

GIS REGISTRY

Cover Sheet

May, 2009
(RR 5367)

Source Property Information

BRRTS #:

ACTIVITY NAME:

PROPERTY ADDRESS:

MUNICIPALITY:

PARCEL ID #:

CLOSURE DATE:

FID #:

DATCP #:

COMM #:

*WTM COORDINATES:

X: Y:

** 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:

- | | |
|---|---|
| <input type="checkbox"/> Groundwater Contamination > ES (236) | <input checked="" type="checkbox"/> Soil Contamination > *RCL or **SSRCL (232) |
| <input type="checkbox"/> Contamination in ROW | <input type="checkbox"/> Contamination in ROW |
| <input type="checkbox"/> Off-Source Contamination | <input type="checkbox"/> Off-Source Contamination |
| <i>(note: for list of off-source properties
see "Impacted Off-Source Property")</i> | <i>(note: for list of off-source properties
see "Impacted Off-Source Property")</i> |

Land Use Controls:

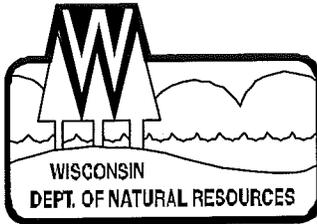
- | | |
|---|---|
| <input type="checkbox"/> N/A (Not Applicable) | <input checked="" type="checkbox"/> Cover or Barrier (222) |
| <input checked="" type="checkbox"/> Soil: maintain industrial zoning (220) | <i>(note: maintenance plan for
groundwater or direct contact)</i> |
| <i>(note: soil contamination concentrations
between non-industrial and industrial levels)</i> | <input type="checkbox"/> Vapor Mitigation (226) |
| <input type="checkbox"/> Structural Impediment (224) | <input type="checkbox"/> Maintain Liability Exemption (230) |
| <input type="checkbox"/> Site Specific Condition (228) | <i>(note: local government or economic
development corporation)</i> |

Monitoring Wells:

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

- Yes No N/A

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



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Oshkosh Service Center
625 East County Road Y, STE 700
Oshkosh, Wisconsin 54901-9731
TELEPHONE 920-424-3050
FAX 920-424-4404

January 17, 2006

WDNR VPLE #: 06-45-229641

Kent Hager
City Administrator
215 N. Shawano St.
New London, WI 54961

SUBJECT: A *Certificate of Completion* for the Environmental Investigation and Cleanup of Property Owned by the City of New London, located at 613 East Beacon Street, New London, WI

Dear Mr. Hager:

The Department of Natural Resources ("the Department") received a request for issuance of a *Certificate of Completion* for the environmental investigation and cleanup of property owned by the City of New London at 613 East Beacon Street, New London, Wisconsin, which will be referred to in this letter as "the Property". You have requested that the Department determine whether the City of New London has met the requirements under s. 292.15(2), Wis. Stats., for issuance of a *Certificate of Completion*.

The Property is currently one parcel of land with no development and a vegetative cover (parcel number 333039900). The Property is described as Lot 1 of Certified Survey Map 4791, in Volume 27 of Certified Survey Maps on page 4791, as Document No. 1607938 at the Register of Deeds office for Outagamie County.

Determination

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

Conclusions

The Department appreciates the work undertaken by the City of New London to investigate and cleanup contamination associated with the Property. The exemption provided by the *Certificate of Completion* applies to any successor or assignee of the City of New London if the successor or assignee complies with the appropriate conditions, pursuant to s. 292.15(3), Wis. Stats.



January 17, 2006

Certificate of Completion
WDNR VPLE #06-45-229641

2

If you have any questions or concerns regarding this letter or the *Certificate of Completion*, please call me at 920-424-7887 or Attorney Joe Renville at 608-266-9454.

Sincerely,

Jennifer Borski
Hydrogeologist
Bureau for Remediation & Redevelopment
(920) 424-7887

Encl. – Certificate of Completion

Electronic Copy (w/o encl.):

Andrew Mott, STS
Annette Weissbach, Green Bay
Michael Prager, Land Recycling Team Leader, Madison – RR/3
Attorney Joe Renville, Madison – LS/5

State of Wisconsin
Department of Natural Resources

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

Whereas, the City of New London has applied for an exemption from liability under s. 292.15, Wis. Stats., for the property located at **613 East Beacon Street, New London, Wisconsin**, parcel number 333039900, which is commonly referred to as *the former Simmons Warehouse Property* and *the Former Wisconsin Central Limited Property*, further described as Lot 1 of Certified Survey Map 4791, in Volume 27 of Certified Survey Maps on page 4791, as Document No. 1607938, Outagamie County Register of Deeds (“the Property”);

Whereas, an environmental investigation of the Property has been conducted and has determined that contamination exists at the Property;

Whereas, the City of New London has submitted to the Wisconsin Department of Natural Resources (“WDNR”) investigation reports and a remedial action plan for the Property which comply with the requirements set forth in chs. NR 700-754, Wis. Adm. Code, consisting of the documents and reports listed in Attachment A;

Whereas, in accordance with s. 292.15(2)(a), Wis. Stats., the WDNR has determined that an environmental investigation has been conducted which adequately identified and evaluated the nature and extent of the hazardous substance discharges on the Property and WDNR has approved of the remedial action plan for the Property; and

Whereas, the WDNR has granted the City of New London an exemption under s. NR 140.28, Wis. Adm. Code, for having benzene and lead in the groundwater above the ch. NR 140 preventive action limit;

Whereas, the City of New London has filed with the Register of Deeds of Outagamie County a deed restriction (Attachment B) on the Property which declares that the Property is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitations and restrictions:

The most recent soil samples that were collected on this property, which were collected on August and November 1998 contained lead in concentrations that exceeded s. NR

720.11, Table 2, Wis. Adm. Code, soil standards and PAHs that exceeded suggested generic RCLs as described in the Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97.

Therefore, the property described above may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) an investigation is conducted, to determine the degree and extent of petroleum contamination that remains on the property, and remedial action is taken as necessary to meet all applicable nonindustrial soil cleanup standards. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains, and must be stored, treated and disposed in compliance with applicable statutes and rules.

The vegetative soil cover that existed on the above -described property in the location shown on the attached Figure 7, labeled Exhibit B, on the date that this restriction was signed shall be maintained in compliance with the Soil Performance Maintenance Plan dated January 2005 that was submitted to the Wisconsin Department of Natural Resources by STS Consultants, Ltd., as required by section NR 724.13 (2), Wis. Adm. Code (October 1999). A copy of the maintenance plan is attached, labeled Exhibit C. This vegetative soil cover must be maintained in order to prevent direct contact with residual arsenic soil contamination that might otherwise pose a threat to human health. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains and must be stored, treated and disposed in compliance with applicable statutes and rules.

In addition, the following activities are prohibited on any portion of the above - described property where soil cover is required, as shown on Figure 7, labeled as Exhibit B, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Replacement with another barrier; (2) Excavating or grading of the land surface; (3) Filling on capped or paved areas; (4) Plowing for agricultural cultivation; and (5) Construction or placement of a building or other structure in an area where soil cover is required.

Whereas, on December 7, 2005 WDNR determined that response actions necessary to restore the environment to the extent practicable with respect to the discharges and minimize the harmful effects from the discharges to the air, land, and waters of the state were completed.

Therefore, based upon the information that has been submitted to the WDNR, the WDNR hereby certifies that the response actions set forth in the

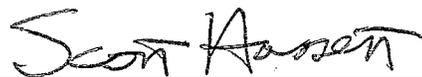
WDNR approved remedial action plan for the Property and any other necessary response actions have been completed.

Upon issuance of this Certificate, **the City of New London** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to the existence of hazardous substances on or originating from the Property, the release of which occurred prior to the date the department approved the environmental investigation required under s. 292.15(2)(a)1., Wis. Stats. However, **the City of New London** and a person otherwise qualified for protection under s. 292.15(3), Wis. Stats. who owns or controls the Property would no longer qualify for this liability exemption if that person fails to maintain or monitor the Property as required by rules promulgated by the WDNR. Any releases of a hazardous substance to or from the Property that occur after the date that the environmental investigation was approved will be the responsibility of the current Property owner and any other person who possesses or controls that discharge and any person who caused the discharge.

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

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

SIGNED AND CERTIFIED this 5th day of JANUARY, 2006.



Scott Hassett, Secretary

Wisconsin Department of Natural Resources

ATTACHMENT A
INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS
613 East Beacon Street, New London, Wisconsin

1. Phase I and Limited Phase II Environmental Site Assessment Report, Simmons Warehouse, New London, Wisconsin, February 1998, Project No. 97442, by Environmental Resources Management-North Central, Inc.
2. Revised Scope of Work for Phase II Environmental Assessment and WAC NR 716.09 Site Investigation Work Plan for Simmons Warehouse Site, Project No. 97442, August 20, 1998, by Environmental Resources Management-North Central, Inc.
3. Preliminary Data for September 21, 1998 Meeting, Proposed Simmons Warehouse Site, New London, Wisconsin, Project No. 97442, September 17, 1998, by Environmental Resources Management.
4. NR 716 Site Investigation for the Proposed Simmons Warehouse Site in the City of New London, Wisconsin, Project No. 97442, October 5, 1998, by Environmental Resources Management Group.
5. NR 716 Site Investigation for the Proposed Simmons Warehouse Site in the City of New London, Wisconsin, Project No. 97442, October 20, 1998, by Environmental Resources Management Group.
6. Additional NR 716 Site Investigation Work Plan, City of New London Site (Formerly the Proposed Simmons Warehouse Site), New London, Wisconsin, November 1998, Project No. 97442, by Environmental Resources Management Group.
7. NR 716 Site Investigation Supplement and Remedial Action Option Analysis, City of New London, Wisconsin Site (Formerly Proposed Simmons Warehouse Site), January 1999, Project No. 97442, by Environmental Resources Management Group.
8. Former Iambrecht Distribution Site, East Beacon Street, New London, Wisconsin – STS Project No. 4-25453W, February 13, 2001, by STS Consultants, Ltd.
9. Request for Certificate of Completion, East Beacon and Montgomery Streets, New London, Wisconsin, WDNR VPLE ID No. 06-45-229641, STS Project No. 4-25570XA, July 9 2001, by STS Consultants, Ltd.
10. Supplemental Information for Certificate of Completion for City of New London Property, East Beacon Street and Montgomery Streets, New London, Wisconsin, WDNR VPLE ID No. 06-45-229641, WDNR ERP Case No. 02-45-230552, STS Project No. 4-25570XA July 27 2001, by STS Consultants, Ltd.

11. Supplemental Information for Environmental Closure of Simmons Warehouse VPLE Site, East Beacon Street, New London, Wisconsin, STS Project No. 4-25570XA, December 6, 2001, by STS Consultants, Ltd.
12. Environmental Closure of Simmons Warehouse VPLE Site, East Beacon Street, New London, Wisconsin, WDNR BRRTS No. 02-45-230552, WDNR VPLE No. 06-45-229641, STS Project No. 4-25570XA, April 9, 2002, by STS Consultants.
13. June 2003 Progress Report, Simmons Warehouse VPLE Site, East Beacon Street, New London, Wisconsin, WDNR VPLE ID No. 06-45-229641, STS Project No. 25570XA, June 27, 2003, by STS Consultants, Ltd.
14. Certificate of Completion Request, East Beacon Street VPLE Site, East Beacon Street, New London, Wisconsin, WDNR VPLE ID No. 06-45-229641, STS Project No. 25570XA, September 27, 2004, by STS Consultants, Ltd.
15. Submittal of Requested Information for the Certificate of Completion, East Beacon Street VPLE Site, Wisconsin Central Ltd (former), East Beacon Street, New London, Wisconsin, WDNR VPLE ID No. 06-45-229641, WDNR BRRTS No. 02-45-443192 and 02-45-230552, STS Project No. 25570XA, March 31, 2005, by STS Consultants, Ltd.
16. Resubmittal of Certificate of Completion Request, East Beacon Street VPLE Site, Simmons Warehouse (former), East Beacon Street, New London, Wisconsin, WDNR VPLE ID No. 06-45-229641, WDNR ERP No. 02-45-230552, STS Project No. 25570XA, January 25, 2005, by STS Consultants, Ltd.
17. Resubmittal of Certificate of Completion Request, East Beacon Street VPLE Site, Wisconsin Central Ltd. (former), East Beacon Street, New London, Wisconsin, WDNR VPLE ID No. 06-45-229641, WDNR ERP No. 02-45-443192, STS Project No. 25570XA, January 25, 2005, by STS Consultants, Ltd.

ATTACHMENT B
DEED RESTRICTION
613 East Beacon Street, New London, Wisconsin

The deed restriction is attached.

1689234

Recorded
NOV. 18, 2005 AT 10:05AM
OUTAGAMIE COUNTY
JANICE FLENZ
REGISTER OF DEEDS
Fee Amount: \$21.00



Document Number

DEED RESTRICTION

Declaration of Restrictions

In Re: Lot 1 of Certified Survey Map 4791, in Volume 27 of Certified Survey Maps on page 4791, as Document No. 1607938 (also described in Quit Claim Deed Document No. 1620507), Outagamie County Register of Deeds.

STATE OF WISCONSIN)
) ss
COUNTY OF OUTAGAMIE)

WHEREAS, the City of New London, a Wisconsin Municipality, is the owner of the above-described property.

WHEREAS, one or more petroleum and arsenic discharges have occurred on this property, and between August 1998 and August 2002 when soil samples were collected on this property, petroleum and arsenic-contaminated soil remained on this property at the following locations: polycyclic aromatic hydrocarbons (PAHs) above suggested generic residual contaminant levels (RCLs) as described in the *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97* at MW-05, MW-06, SB-03 [Note: SB-03 at location of MW-03 shown on Exhibit A], SB-05, SB-06 and SB-07 and lead above the ch. NR 720, Wis. Adm. Code non-industrial RCL at MW-05, as shown on Figure 4, labeled as Exhibit A; arsenic above five (5) parts per million at SB-RR4, MW-05, S-2, S-4, S-6, S-7, S-10, S-10A, S-12, S-12A, S-13, S-16, S-18A, S-19A, S-20, S-20A, S-21, S-21A, S-22, S-23A, S-24, S-25, S-27, S-30A, S-31, S-32 and S-33 as shown on Figure 7, labeled Exhibit B.

WHEREAS, it is the desire and intention of the property owner to impose on the property restrictions which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

NOW THEREFORE, the owner hereby declares that all of the property described above is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitation and restrictions:

The most recent soil samples that were collected on this property, which were collected on August and November 1998 contained lead in concentrations that exceeded s. NR 720.11, Table 2, Wis. Adm. Code, soil standards and PAHs that

Recording Area

21.00
(6)

Name and Return Address

Kent Hager
City Administrator, City of NL
215 N. Shawano Street
New London, WI 54961

333039900

Parcel Identification Number

exceeded suggested generic RCLs as described in the *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97*. Therefore, the property described above may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) an investigation is conducted, to determine the degree and extent of petroleum contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains, and must be stored, treated and disposed in compliance with applicable statutes and rules.

The vegetative soil cover that existed on the above-described property in the location shown on the attached Figure 7, labeled Exhibit B, on the date that this restriction was signed shall be maintained in compliance with the Soil Performance Maintenance Plan dated January 2005 that was submitted to the Wisconsin Department of Natural Resources by STS Consultants, Ltd., as required by section NR 724.13 (2), Wis. Adm. Code (October 1999). A copy of the maintenance plan is attached, labeled Exhibit C. This vegetative soil cover must be maintained in order to prevent direct contact with residual arsenic soil contamination that might otherwise pose a threat to human health. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains and must be stored, treated and disposed in compliance with applicable statutes and rules.

In addition, the following activities are prohibited on any portion of the above-described property where soil cover is required, as shown on Figure 7, labeled as Exhibit B, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Replacement with another barrier; (2) Excavating or grading of the land surface; (3) Filling on capped or paved areas; (4) Plowing for agricultural cultivation; and (5) Construction or placement of a building or other structure in an area where soil cover is required.

This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction inures to the benefit of and is enforceable by the Wisconsin Department of Natural Resources, its successors or assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that one or more of the restrictions set forth in this covenant is no longer required. Upon the receipt of such a request, the Wisconsin Department of Natural Resources shall determine whether or not the restrictions contained herein can be extinguished. If the Department determines that the restrictions can be extinguished, an affidavit, attached to a copy of the Department's written determination, may be recorded by the property owner or other interested party to give notice that this deed restriction, or portions of this deed restriction, are no longer binding.

By signing this document, Kent Hager asserts that he or she is duly authorized to sign this document on behalf of the City of New London.

IN WITNESS WHEREOF, the owner of the property has executed this Declaration of Restrictions, this 16th day of November, 2005.

Signature: *Kent Hager*
Printed Name: KENT HAGER
Title: City Administrator

Subscribed and sworn to before me this 16th day of Nov, 2005.

Susan M. Tenney
Notary Public, State of WI
My commission 7-23-06

This document was drafted by the Department of Natural Resources based on information provided by STS Consultants, Ltd.

Exhibit A

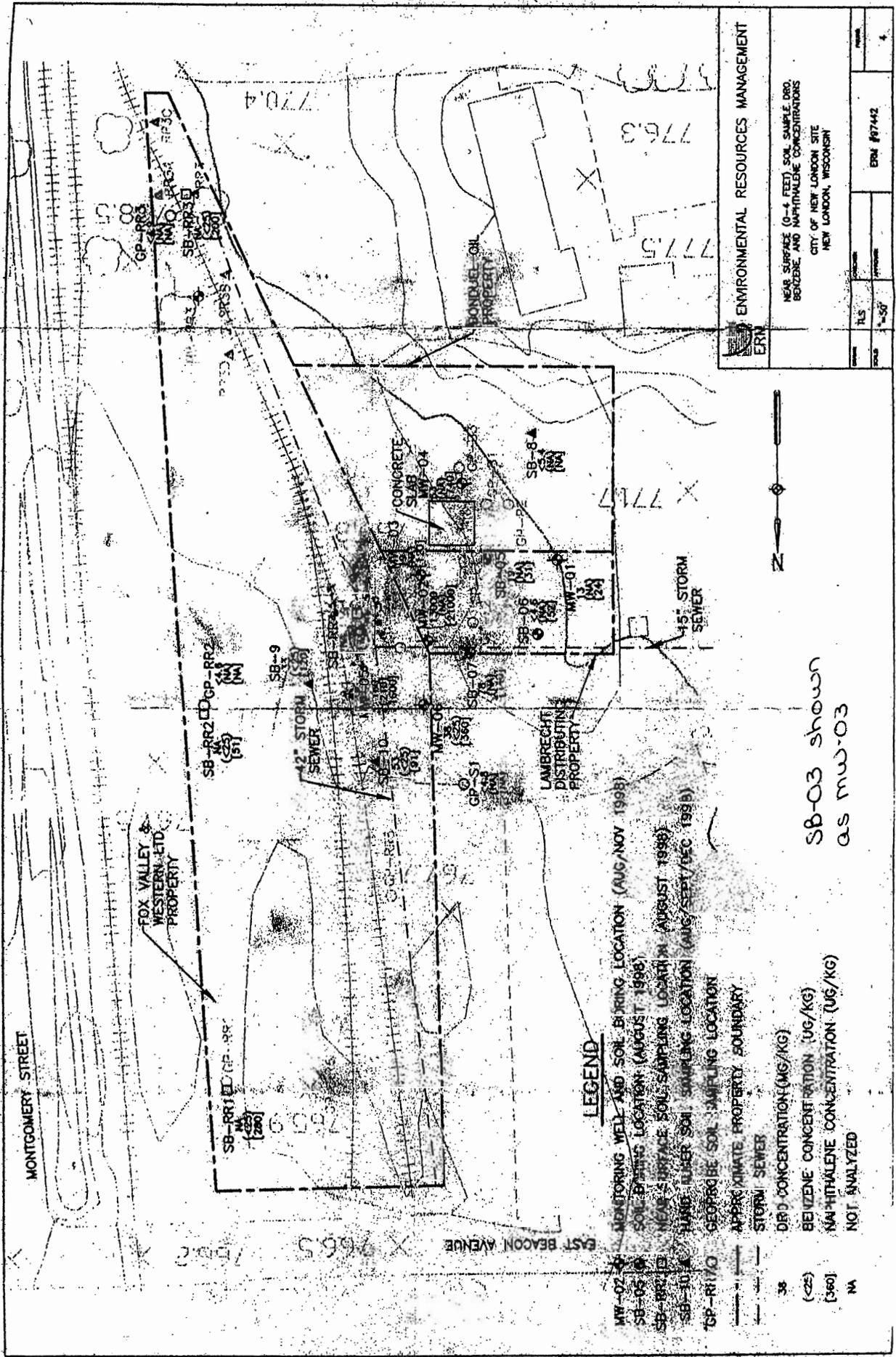


Figure 4



STS CONSULTANTS
 1035 Kepler Dr.
 Green Bay, WI 54311
 920-468-1978
 www.stsconsultants.com
 Copyright © 2005, By STS Consultants, Ltd.

CERTIFICATE OF COMPLETION
CITY OF NEW LONDON
NEW LONDON, WISCONSIN
NEW LONDON PROPERTY ACQUISITION

Drawn: LDK 6/24/04
 Checked: AGM 9/16/05
 Approved: AGM 10/5/05

PROJECT NUMBER
425570XA

FIGURE NUMBER
7

LEGEND

- MW-05 GROUNDWATER MONITORING WELL
- PARCEL LIMITS (APPROXIMATE)
- LIMITS OF PROPERTY ACQUIRED BY CITY OF NEW LONDON
- APPROXIMATE LIMITS OF EXCAVATION (PETROLEUM)
- APPROXIMATE LIMITS OF EXCAVATION (ARSENIC)
- APPROXIMATE LIMITS OF ARSENIC EXCEEDANCE
- (3.9) TOTAL ARSENIC LEVEL IN SOIL SAMPLE
- SB-RR1 ERM SOIL SAMPLES
- S-1 SOIL SAMPLES
- SANITARY MANHOLE
- STORM MANHOLE
- POWER POLE
- IRON PIPE

Notes:

- * Soil samples represents in-place soil conditions.
- ** Samples collected 9/11/01
- *** Samples collected 10/9/01
- S-27A (2.1) Samples collected 7/16/02
- S-27A (2.1) Soil Samples Exceeding DNR Standard for Arsenic (>5.0 ppm)
- (6.5) DNR Standard for Arsenic (>5.0 ppm)

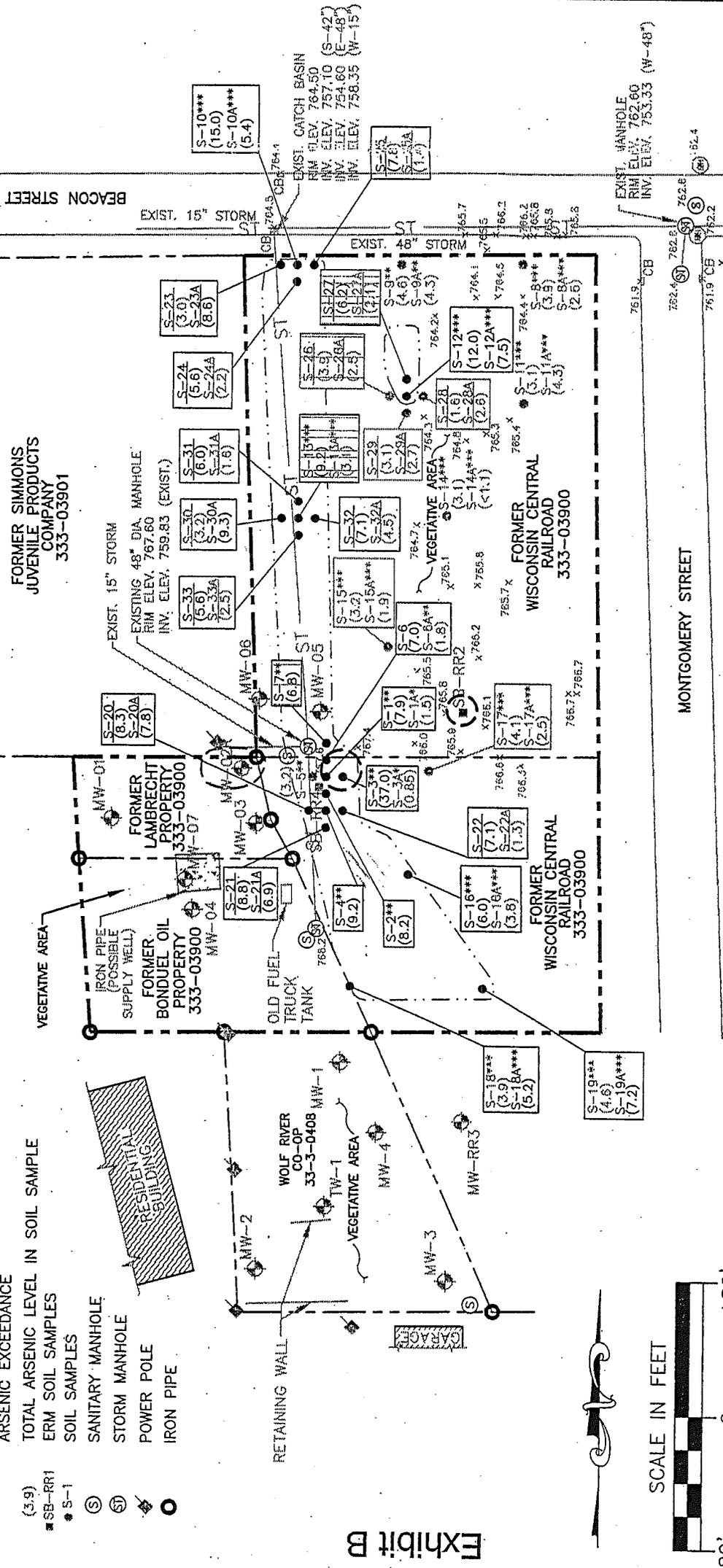


Exhibit B

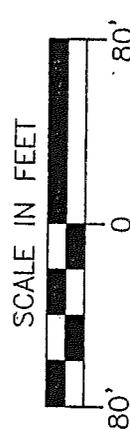


Exhibit C

Soil Performance Standard [NR 724.02(1)] Maintenance Plan

Jan 2005

Description:

The soil performance standard selected is use of existing ground vegetation to provide a barrier to direct contact with soil. Ground cover created by the existing vegetation will prevent disturbance and air suspension of soil particles, thereby preventing direct contact.

Maintenance Plan [NR 724.13(2)]:

As a condition of closure, a vegetation cap has been identified as an institutional control to address residual arsenic concentrations in soils identified on the former Wisconsin Central Ltd. (WCL) parcels as shown on the attached figure.

In accordance with Chapter NR 724.13(2), Wisconsin Administrative Code, the City of New London will inspect the vegetative cap in accordance with this maintenance plan.

Written records of inspections will be maintained by the City of New London. The inspections will consist of visual observations to confirm the following:

- ✓ The general integrity of and ground cover provided by the existing vegetation.
- ✓ No filling or digging has occurred.

Deficiencies in the cap will be documented and addressed within one month of discovery.

The existing cover will be inspected according to the following schedule:

- ✓ Once annually during the month of September.

In addition, the Wisconsin Department of Natural Resources (WDNR) should be notified prior to conducting any of the following activities:

- ✓ Digging or filling within the institutional control area.
- ✓ Construction or installation of a building or other structure with a foundation that would be located within the institutional control area.



STS CONSULTANTS
 1035 Kepler Dr.
 Green Bay, WI 54311
 920-468-1978
 www.stsconsultants.com
 Copyright ©2005, By: STS Consultants, Ltd.

CERTIFICATE OF COMPLETION
CITY OF NEW LONDON
NEW LONDON, WISCONSIN
NEW LONDON PROPERTY ACQUISITION

Drawn: LDK 6/24/04
 Checked: AGM 9/16/05
 Approved: AGM 10/5/05

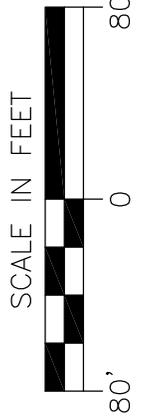
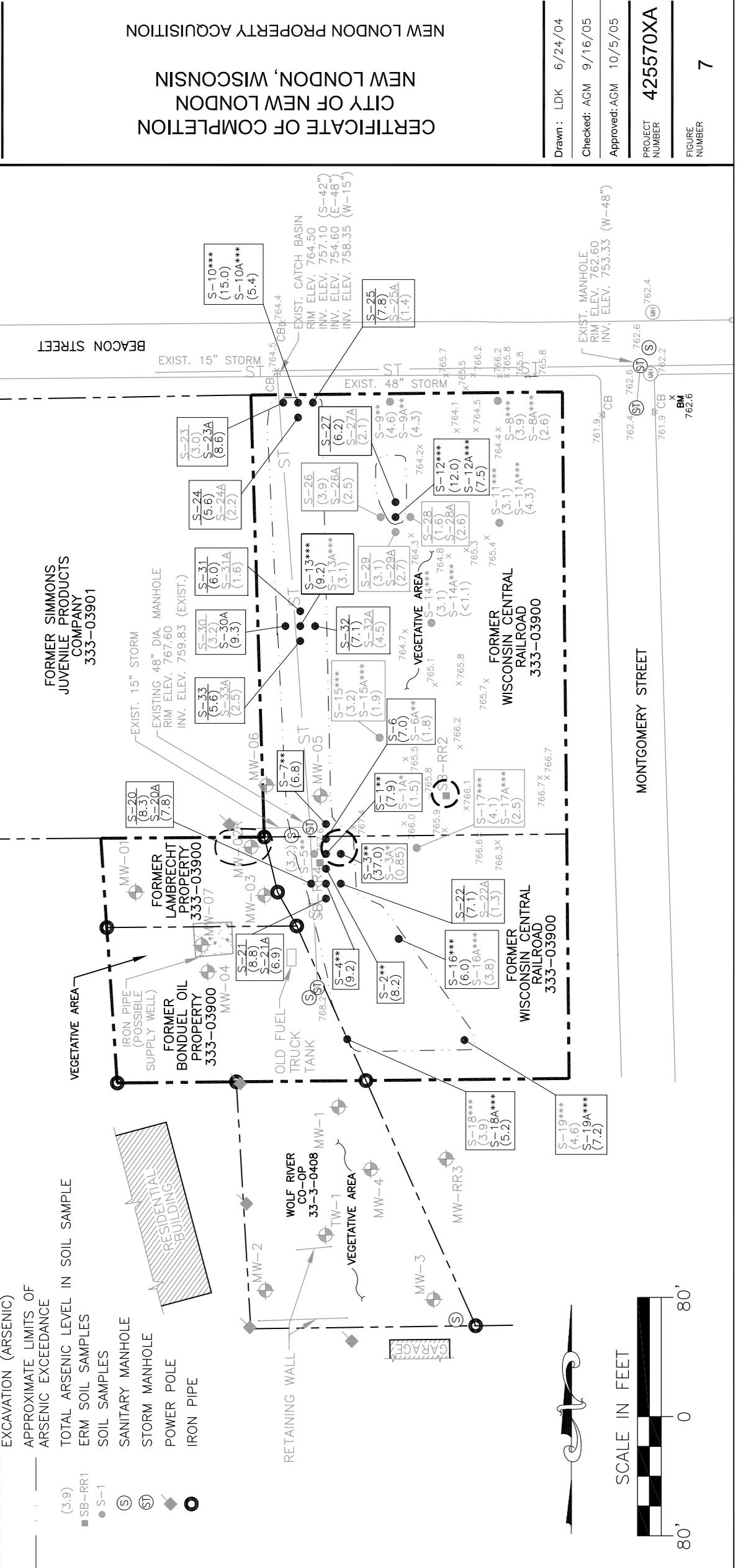
PROJECT NUMBER **425570XA**
 FIGURE NUMBER **7**

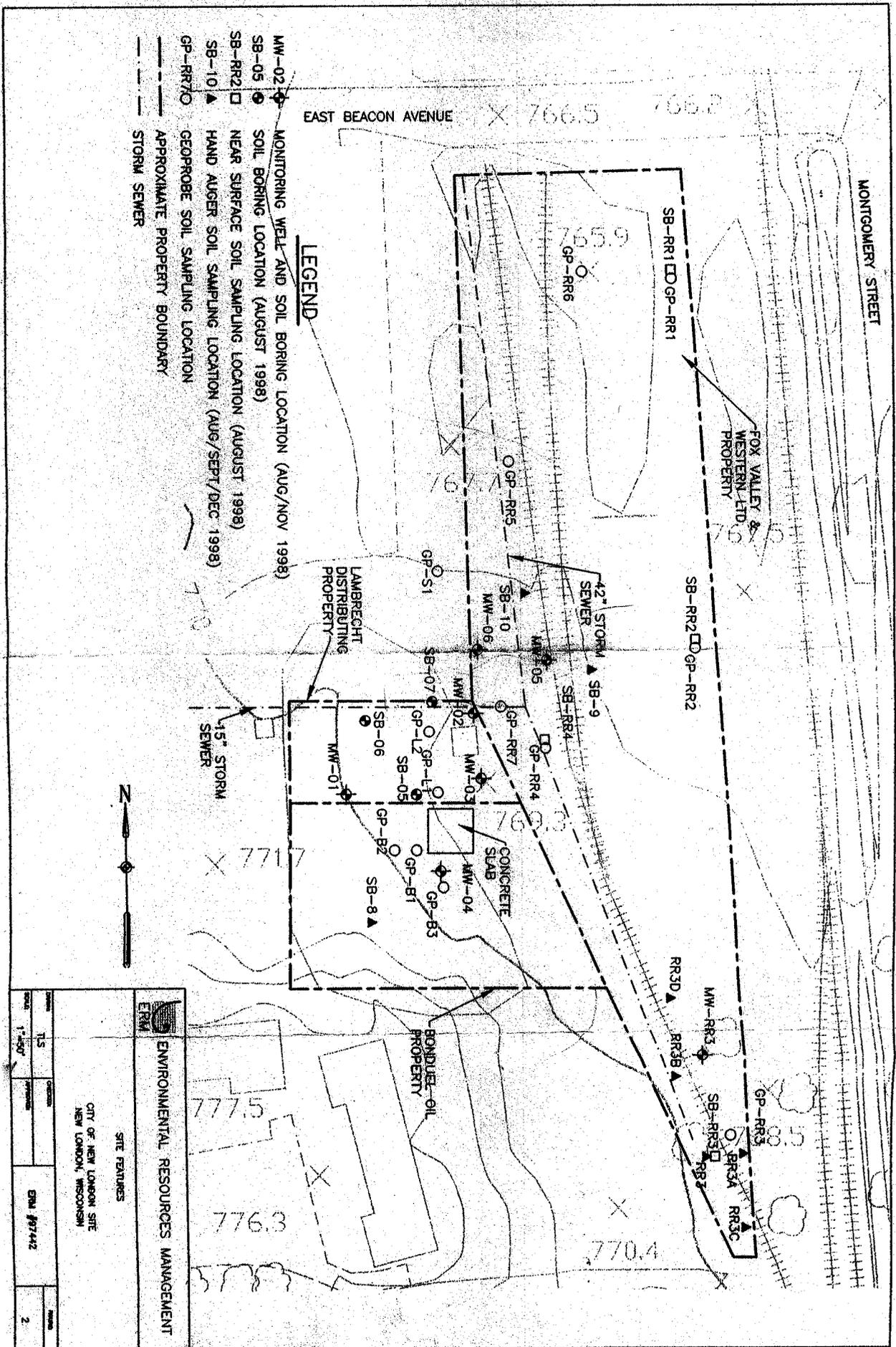
LEGEND

- MW-06 GROUNDWATER MONITORING WELL
- PARCEL LIMITS (APPROXIMATE)
- LIMITS OF PROPERTY ACQUIRED BY CITY OF NEW LONDON
- APPROXIMATE LIMITS OF EXCAVATION (PETROLEUM)
- APPROXIMATE LIMITS OF EXCAVATION (ARSENIC)
- APPROXIMATE LIMITS OF ARSENIC EXCEEDANCE
- TOTAL ARSENIC LEVEL IN SOIL SAMPLE
- ERM SOIL SAMPLES
- SOIL SAMPLES
- SANITARY MANHOLE
- STORM MANHOLE
- POWER POLE
- IRON PIPE

Notes:

- * Soil samples represents in-place soil conditions.
- ** Samples collected 9/11/01
- *** Samples collected 10/9/01
- S-27A Samples collected 7/16/02
- S-27A Soil Samples Exceeding
- (6.5) DNR Standard for Arsenic (>5.0 ppm)





- LEGEND**
- MW-02 ○ MONITORING WELL AND SOIL BORING LOCATION (AUG/NOV 1998)
 - SB-05 ● SOIL BORING LOCATION (AUGUST 1998)
 - SB-RR2 □ NEAR SURFACE SOIL SAMPLING LOCATION (AUGUST 1998)
 - SB-10 ▲ HAND AUGER SOIL SAMPLING LOCATION (AUG/SEPT/DEC 1998)
 - GP-RR7 ○ GEOPROBE SOIL SAMPLING LOCATION
 - APPROXIMATE PROPERTY BOUNDARY
 - - - STORM SEWER



ENVIRONMENTAL RESOURCES MANAGEMENT	
SITE FEATURES CITY OF NEW LONDON SITE NEW LONDON, WISCONSIN	
SCALE	1"=50'
DATE	ERM #97442
NO.	2

GIS REGISTRY

Cover Sheet

May, 2009
(RR 5367)

Source Property Information

BRRTS #:

ACTIVITY NAME:

PROPERTY ADDRESS:

MUNICIPALITY:

PARCEL ID #:

CLOSURE DATE:

FID #:

DATCP #:

COMM #:

*WTM COORDINATES:

X: Y:

** 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:

- | | |
|--|--|
| <input type="checkbox"/> Groundwater Contamination > ES (236) | <input checked="" type="checkbox"/> Soil Contamination > *RCL or **SSRCL (232) |
| <input type="checkbox"/> Contamination in ROW | <input type="checkbox"/> Contamination in ROW |
| <input type="checkbox"/> Off-Source Contamination
<i>(note: for list of off-source properties
see "Impacted Off-Source Property")</i> | <input type="checkbox"/> Off-Source Contamination
<i>(note: for list of off-source properties
see "Impacted Off-Source Property")</i> |

Land Use Controls:

- | | |
|---|--|
| <input type="checkbox"/> N/A (Not Applicable) | <input type="checkbox"/> Cover or Barrier (222)
<i>(note: maintenance plan for
groundwater or direct contact)</i> |
| <input checked="" type="checkbox"/> Soil: maintain industrial zoning (220)
<i>(note: soil contamination concentrations
between non-industrial and industrial levels)</i> | <input type="checkbox"/> Vapor Mitigation (226) |
| <input type="checkbox"/> Structural Impediment (224) | <input type="checkbox"/> Maintain Liability Exemption (230)
<i>(note: local government or economic
development corporation)</i> |
| <input type="checkbox"/> Site Specific Condition (228) | |

Monitoring Wells:

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

- Yes No N/A

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

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

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

BRRTS #: PARCEL ID #:

ACTIVITY NAME: WTM COORDINATES: X: Y:

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

- Closure Letter**
- Maintenance Plan** (if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)
- Conditional Closure Letter**
- Certificate of Completion (COC)** for VPLE sites

SOURCE LEGAL DOCUMENTS

- Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).
Figure #: **Title: Certified Survey Map 4791**
- 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 8.5 x 14 inches unless the map is submitted electronically.

- Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.
Note: Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.
Figure #: 1 **Title: Site Location Diagram**
- Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.
Figure #: 2 **Title: Site Features**
- 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 #: 2 **Title: Site Features**

BRRTS #: 02-45-230552

ACTIVITY NAME: Simmons Warehouse (Former)

MAPS (continued)

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

Figure #: **Title:**

Figure #: **Title:**

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

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

Figure #: **Title:**

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

Figure #: **Title:**

Figure #: **Title:**

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

Tables must be no larger than 8.5 x 14 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 #: 4 Title: Soil Sample Analytical Results Summary

- 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 #: Title:

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

Table #: Title:

IMPROPERLY ABANDONED MONITORING WELLS

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

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

- Not Applicable**

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

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

Figure #: **Title:**

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

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

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

BRRTS #: 02-45-230552

ACTIVITY NAME: Simmons Warehouse (Former)

NOTIFICATIONS

Source Property

- 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.

- Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.
Note: Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.
Number of "Off-Source" Letters:
- Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying any off-source property owner.
- Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Letter To "Governmental Unit/Right-Of-Way" Owners:** Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
Number of "Governmental Unit/Right-Of-Way Owner" Letters:



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Oshkosh Service Center
625 East County Road Y, STE. 700
Oshkosh, WI 54901-9731
TELEPHONE 920-424-3050
FAX 920-424-4404

December 7, 2005

Mr. Kent Hager
City Administrator
215 N. Shawano St.
New London, WI 54961

SUBJECT: Final Case Closure By Closure Committee With Conditions Met for
Simmons Warehouse (former), 613 E. Beacon St., New London, WI
WDNR ERP # 02-45-230552
WDNR VPLE # 06-45-229641

Dear Mr. Hager:

On September 6, 2005, the Northeast Regional Closure Committee reviewed your request for closure of the case described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. The closure committee denied closure pending filing a restriction to the deed and well abandonment in a letter dated September 7, 2005.

On December 6, 2005, the Department received correspondence indicating that you have complied with the requirements of closure. Specifically, you submitted a copy of the filed deed restriction. Your consultant submitted the required documentation of well abandonment in October 2004. Based on the correspondence and data provided, it appears that your case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code. The Department considers this case closed and no further investigation, remediation or other action is required at this time.

FUTURE EXCAVATION OF RESIDUAL CONTAMINATED SOIL

Residual soil contamination remains at former MW-05, MW-06, SB-03 (MW-03), SB-04 (MW-04), SB-05, SB-06 and SB-07 as indicated in the information submitted to the Department of Natural Resources. If soil in these specific locations is excavated in the future, the property owner at the time of excavation will be required to sample and analyze the excavated soil to determine whether the contamination remains. If contamination remains, 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 at the time of excavation. **Special precautions may need to be taken during excavation activities to prevent a direct contact health threat to humans.** Based upon the results of sample analysis, the current owner will also have to properly store, treat, or dispose of any excavated materials, in accordance with state and federal laws.

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>.

Your site was closed with the requirement that a deed restriction be recorded at the county Register of Deeds office to maintain the industrial zoning. A copy of the deed restriction can be found in the Department's regional files, or they can be viewed on the GIS Registry for this site, at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>.

The most recent groundwater monitoring data at this site indicates exceedances of the NR 140 preventive action limit (PAL) for benzene and lead at MW-02R and, 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 based on removal of the source area and long term monitoring. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for benzene and lead at MW-02R. This letter serves as your exemption.

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

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

Sincerely,



Jennifer Borski
Hydrogeologist
Bureau for Remediation & Redevelopment
(920) 424-7887

Electronic Copy: A. Mott, STS
 B. Phelps – Madison, DG/2

Recorded
NOV. 18, 2005 AT 10:05AM
OUTAGAMIE COUNTY
JANICE FLENZ
REGISTER OF DEEDS
Fee Amount: \$21.00



Recording Area

21.00
(6)

Name and Return Address

Kent Hager
City Administrator, City of NL
215 N. Shawano Street
New London, WI 54961

Document Number

DEED RESTRICTION

Declaration of Restrictions

In Re: Lot 1 of Certified Survey Map 4791, in Volume 27 of Certified Survey Maps on page 4791, as Document No. 1607938 (also described in Quit Claim Deed Document No. 1620507), Outagamie County Register of Deeds.

STATE OF WISCONSIN)
) ss
COUNTY OF OUTAGAMIE)

WHEREAS, the City of New London, a Wisconsin Municipality, is the owner of the above-described property.

333039900
Parcel Identification Number

WHEREAS, one or more petroleum and arsenic discharges have occurred on this property, and between August 1998 and August 2002 when soil samples were collected on this property, petroleum and arsenic-contaminated soil remained on this property at the following locations: polycyclic aromatic hydrocarbons (PAHs) above suggested generic residual contaminant levels (RCLs) as described in the *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97* at MW-05, MW-06, SB-03 [Note: SB-03 at location of MW-03 shown on Exhibit A], SB-05, SB-06 and SB-07 and lead above the ch. NR 720, Wis. Adm. Code non-industrial RCL at MW-05, as shown on Figure 4, labeled as Exhibit A; arsenic above five (5) parts per million at SB-RR4, MW-05, S-2, S-4, S-6, S-7, S-10, S-10A, S-12, S-12A, S-13, S-16, S-18A, S-19A, S-20, S-20A, S-21, S-21A, S-22, S-23A, S-24, S-25, S-27, S-30A, S-31, S-32 and S-33 as shown on Figure 7, labeled Exhibit B.

WHEREAS, it is the desire and intention of the property owner to impose on the property restrictions which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

NOW THEREFORE, the owner hereby declares that all of the property described above is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitation and restrictions:

The most recent soil samples that were collected on this property, which were collected on August and November 1998 contained lead in concentrations that exceeded s. NR 720.11, Table 2, Wis. Adm. Code, soil standards and PAHs that

exceeded suggested generic RCLs as described in the *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97*.

Therefore, the property described above may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) an investigation is conducted, to determine the degree and extent of petroleum contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains, and must be stored, treated and disposed in compliance with applicable statutes and rules.

The vegetative soil cover that existed on the above-described property in the location shown on the attached Figure 7, labeled Exhibit B, on the date that this restriction was signed shall be maintained in compliance with the Soil Performance Maintenance Plan dated January 2005 that was submitted to the Wisconsin Department of Natural Resources by STS Consultants, Ltd., as required by section NR 724.13 (2), Wis. Adm. Code (October 1999). A copy of the maintenance plan is attached, labeled Exhibit C. This vegetative soil cover must be maintained in order to prevent direct contact with residual arsenic soil contamination that might otherwise pose a threat to human health. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains and must be stored, treated and disposed in compliance with applicable statutes and rules.

In addition, the following activities are prohibited on any portion of the above-described property where soil cover is required, as shown on Figure 7, labeled as Exhibit B, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Replacement with another barrier; (2) Excavating or grading of the land surface; (3) Filling on capped or paved areas; (4) Plowing for agricultural cultivation; and (5) Construction or placement of a building or other structure in an area where soil cover is required.

This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction inures to the benefit of and is enforceable by the Wisconsin Department of Natural Resources, its successors or assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that one or more of the restrictions set forth in this covenant is no longer required. Upon the receipt of such a request, the Wisconsin Department of Natural Resources shall determine whether or not the restrictions contained herein can be extinguished. If the Department determines that the restrictions can be extinguished, an affidavit, attached to a copy of the Department's written determination, may be recorded by the property owner or other interested party to give notice that this deed restriction, or portions of this deed restriction, are no longer binding.

By signing this document, Kent Hager asserts that he or she is duly authorized to sign this document on behalf of the City of New London.

IN WITNESS WHEREOF, the owner of the property has executed this Declaration of Restrictions, this 16th day of November, 2005.

Signature: Kent Hager
Printed Name: KENT HAGER
Title: City Administrator

Subscribed and sworn to before me
this 16th day of Nov, 2005.
Susan M. Tenney
Notary Public, State of WI
My commission 7-23-06

This document was drafted by the Department of Natural Resources based on information provided by STS Consultants, Ltd.

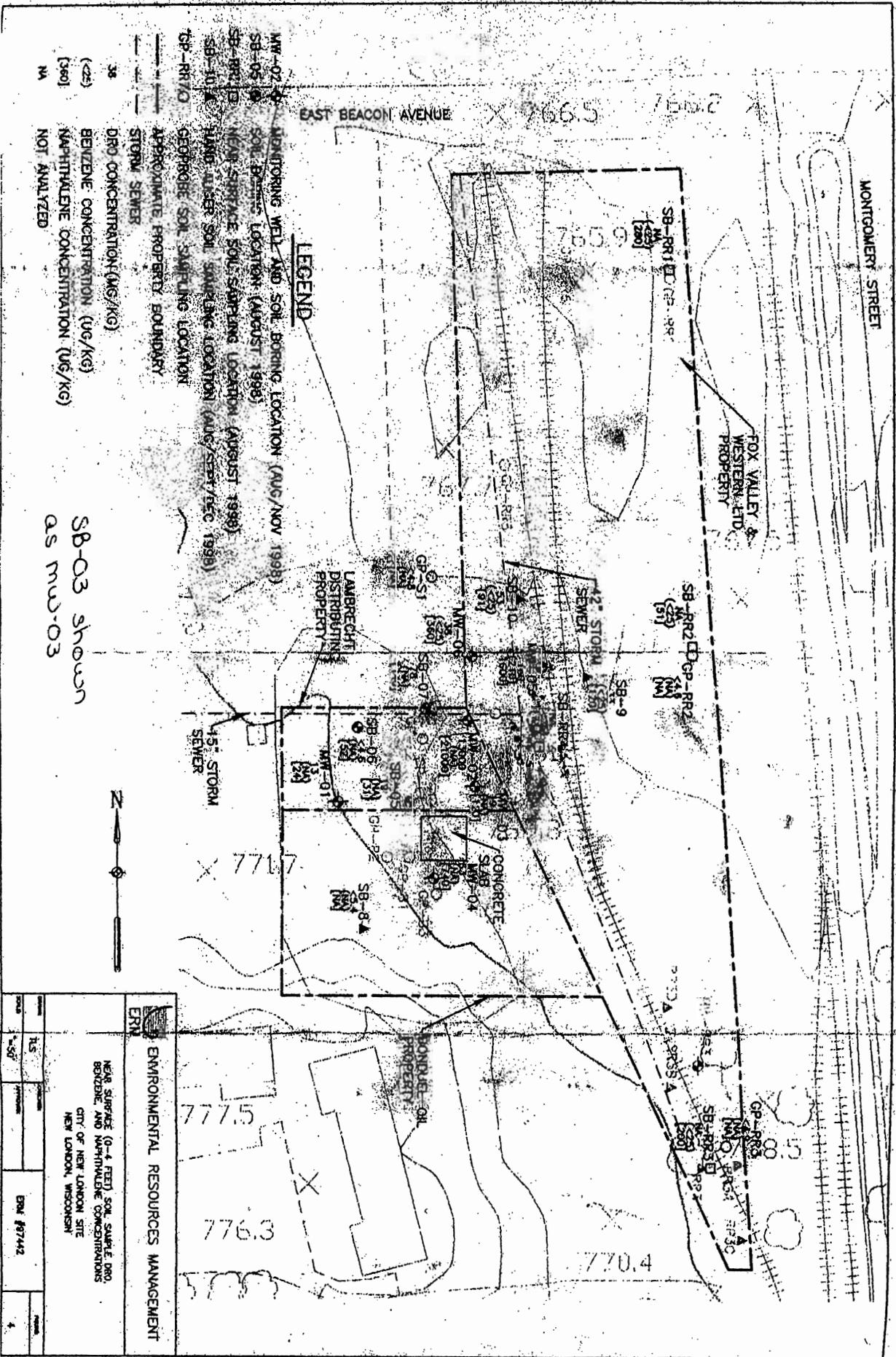


Figure 4



STS CONSULTANTS
 1035 Kepler Dr.
 Green Bay, WI 54311
 920-468-1978
 www.stsconsultants.com
 Copyright ©2005, By: STS Consultants, Ltd.

CERTIFICATE OF COMPLETION
CITY OF NEW LONDON
NEW LONDON, WISCONSIN
NEW LONDON PROPERTY ACQUISITION

Drawn: LDK	6/24/04
Checked: AGM	9/16/05
Approved: AGM	10/5/05
PROJECT NUMBER	425570XA
FIGURE NUMBER	7

- LEGEND**
- MW-06 GROUNDWATER MONITORING WELL
 - PARCEL LIMITS (APPROXIMATE)
 - LIMITS OF PROPERTY ACQUIRED BY CITY OF NEW LONDON
 - APPROXIMATE LIMITS OF EXCAVATION (PETROLEUM)
 - APPROXIMATE LIMITS OF EXCAVATION (ARSENIC)
 - APPROXIMATE LIMITS OF ARSENIC EXCEEDANCE
 - (3.9) TOTAL ARSENIC LEVEL IN SOIL SAMPLE
 - SB-RR1 ERM SOIL SAMPLES
 - S-1 SOIL SAMPLES
 - Ⓢ SANITARY MANHOLE
 - Ⓢ STORM MANHOLE
 - ◆ POWER POLE
 - IRON PIPE

- Notes:**
- * Soil samples represents in-place soil conditions.
 - ** Samples collected 9/11/01
 - *** Samples collected 10/9/01
 - S-27A Samples collected 7/16/02 (2.1)
 - S-27A Soil Samples Exceeding DNR Standard for Arsenic (>5.0 ppm) (6.5)

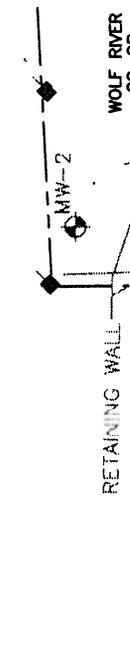
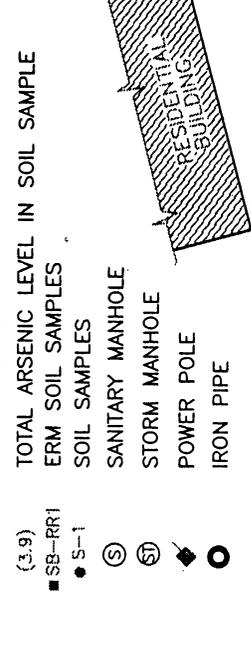


Exhibit B

Exhibit C

Soil Performance Standard [NR 724.02(1)]

Maintenance Plan

Jan 2005

Description:

The soil performance standard selected is use of existing ground vegetation to provide a barrier to direct contact with soil. Ground cover created by the existing vegetation will prevent disturbance and air suspension of soil particles, thereby preventing direct contact.

Maintenance Plan [NR 724.13(2)]:

As a condition of closure, a vegetation cap has been identified as an institutional control to address residual arsenic concentrations in soils identified on the former Wisconsin Central Ltd. (WCL) parcels as shown on the attached figure.

In accordance with Chapter NR 724.13(2), Wisconsin Administrative Code, the City of New London will inspect the vegetative cap in accordance with this maintenance plan.

Written records of inspections will be maintained by the City of New London. The inspections will consist of visual observations to confirm the following:

- ✓ The general integrity of and ground cover provided by the existing vegetation.
- ✓ No filling or digging has occurred.

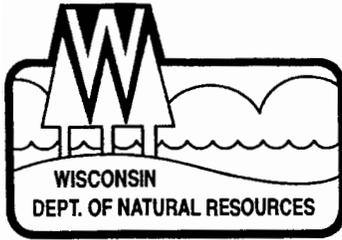
Deficiencies in the cap will be documented and addressed within one month of discovery.

The existing cover will be inspected according to the following schedule:

- ✓ Once annually during the month of September.

In addition, the Wisconsin Department of Natural Resources (WDNR) should be notified prior to conducting any of the following activities:

- ✓ Digging or filling within the institutional control area.
- ✓ Construction or installation of a building or other structure with a foundation that would be located within the institutional control area.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Oshkosh Service Center
625 East County Road Y, STE. 700
Oshkosh, WI 54901-9731
TELEPHONE 920-424-3050
FAX 920-424-4404

September 7, 2005

Mr. Kent Hager
City Administrator
215 N. Shawano St.
New London, WI 54961

SUBJECT: Case Closure Denial for Deed Restriction for
Simmons Warehouse (former), 613 E. Beacon St., New London, WI
WDNR ERP # 02-45-230552
WDNR VPLE # 06-45-229641

Dear Mr. Hager:

On September 6, 2005, the Northeast Regional Closure Committee reviewed your request for closure of the case described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of your closure request, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure, and to request your written response.

Your site was denied closure because no deed restriction was provided, which is required in order to comply with state law and administrative codes. It appears your site has been adequately investigated and may be eligible for case closure if certain minimum closure requirements are met. Once you complete the tasks below, your site will be reconsidered for closure.

DEED RESTRICTION FOR CONTAMINATED SOIL

To close this site, the Department requires that a deed restriction be signed and recorded to limit the use of the contaminated property to industrial land uses due to exceedances of non-industrial residual contaminant levels in soil.

The Department is currently drafting a deed restriction. The draft restriction will be reviewed by our legal department and forwarded to you. After you have reviewed the draft document for completeness, you should have a representative for the property owner sign it and have it recorded by the Outagamie County Register of Deeds. **Then submit a copy of the entire recorded document, with the recording information stamped on it, to me within 30 days of receiving the final, approved deed document from the Department.** 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.

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. NOTE: MONITORING WELLS SHOULD BE ABANDONED ONLY IF ALL OTHER REQUIREMENTS OF CLOSURE ARE MET.

When all the above requirements have been satisfied, please submit a letter, together with any required documentation, to let me know that applicable requirements have been met. 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://maps.dnr.state.wi.us/brrts>.

Note: case closure will be approved only if all the above requirements have been satisfied, including submitting the required documentation to the Department. **If these requirements are not met your site will remain "open" and additional remedial actions may be necessary by you to eliminate the need for these requirements.**

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at the number below.

Sincerely,



Jennifer Borski
Hydrogeologist
Bureau for Remediation & Redevelopment
(920) 424-7887

Electronic Copy: A. Mott, STS



APRIL 14, 1999

RE: B993.43 - CITY OF NEW LONDON

1837 West Wisconsin Ave.
P.O. Box 1297
Appleton, Wisconsin 54912-1297
Phone (920) 731-4168
Fax (920) 731-5673

DESCRIPTION OF THAT PART OF QUIT CLAIM DEED THAT FOX VALLEY & WESTERN, LTD. HAS TITLE TO

BEING A PART OF LOT 1 AND LOT 2 OF DEDOLPH AND LIPKE'S OUTLOTS. A PARCEL OF LAND LOCATED IN THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 18, TOWNSHIP 22 NORTH, RANGE 15 EAST, CITY OF NEW LONDON, OUTAGAMIE COUNTY, WISCONSIN, BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTH 1/4 CORNER OF SAID SECTION 18; THENCE S89-12-40W, 765.51 FEET ALONG THE NORTH LINE OF THE NORTHWEST 1/4 OF SAID SECTION 18 TO ITS INTERSECTION WITH A LINE LYING 50 FEET WEST OF THE CENTERLINE OF THE MAIN TRACK AS MEASURED AT RIGHT ANGLES TO SAID CENTERLINE OF THE FOX VALLEY & WESTERN, LTD. RAILROAD; THENCE S04-54-27E, 8.11 FEET ALONG SAID PARALLEL LINE TO THE SOUTH RIGHT-OF-WAY LINE OF BEACON STREET ALSO BEING THE NORTH LINE OF LOT 1 OF DEDOLPH AND LIPKE'S OUTLOTS AND THE POINT OF BEGINNING; THENCE CONTINUING S04-54-27E, 503.96 FEET ALONG SAID PARALLEL LINE TO A WEST LINE OF LANDS DESCRIBED IN VOLUME 99 ON PAGE 407; THENCE N16-26-46W, 40.41 FEET ALONG SAID WEST LINE TO THE NORTH LINE OF THE SOUTH 1/2 OF LOT 2 OF DEDOLPH AND LIPKE'S OUTLOTS; THENCE N89-52-09W, 65.68 FEET ALONG SAID NORTH LINE TO THE WESTERLY LINE OF SAID DESCRIBED LANDS; THENCE N24-00-14W, 179.27 FEET ALONG SAID WESTERLY LINE TO THE SOUTH LINE OF LOT 1 OF DEDOLPH AND LIPKE'S OUTLOTS; THENCE N89-47-48E, 4.97 FEET ALONG SAID SOUTH LINE TO THE WEST LINE OF THE EAST 1/2 OF THE EAST 1/2 OF SAID LOT 1; THENCE N03-43-35W, 298.06 FEET ALONG SAID WEST LINE TO THE NORTH LINE OF SAID LOT 1; THENCE N89-03-10E, 121.35 FEET ALONG SAID NORTH LINE TO THE POINT OF BEGINNING. SAID PARCEL CONTAINS 54246 SQUARE FEET (1.2453 ACRES) OF LAND MORE OR LESS. SUBJECT TO ALL EASEMENTS AND RESTRICTIONS OF RECORD.

1607938

Document Number 1607938 Filed this 19 day of April, 2004 at 9:10 a.m. in Volume 27 of Certified Survey Maps on page 4791 being Certified Survey Map Number 4791.

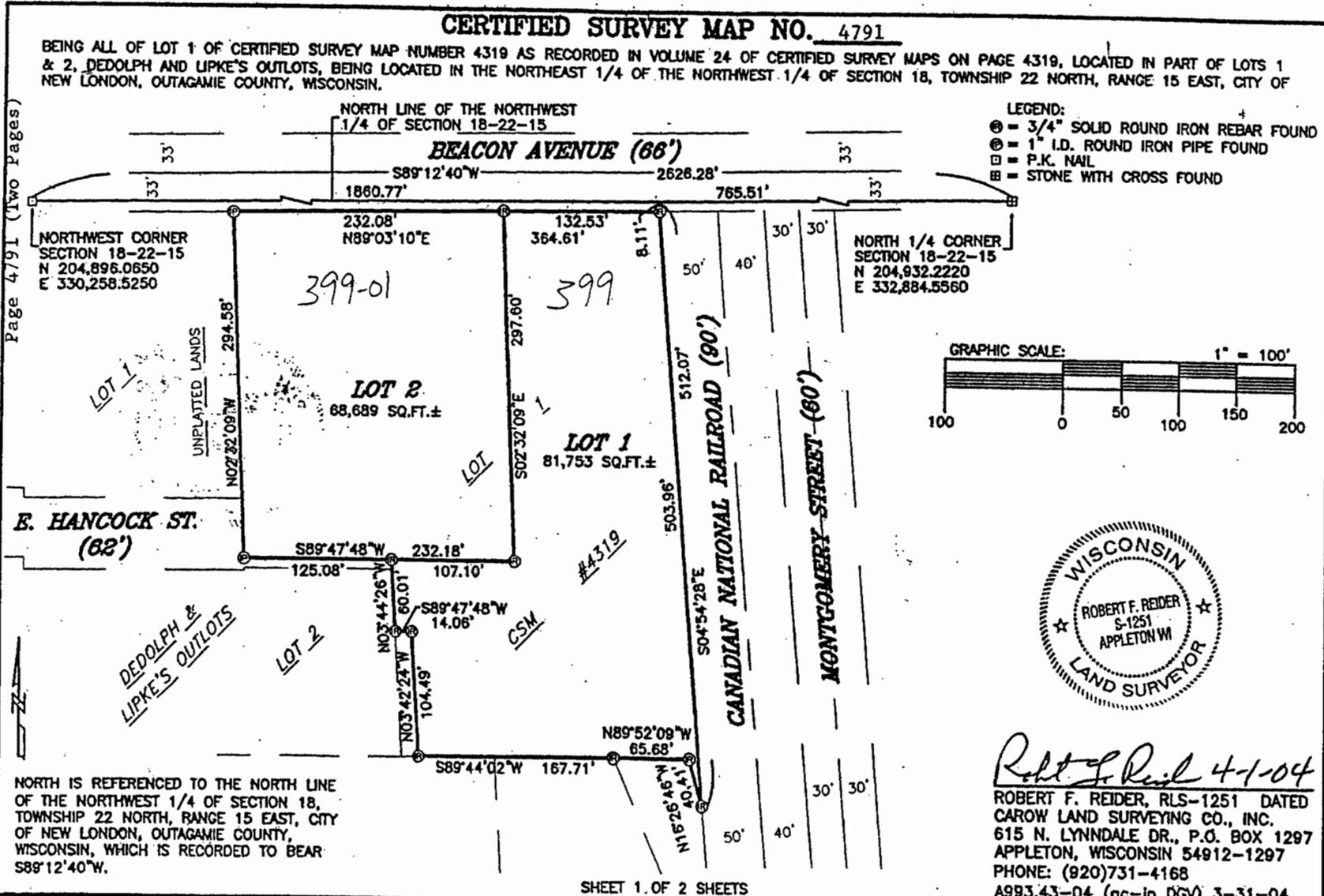
Janice Flenz, Register of Deeds

Current Parcel #15 Date: _____

CERTIFIED SURVEY MAP NO. 4791

BEING ALL OF LOT 1 OF CERTIFIED SURVEY MAP NUMBER 4319 AS RECORDED IN VOLUME 24 OF CERTIFIED SURVEY MAPS ON PAGE 4319, LOCATED IN PART OF LOTS 1 & 2, DEDOLPH AND LIPKE'S OUTLOTS, BEING LOCATED IN THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 18, TOWNSHIP 22 NORTH, RANGE 15 EAST, CITY OF NEW LONDON, OUTAGAMIE COUNTY, WISCONSIN.

Page 4791 (Two Pages)



STATEMENT OF PROPERTY LEGAL DESCRIPTION

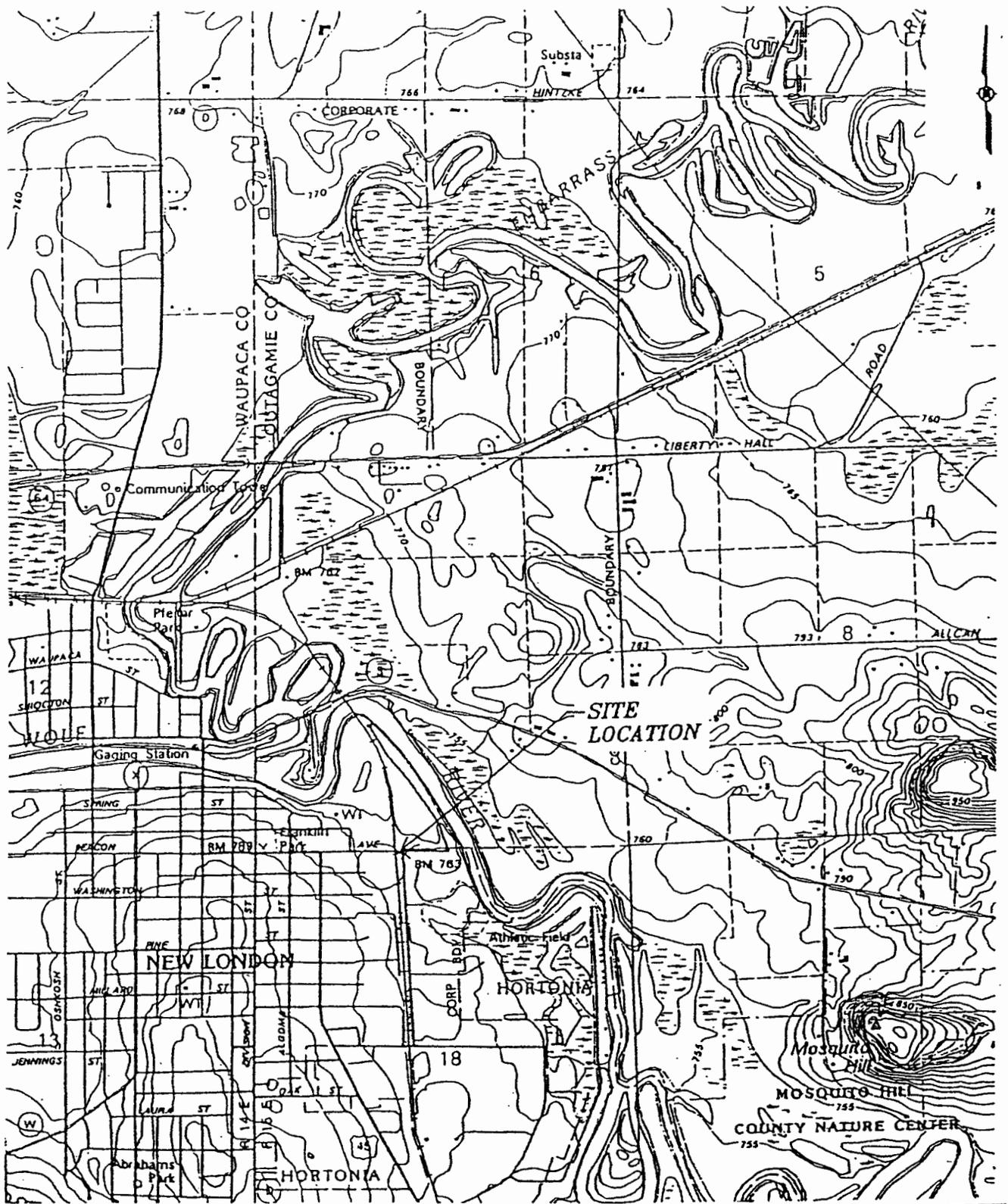
As required by s.NR 726.05(3)(f) of the Wisconsin Administrative Code, I am providing this signed statement that to the best of my knowledge, the legal descriptions that are attached to this statement are complete and accurate for the properties (Wisconsin Central Ltd.) located at 613 East Beacon Avenue, New London, Outagamie County, Wisconsin.

Firm: City of New London

Signature: [Handwritten Signature]

Title: City Administrator

Date: 7/16/04



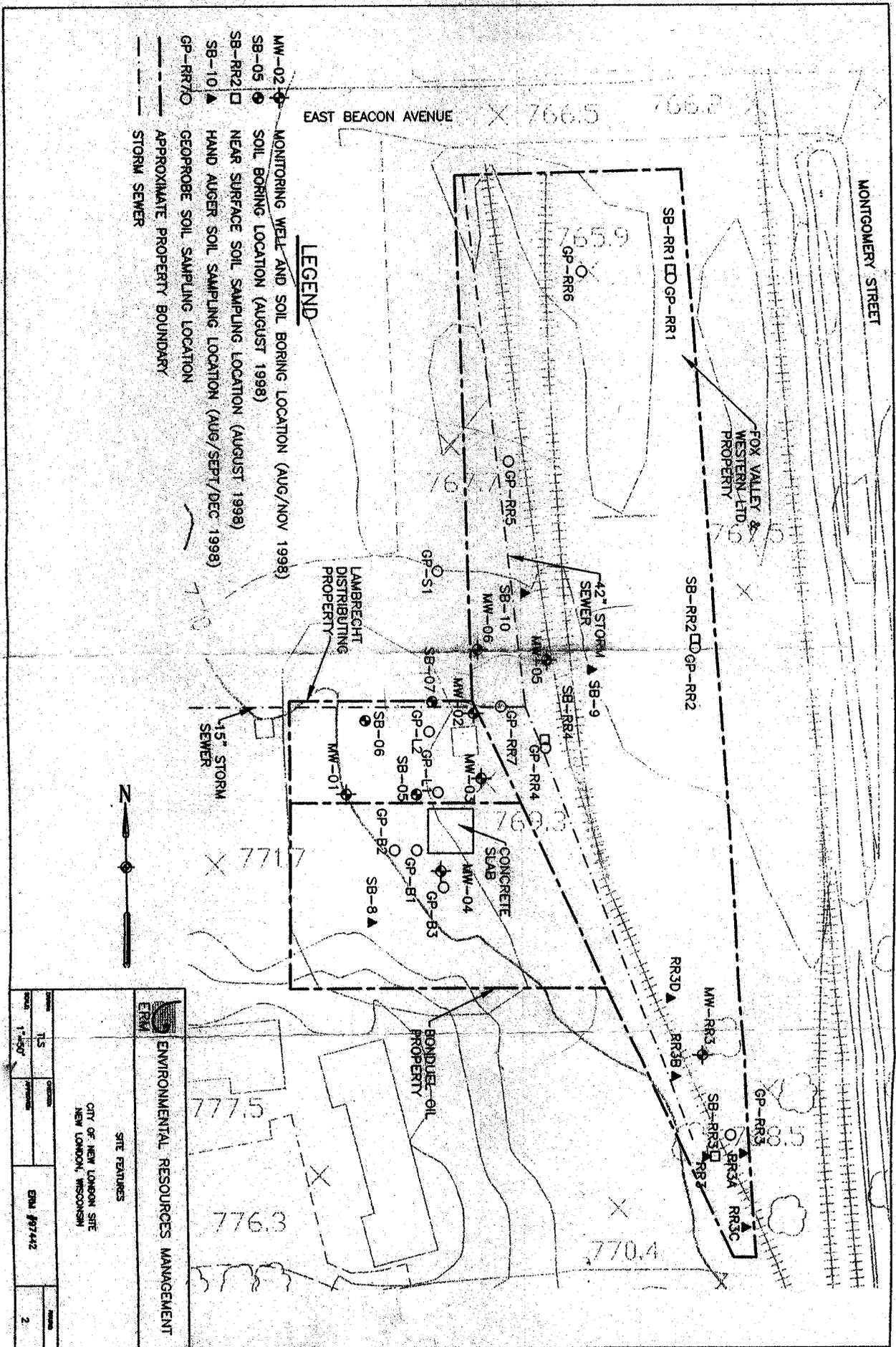
MAP SOURCE: MODIFIED FROM NEW LONDON(1992), WIS. 7.5 MIN USGS QUADRANGLE



STS Consultants Ltd.
Consulting Engineers

SITE LOCATION DIAGRAM
FORMER LAMBRECHT DISTRIBUTION FACILITY
NEW LONDON, WISCONSIN

DRAWN BY	AGM	5-29-01
CHECKED BY	PJK	5-29-01
APPROVED BY		
CADFILE	SCALE	
G470A001.dwg	1"=2000'	
STS PROJECT NO.	FIGURE NO.	
25570XA	1	



- LEGEND**
- MW-02 MONITORING WELL AND SOIL BORING LOCATION (AUG/NOV 1998)
 - SB-05 SOIL BORING LOCATION (AUGUST 1998)
 - SB-RR2 NEAR SURFACE SOIL SAMPLING LOCATION (AUGUST 1998)
 - SB-10 HAND AUGER SOIL SAMPLING LOCATION (AUG/SEPT/DEC 1998)
 - GP-RR7 GEOPROBE SOIL SAMPLING LOCATION
 - - - - - APPROXIMATE PROPERTY BOUNDARY
 - - - - - STORM SEWER

ENVIRONMENTAL RESOURCES MANAGEMENT	
SITE FEATURES CITY OF NEW LONDON SITE NEW LONDON, WISCONSIN	
SCALE: 1"=50' DATE: 11/90	ERM #97442 SHEET: 2

GIS REGISTRY

Cover Sheet

May, 2009
(RR 5367)

Source Property Information

BRRTS #:

ACTIVITY NAME:

PROPERTY ADDRESS:

MUNICIPALITY:

PARCEL ID #:

CLOSURE DATE:

FID #:

DATCP #:

COMM #:

*WTM COORDINATES:

X: Y:

** 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:

- | | |
|--|--|
| <input type="checkbox"/> Groundwater Contamination > ES (236) | <input checked="" type="checkbox"/> Soil Contamination > *RCL or **SSRCL (232) |
| <input type="checkbox"/> Contamination in ROW | <input type="checkbox"/> Contamination in ROW |
| <input type="checkbox"/> Off-Source Contamination
<i>(note: for list of off-source properties
see "Impacted Off-Source Property")</i> | <input type="checkbox"/> Off-Source Contamination
<i>(note: for list of off-source properties
see "Impacted Off-Source Property")</i> |

Land Use Controls:

- | | |
|--|--|
| <input type="checkbox"/> N/A (Not Applicable) | <input checked="" type="checkbox"/> Cover or Barrier (222)
<i>(note: maintenance plan for
groundwater or direct contact)</i> |
| <input type="checkbox"/> Soil: maintain industrial zoning (220)
<i>(note: soil contamination concentrations
between non-industrial and industrial levels)</i> | <input type="checkbox"/> Vapor Mitigation (226) |
| <input type="checkbox"/> Structural Impediment (224) | <input type="checkbox"/> Maintain Liability Exemption (230)
<i>(note: local government or economic
development corporation)</i> |
| <input type="checkbox"/> Site Specific Condition (228) | |

Monitoring Wells:

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

- Yes No N/A

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

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

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

BRRTS #: PARCEL ID #:

ACTIVITY NAME: WTM COORDINATES: X: Y:

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

- Closure Letter**
- Maintenance Plan** (if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)
- Conditional Closure Letter**
- Certificate of Completion (COC)** for VPLE sites

SOURCE LEGAL DOCUMENTS

- Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).
Figure #: **Title: Certified Survey Map 4791**
- 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 8.5 x 14 inches unless the map is submitted electronically.

- Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.
Note: Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.
Figure #: 1 **Title: Site Location Diagram**
- 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 #: 7 **Title: Certificate of Completion**
- 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 #: 7 **Title: Certificate of Completion**

BRRTS #: 02-45-443192

ACTIVITY NAME: WCL (Former)

MAPS (continued)

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

Figure #: **Title:**

Figure #: **Title:**

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

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

Figure #: **Title:**

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

Figure #: **Title:**

Figure #: **Title:**

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

Tables must be no larger than 8.5 x 14 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 #: 5,4 **Title:** **Arsenic Analytical Results, Soil Sample Analytical Results Summary**

- 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 #: **Title:**

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

Table #: **Title:**

IMPROPERLY ABANDONED MONITORING WELLS

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

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

- Not Applicable**

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

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

Figure #: **Title:**

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

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

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

BRRTS #: 02-45-443192

ACTIVITY NAME: WCL (Former)

NOTIFICATIONS

Source Property

- 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.

- Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.
Note: Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.
Number of "Off-Source" Letters:
- Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying any off-source property owner.
- Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Letter To "Governmental Unit/Right-Of-Way" Owners:** Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
Number of "Governmental Unit/Right-Of-Way Owner" Letters:



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Oshkosh Service Center
625 East County Road Y, STE. 700
Oshkosh, WI 54901-9731
TELEPHONE 920-424-3050
FAX 920-424-4404

December 7, 2005

Mr. Kent Hager
City Administrator
215 N. Shawano St.
New London, WI 54961

SUBJECT: Final Case Closure By Closure Committee With Conditions Met for
WCL (former), 613 E. Beacon St., New London, WI
WDNR ERP # 02-45-443192
WDNR VPLE # 06-45-229641 (Simmons Warehouse (former))

Dear Mr. Hager:

On September 6, 2005, the Northeast Regional Closure Committee reviewed your request for closure of the case described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. The closure committee denied closure pending filing a restriction to the deed in a letter dated September 7, 2005.

On December 6, 2005, the Department received correspondence indicating that you have complied with the requirements of closure. Specifically, you submitted a copy of the filed deed restriction. Based on the correspondence and data provided, it appears that your case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code. The Department considers this case closed and no further investigation, remediation or other action is required at this time.

FUTURE EXCAVATION OF RESIDUAL CONTAMINATED SOIL

Arsenic contamination remains in soil at former MW-05, SB-RR4, S-2, S-4, S-6, S-7, S-10, S-10A, S-12, S-12A, S-13, S-16, S-18A, S-19A, S-20, S-20A, S-21, S-21A, S-22, S-23A, S-24, S-25, S-27, S-30A, S-31, S-32 and S-33 as indicated in the information submitted to the Department of Natural Resources. If soil in these specific locations is excavated in the future, the property owner at the time of excavation will be required to sample and analyze the excavated soil to determine whether the contamination remains. If contamination remains, 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 at the time of excavation. **Special precautions may need to be taken during excavation activities to prevent a direct contact health threat to humans.** Based upon the results of sample analysis, the current owner will also have to properly store, treat, or dispose of any excavated materials, in accordance with state and federal laws.

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>.

Your site was closed with the requirement that a deed restriction to maintain a direct contact barrier be recorded at the county Register of Deeds office. The restriction requires that observation and maintenance of the vegetative cover be conducted as described in the maintenance plan, dated January 2005. The maintenance plan and inspection logs are to be kept up-to-date and stored at the City of New London offices. The inspection log need only be submitted to the Department upon request. A copy of the deed restriction and the referenced maintenance plan can be found in the Department's regional files, or they can be viewed on the GIS Registry for this site, at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>.

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

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

Sincerely,



Jennifer Borski
Hydrogeologist
Bureau for Remediation & Redevelopment
(920) 424-7887

Electronic Copy: A. Mott, STS

Recorded
NOV. 18, 2005 AT 10:05AM
OUTAGAMIE COUNTY
JANICE FLENZ
REGISTER OF DEEDS
Fee Amount: \$21.00



Document Number

DEED RESTRICTION

Declaration of Restrictions

In Re: Lot 1 of Certified Survey Map 4791, in Volume 27 of Certified Survey Maps on page 4791, as Document No. 1607938 (also described in Quit Claim Deed Document No. 1620507), Outagamie County Register of Deeds.

STATE OF WISCONSIN)
) ss
COUNTY OF OUTAGAMIE)

WHEREAS, the City of New London, a Wisconsin Municipality, is the owner of the above-described property.

WHEREAS, one or more petroleum and arsenic discharges have occurred on this property, and between August 1998 and August 2002 when soil samples were collected on this property, petroleum and arsenic-contaminated soil remained on this property at the following locations: polycyclic aromatic hydrocarbons (PAHs) above suggested generic residual contaminant levels (RCLs) as described in the *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97* at MW-05, MW-06, SB-03 [Note: SB-03 at location of MW-03 shown on Exhibit A], SB-05, SB-06 and SB-07 and lead above the ch. NR 720, Wis. Adm. Code non-industrial RCL at MW-05, as shown on Figure 4, labeled as Exhibit A; arsenic above five (5) parts per million at SB-RR4, MW-05, S-2, S-4, S-6, S-7, S-10, S-10A, S-12, S-12A, S-13, S-16, S-18A, S-19A, S-20, S-20A, S-21, S-21A, S-22, S-23A, S-24, S-25, S-27, S-30A, S-31, S-32 and S-33 as shown on Figure 7, labeled Exhibit B.

WHEREAS, it is the desire and intention of the property owner to impose on the property restrictions which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

NOW THEREFORE, the owner hereby declares that all of the property described above is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitation and restrictions:

The most recent soil samples that were collected on this property, which were collected on August and November 1998 contained lead in concentrations that exceeded s. NR 720.11, Table 2, Wis. Adm. Code, soil standards and PAHs that

Recording Area

21.00
(6)

Name and Return Address

Kent Hager
City Administrator, City of NL
215 N. Shawano Street
New London, WI 54961

333039900
Parcel Identification Number

exceeded suggested generic RCLs as described in the *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97*.

Therefore, the property described above may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) an investigation is conducted, to determine the degree and extent of petroleum contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains, and must be stored, treated and disposed in compliance with applicable statutes and rules.

The vegetative soil cover that existed on the above-described property in the location shown on the attached Figure 7, labeled Exhibit B, on the date that this restriction was signed shall be maintained in compliance with the Soil Performance Maintenance Plan dated January 2005 that was submitted to the Wisconsin Department of Natural Resources by STS Consultants, Ltd., as required by section NR 724.13 (2), Wis. Adm. Code (October 1999). A copy of the maintenance plan is attached, labeled Exhibit C. This vegetative soil cover must be maintained in order to prevent direct contact with residual arsenic soil contamination that might otherwise pose a threat to human health. If soil that remains on the property in the location or locations described above where there is residual contamination is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains and must be stored, treated and disposed in compliance with applicable statutes and rules.

In addition, the following activities are prohibited on any portion of the above-described property where soil cover is required, as shown on Figure 7, labeled as Exhibit B, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Replacement with another barrier; (2) Excavating or grading of the land surface; (3) Filling on capped or paved areas; (4) Plowing for agricultural cultivation; and (5) Construction or placement of a building or other structure in an area where soil cover is required.

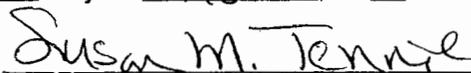
This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction inures to the benefit of and is enforceable by the Wisconsin Department of Natural Resources, its successors or assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that one or more of the restrictions set forth in this covenant is no longer required. Upon the receipt of such a request, the Wisconsin Department of Natural Resources shall determine whether or not the restrictions contained herein can be extinguished. If the Department determines that the restrictions can be extinguished, an affidavit, attached to a copy of the Department's written determination, may be recorded by the property owner or other interested party to give notice that this deed restriction, or portions of this deed restriction, are no longer binding.

By signing this document, Kent Hager asserts that he or she is duly authorized to sign this document on behalf of the City of New London.

IN WITNESS WHEREOF, the owner of the property has executed this Declaration of Restrictions, this 16th day of November, 2005.

Signature: 
Printed Name: KENT HAGER
Title: City Administrator

Subscribed and sworn to before me
this 16th day of Nov, 2005.

Notary Public, State of WI
My commission 7-23-06

This document was drafted by the Department of Natural Resources based on information provided by STS Consultants, Ltd.

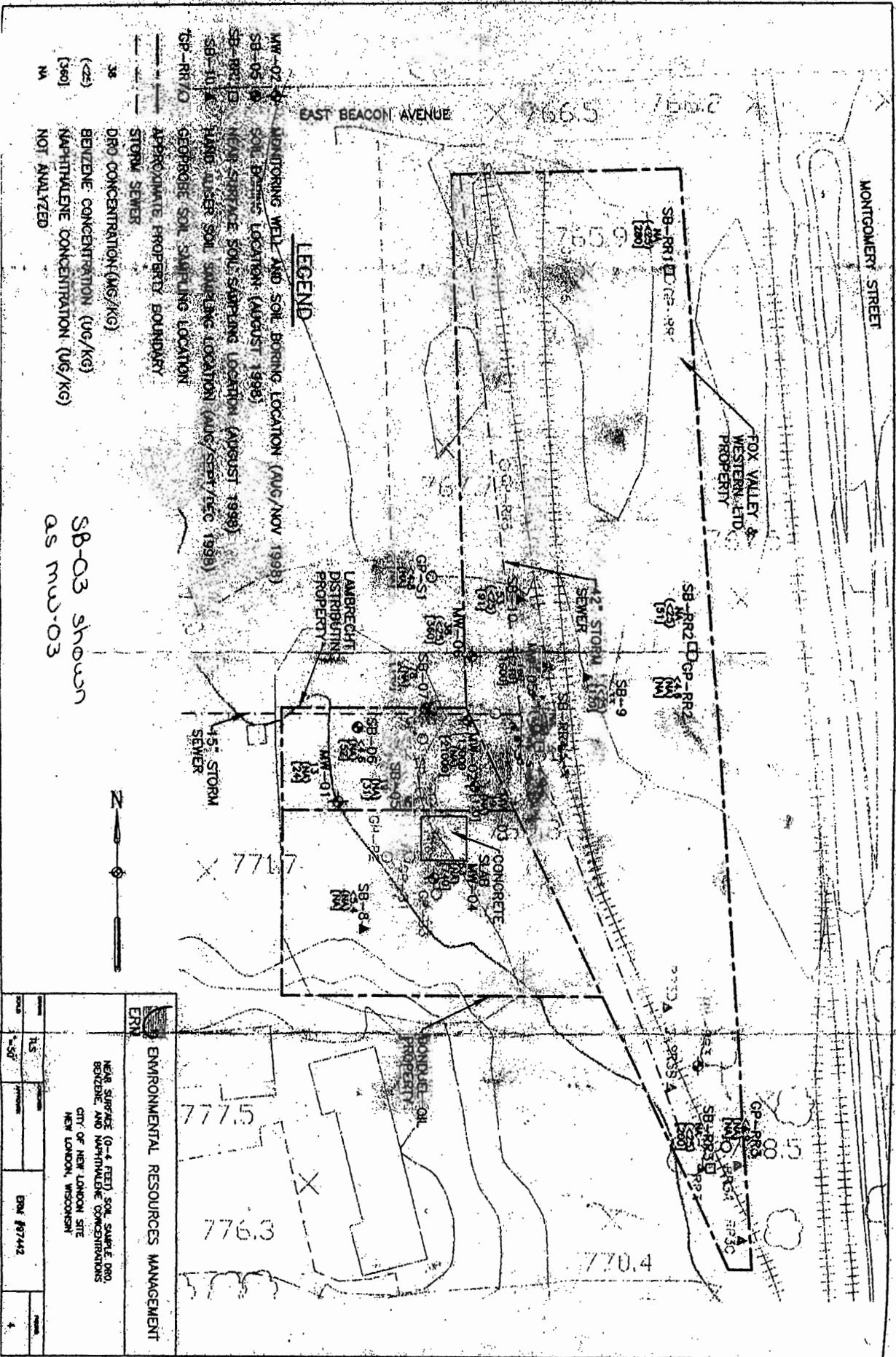


Figure 4



STS CONSULTANTS
 1035 Kepler Dr.
 Green Bay, WI 54311
 920-468-1978
 www.stsconsultants.com
 Copyright ©2005, By: STS Consultants, Ltd.

CERTIFICATE OF COMPLETION
CITY OF NEW LONDON
NEW LONDON, WISCONSIN
NEW LONDON PROPERTY ACQUISITION

Drawn: LDK 6/24/04
 Checked: AGM 9/16/05
 Approved: AGM 10/5/05
 PROJECT NUMBER **425570XA**
 FIGURE NUMBER **7**

- LEGEND**
- MW-06
 - GROUNDWATER MONITORING WELL
 - PARCEL LIMITS (APPROXIMATE)
 - LIMITS OF PROPERTY ACQUIRED BY CITY OF NEW LONDON
 - APPROXIMATE LIMITS OF EXCAVATION (PETROLEUM)
 - APPROXIMATE LIMITS OF EXCAVATION (ARSENIC)
 - APPROXIMATE LIMITS OF ARSENIC EXCEEDANCE
 - (3.9) TOTAL ARSENIC LEVEL IN SOIL SAMPLE
 - SB-RR1 ERM SOIL SAMPLES
 - S-1 SOIL SAMPLES
 - Ⓢ SANITARY MANHOLE
 - Ⓢ STORM MANHOLE
 - ⚡ POWER POLE
 - IRON PIPE

Notes:
 * Soil samples represents in-place soil conditions.
 ** Samples collected 9/11/01
 *** Samples collected 10/9/01
 S-27A (2.1) Samples collected 7/16/02
 S-27A (6.5) Soil Samples Exceeding DNR Standard for Arsenic (>5.0 ppm)

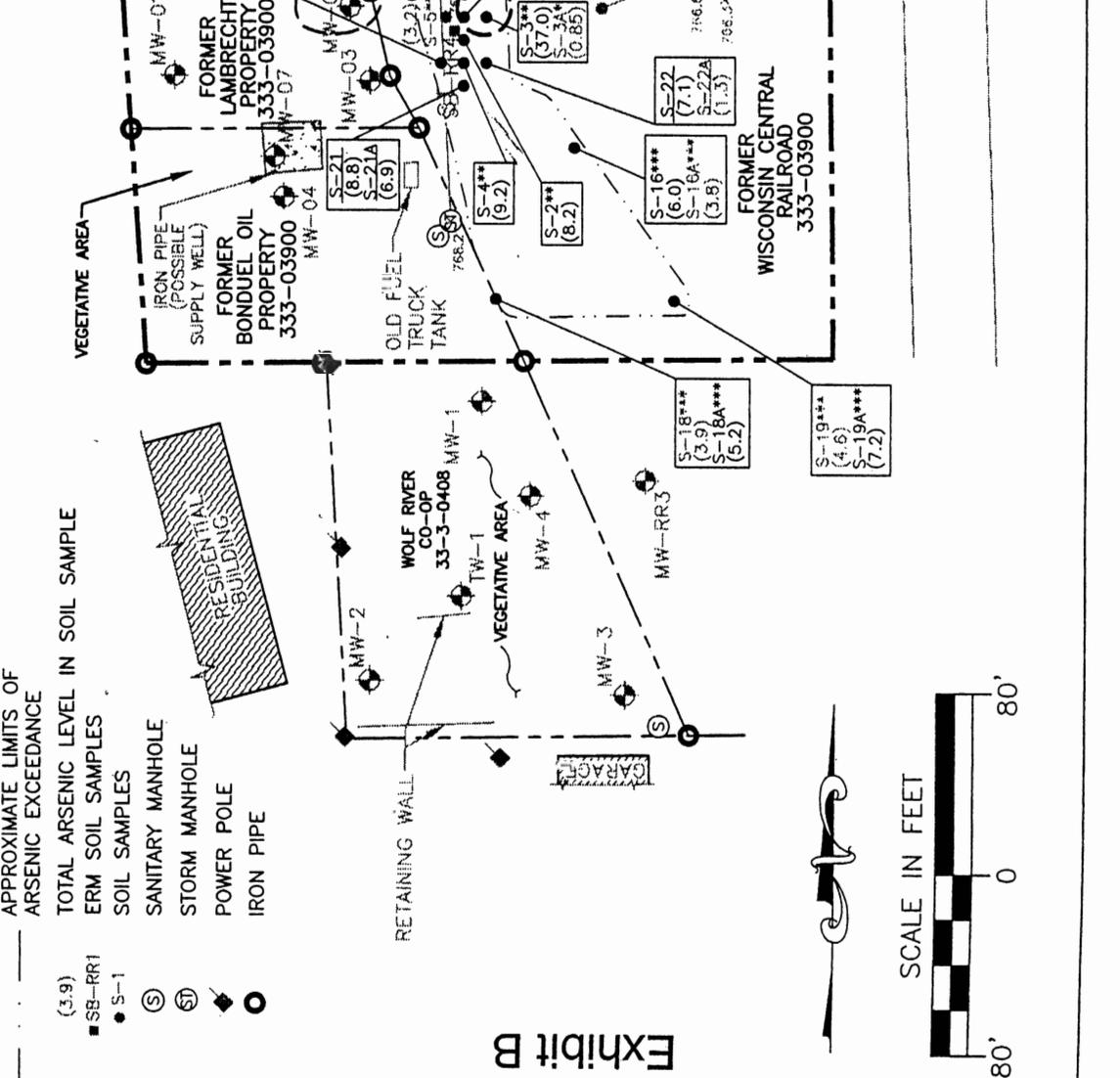


Exhibit B

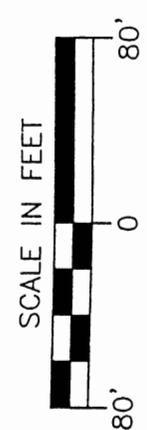


Exhibit C

Soil Performance Standard [NR 724.02(1)]

Maintenance Plan

Jan 2005

Description:

The soil performance standard selected is use of existing ground vegetation to provide a barrier to direct contact with soil. Ground cover created by the existing vegetation will prevent disturbance and air suspension of soil particles, thereby preventing direct contact.

Maintenance Plan [NR 724.13(2)]:

As a condition of closure, a vegetation cap has been identified as an institutional control to address residual arsenic concentrations in soils identified on the former Wisconsin Central Ltd. (WCL) parcels as shown on the attached figure.

In accordance with Chapter NR 724.13(2), Wisconsin Administrative Code, the City of New London will inspect the vegetative cap in accordance with this maintenance plan.

Written records of inspections will be maintained by the City of New London. The inspections will consist of visual observations to confirm the following:

- ✓ The general integrity of and ground cover provided by the existing vegetation.
- ✓ No filling or digging has occurred.

Deficiencies in the cap will be documented and addressed within one month of discovery.

The existing cover will be inspected according to the following schedule:

- ✓ Once annually during the month of September.

In addition, the Wisconsin Department of Natural Resources (WDNR) should be notified prior to conducting any of the following activities:

- ✓ Digging or filling within the institutional control area.
- ✓ Construction or installation of a building or other structure with a foundation that would be located within the institutional control area.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Oshkosh Service Center
625 East County Road Y, STE. 700
Oshkosh, WI 54901-9731
TELEPHONE 920-424-3050
FAX 920-424-4404

September 7, 2005

Mr. Kent Hager
City Administrator
215 N. Shawano St.
New London, WI 54961

SUBJECT: Case Closure Denial for Deed Restriction for
WCL (former), 613 E. Beacon St., New London, WI
WDNR ERP # 02-45-443192
WDNR VPLE # 06-45-229641 (Simmons Warehouse (former))

Dear Mr. Hager:

On September 6, 2005, the Northeast Regional Closure Committee reviewed your request for closure of the case described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of your closure request, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure, and to request your written response.

Your site was denied closure because no deed restriction was provided, which is required in order to comply with state law and administrative codes. It appears your site has been adequately investigated and may be eligible for case closure if certain minimum closure requirements are met. Once you complete the task below, your site will be reconsidered for closure.

DEED RESTRICTION FOR CONTAMINATED SOIL

To close this site, the Department requires that a deed restriction be signed and recorded to maintain the vegetative surface barrier over the remaining soil contamination to prevent contamination from impacting human health through direct contact due to arsenic in soil above five parts per million.

The Department is currently drafting a deed restriction. The draft restriction will be reviewed by our legal department and forwarded to you. After you have reviewed the draft document for completeness, you should have a representative for the property owner sign it and have it recorded by the Outagamie County Register of Deeds. **Then submit a copy of the entire recorded document, with the recording information stamped on it, to me within 30 days of receiving the final, approved deed document from the Department.** 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.

September 7, 2005

WCL (former)
WDNR ERP # 02-45-443192
WDNR VPLE # 06-45-229641

2

When the above requirement has been satisfied, please submit a letter, together with any required documentation, to let me know that applicable requirements have been met. 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://maps.dnr.state.wi.us/brrts>.

Note: case closure will be approved only if all the above requirements have been satisfied, including submitting the required documentation to the Department. **If these requirements are not met your site will remain "open" and additional remedial actions may be necessary by you to eliminate the need for these requirements.**

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at the number below.

Sincerely,



Jennifer Borski
Hydrogeologist
Bureau for Remediation & Redevelopment
(920) 424-7887

Electronic Copy: A. Mott, STS



APRIL 14, 1999

RE: B993.43 - CITY OF NEW LONDON

1837 West Wisconsin Ave.
P.O. Box 1297
Appleton, Wisconsin 54912-1297
Phone (920) 731-4168
Fax (920) 731-5673

DESCRIPTION OF THAT PART OF QUIT CLAIM DEED THAT FOX VALLEY & WESTERN, LTD. HAS TITLE TO

BEING A PART OF LOT 1 AND LOT 2 OF DEDOLPH AND LIPKE'S OUTLOTS. A PARCEL OF LAND LOCATED IN THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 18, TOWNSHIP 22 NORTH, RANGE 15 EAST, CITY OF NEW LONDON, OUTAGAMIE COUNTY, WISCONSIN, BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTH 1/4 CORNER OF SAID SECTION 18; THENCE S89-12-40W, 765.51 FEET ALONG THE NORTH LINE OF THE NORTHWEST 1/4 OF SAID SECTION 18 TO ITS INTERSECTION WITH A LINE LYING 50 FEET WEST OF THE CENTERLINE OF THE MAIN TRACK AS MEASURED AT RIGHT ANGLES TO SAID CENTERLINE OF THE FOX VALLEY & WESTERN, LTD. RAILROAD; THENCE S04-54-27E, 8.11 FEET ALONG SAID PARALLEL LINE TO THE SOUTH RIGHT-OF-WAY LINE OF BEACON STREET ALSO BEING THE NORTH LINE OF LOT 1 OF DEDOLPH AND LIPKE'S OUTLOTS AND THE POINT OF BEGINNING; THENCE CONTINUING S04-54-27E, 503.96 FEET ALONG SAID PARALLEL LINE TO A WEST LINE OF LANDS DESCRIBED IN VOLUME 99 ON PAGE 407; THENCE N16-26-46W, 40.41 FEET ALONG SAID WEST LINE TO THE NORTH LINE OF THE SOUTH 1/2 OF LOT 2 OF DEDOLPH AND LIPKE'S OUTLOTS; THENCE N89-52-09W, 65.68 FEET ALONG SAID NORTH LINE TO THE WESTERLY LINE OF SAID DESCRIBED LANDS; THENCE N24-00-14W, 179.27 FEET ALONG SAID WESTERLY LINE TO THE SOUTH LINE OF LOT 1 OF DEDOLPH AND LIPKE'S OUTLOTS; THENCE N89-47-48E, 4.97 FEET ALONG SAID SOUTH LINE TO THE WEST LINE OF THE EAST 1/2 OF THE EAST 1/2 OF SAID LOT 1; THENCE N03-43-35W, 298.06 FEET ALONG SAID WEST LINE TO THE NORTH LINE OF SAID LOT 1; THENCE N89-03-10E, 121.35 FEET ALONG SAID NORTH LINE TO THE POINT OF BEGINNING. SAID PARCEL CONTAINS 54246 SQUARE FEET (1.2453 ACRES) OF LAND MORE OR LESS. SUBJECT TO ALL EASEMENTS AND RESTRICTIONS OF RECORD.

1607938

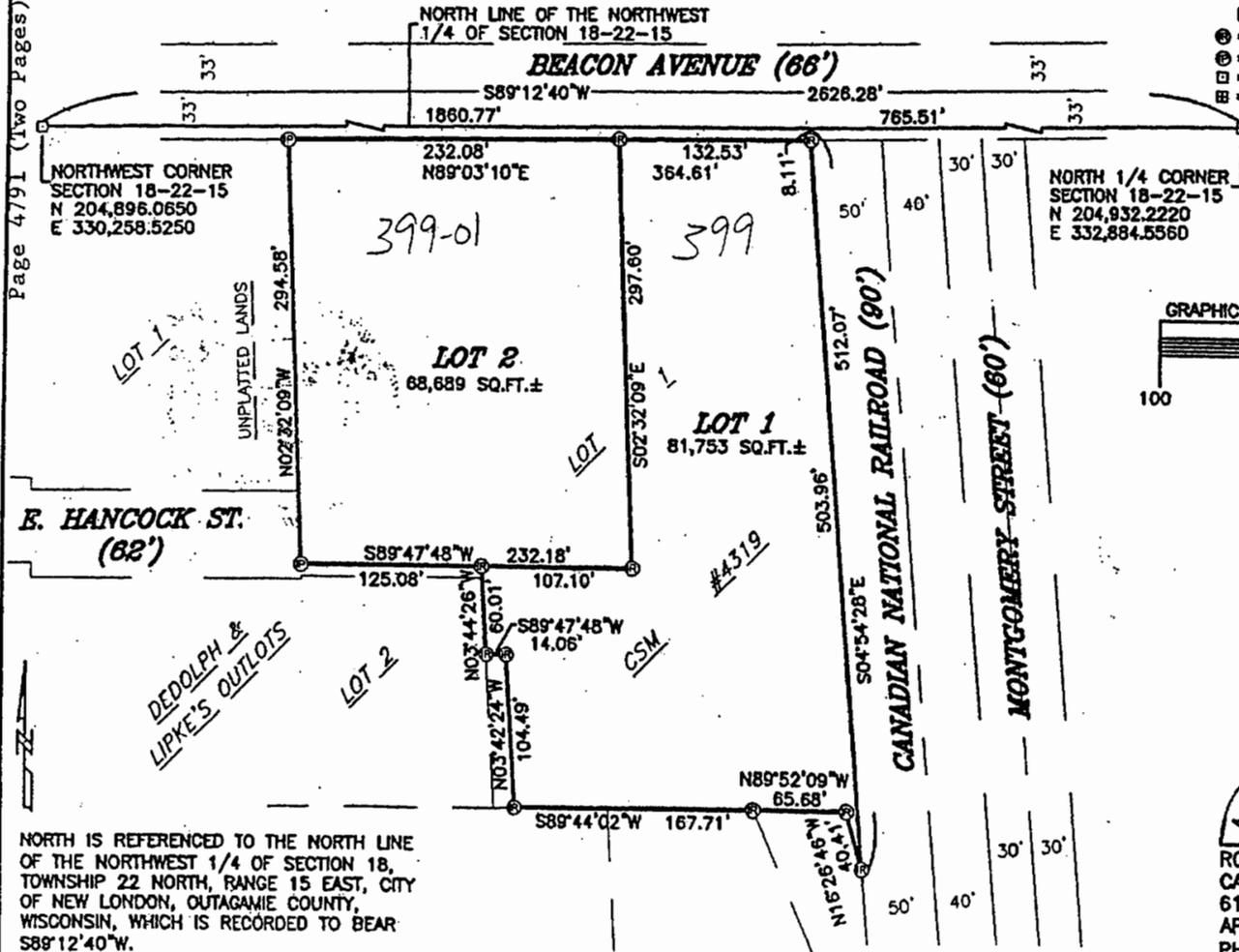
Document Number 1607938 Filed this 19 day of April, 2004 at 9:10 a.m. in Volume 27 of Certified Survey Maps on page 4791 being Certified Survey Map Number 4791.

Janice Flenz, Register of Deeds
Page 4791 (Two Pages)

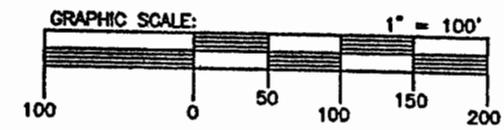
Current Parcel #5 Date: _____

CERTIFIED SURVEY MAP NO. 4791

BEING ALL OF LOT 1 OF CERTIFIED SURVEY MAP NUMBER 4319 AS RECORDED IN VOLUME 24 OF CERTIFIED SURVEY MAPS ON PAGE 4319, LOCATED IN PART OF LOTS 1 & 2, DEDOLPH AND LIPKE'S OUTLOTS, BEING LOCATED IN THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 18, TOWNSHIP 22 NORTH, RANGE 15 EAST, CITY OF NEW LONDON, OUTAGAMIE COUNTY, WISCONSIN.



- LEGEND:**
- ⊙ = 3/4" SOLID ROUND IRON REBAR FOUND
 - ⊗ = 1" I.D. ROUND IRON PIPE FOUND
 - ⊠ = P.K. NAIL
 - ⊞ = STONE WITH CROSS FOUND



Robert F. Reider 4-1-04
 ROBERT F. REIDER, RLS-1251 DATED
 CAROW LAND SURVEYING CO., INC.
 615 N. LYNDALE DR., P.O. BOX 1297
 APPLETON, WISCONSIN 54912-1297
 PHONE: (920)731-4168
 A993.43-04 (ac-lp DGV) 3-31-04

STATEMENT OF PROPERTY LEGAL DESCRIPTION

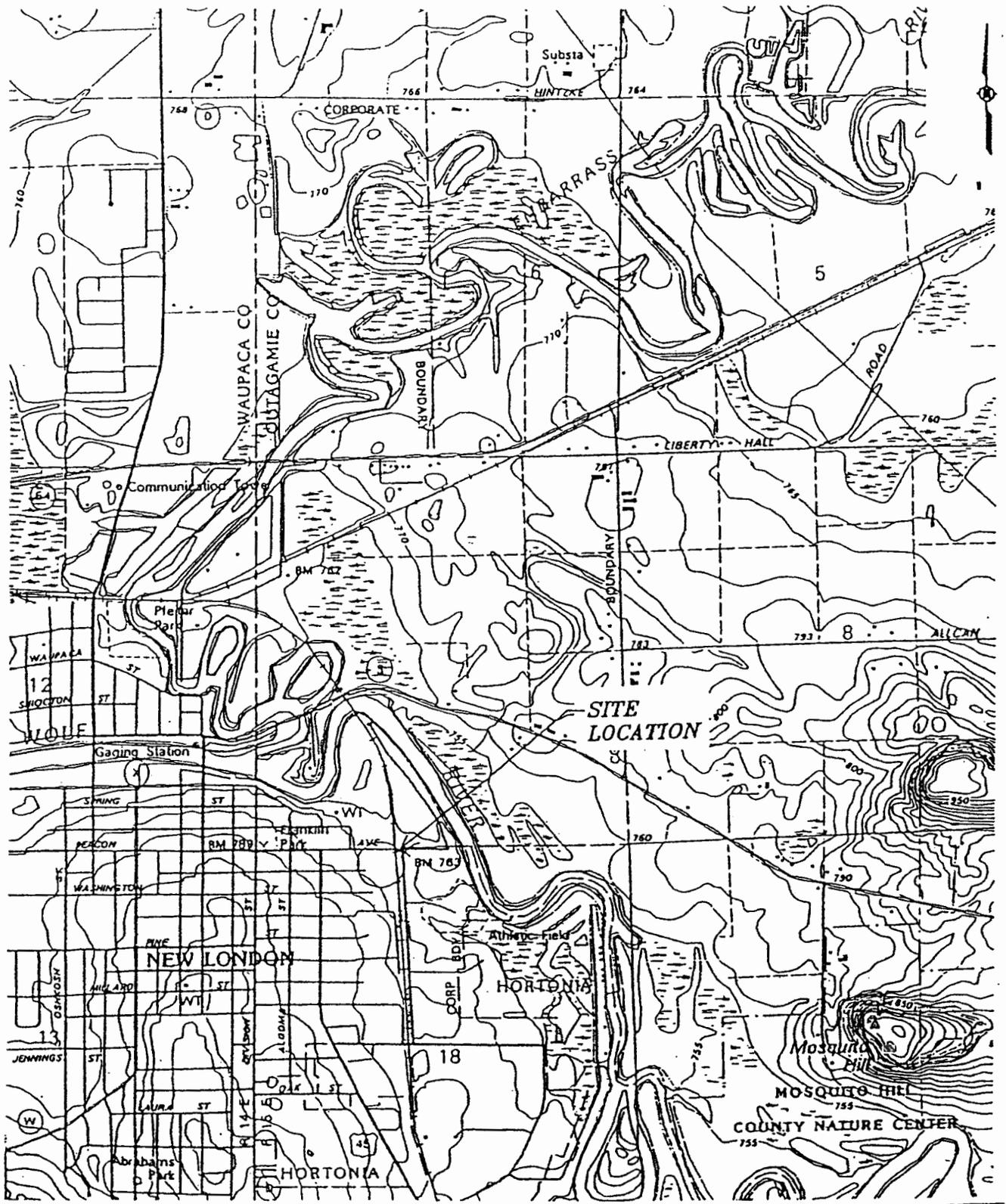
As required by s.NR 726.05(3)(f) of the Wisconsin Administrative Code, I am providing this signed statement that to the best of my knowledge, the legal descriptions that are attached to this statement are complete and accurate for the properties (Wisconsin Central Ltd.) located at 613 East Beacon Avenue, New London, Outagamie County, Wisconsin.

Firm: City of New London

Signature: [Handwritten Signature]

Title: City Administrator

Date: 7/16/04



MAP SOURCE: MODIFIED FROM NEW LONDON(1992), WIS. 7.5 MIN USGS QUADRANGLE



STS Consultants Ltd.
Consulting Engineers

SITE LOCATION DIAGRAM
FORMER LAMBRECHT DISTRIBUTION FACILITY
NEW LONDON, WISCONSIN

DRAWN BY	AGM	5-29-01
CHECKED BY	PJK	5-29-01
APPROVED BY		
CADFILE	SCALE	
G470A001.dwg	1" = 2000'	
STS PROJECT NO.	FIGURE NO.	
25570XA	1	



STS CONSULTANTS
 1035 Kepler Dr.
 Green Bay, WI 54311
 920-468-1978
 www.stsconsultants.com
 Copyright ©2005, By: STS Consultants, Ltd.

CERTIFICATE OF COMPLETION
CITY OF NEW LONDON
NEW LONDON, WISCONSIN
NEW LONDON PROPERTY ACQUISITION

Drawn: LDK 6/24/04
 Checked: AGM 9/16/05
 Approved: AGM 10/5/05

PROJECT NUMBER **425570XA**
 FIGURE NUMBER **7**

- LEGEND**
- MW-06 GROUNDWATER MONITORING WELL
 - PARCEL LIMITS (APPROXIMATE)
 - - - LIMITS OF PROPERTY ACQUIRED BY CITY OF NEW LONDON
 - - - APPROXIMATE LIMITS OF EXCAVATION (PETROLEUM)
 - - - APPROXIMATE LIMITS OF EXCAVATION (ARSENIC)
 - - - APPROXIMATE LIMITS OF ARSENIC EXCEEDANCE
 - (3.9) ■ SB-RR1 TOTAL ARSENIC LEVEL IN SOIL SAMPLE
 - S-1 ERM SOIL SAMPLES
 - S-1 SOIL SAMPLES
 - ⊙ SANITARY MANHOLE
 - ⊕ STORM MANHOLE
 - ◆ POWER POLE
 - IRON PIPE

Notes:

- * Soil samples represents in-place soil conditions.
- ** Samples collected 9/11/01
- *** Samples collected 10/9/01
- S-27A Samples collected 7/16/02
- S-27A Soil Samples Exceeding
- (6.5) DNR Standard for Arsenic (>5.0 ppm)

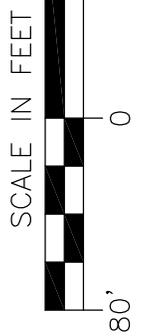
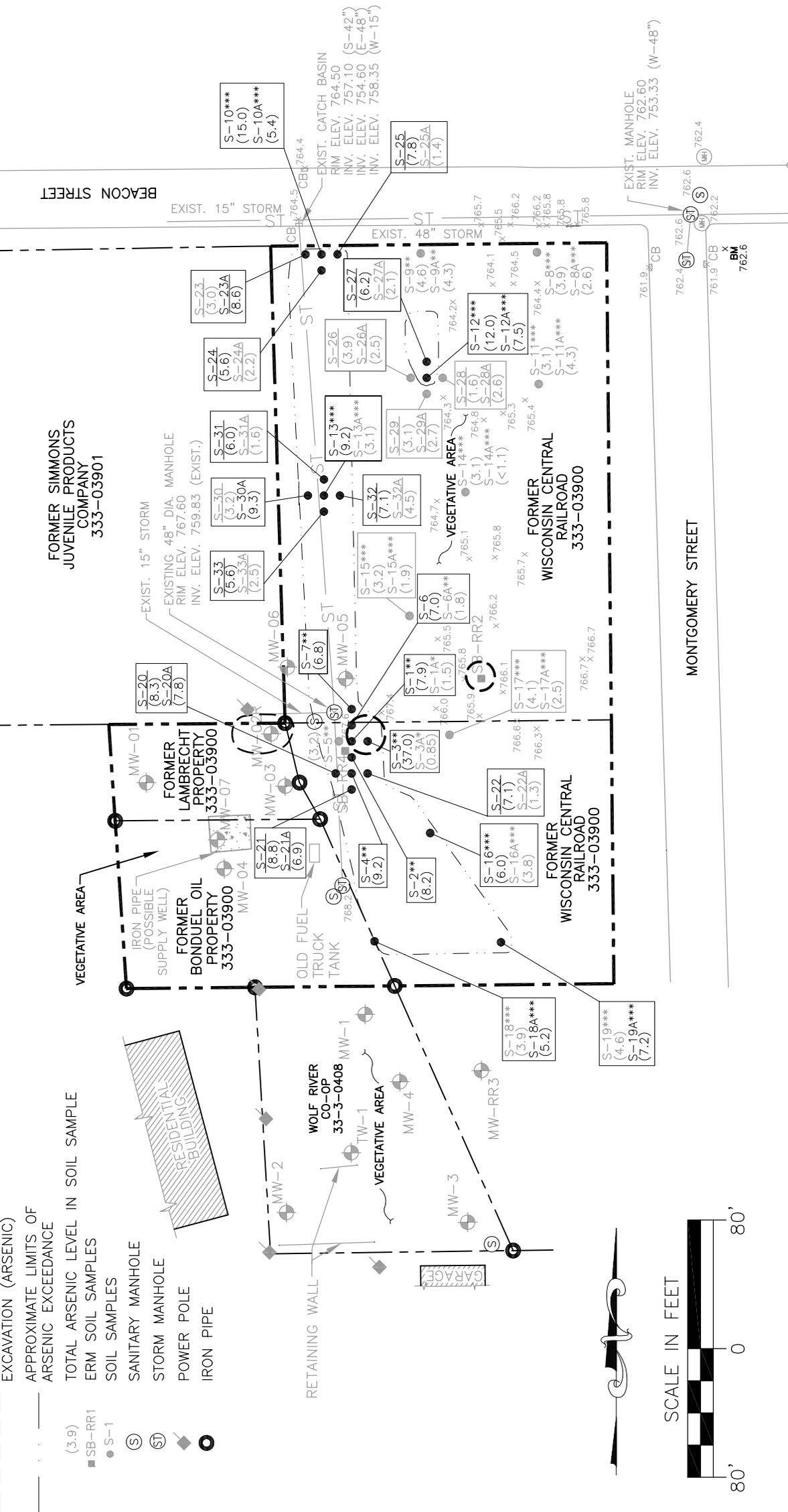


Table 5
Arsenic Analytical Results
Simmons Warehouse VPLE Site,
New London, Wisconsin

Sample Identification	S-1 *	S-1A	S-2	S-3 *	S-3A	S-4	S-5	S-6	S-6A	S-7	S-8	S-8A	S-9	S-9A	S-10	S-10A
Depths	0 - 1	3 - 4	0 - 1	0 - 1	3 - 4	0 - 1	0 - 1	0 - 1	1 - 2	0 - 1	0 - 1	1 - 2	0 - 1	1 - 2	0 - 1	1 - 2
Date Sampled	9/11/2001	12/20/2001	9/11/2001	9/11/2001	12/20/2001	9/11/2001	9/11/2001	9/11/2001	10/9/2001	9/11/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001
Parameter (mg/kg)																
Total Arsenic Confirmation Sample	7.9 (1A) 1.5	1.5	8.2	37 (3A) 0.85	0.85	9.2	3.2	7.0	1.8	6.8	3.9	2.6	4.6	4.3	15	5.4

Sample Identification	S-11	S-11A	S-12	S-12A	S-13	S-13A	S-14	S-14A	S-15	S-15A	S-16	S-16A	S-17	S-17A	S-18	S-18A
Depths	0 - 1	1 - 2	0 - 1	1 - 2	0 - 1	1 - 2	0 - 1	1 - 2	0 - 1	1 - 2	0 - 1	1 - 2	0 - 1	1 - 2	0 - 1	1 - 2
Date Sampled	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001	10/9/2001
Parameter (mg/kg)																
Total Arsenic Confirmation Sample	3.1	4.3	12	7.5	9.2	3.1	3.1	<1.1	3.2	1.9	6.0	3.8	4.1	2.5	3.9	5.2

Sample Identification	S-19	S-19A	S-20	S-20A	S-21	S-21A	S-22	S-22A	S-23	S-23A	S-24	S-24A	S-25	S-25A	S-26	S-26A
Depths	0 - 1	1 - 2	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4
Date Sampled	10/9/2001	10/9/2001	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002
Parameter (mg/kg)																
Total Arsenic Confirmation Sample	4.6	7.2	8.3	7.8	8.8	6.9	7.1	1.3	3.0	8.6	5.6	2.2	7.8	1.4	3.9	2.5

Sample Identification	S-27	S-27A	S-28	S-28A	S-29	S-29A	S-30	S-30A	S-31	S-31A	S-32	S-32A	S-33	S-33A
Depths	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4
Date Sampled	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002	8/2/2002
Parameter (mg/kg)														
Total Arsenic Confirmation Sample	6.2	2.1	1.6	2.6	3.1	2.7	3.2	9.3	6.0	1.6	7.1	4.5	5.6	2.5

Notes:
 * - Excavated Soil

Table 4
Soil Sample Analytical Results Summary
DRO, GRO, VOCs, SVOCs, Pesticides, and Metals
City of New London Site
(Formerly Proposed Simmons Warehouse Site)
New London, Wisconsin
 (Page 1 of 4)

Soil Boring No. Sample Depth Interval (ft) Date Sampled	GP-B1	GP-B2	GP-L1	GP-RR7	GP-S1	GP-RR1	GP-RR2	GP-RR3	GP-RR4	GP-RR5	GP-RR6	GP-B3	GP-L2	GP-L2	SB-RR1	SB-RR2	SB-RR3	SB-RR4	MDEQ Soil Cleanup Objective ^a	
	2-4 6/30/97	2-4 6/30/97	0-2 6/30/97	6-8 7/28/97	2-4 7/28/97	4-8 1/8/98	3-4 1/8/98	0-2 1/8/98	6-8 1/8/98	10-12 1/8/98	6-8 1/8/98	NS 1/8/98	7-8 1/8/98	8-10 1/8/98	0-1 8/28/98	9-1 8/28/98	0-1 8/28/98	0-1 8/28/98	GW Protection ^b	Direct Contact Industrial ^c
DRO (mg/kg)	<4.5	<4.5	23	<5.4	<4.8	<4.7	<4.6	<4.9	<4.7	<4.4	<5.0	NA	<3.6	29	NA	NA	NA	NA	100 ^d	100 ^d
GRO (mg/kg)	NA	NA	NA	NA	NA	<3.2	<3.3	<3.1	<3.2	<3.0	<3.0	NA	<2.6	4.3	NA	NA	NA	NA		
PAHs (ug/kg)																				
acenaphthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	38,000 ^e	60,000,000 ^e
acenaphthylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	700 ^e	360,000 ^e
anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	3,000,000 ^e	300,000,000 ^e
benzo(a)anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	17,000 ^e	3,900 ^e
benzo(a)pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	48,000 ^e	390 ^e
benzo(b)fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	210	<200	360,000 ^e	3,900 ^e
benzo(k)fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	6,800,000 ^e	39,000 ^e
benzo(g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	870,000 ^e	39,000 ^e
benzofluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	230	<200	37,000 ^e	390,000 ^e
benzo(a,h)anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	38,000 ^e	390 ^e
fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	220	<200	500,000 ^e	40,000,000 ^e
fluorene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	190,000 ^e	40,000,000 ^e
indeno(1,2,3-cd)pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	<190	<200	890,000 ^e	3,900 ^e
1-methylanthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	23,000 ^e	70,000,000 ^e
2-methylanthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	750	<200	20,000 ^e	40,000,000 ^e
perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	280	<200	400 ^e	110,000 ^e
phenanthrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	780	<200	1,800 ^e	350,000 ^e
pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<170	<190	340	<200	8,700,000 ^e	30,000 ^e
VOCs (mg/kg)																				
benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<25	<25	<25	<25	5.5 ^f	
o-xylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<25	<25	40	<25		
m-xylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	56	30	56	<25		
p-xylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	51	<25	45	<25	2,900 ^f	
toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	33	<25	40	<25		
ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	28	<25	32	<25		
styrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	290	51	200	74	400 ^f	110,000 ^f
1,2-dichlorobenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	54	<25	45	<25		
1,4-dichlorobenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	130	83	170	38	1,500 ^f	
1,2,4-trichlorobenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	190	66	140	46		
1,3,5-trichlorobenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	82	<25	64	<25		
cyclohexane	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	230	74	200	60	4,100 ^f	
chloroform	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	140	48	150	<25	4,100 ^f	
Pesticides (ug/kg)																				
4,4'-DDT	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<3.4	<3.9	26	<4.0		
4,4'-DDE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<3.4	<3.8	<3.7	<4.0		
Metals, Total (mg/kg)																				
arsenic	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	5.2	6.9	22	6.2		1.6 ^f
barium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	74	72	44	160		
chromium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.7	10	7.3	25		16,000 ^f
copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	27	24	16	27		
lead	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	22	34	35	31		500 ^f
zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	52	110	99	139		

