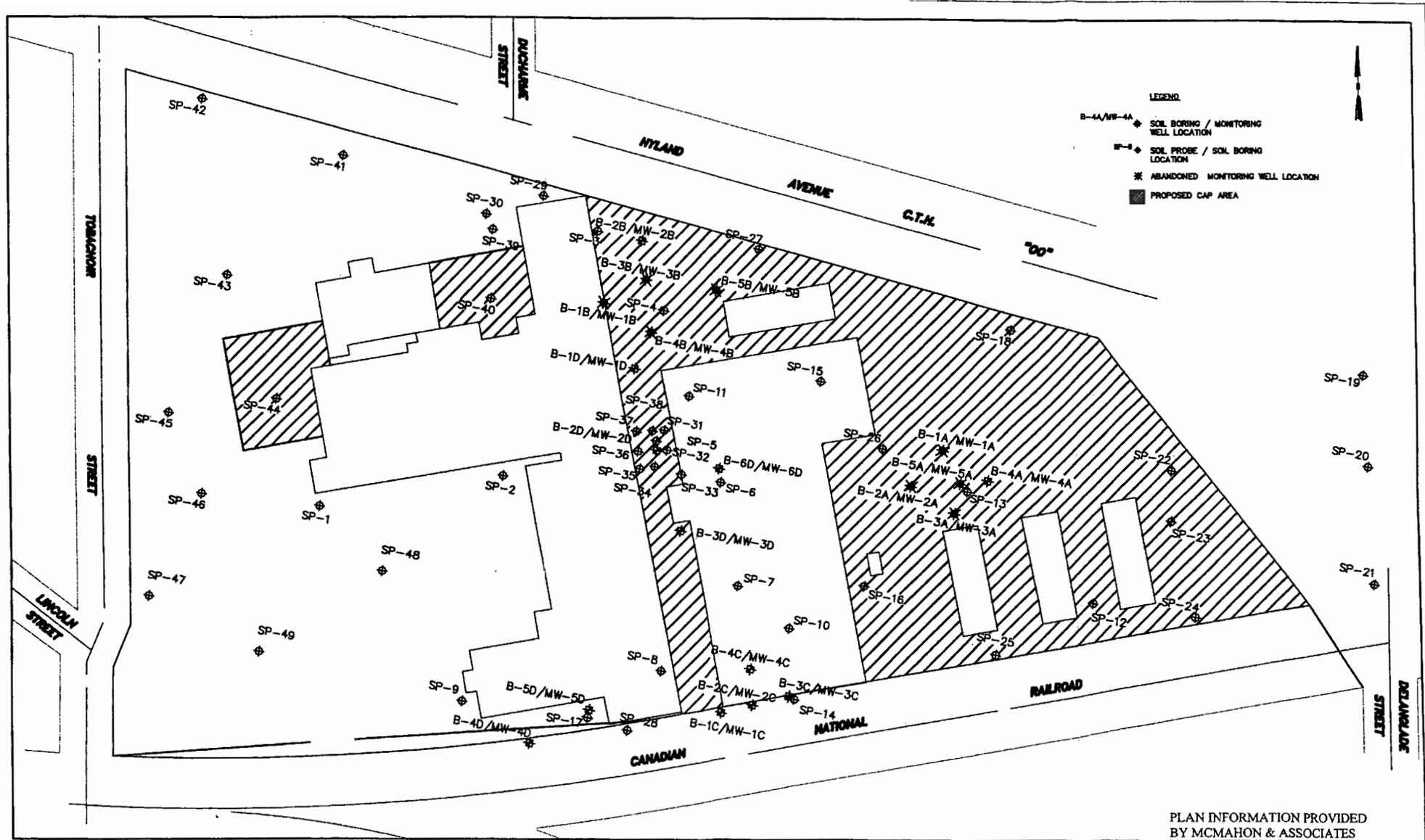
- Any remaining contaminated soils that cannot be replaced in the excavation shall be properly characterized and disposed of at an appropriately licensed facility.
- Prepare a brief report documenting the work performed, identifying the person(s) performing the work, and verifying that this *Cap Maintenance Plan* was adhered to. Maintain report on file (to be made available to WDNR, upon reasonable request).

UTILITY REPAIRS

No underground utility repairs or installation of new or replacement utilities shall be conducted on the Property until after the utility and any contractor(s) for the utility have acknowledged receipt of a copy of this *Cap Maintenance Plan*.

- The underground utility repairs or installation(s) shall be conducted in accordance with the methods above with respect to excavations into unpaved and paved areas.
- If the underground utility repairs or installation(s) involve any disturbance of the seals used to seal the entrance of utility lines into structures on the property, such seals shall be replaced with new seals of like or superior quality.
- Prepare a brief report documenting the work performed, identifying the person(s) performing the work, and verifying that this *Cap Maintenance Plan* was adhered to. Maintain report on file (to be made available to WDNR, upon reasonable request).

H:\ZB\Bickford\capmaintenanceplan.rtf



PLAN INFORMATION PROVIDED BY MCMAHON & ASSOCIATES

REVISION NO.	DESCRIPTION	DATE	BY	DESIGNED BY	DATE
				ZB	9/27/06
				DMB	10/16/06
				APP	

EXHIBIT 1
PROPOSED CAP AREA
FORMER BICKFORD FACILITY
820 HYLAND AVENUE KAUKAUNA, WISCONSIN

THE INFORMATION SHOWN ON THIS DRAWING CONCERNING TYPE AND LOCATION OF UNDERGROUND UTILITIES IS NOT GUARANTEED TO BE ACCURATE OR ALL INCLUDING. THE CONTRACTOR IS RESPONSIBLE FOR MAKING HIS OWN DETERMINATIONS AS TO THE TYPE AND LOCATION OF UNDERGROUND UTILITIES AS WELL AS NECESSARY TO AVOID DAMAGE THEREOF.

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KEY PROJECT NUMBER
0907001.4A

PROJECT SCALE
1"=60'

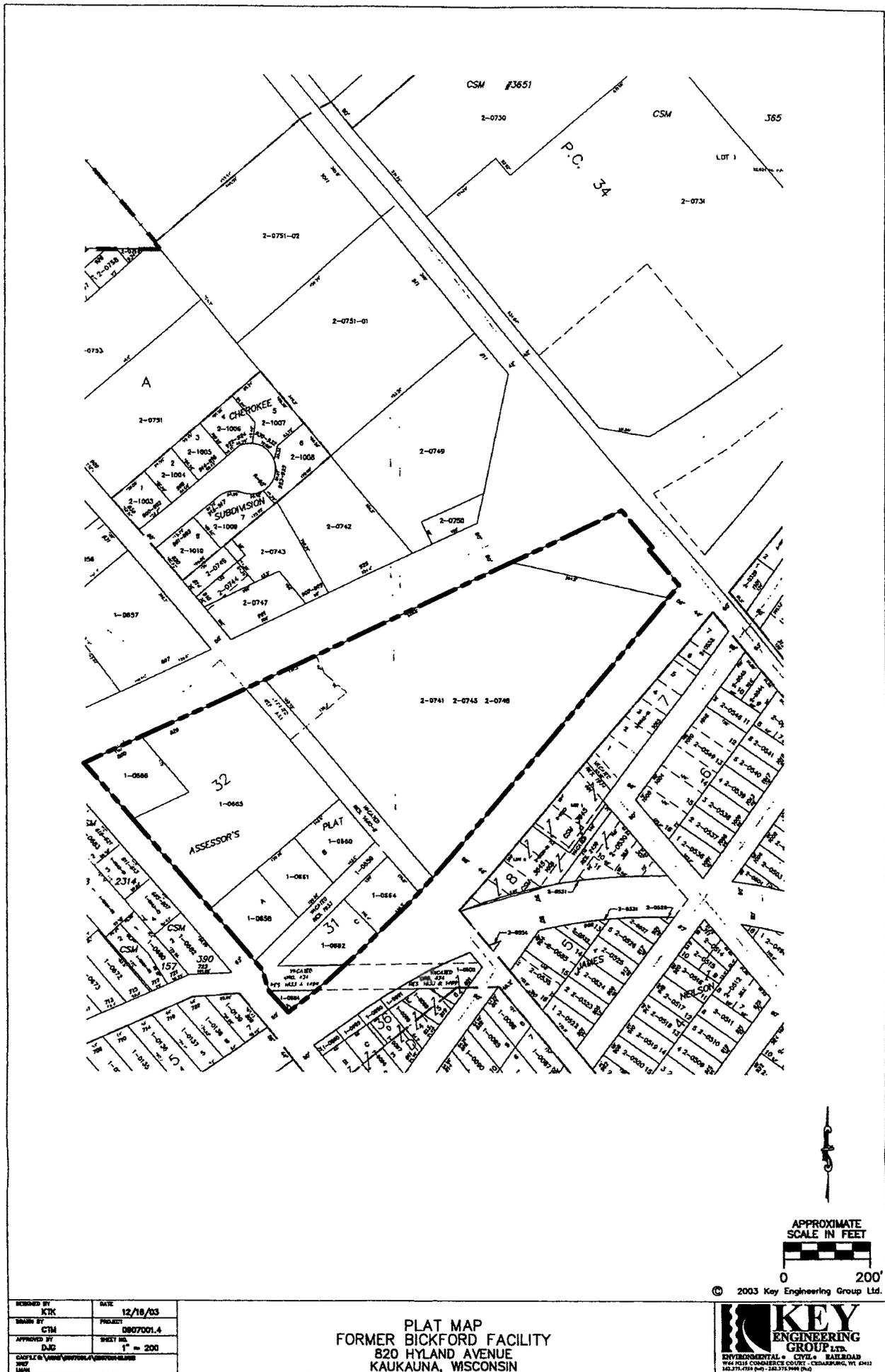
SHEET NUMBER
C-1

Exhibit A

A parcel of land located in part of Lot 26; part of Lot 31A; all of Lot 31B and Lot 31C, part of Lot 32; all of Lot 36A, all located in the South 1/2 of Private Claim 35; and part of Lot A in the North 1/2 of Private Claim 35 and all that part of vacated Plank Road, Ducharme Street and Lincoln Avenue, all being a part of the 1890 Recorded Assessor's Plat, T21N, R18E, City of Kaukauna, Outagamie County, Wisconsin, more fully described as follows:

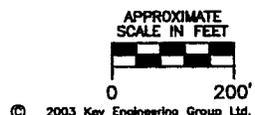
Commencing at the most Southerly corner of Lot 26 of the South 1/2 of said Private Claim 35; thence N49°49'55"E along the Southeasterly line of said Lot 26, 52.52 feet to a point on the Northeasterly right-of-way line of Division Street; thence N39°44'55"W along said Northeasterly right-of-way line, 155.34 feet to its intersection with the Southeasterly right-of-way line of Hyland Avenue, C.T.H. "OO" (formerly U.S.H. "41"); thence N65°04'25"E along said Southeasterly right-of-way line, 509.97 feet to its intersection with the Northeasterly right-of-way line of Tobaccoir Street, the point of beginning.

Thence continuing N65°04'25"E along the Southeasterly right-of-way line of Hyland Avenue (C.T.H. "OO"), 1,135.91 feet to its intersection with the right-of-way line of the Southwesterly vision corner of Hyland Avenue (C.T.H. "OO") and Delanglade Street (S.T.H. "55"); thence S77°18'09"E along said vision corner right-of-way line, 382.43 feet to its intersection with the Northwesterly right-of-way line of the Chicago and Northwestern Railroad property; thence S39°56'08"W along said Northwesterly railroad right-of-way line, 752.23 feet to the beginning of a curve; thence Southwesterly along said curved railroad right-of-way line (having a radius of 2,808.93 feet with its center located towards the Northwest and having a chord 607.86 feet in length which bears S46°08'50"W) a distance of 609.05 feet to its intersection with the East right-of-way line of Tobaccoir Street; thence N39°35'05"W along said East right-of-way line, 98.03 feet; thence N16°46'13"W along said East right-of-way line, 51.91 feet; thence N40°14'27"W along said East right-of-way line, 626.18 feet to the point of beginning.



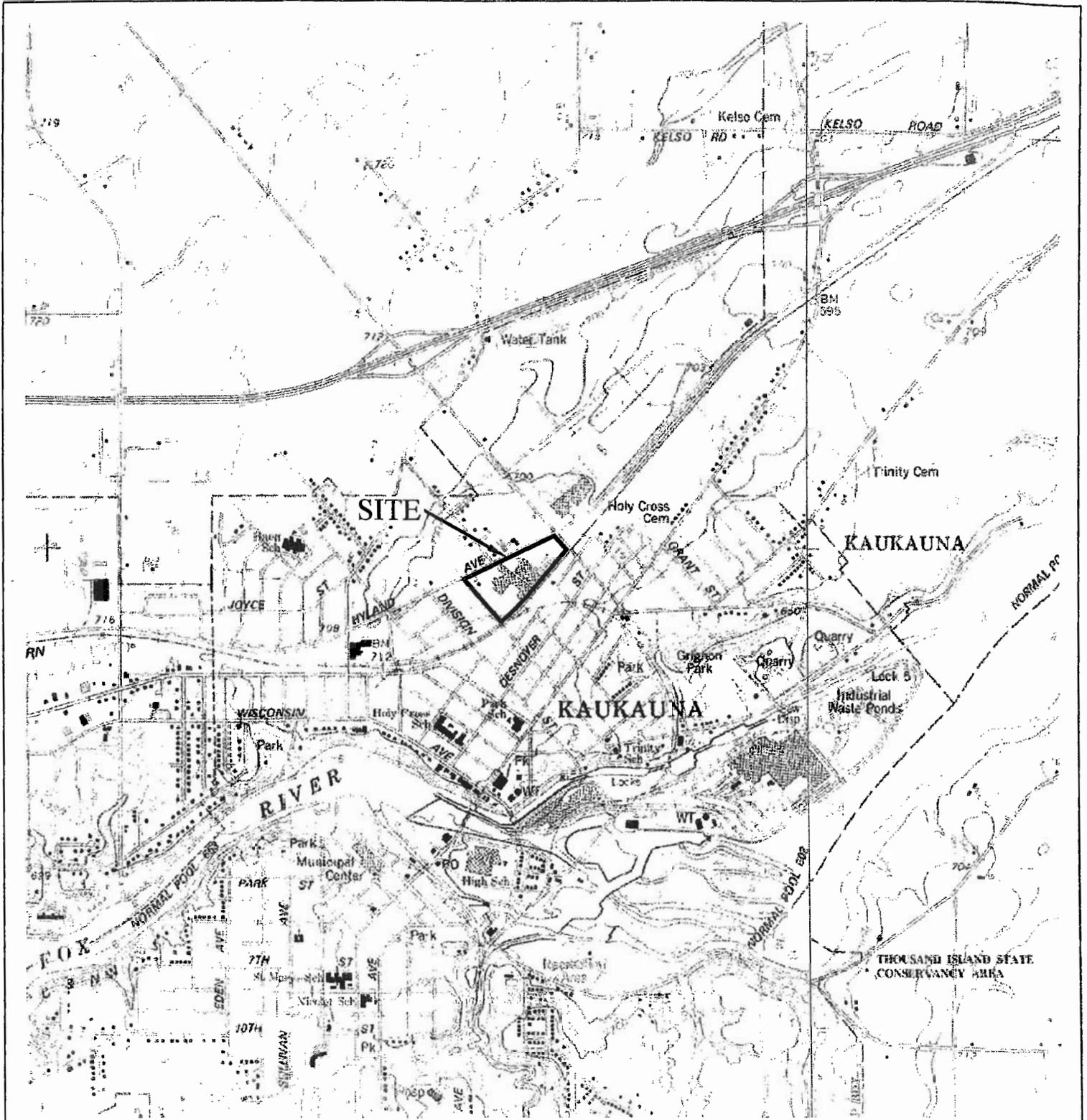
DESIGNED BY KTK	DATE 12/18/03
DRAWN BY CTM	PROJECT 0807001.4
APPROVED BY DJG	SHEET NO. 1" = 200'
<small>CADFILE & PLOTTER: \\server\plotters\plotter.dwg PLOT DATE:</small>	

PLAT MAP
 FORMER BICKFORD FACILITY
 820 HYLAND AVENUE
 KAUKAUNA, WISCONSIN

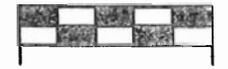


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SCALE IN FEET



0 2000'

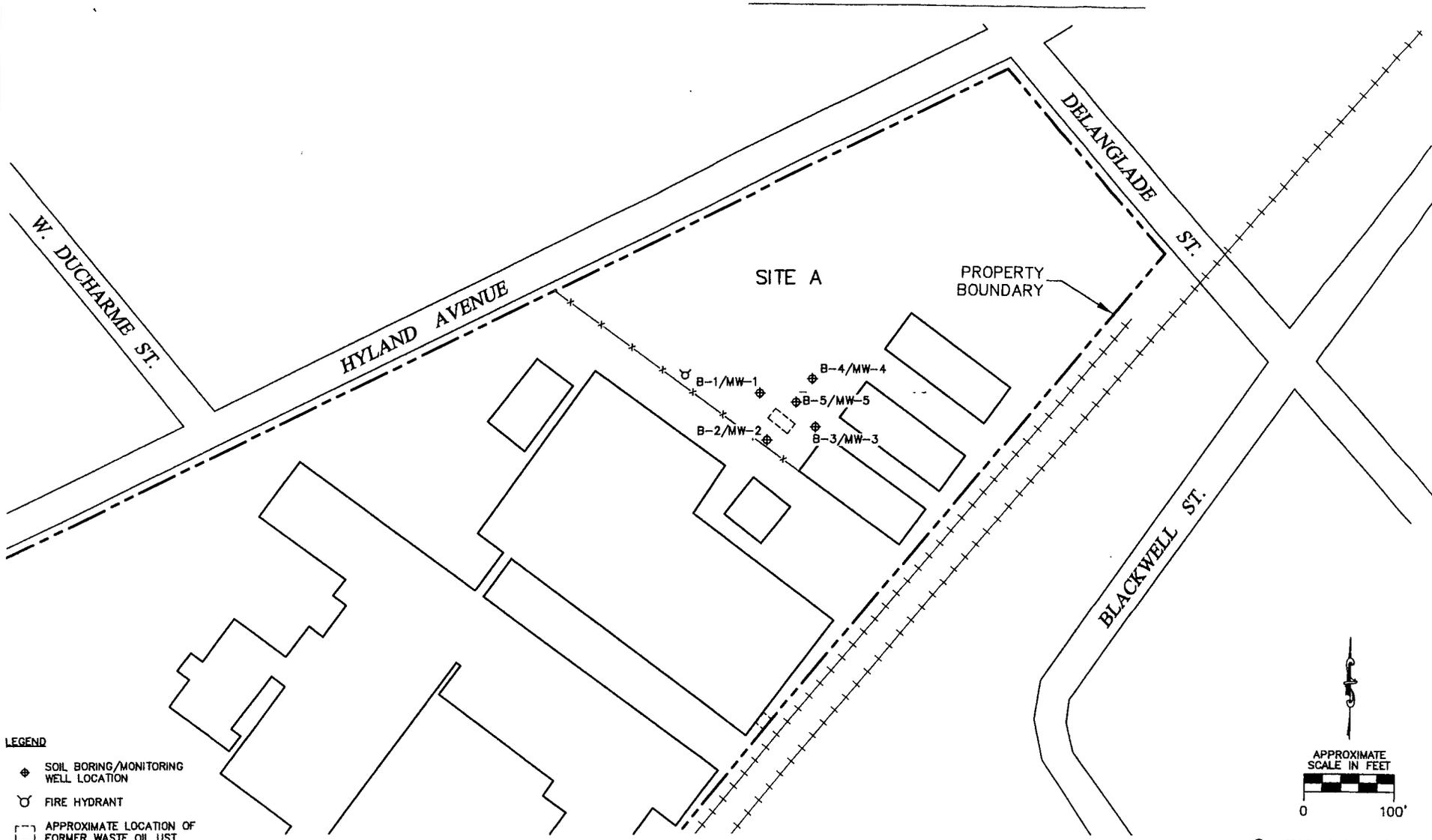
SOURCE: USGS Kaukauna, Wisconsin Quadrangle Map
Topographic Map 1974
Photorevised 1984

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DESIGNED BY KEK	DATE 03/07/03
DRAWN BY CTM	PROJECT 0907001.4
APPROVED BY DJG	SHEET NO. 1
CADFILE @ \A\RD\030703\A020700109.C;J NREF LJIAN	

SITE LOCATION MAP
SITE INVESTIGATION WORK PLAN
FORMER BICFORD FACILITY
820 HYLAND AVENUE
KAUKAUNA, WISCONSIN





- LEGEND**
- ⊕ SOIL BORING/MONITORING WELL LOCATION
 - ⊕ FIRE HYDRANT
 - ⊔ APPROXIMATE LOCATION OF FORMER WASTE OIL UST

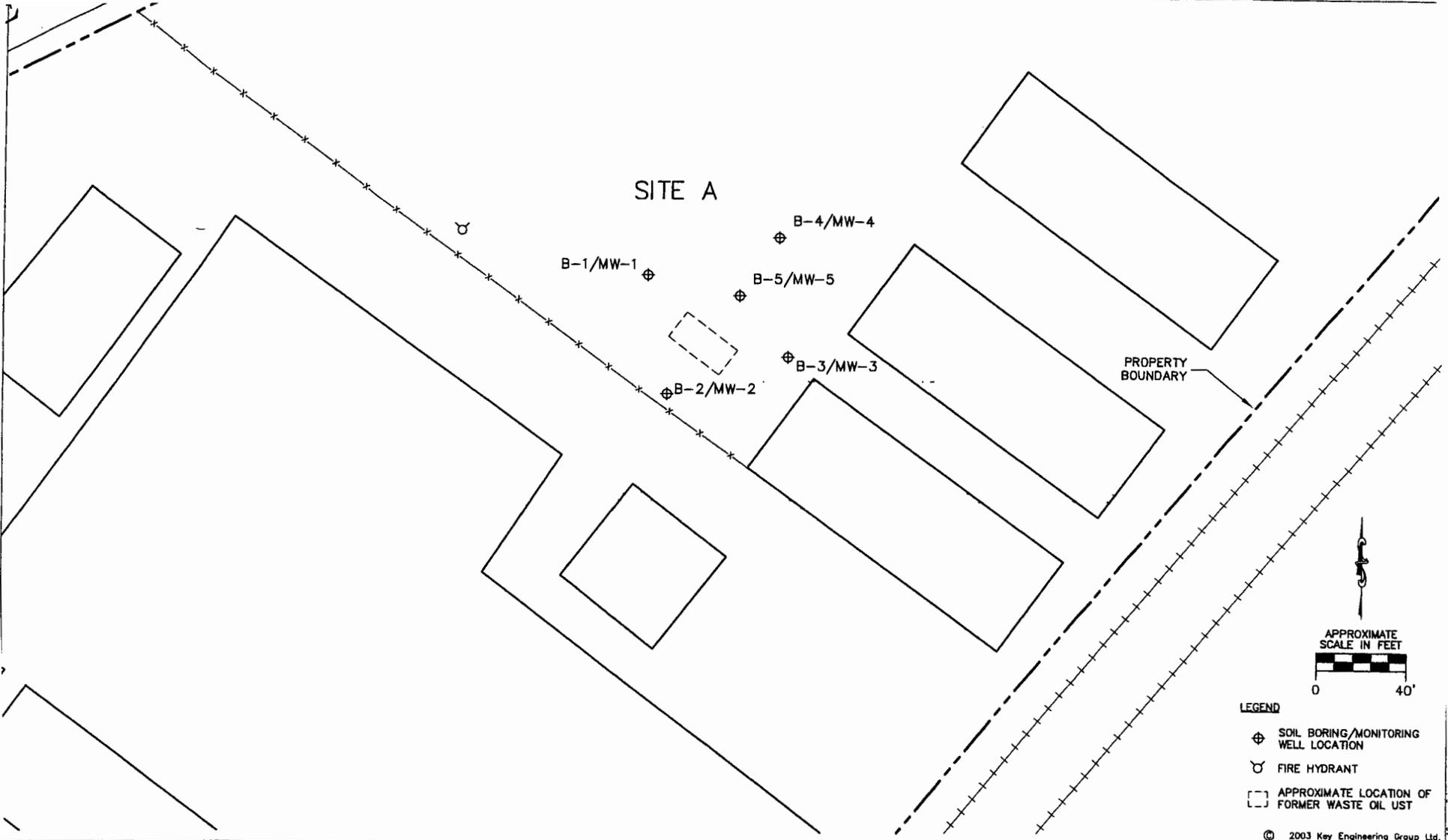


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DESIGNED BY KEK	DATE 11/07/03
DRAWN BY CTM	PROJECT 0907001.4
APPROVED BY DJO	SHEET NO. 1
<small>CADFILE: \\CAD\PROJECTS\0907001.4\0907001.4.dwg SHEET 1/01</small>	

SITE VICINITY LAYOUT
 FORMER BICKFORD FACILITY SITE A
 820 HYLAND AVENUE
 KAUKAUNA, WISCONSIN

KEY
 ENGINEERING
 GROUP LTD.
ENVIRONMENTAL • CIVIL • RAILROAD
 146 1113 COMMERCE COURT - CEDARBURG, WI 53103
 262.375.0796 (EXT. 352.375.0800) FAX



DESIGNED BY KEK	DATE 11/07/03
DRAWN BY CTM	PROJECT 0907001.4
APPROVED BY DJG	SHEET NO. 2
<small>SCALE: 1" = 40' (VERTICAL) 1" = 80' (HORIZONTAL)</small>	

SITE LAYOUT
FORMER BICKFORD FACILITY SITE A
820 HYLAND AVENUE
KAUKAUNA, WISCONSIN

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TABLE 3

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

FORMER BICKFORD FACILITY

Site A

820 Hyland Avenue
Kaukauna, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION								NR 140 GROUNDWATER QUALITY STANDARD	
	MW-1	MW-2		MW-3	MW-4		MW-5		ES	PAL
Date Collected	10/23/03	10/23/03	3/2/04	10/23/03	10/23/03	3/2/04	10/23/03	4/21/04		
Lead (µg/l)	<1.4	<1.4	---	<1.4	<1.4	---	<1.4	---	15	1.5
Detected VOCs (µg/l)										
Toluene	0.20	<0.20	---	<0.20	<0.20	---	<0.20	---	1,000	200
Detected PAHs (µg/l)										
Benzo (a) pyrene	<0.092	0.040	<0.033	<0.034	<0.033	<0.034	0.038	<0.033	0.2	0.02

Notes:

- Bold values exceed NR 140 preventive action limit
- ES - enforcement standard
- PAHs - polynuclear aromatic hydrocarbons
- PAL - preventive action limit
- µg/l - micrograms per liter
- VOCs - volatile organic compounds

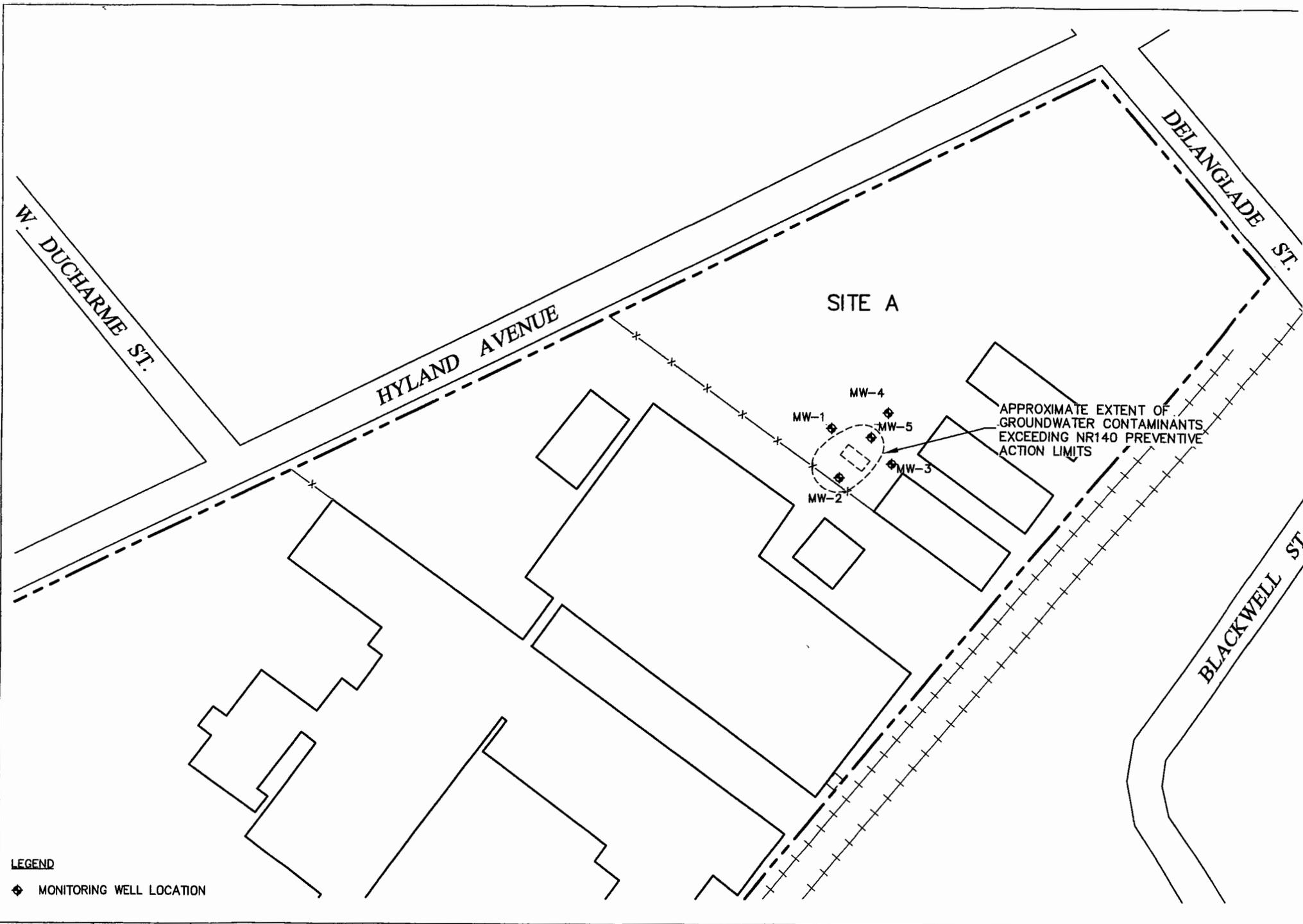
SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS

FORMER BICKFORD FACILITY
Site A
820 Hyland Avenue
Kaukauna, Wisconsin

PARAMETER	SAMPLE IDENTIFICATION										GRCL		
	B-1		B-2		B-3		B-4		B-5		DIRECT CONTACT PATHWAY		GROUNDWATER PATHWAY
	10/15/03	10/15/03	10/15/03	10/15/03	10/15/03	10/15/03	10/16/03	10/16/03	10/16/03	10/16/03	Non-Industrial	Industrial	
Date Collected	10/15/03	10/15/03	10/15/03	10/15/03	10/15/03	10/15/03	10/16/03	10/16/03	10/16/03	10/16/03			
Depth (feet bgs)	1-3	6-8	1-3	6-8	1-3	6-8	1-3	8.5-10.5	1-3	8.5-10.5			
PID (i.u.)	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1			
DRO (mg/kg)	46	<6.6	1,380	17	80	<6.6	127	<6.3	87	<6.5	—	—	100
GRO (mg/kg)	<5.6	<6.6	<5.3	<6.4	<6.5	<6.6	<5.3	<6.3	8.9	<6.5	—	—	100
Lead (mg/kg)	62	11	149	10	17	12	382	9.4	21	11	50	500	—
Detected VOCs (µg/kg)													
Naphthalene	<28	<33	149	<32	<33	<33	244	<31	89	<33	—	—	2,700
Toluene	<28	<33	53	<32	<33	<33	<27	<31	30	<33	—	—	38,000
1,2,4-Trimethylbenzene	<28	<33	181	<32	<33	<33	<27	<31	<27	<33	—	—	83,000
1,3,5-Trimethylbenzene	<28	<33	138	<32	<33	<33	<27	<31	<27	<33	—	—	11,000
Xylenes	<39	<46	74	<45	<46	<46	<37	<44	<37	<46	—	—	42,000
Detected PAHs (µg/kg)													
Anthracene	110	<6.6	202	15	<6.5	<6.6	170	<6.3	223	<6.5	5.0x10 ⁵	3.0x10 ⁵	3.0x10 ⁵
Benzo (a) anthracene	2,460	24	4,250	92	26	<6.6	3,080	9.6	5,110	<6.5	88	3,900	17,000
Benzo (b) fluoranthene	4,140	29	9,670	204	55	<6.6	6,260	21	11,700	<6.5	88	3,900	3.6x10 ⁵
Benzo (k) fluoranthene	1,680	13	4,250	88	33	<6.6	2,760	8.2	5,530	<6.5	880	39,000	8.7x10 ⁵
Benzo (a) pyrene	4,140	28	9,990	217	77	<6.6	6,790	19	12,800	<6.5	8.8	390	48,000
Benzo (ghi) perylene	2,570	21	10,600	307	95	<6.6	7,000	19	11,700	<6.5	1,800	39,000	6.8x10 ⁵
Chrysene	2,130	25	4,890	110	34	<6.6	3,180	13	3,400	<6.5	8,800	3.9x10 ⁵	37,000
Dibenzo (a,h) anthracene	928	<9.9	1,910	37	13	<9.9	1,270	<9.4	2,130	<9.8	8.8	390	38,000
Fluoranthene	2,570	61	4,040	230	30	<13	2,550	<13	4,680	<13	6.0x10 ⁵	4.0x10 ⁷	5.0x10 ⁵
Indeno (1,2,3-cd) pyrene	4,360	25	10,600	255	84	<6.6	6,790	23	11,700	<6.5	88	390	6.8x10 ⁵
1-Methylnaphthalene	<680	<40	<640	<38	<39	<39	<640	<38	2,230	<39	1.1x10 ⁵	7.0x10 ⁷	23,000
2-Methylnaphthalene	<560	<33	<540	68	<33	<33	<540	<31	2,870	<33	6.0x10 ⁵	4.0x10 ⁷	20,000
Phenanthrene	738	23	871	120	<6.5	<6.6	679	<6.3	1,050	<6.5	18,000	3.9x10 ⁵	1,800
Pyrene	1,680	48	4,360	120	22	<6.6	2,970	14	5,210	<6.5	5.0x10 ⁵	3.0x10 ⁷	8.7x10 ⁵
Physical Parameters													
TOC (mg/kg)	—	10,400 ⁽¹⁾	—	—	—	17,300 ⁽²⁾	—	—	—	11,700 ⁽³⁾	—	—	—

Notes:

- Bold values exceed Industrial Direct Contact GRCL
- Boxed values exceed Groundwater Pathway GRCL
- (1) - Collected at 12-17 feet bgs
- (2) - Collected at 12-15 feet bgs
- (3) - Collected at 11-16 feet bgs
- - not analyzed/not applicable
- bgs - below ground surface
- DRO - diesel range organics
- GRCL - generic residual contaminant level
- GRO - gasoline range organics
- i.u. - instrument units
- mg/kg - milligrams per kilogram
- ND - none detected above laboratory detection limits
- PAHs - polynuclear aromatic hydrocarbons
- PID - photoionization detector
- TOC - total organic carbon
- µg/kg - micrograms per kilogram
- VOCs - volatile organic compounds

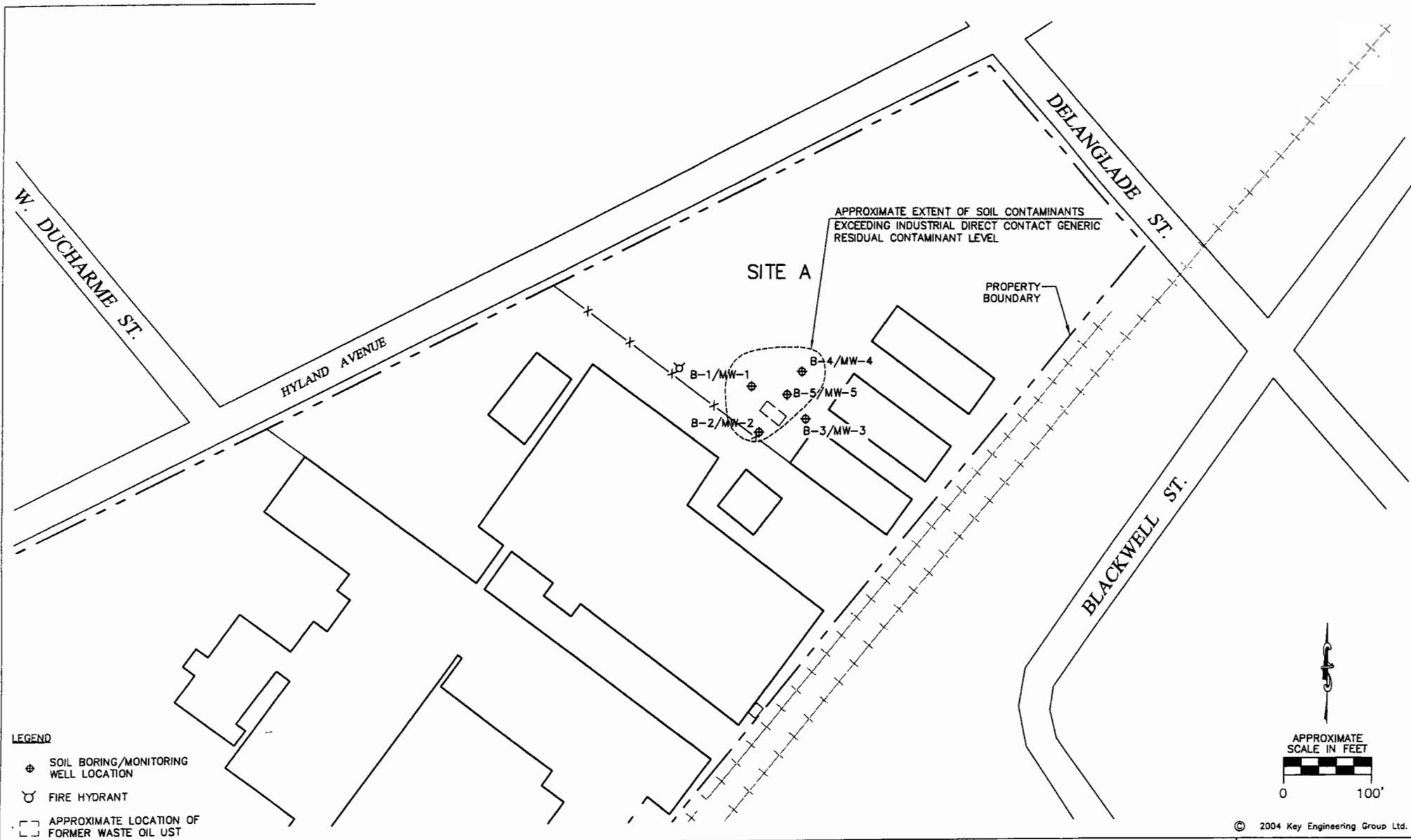


LEGEND

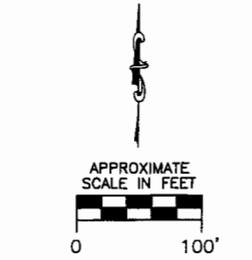
◆ MONITORING WELL LOCATION

DESIGNED BY KEK	DATE 12/10/03
DRAWN BY CTM	PROJECT 0807001.4
APPROVED BY DJG	SHEET NO.
<small>CADFILE G:\ACAD\0807001.4\08070014L.DWG 2003</small>	

GROUNDWATER CONTAMINANT CONTOUR MAP
FORMER BICKFORD FACILITY SITE A
820 HYLAND AVENUE



- LEGEND**
- ⊕ SOIL BORING/MONITORING WELL LOCATION
 - ⊕ FIRE HYDRANT
 - APPROXIMATE LOCATION OF FORMER WASTE OIL UST



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DESIGNED BY KEK	DATE 11/07/03
DRAWN BY CTM	PROJECT 0907001.4
APPROVED BY DJG	SHEET NO. 1
CADFILE & \CAD\0907001.4\090700144.dwg	
DWG	
LMAN	

FIGURE 1
SOIL CONTAMINANT MAP
FORMER BICKFORD FACILITY SITE A
820 HYLAND AVENUE
KAUKAUNA, WISCONSIN

KEY ENGINEERING GROUP L.P.
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 414.834.8000 (ext. 200) 414.834.8001 (fax)

TABLE 2

SUMMARY OF GROUNDWATER ELEVATION DATA

FORMER BICKFORD FACILITY

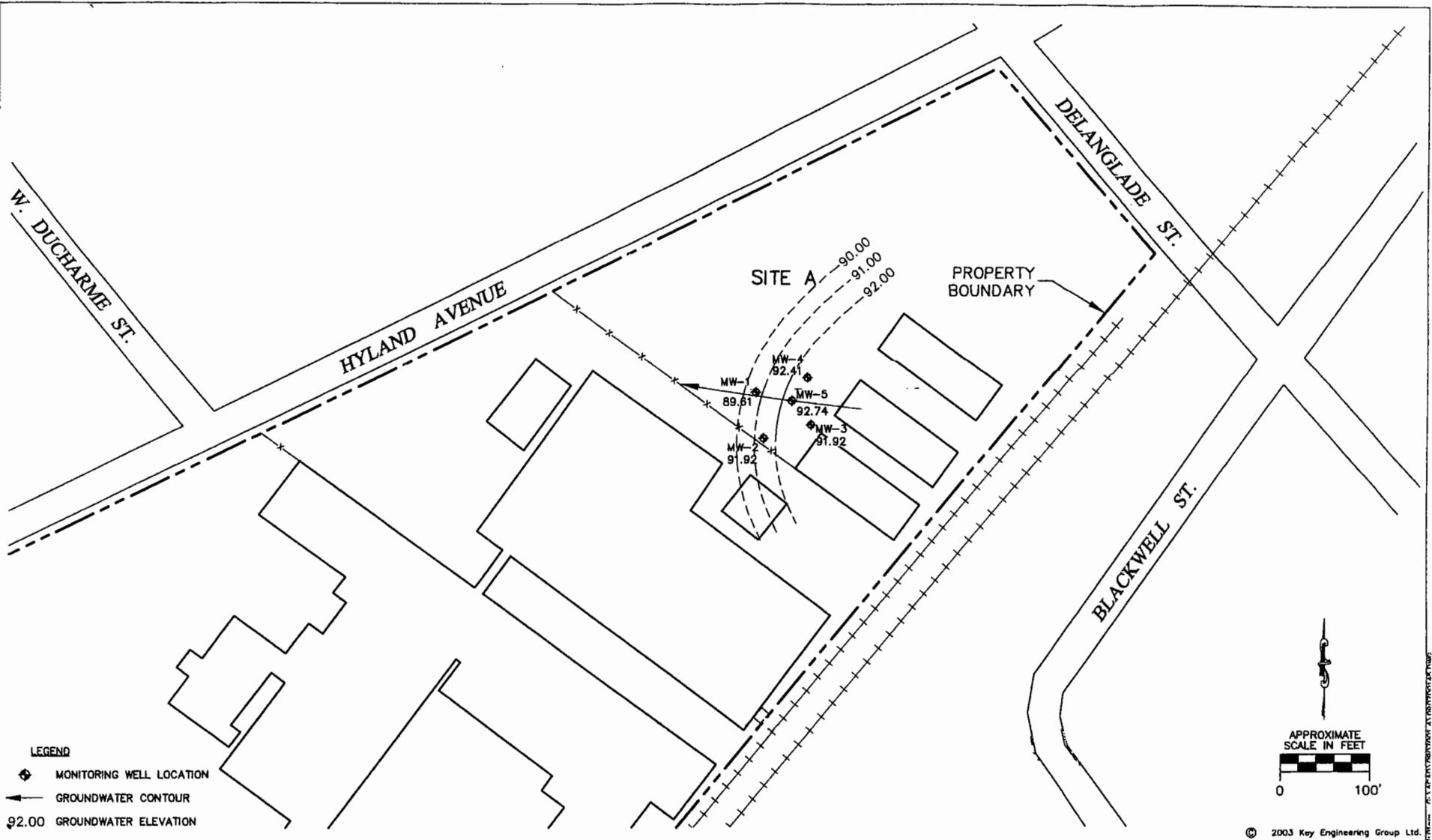
Site A

820 Hyland Avenue
Kaukauna, Wisconsin

WELL ID	ELEVATION (feet MSL)		DEPTH TO GROUNDWATER FROM TOP OF PVC (feet)	DEPTH TO GROUNDWATER FROM GROUND SURFACE (feet)	GROUNDWATER ELEVATION (feet MSL)	APPROXIMATE SCREEN ELEVATION (feet MSL)	SCREEN LENGTH (feet)
	TOP OF PVC	GROUND SURFACE					
MW-1	701.86	702.14				695.01-685.01	10
10/23/03			8.13	8.41	693.73		
2/13/04			(1)	---	---		
3/2/04			7.90	8.18	693.96		
5/25/04			5.85	6.13	696.01		
MW-2	701.80	702.41				696.62-686.62	10
10/23/03			5.76	6.37	696.04		
2/13/04			6.87	7.48	694.93		
3/2/04			5.34	5.95	696.46		
5/25/04			4.44	5.05	697.36		
MW-3	701.79	702.46				696.61-686.61	10
10/23/03			5.75	6.42	696.04		
2/13/04			6.69	7.36	695.10		
3/2/04			5.10	5.77	696.69		
5/25/04			3.44	4.11	698.35		
MW-4	701.29	701.85				696.10-686.10	10
10/23/03			4.78	5.34	696.51		
2/13/04			(1)	---	---		
3/2/04			4.35	4.91	696.94		
5/25/04			3.33	3.89	697.96		
MW-5	701.30	702.06				696.12-686.12	10
10/23/03			4.43	5.19	696.87		
2/13/04			5.60	6.36	695.70		
3/2/04			4.75	5.51	696.55		
5/25/04			2.83	3.59	698.47		

Notes:

- MSL - mean sea level
- PVC - polyvinyl chloride
- (1) - could not find



LEGEND

- ⊕ MONITORING WELL LOCATION
- GROUNDWATER CONTOUR
- 92.00 GROUNDWATER ELEVATION

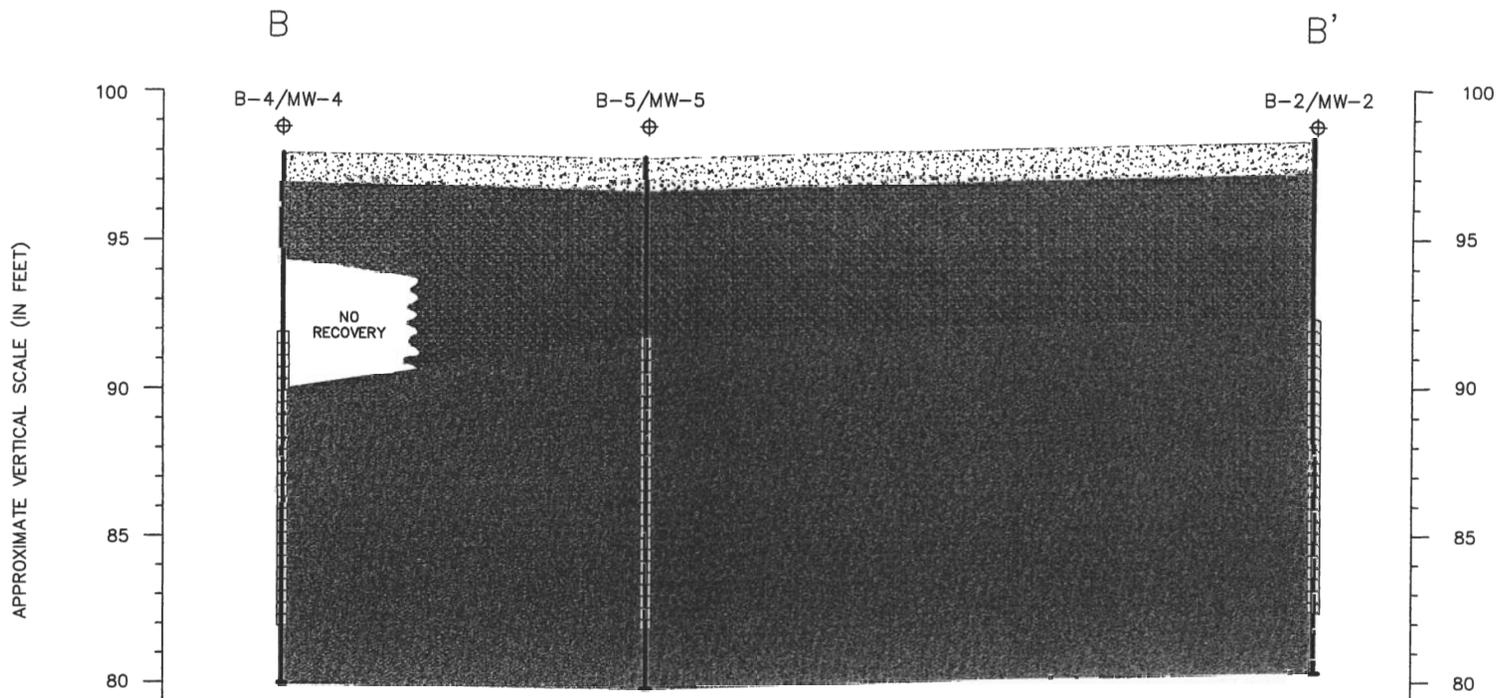


CREATED BY	MEK	DATE	11/07/03
DRAWN BY	CTM	PROJECT	0807001.4
PROVED BY	DJG	SHEET NO.	5
<small>SCALE: 1" = 100' (AS SHOWN) <small>DATE: 11/07/03</small> </small>			

GROUNDWATER ELEVATION CONTOUR MAP (OCTOBER 23, 2003)
 FORMER BICKFORD FACILITY SITE A
 820 HYLAND AVENUE
 KAUKAUNA, WISCONSIN

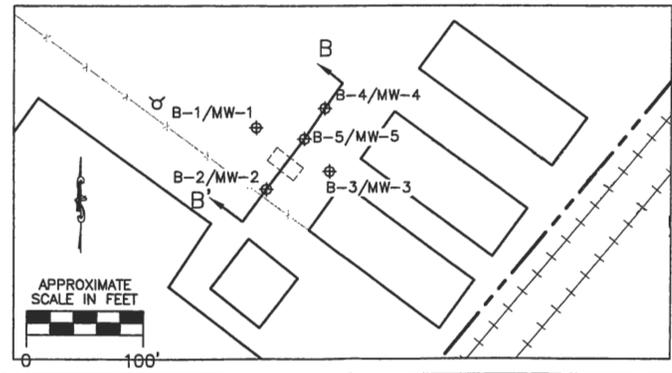
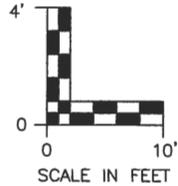
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LEGEND

-  ASPHALT
-  SAND AND GRAVEL (FILL)
-  SILTY CLAY
-  WELL SCREEN



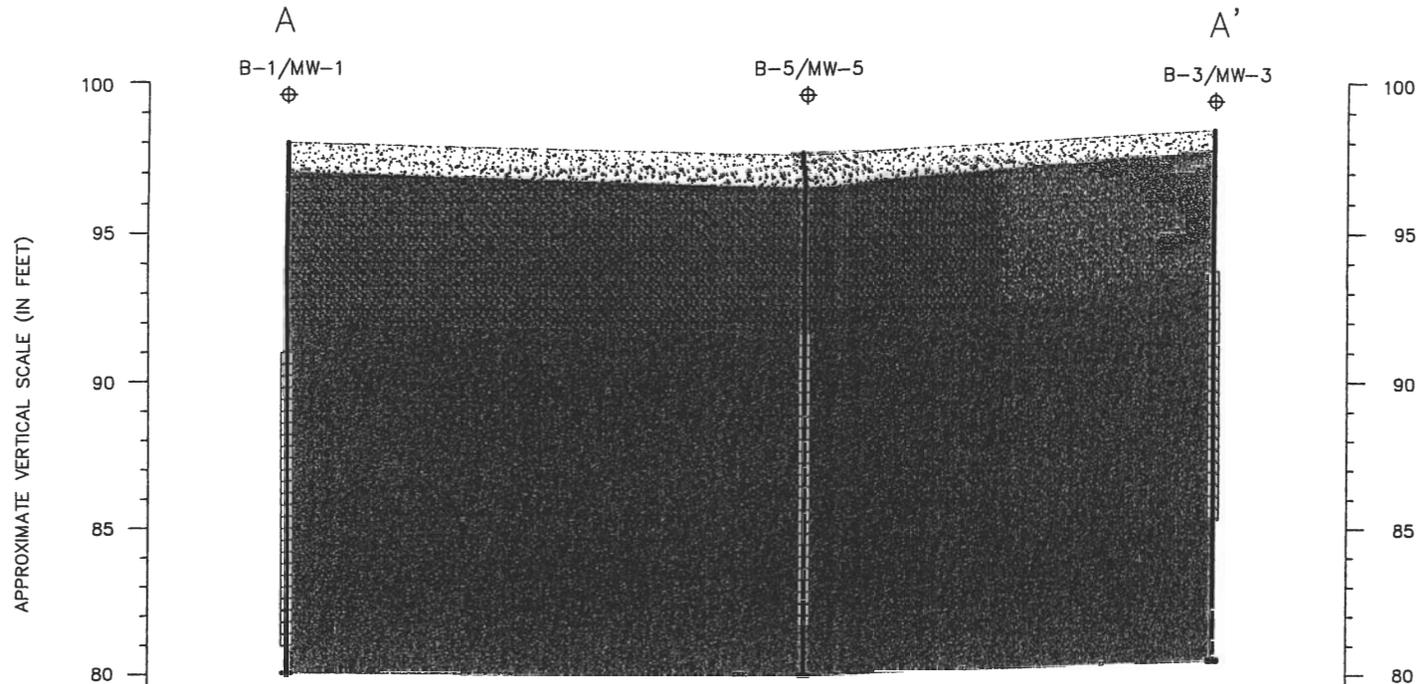
DESIGNED BY KTK	DATE 11/20/03
DRAWN BY CTM	PROJECT 0807001.4
APPROVED BY DJG	SHEET NO. 3B
CAUFLE & VACAR \0807001.4\0807001.4.dwg	
JMS	
JMS	

SCHMATIC CROSS-SECTION (B-B')
FORMER BICKFORD FACILITY
SITE A
820 HYLAND AVENUE
KAUKAUNA, WI

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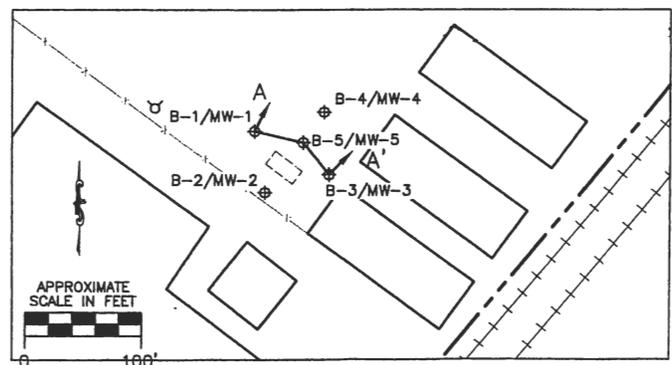
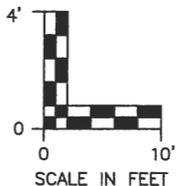


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LEGEND

-  ASPHALT
-  SAND AND GRAVEL (FILL)
-  SILTY CLAY
-  SAND AND CLAY (FILL)
-  WELL SCREEN



SCHMATIC CROSS-SECTION (A-A')
 FORMER BICKFORD FACILITY
 SITE A
 820 HYLAND AVENUE
 KAIKAIANA WI

DESIGNED BY KTK	DATE 11/20/03
DRAWN BY CTM	PROJECT 0907001.4
PRODUCED BY DJG	SHEET NO. 3A
<small>SCALE & VENDOR INFORMATION</small> <small>1/2" = 1' 0"</small>	

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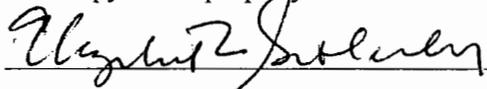
DATE PLOTTED: 11/20/03 10:00 AM

Reference: Geographic Information System Registry
Former Bickford Facility – Site A
820 Hyland Avenue
Kaukauna, Wisconsin 54130
BRRTS #: 03-45-519577

To Whom it May Concern:

I, Elizabeth Sitterly, Attorney, Giddings & Lewis, LLC (f/k/a Giddings & Lewis, Inc., a Wisconsin Corporation), do hereby declare to the best of my knowledge that the attached legal property description represents completely and accurately the above referenced property for which I am requesting listing on the Wisconsin Department of Natural Resources Geographic Information System Registry of Closed Remediation Sites.

Please find a copy of the property deed for the above referenced property.

Signed:  Date: 5/16/05

Elizabeth Sitterly, Attorney
Giddings & Lewis, LLC (Responsible Party)