

GIS REGISTRY

Cover Sheet

August 2011
(RR-5367)

Source Property Information

BRRTS #:

ACTIVITY NAME:

PROPERTY ADDRESS:

MUNICIPALITY:

PARCEL ID #:

CLOSURE DATE:

FID #:

DATCP #:

PECFA#:

*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:

Groundwater Contamination > ES (236)

Contamination in ROW

Off-Source Contamination

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

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

Contamination in ROW

Off-Source Contamination

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

Land Use Controls:

N/A (Not Applicable)

Soil: maintain industrial zoning (220)

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

Structural Impediment (224)

Site Specific Condition (228)

Cover or Barrier (222)

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

Vapor Mitigation (226)

Maintain Liability Exemption (230)

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

Monitoring Wells:

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

Yes No N/A

** Residual Contaminant Level*

***Site Specific Residual Contaminant Level*

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 #: 06-16-556778 PARCEL ID #: 02-802-07114-00 & 02-802-07114-01
ACTIVITY NAME: NORDIC LAND SUPERIOR/MINNESOTA LIMITED WTM COORDINATES: X: 361038 Y: 694116

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.)
- Continuing Obligation Cover Letter** (for property owners affected by residual contamination and/or continuing obligations)
- 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**
- Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

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

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

- 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 #: **Title: Site Location Map**
- 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 #: **Title: Detailed Site Map**
- 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 #: **Title: Soil Contamination Contour Map**

BRRTS #: 02-16-556740

ACTIVITY NAME: Nordic Land Superior LLC/Minnesota Limited Inc.

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: **Geologic Cross-Section A - A'**

Figure #: Title:

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

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

Figure #: Title: **Groundwater Isoconcentration Map**

- 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: **Groundwater Flow Map**

Figure #: Title:

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

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

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

Table #: **1, 2, 2A, 2B** Title: **multiple titles**

- Groundwater Analytical Table:** Table(s) that show the most recent analytical results and collection dates, for all monitoring wells and any potable wells for which samples have been collected.

Table #: **3 and 3** Title: **Summary of Groundwater Analytical Results, and July & August 2011 Groundwater**

- 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 #: 02-16-556740

ACTIVITY NAME: Nordic Land Superior LLC/Minnesota Limited Inc.

NOTIFICATIONS

Source Property

Not Applicable

Letter To Current Source Property Owner: If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.

Return Receipt/Signature Confirmation: Written proof of date on which confirmation was received for notifying current source property owner.

Off-Source Property

Group the following information per individual property and label each group according to alphabetic listing on the "Impacted Off-Source Property" attachment.

Not Applicable

Letter To "Off-Source" Property Owners: Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.

Note: Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.

Number of "Off-Source" Letters:

Return Receipt/Signature Confirmation: Written proof of date on which confirmation was received for notifying any off-source property owner.

Deed of "Off-Source" Property: The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.

Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.

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

Figure #:

Title:

Letter To "Governmental Unit/Right-Of-Way" Owners: Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).

Number of "Governmental Unit/Right-Of-Way Owner" Letters:



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary
John Gozdzialski, Regional Director

Northern Region Headquarters
107 Sutliff Avenue
Rhineland, Wisconsin 54501
Telephone 715-365-8900
FAX 715-365-8932
TTY Access via relay - 711

November 21, 2011

MR CHRISTOPHER LEINES
NORDIC LAND SUPERIOR LLC
PO BOX 410
BIG LAKE MN 55309

Subject: Final Case Closure with Continuing Obligations
Nordic Land Superior LLC/Minnesota Limited, Inc. Property
3116 James Day Avenue, Superior, Wisconsin
WDNR BRRTS #02-16-556740

Dear Mr. Leines:

On November 17, 2011, the Department's Northern Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases.

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

GIS Registry

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

- Before the land use may be changed from industrial to non-industrial, additional environmental work must be completed
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier
- Groundwater contamination is present above Chapter NR 140 enforcement standards

All site information, including the maintenance plan, is also on file at the Northern Region DNR office at 107 Sutliff Avenue, Rhineland, Wisconsin. This letter and information that was submitted with your closure request application, including the maintenance plan, will be included on the GIS Registry, in a PDF attachment. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If the property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior

Department approval in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at the web address listed above for the GIS Registry or at <http://dnr.wi.gov/org/water/dwg/3300254.pdf>.

Closure Conditions

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

Industrial Residual Soil Standards

Soil samples that are representative of remaining residual soil contamination on this property were collected on December 13, 14 and 15, 2010, July 6 and 12, 2011 and October 26, 2011. These samples contained benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene and indeno(1,2,3-c,d)pyrene at concentrations that exceeded suggested non-industrial residual contaminant levels (RCLs) as listed in Department publication RR-519, *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance*, but met industrial RCLs from that same guidance document.

Therefore, pursuant to s. NR 726.05(8)(b)1., Wis. Adm. Code, this property 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) the property owner provides notification to the Department of Natural Resources of the change in land use and an investigation is conducted, to determine the degree and extent of PAH contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If soil in the specific locations shown on the attached Soil Contamination Contour Map, prepared by Natural Resources Engineering Co. (NRE), and described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

Cover or Barrier

Because soil contamination remains below the building foundation of the site's maintenance and storage building that currently exists in the location shown on the attached Soil Contamination Contour Map which was prepared by Northern Resources Engineering Company on July 14, 2011, pursuant to s. 292.12(2)(a), Wis. Stats., the building foundation shall be maintained in compliance with the attached Cover (Barrier or Cap) Maintenance Plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

If soil in the specific locations shown on the attached map is excavated in the future, the same requirements regarding sampling, storage, treatment or disposal as described above in the section titled Industrial Residual Soil Standards need to be followed.

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

Prohibited Activities

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

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

Residual Groundwater Contamination

Groundwater impacted by naphthalene in excess of its enforcement standard set forth in ch. NR 140, Wis. Adm. Code, is present on this contaminated property, as shown on the attached Groundwater Isoconcentration Map prepared by Natural Resources Engineering Co. on July 14, 2011.

Post-Closure Notification Requirements

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

- Development, construction or other changes, including zoning changes, that change the land use from industrial to non-industrial
- Disturbance, construction on, change or removal in whole or part of pavement, an engineered cover or a soil barrier that must be maintained over contaminated soil

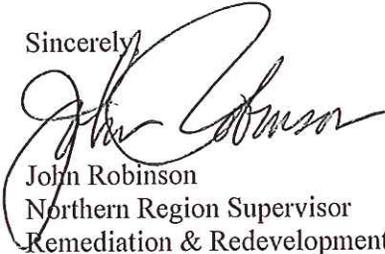
Please send written notifications in accordance with the above requirements to the attention of the Northern Region RR Environmental Program Associate, WDNR, 107 Sutliff Avenue, Rhinelander, WI 54501.

The following DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. You may obtain additional copies at <http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf>.

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

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Chris Saari at 715-685-2920, or via e-mail at Christopher.Saari@Wi.gov.

Sincerely,



John Robinson
Northern Region Supervisor
Remediation & Redevelopment Program

Attachments: Soil Contamination Contour Map
Cover (Barrier or Cap) Maintenance Plan
Groundwater Isoconcentration Map
Continuing Obligations for Environmental Protection, publication RR-819

cc:

Patrick V. Johnson
Speeter & Johnson
1515 1 Financial Plaza
120 S. Sixth St.
Minneapolis, MN 55402

Barry Power
Natural Resources Engineering Co.
1409 Hammond Ave.
Superior, WI 54880

Michael Prager
DNR – RR/5
PO Box 7921
Madison, WI 53707-7921



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary
John Gozdzialski, Regional Director

Northern Region Headquarters
107 Sutliff Avenue
Rhinelander, Wisconsin 54501
Telephone 715-365-8900
FAX 715-365-8932
TTY Access via relay - 711

November 21, 2011

MR CHRISTOPHER LEINES
PRESIDENT
MINNESOTA LIMITED INC
PO BOX 410
BIG LAKE MN 55309

Subject: Final Case Closure with Continuing Obligations
Nordic Land Superior LLC/Minnesota Limited, Inc. Property
3116 James Day Avenue, Superior, Wisconsin
WDNR BRRTS #02-16-556740

Dear Mr. Leines:

On November 17, 2011, the Department's Northern Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases.

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

GIS Registry

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

- Before the land use may be changed from industrial to non-industrial, additional environmental work must be completed
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier
- Groundwater contamination is present above Chapter NR 140 enforcement standards

All site information, including the maintenance plan, is also on file at the Northern Region DNR office at 107 Sutliff Avenue, Rhinelander, Wisconsin. This letter and information that was submitted with your closure request application, including the maintenance plan, will be included on the GIS Registry, in a PDF attachment. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If the property is listed on the GIS Registry because of

remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at the web address listed above for the GIS Registry or at <http://dnr.wi.gov/org/water/dwg/3300254.pdf>.

Closure Conditions

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

Industrial Residual Soil Standards

Soil samples that are representative of remaining residual soil contamination on this property were collected on December 13, 14 and 15, 2010, July 6 and 12, 2011 and October 26, 2011. These samples contained benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene and indeno(1,2,3-c,d)pyrene at concentrations that exceeded suggested non-industrial residual contaminant levels (RCLs) as listed in Department publication RR-519, *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance*, but met industrial RCLs from that same guidance document.

Therefore, pursuant to s. NR 726.05(8)(b)1., Wis. Adm. Code, this property 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) the property owner provides notification to the Department of Natural Resources of the change in land use and an investigation is conducted, to determine the degree and extent of PAH contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If soil in the specific locations shown on the attached Soil Contamination Contour Map, prepared by Natural Resources Engineering Co. (NRE), and described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

Cover or Barrier

Because soil contamination remains below the building foundation of the site's maintenance and storage building that currently exists in the location shown on the attached Soil Contamination Contour Map, pursuant to s. 292.12(2)(a), Wis. Stats., the building foundation shall be maintained in compliance with the attached Cover (Barrier or Cap) Maintenance Plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

If soil in the specific locations shown on the attached map is excavated in the future, the same requirements regarding sampling, storage, treatment or disposal as described above in the section titled Industrial Residual Soil Standards need to be followed.

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

Prohibited Activities

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

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

Residual Groundwater Contamination

Groundwater impacted by naphthalene in excess of its enforcement standard set forth in ch. NR 140, Wis. Adm. Code, is present on this contaminated property, as shown on the attached Groundwater Isoconcentration Map prepared by NRE on July 14, 2011.

Post-Closure Notification Requirements

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

- Development, construction or other changes, including zoning changes, that change the land use from industrial to non-industrial
- Disturbance, construction on, change or removal in whole or part of pavement, an engineered cover or a soil barrier that must be maintained over contaminated soil

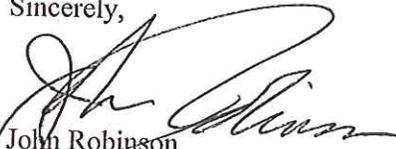
Please send written notifications in accordance with the above requirements to the attention of the Northern Region RR Environmental Program Associate, WDNR, 107 Sutliff Avenue, Rhineland, WI 54501.

The following DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. You may obtain additional copies at <http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf>.

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

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Chris Saari at 715-685-2920, or via e-mail at Christopher.Saari@Wi.gov.

Sincerely,



John Robinson
Northern Region Supervisor
Remediation & Redevelopment Program

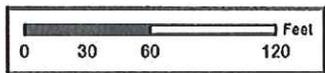
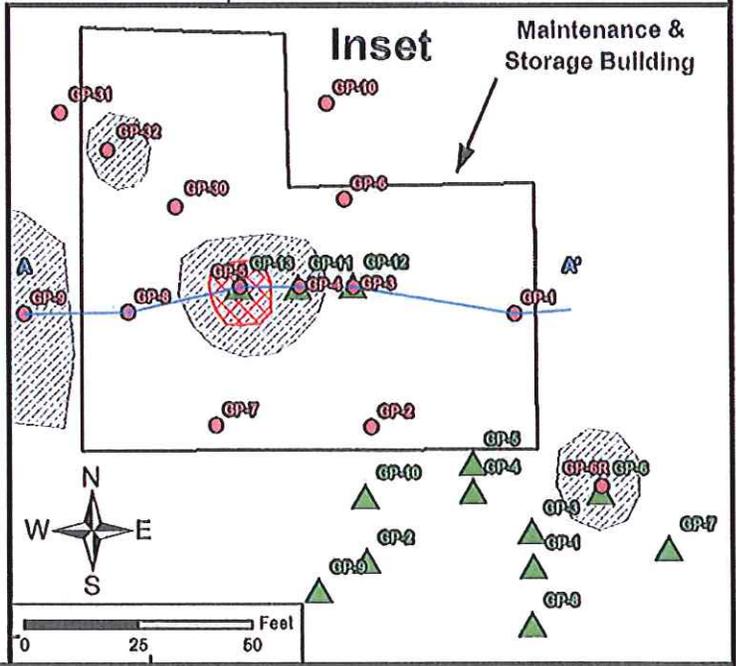
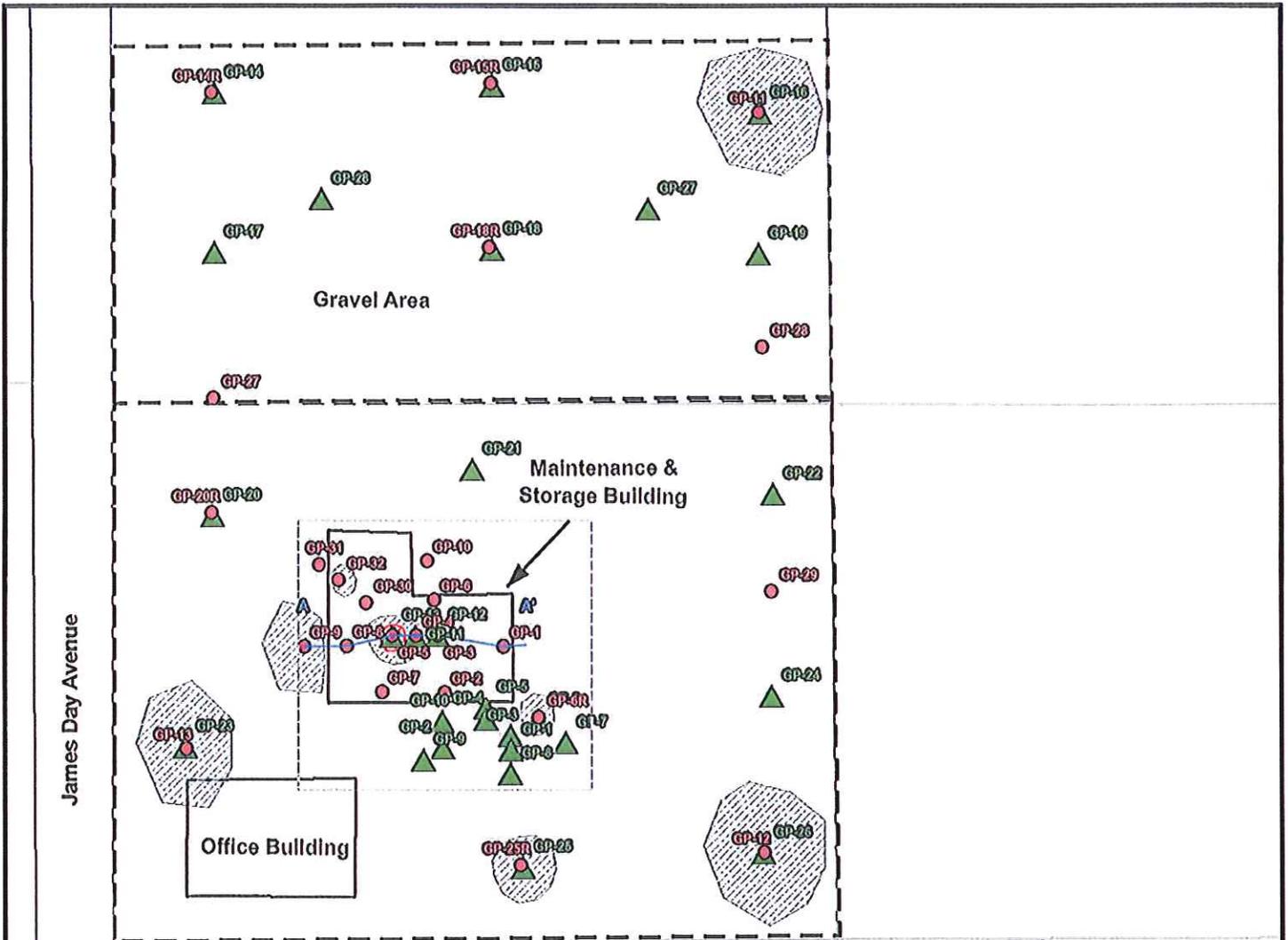
Attachments: Soil Contamination Contour Map
Cover (Barrier or Cap) Maintenance Plan
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cc:

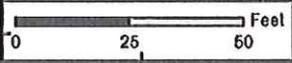
Patrick V. Johnson
Speeter & Johnson
1515 1 Financial Plaza
120 S. Sixth St.
Minneapolis, MN 55402

Barry Power
Natural Resources Engineering Co.
1409 Hammond Ave.
Superior, WI 54880

Michael Prager
DNR – RR/5
PO Box 7921
Madison, WI 53707-7921



- Legend**
- Approximate Extent of Soil Exceeding Industrial RCL
 - Approximate Extent of Soil Exceeding Non-Industrial RCL
 - 2011 NREC Geoprobe Location
 - 2010 AET Geoprobe Location
 - Cross Section A-A'
 - Extent of Inset
 - Nordic Land LLC Property Boundary
 - Adjacent Property Boundary



Nordic Land Superior/Minnesota Limited Property
Soil Contamination Contour Map

DATE ISSUED: 7/14/2011
DATE REVISED: 11/03/2011
SCALE: 1:1,000
DRAWN BY: JPM
SERIES: 715-395-5680

Cover (Barrier or Cap) Maintenance Plan

Date: 9/20/2011

Property Located at: 3116 James Day Avenue Superior, WI 54880

FID #: 816061620

WDNR BRRTS/Activity #]: 02-16-556740

Legal Description: SUPERIOR INDUSTRIAL PARK LOT 13, BL 2 #780476

Parcel ID: 02-802-07114-00

Introduction

This document is the Maintenance Plan for a cap (concrete slab) at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing cap (concrete slab) occupying the area over the contaminated groundwater plume and soil on-site.

Site-specific information about this property may be found in the September 2011 Closure Request submitted to WDNR. The case file is located in the DNR Northern Regional Office and was submitted to Chris Saari. Information about this Site can be located through BRRTS on the Web (DNR's internet based data base of contaminated sites): <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>

A GIS Registry PDF file for further information on the nature and extent of contamination can be found at through the following link: <http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brts2>; and the DNR project manager for Douglas County is Chris Saari.

Description of Contamination

Soil contaminated by naphthalene is at a depth of two feet below the slab of the maintenance building located at 3116 James Day Avenue. Groundwater contaminated by naphthalene is located at a depth of one foot below the slab of the maintenance building located at 3116 James Day Avenue. The extent of the soil and groundwater contamination is shown on Figure 1 of this appendix.

Description of the Cap to be Maintained

The Cap consists of a one and one-half foot thick concrete slab covering the ground within the building's larger bay. It is located in the storage and maintenance building as shown on Figure 1 of this appendix.

Purpose of Cap

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

Annual Inspection

The cap overlying the contaminated groundwater plume and soil and as depicted in Figure 1 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized] will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included in this appendix and entitled the Cap Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be kept at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources ("WDNR") representatives upon their request.

Maintenance Activities

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

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

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

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

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

or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

Amendment or Withdrawal of Maintenance Plan

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

Contact Information

Date: September 2011

Site Owner and Operator: Nordic Land Superior LLC

Phone #:

Signature: Chris Jensen

(DNR may request signature of affected property owners, on a case-by-case basis)

Property Owner: Nordic Land Superior LLC

Address: PO Box 410 Big Lake, MN 55039

Phone #:

Signature: Chris Jensen

Consultant: Barry Power, NREC

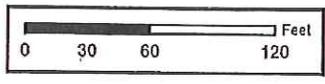
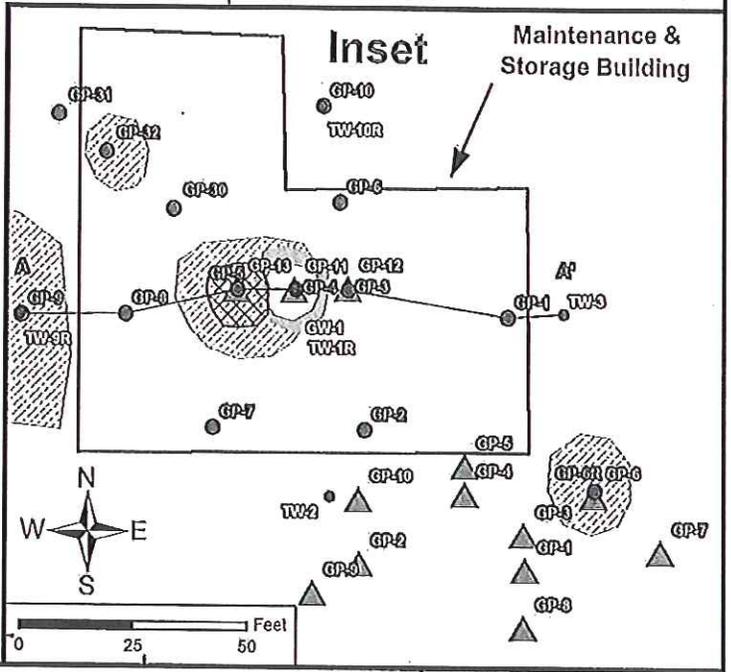
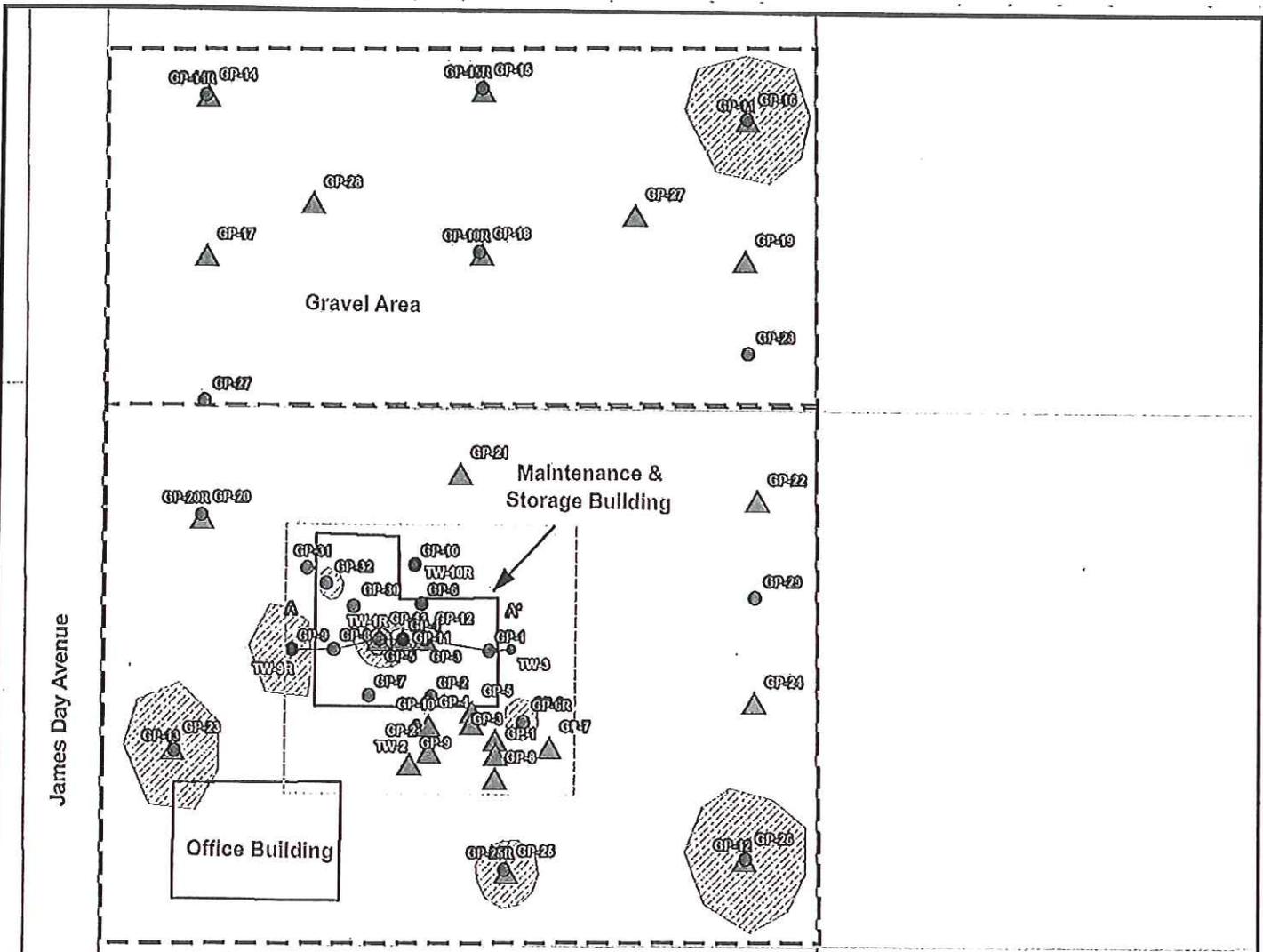
Address: 1409 Hammond Ave. Suite 110 Superior, WI 54880

Phone #: 715-395-5680

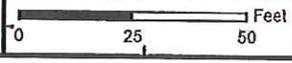
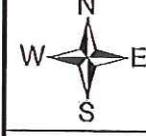
WDNR: Chris Saari, Project Manager

Address: 2501 Golf Course Road Ashland, WI 54806

Phone #: 715-685-2920

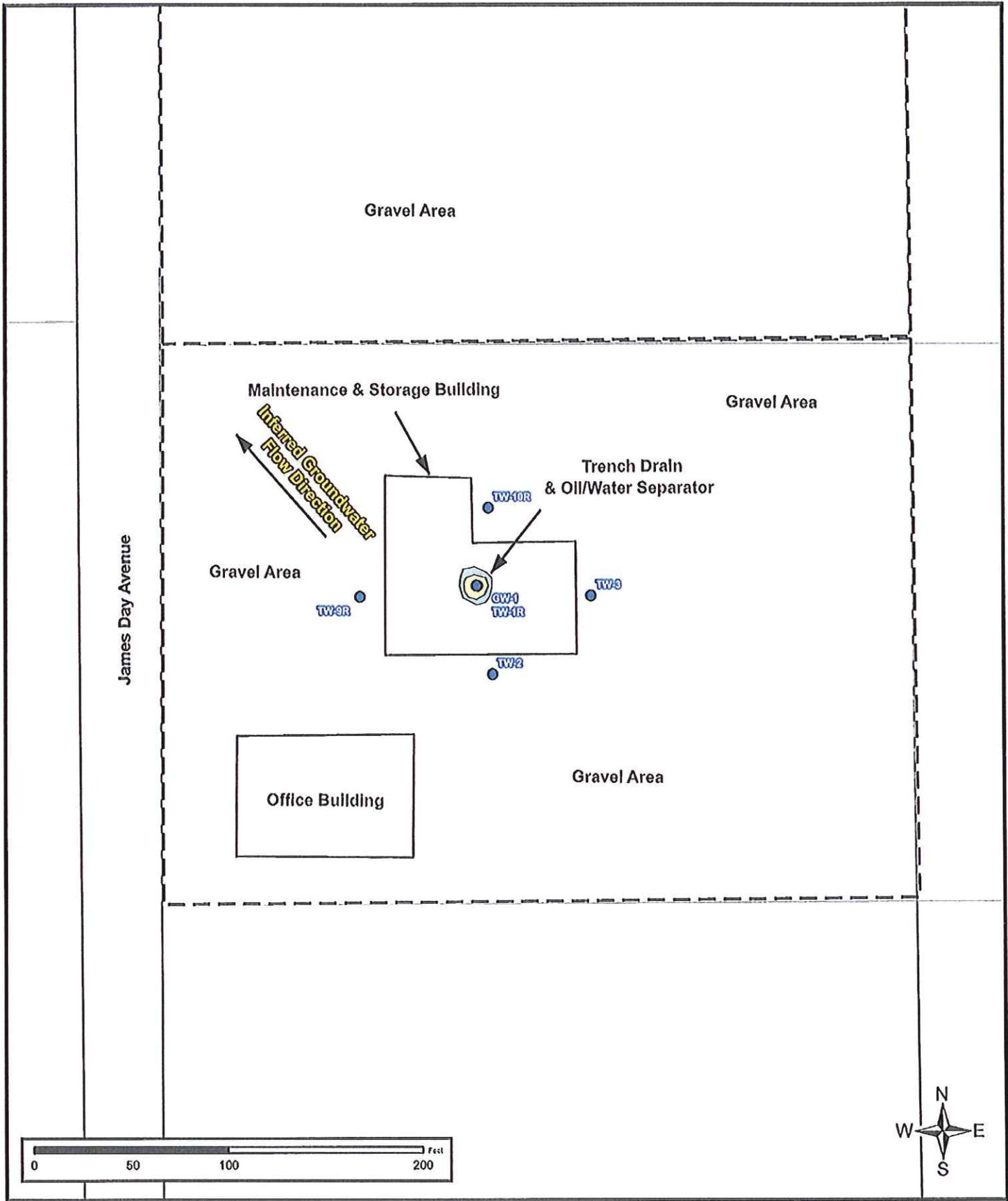


- Legend**
- Approximate Extent of Soil Exceeding Industrial RCL
 - Approximate Extent of Soil Exceeding Non-Industrial RCL
 - Approximate Extent of NR 140 ES Exceedence
 - Approximate Extent of NR 140 PAL Exceedence
 - 2011 NREC Geoprobe Location
 - 2010 AET Geoprobe Location
 - Cross Section A-A'
 - Extent of Inset
 - Nordic Land LLC Property Boundary
 - Adjacent Property Boundary



Nordic Land Superior/Minnesota Limited Property
 Figure 1: Map of Contaminated Properties

DATE ISSUED: 7/14/2011
DATE REVISED: 11/03/2011
SCALE: 1:1,000
DRAWN BY: JPM
SERIES: 715-395-5680



Legend	
	Temporary Monitoring Well
	Approx. Area Exceeding ES (Naphthalene)
	Approx. Area Exceeding PAL (Naphthalene)

Nordic Land Superior/Minnesota Limited Property
 Groundwater Isoconcentration Map

DATE ISSUED: 7/14/2011	
DATE REVISED: 11/03/2011	
SCALE: 1:750	
DRAWN BY: JPM	
SERIES: 715-395-5680	



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary

Ashland Service Center
2501 Golf Course Road
Ashland, Wisconsin 54806
Telephone 715-685-2900
FAX 715-685-2909

January 10, 2012

MR CHRISTOPHER LEINES
PRESIDENT
MINNESOTA LIMITED INC
PO BOX 410
BIG LAKE MN 55309

FILE COPY

Subject: *A Certificate of Completion* for the Environmental Investigation and Cleanup of Property Owned by Nordic Land Superior, LLC at 3116 James Day Avenue, Superior, Wisconsin

Dear Mr. Leines:

The Department of Natural Resources ("the Department") has received your request for issuance of a *Certificate of Completion* for the environmental investigation and cleanup of property owned by Nordic Land Superior, LLC located at 3116 James Day Avenue in Superior, Wisconsin, which will be referred to in this letter as "the Property". You have requested that the Department determine whether Minnesota Limited, Inc. has met the requirements under section 292.15(2), Wisconsin Statutes, for issuance of a *Certificate of Completion*.

The Property is comprised of a rectangular-shaped parcel of real property encompassing approximately 3 acres and is presently owned by Nordic Land Superior, LLC. The property is described on the Warranty Deed (Document Number 780476) recorded at the Douglas County Register of Deeds Office, and identified by Parcel Identification Numbers 02-802-07114-00 and 02-802-07114-01 in the City of Superior, Douglas County, Wisconsin.

Determination

As you are aware, s. 292.15, Wis. Stats., authorizes the Department to issue a *Certificate of Completion* to a voluntary party that conducts an approved environmental investigation of a property and restores the environment to the extent practicable and minimizes the harmful effects with respect to hazardous substance discharges on or originating from the property. Based on the information received 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.

Mr. Christopher Leines – January 10, 2012
Page 2

Conclusions

The Department appreciates the work undertaken by Minnesota Limited, Inc. to investigate and clean up contamination associated with the Property. The exemption provided by the *Certificate of Completion* applies to any successor or assignee of Minnesota Limited, Inc. if the successor or assignee complies with the appropriate conditions, pursuant to s. 292.15(3), Wis. Stats. If you have any questions or concerns regarding this letter or the *Certificate of Completion*, please contact me at 715-685-2920, or by e-mail at Christopher.Saari@Wisconsin.gov.

Sincerely,



Christopher A. Saari
Hydrogeologist

Attachment: *Certificate of Completion*

cc: Land Recycling Program – DNR Madison
Patrick V. Johnson – Speeter & Johnson
Jesse Martus – Natural Resources Engineering Company

State of Wisconsin
Department of Natural Resources

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

Whereas, Minnesota Limited, Inc. has applied for an exemption from liability under s. 292.15, Wis. Stats., for the property located at 3116 James Day Avenue, Superior, Wisconsin, which is commonly referred to as the Nordic Land Superior, LLC site, further described in the legal description found on Attachment A (the "Property");

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

Whereas, Minnesota Limited, Inc. has submitted to the WDNR certain investigation reports and other reports for the Property which comply with the requirements set forth in ch. 292, Wis. Stats., and chs. NR 700-754, Wis. Adm. Code, consisting of the documents and reports listed in Attachment B;

Whereas, in accordance with s. 292.15(2)(ae)1, Wis. Stats., the WDNR has determined that an environmental investigation has been conducted which adequately identified and evaluated the nature and extent of the hazardous substance discharges on and migrating from the Property. The WDNR approved of the site investigation on November 17, 2011;

Whereas, the Property contains soil contamination that exceeds site-specific and generic residual contaminant levels ("RCLs") under ch. NR 720, Wis. Adm. Code, and groundwater contamination that exceeds groundwater quality enforcement standards under ch. NR 140, Wis. Adm. Code. Therefore, the Property will be included on the WDNR's Geographical Information System data base ("the GIS Registry") pursuant to s. 292.12(3), Wis. Stats. **Minnesota Limited, Inc.** has

submitted to the WDNR all the information necessary to be included on the GIS Registry, pursuant to s. NR 726.05(2)(a), Wis. Adm. Code;

Whereas, on November 21, 2011, the WDNR issued a case closure letter for the Property (Attachment C). The owner of this Property shall adhere to, abide by, and maintain the continuing obligations and other requirements that are specified in the attached state case closure letter and maintenance plan. The WDNR requires maintenance of the existing concrete foundation of the site's maintenance and storage building, as this foundation serves as a barrier to prevent direct contact with and infiltration through residual soil contamination that might otherwise pose a threat to public health and the environment. Because residual contamination not under the barrier exceeds non-industrial RCLs, the closure letter also requires that the Property not be used for residential, commercial, agricultural or other non-industrial uses, unless appropriate investigation and remedial actions are taken in accordance with the continuing obligations identified in this document and closure letter. Also, if soil with residual contamination is excavated in the future, the Property owner at the time of excavation must manage the soil in accordance with applicable laws;

Whereas, the WDNR has determined that the response action is complete and is based on the Property being used as an industrial facility. In the event that the foundation barrier that currently exists is removed, the replacement barrier must be equally protective. Because of the residual contamination and certain continuing obligations for this Property, before use of this site can be changed to non-industrial use, notification to the WDNR is required at a minimum prior to understanding such a land use change. Additional sampling and/or cleanup may be required to ensure that the residual contamination levels, existing remedial action and land use is protective;

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

Whereas, **Nordic Land Superior, LLC** has paid to WDNR the appropriate insurance fee and has submitted a complete insurance application form to obtain coverage for the Property under the state's master insurance contract in accordance with s. 292.15(2)(ae)3m., Wis. Stats., and ch. NR 754, Wis. Adm. Code, based on their desire to use natural attenuation to remediate groundwater contamination that exceeds ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standards;

Whereas, on November 21, 2011, the WDNR determined that response actions necessary to restore the environment were completed, except with respect to

groundwater contaminated with naphthalene above the ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standard. The WDNR has determined that this groundwater contamination will be brought into compliance through natural attenuation, in accordance with administrative rules promulgated by the WDNR.

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

Upon issuance of this Certificate, **Minnesota Limited, Inc.** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to the existence of hazardous substances on or originating from the Property, the release of which occurred prior to the date the WDNR approved the environmental investigation required under s. 292.15(2)(ae)1., Wis. Stats. However, the person who owns or controls the Property would no longer qualify for this liability exemption if that person fails to maintain or monitor the Property as required by the conditions in this Certificate, the November 21, 2011 case closure letter, s. 292.12, Wis. Stats., and administrative rules promulgated by the WDNR. Any discharges 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.

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

The protection from liability provided under s. 292.15(2), Wis. Stats., does not apply to any person who has obtained a Certificate of Completion by fraud or misrepresentation, or by knowingly failing to disclose material information or under circumstances in which **Minnesota Limited, Inc.** 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 6th day of January, 2012.


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

**ATTACHMENT A
LEGAL DESCRIPTION
Nordic Land Superior, LLC, 3116 James Day Avenue, Superior, Wisconsin**

See attached Warranty Deed Document # 780476 recorded with the Douglas County Register of Deeds Office on January 10, 2005.

780476

EXHIBIT A

1. Real estate taxes and assessments not yet due and payable.
2. Subject to limitations and restrictions as set out in Notice of Contamination to Property dated June 16, 2003, filed August 19, 2004, as Document No. 775590.
3. Restrictive covenants and easements contained in the following deeds from the City of Superior, to wit: Volume 442 of Records, page 54 and Volume 467 of Records, page 838.

780476

EXHIBIT A

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ATTACHMENT C
Closure Letter and Cap Maintenance Plan
Nordic Land Superior, LLC, 3116 James Day Avenue, Superior, Wisconsin

See Attached November 21, 2011 Case Closure Letter and cap maintenance plan for the **Nordic Land Superior, LLC** site.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary

Ashland Service Center
2501 Golf Course Road
Ashland, Wisconsin 54806
Telephone 715-685-2900
FAX 715-685-2909

January 10, 2012

FILE COPY

MR CHRISTOPHER LEINES
NORDIC LAND SUPERIOR LLC
PO BOX 410
BIG LAKE MN 55309

Subject: *A Certificate of Completion* for the Environmental Investigation and Cleanup of Property Owned by Nordic Land Superior, LLC at 3116 James Day Avenue, Superior, Wisconsin

Dear Mr. Leines:

The Department of Natural Resources ("the Department") has received your request for issuance of a *Certificate of Completion* for the environmental investigation and cleanup of property owned by Nordic Land Superior, LLC located at 3116 James Day Avenue in Superior, Wisconsin, which will be referred to in this letter as "the Property". You have requested that the Department determine whether Nordic Land Superior, LLC has met the requirements under section 292.15(2), Wisconsin Statutes, for issuance of a *Certificate of Completion*.

The Property is comprised of a rectangular-shaped parcel of real property encompassing approximately 3 acres and is presently owned by Nordic Land Superior, LLC. The property is described on the Warranty Deed (Document Number 780476) recorded at the Douglas County Register of Deeds Office, and identified by Parcel Identification Numbers 02-802-07114-00 and 02-802-07114-01 in the City of Superior, Douglas County, Wisconsin.

Determination

As you are aware, s. 292.15, Wis. Stats., authorizes the Department to issue a *Certificate of Completion* to a voluntary party that conducts an approved environmental investigation of a property and restores the environment to the extent practicable and minimizes the harmful effects with respect to hazardous substance discharges on or originating from the property. Based on the information received 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.

Mr. Christopher Leines – January 10, 2012
Page 2

Conclusions

The Department appreciates the work undertaken by Nordic Land Superior, LLC to investigate and clean up contamination associated with the Property. The exemption provided by the *Certificate of Completion* applies to any successor or assignee of Nordic Land Superior, LLC if the successor or assignee complies with the appropriate conditions, pursuant to s. 292.15(3), Wis. Stats. If you have any questions or concerns regarding this letter or the *Certificate of Completion*, please contact me at 715-685-2909, or by e-mail at Christopher.Saari@Wisconsin.gov.

Sincerely,



Christopher A. Saari
Hydrogeologist

Attachment: *Certificate of Completion*

cc: Land Recycling Program – DNR Madison
Patrick V. Johnson – Speeter & Johnson
Jesse Martus – Natural Resources Engineering Company

State of Wisconsin
Department of Natural Resources

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

Whereas, **Nordic Land Superior, LLC** has applied for an exemption from liability under s. 292.15, Wis. Stats., for the property located at 3116 James Day Avenue, Superior, Wisconsin, which is commonly referred to as the Nordic Land Superior, LLC site, further described in the legal description found on Attachment A (the "Property");

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

Whereas, **Nordic Land Superior, LLC** has submitted to the WDNR certain investigation reports and other reports for the Property which comply with the requirements set forth in ch. 292, Wis. Stats., and chs. NR 700-754, Wis. Adm. Code, consisting of the documents and reports listed in Attachment B;

Whereas, in accordance with s. 292.15(2)(ae)1, Wis. Stats., the WDNR has determined that an environmental investigation has been conducted which adequately identified and evaluated the nature and extent of the hazardous substance discharges on and migrating from the Property. The WDNR approved of the site investigation on November 17, 2011;

Whereas, the Property contains soil contamination that exceeds site-specific and generic residual contaminant levels ("RCLs") under ch. NR 720, Wis. Adm. Code, and groundwater contamination that exceeds groundwater quality enforcement standards under ch. NR 140, Wis. Adm. Code. Therefore, the Property will be included on the WDNR's Geographical Information System data base ("the GIS Registry") pursuant to s. 292.12(3), Wis. Stats. **Nordic Land Superior, LLC** has

submitted to the WDNR all the information necessary to be included on the GIS Registry, pursuant to s. NR 726.05(2)(a), Wis. Adm. Code;

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Whereas, **Nordic Land Superior, LLC** has paid to WDNR the appropriate insurance fee and has submitted a complete insurance application form to obtain coverage for the Property under the state's master insurance contract in accordance with s. 292.15(2)(ae)3m., Wis. Stats., and ch. NR 754, Wis. Adm. Code, based on their desire to use natural attenuation to remediate groundwater contamination that exceeds ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standards;

Whereas, on November 21, 2011, the WDNR determined that response actions necessary to restore the environment were completed, except with respect to

groundwater contaminated with naphthalene above the ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standard. The WDNR has determined that this groundwater contamination will be brought into compliance through natural attenuation, in accordance with administrative rules promulgated by the WDNR.

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Upon issuance of this Certificate, **Nordic Land Superior, LLC** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to the existence of hazardous substances on or originating from the Property, the release of which occurred prior to the date the WDNR approved the environmental investigation required under s. 292.15(2)(ae)1., Wis. Stats. However, the person who owns or controls the Property would no longer qualify for this liability exemption if that person fails to maintain or monitor the Property as required by the conditions in this Certificate, the November 21, 2011 case closure letter, s. 292.12, Wis. Stats., and administrative rules promulgated by the WDNR. Any discharges 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.

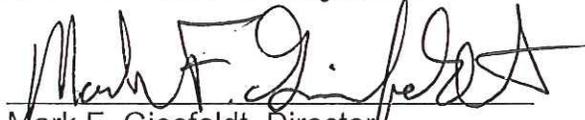
If natural attenuation of contaminated groundwater fails, the insurance coverage under s. 292.15(2)(ae)3m., Wis. Stats., may be used by the State of Wisconsin to cover the costs of complying with s. 292.11(2), Wis. Stats., with respect to groundwater quality.

The protection from liability provided under s. 292.15(2), Wis. Stats., does not apply to any person who has obtained a Certificate of Completion by fraud or misrepresentation, or by knowingly failing to disclose material information or under circumstances in which **Nordic Land Superior, LLC** 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 7th day of December, 2011.

A handwritten signature in black ink, appearing to read "Mark F. Giesfeldt", written over a horizontal line.

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

**ATTACHMENT A
LEGAL DESCRIPTION
Nordic Land Superior, LLC, 3116 James Day Avenue, Superior, Wisconsin**

See attached Warranty Deed Document # 780476 recorded with the Douglas County Register of Deeds Office on January 10, 2005.

780476

EXHIBIT A

1. Real estate taxes and assessments not yet due and payable.
2. Subject to limitations and restrictions as set out in Notice of Contamination to Property dated June 16, 2003, filed August 19, 2004, as Document No. 775590.
3. Restrictive covenants and easements contained in the following deeds from the City of Superior, to wit: Volume 442 of Records, page 54 and Volume 467 of Records, page 838.

ATTACHMENT B
INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS
Nordic Land Superior, LLC, 3116 James Day Avenue, Superior, Wisconsin

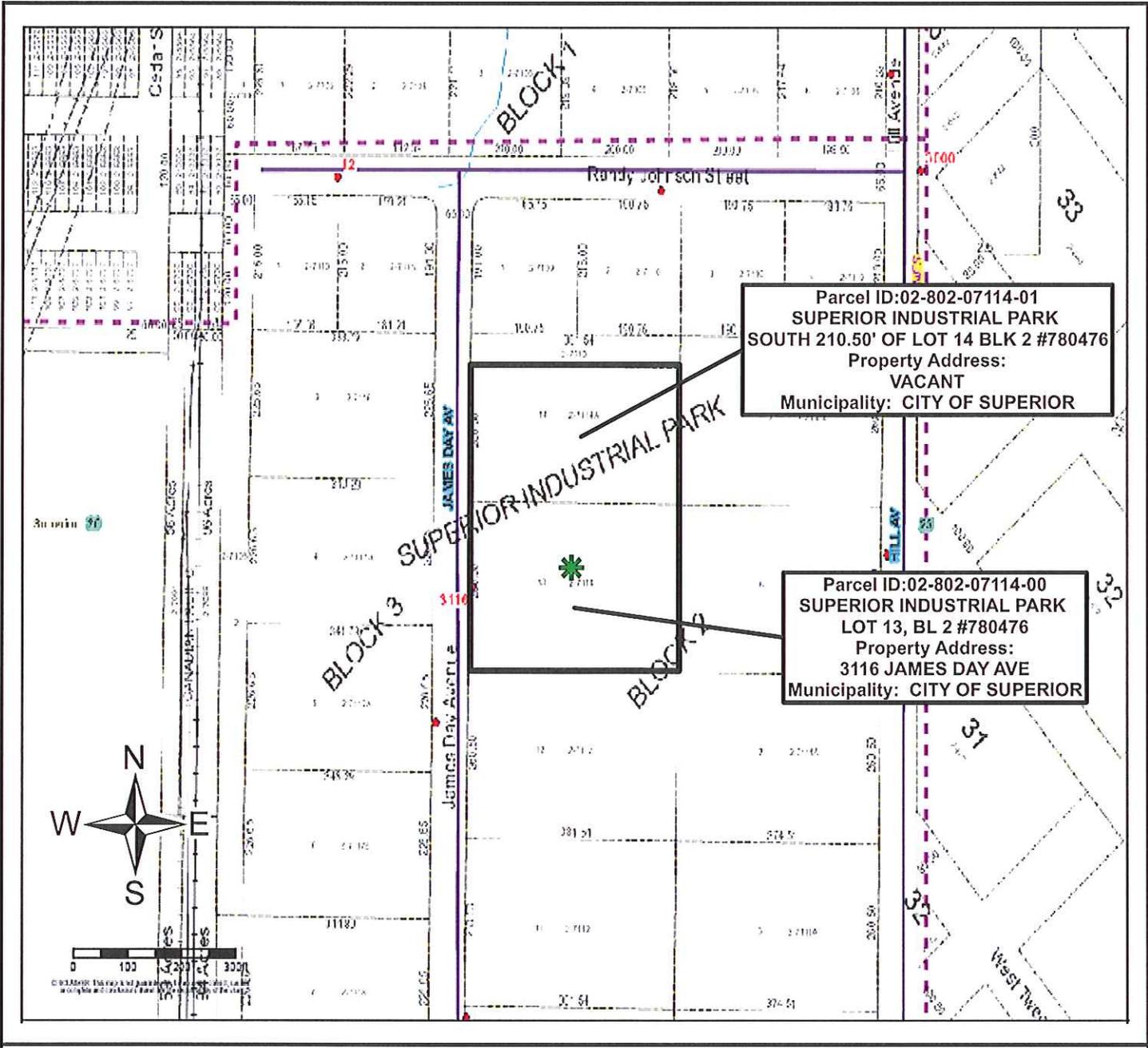
1. Request for Site Closure – Additional Information, Koch Trucking Site, dated December 11, 2001, prepared by Environmental Troubleshooters, Inc.
2. Conditional Case Closure letter, Koch Twin Ports Trucking, 3116 James Day Avenue, Superior, Wisconsin, dated January 10, 2002, prepared by the Wisconsin Department of Commerce
3. Final Closure letter, Koch Twin Ports Trucking, 3116 James Day Avenue, Superior, Wisconsin, dated August 24, 2004, prepared by the Wisconsin Department of Commerce
4. Phase II Environmental Site Assessment Report, 3116 James Day Avenue, Superior, Minnesota (sic), dated October 26, 2004, prepared by Environmental Troubleshooters, Inc.
5. Letter report entitled Former Koch Trucking Property, WDNR BRRTS #03-16-210611 (Site Closed), Request for Removal of Notice of Contamination from the Property Deed, dated September 9, 2005, prepared by Natural Resources Engineering Company
6. Phase I Environmental Site Assessment, Minnesota Limited, Inc. Property, dated November 24, 2010, prepared by American Engineering Testing, Inc.
7. Report of Phase II Environmental Site Assessment, Minnesota Limited, Inc. Property, (DRAFT), dated December 23, 2010, prepared by American Engineering Testing, Inc.
8. Site Investigation Workplan, Nordic Land Superior/MN Limited Property, dated June 27, 2011, prepared by Natural Resources Engineering Company
9. Case Closure Request: Nordic Land Superior/MN Limited Property, dated September 30, 2011, prepared by Natural Resources Engineering Company
10. Case Closure Request: Nordic Land Superior/MN Limited Property, dated November 4, 2011, prepared by Natural Resources Engineering Company

ATTACHMENT C
Closure Letter and Cap Maintenance Plan
Nordic Land Superior, LLC, 3116 James Day Avenue, Superior, Wisconsin

See Attached November 21, 2011 Case Closure Letter and cap maintenance plan for the **Nordic Land Superior, LLC** site.

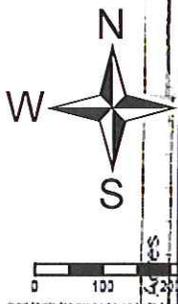
EXHIBIT A

1. Real estate taxes and assessments not yet due and payable.
2. Subject to limitations and restrictions as set out in Notice of Contamination to Property dated June 16, 2003, filed August 19, 2004, as Document No. 775590.
3. Restrictive covenants and easements contained in the following deeds from the City of Superior, to wit: Volume 442 of Records, page 54 and Volume 467 of Records, page 838.



Parcel ID:02-802-07114-01
SUPERIOR INDUSTRIAL PARK
 SOUTH 210.50' OF LOT 14 BLK 2 #780476
 Property Address:
 VACANT
 Municipality: CITY OF SUPERIOR

Parcel ID:02-802-07114-00
SUPERIOR INDUSTRIAL PARK
 LOT 13, BL 2 #780476
 Property Address:
 3116 JAMES DAY AVE
 Municipality: CITY OF SUPERIOR



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Legend
 * Site Location

Nordic Land Superior/Minnesota Limited Property
 Certified Survey Map

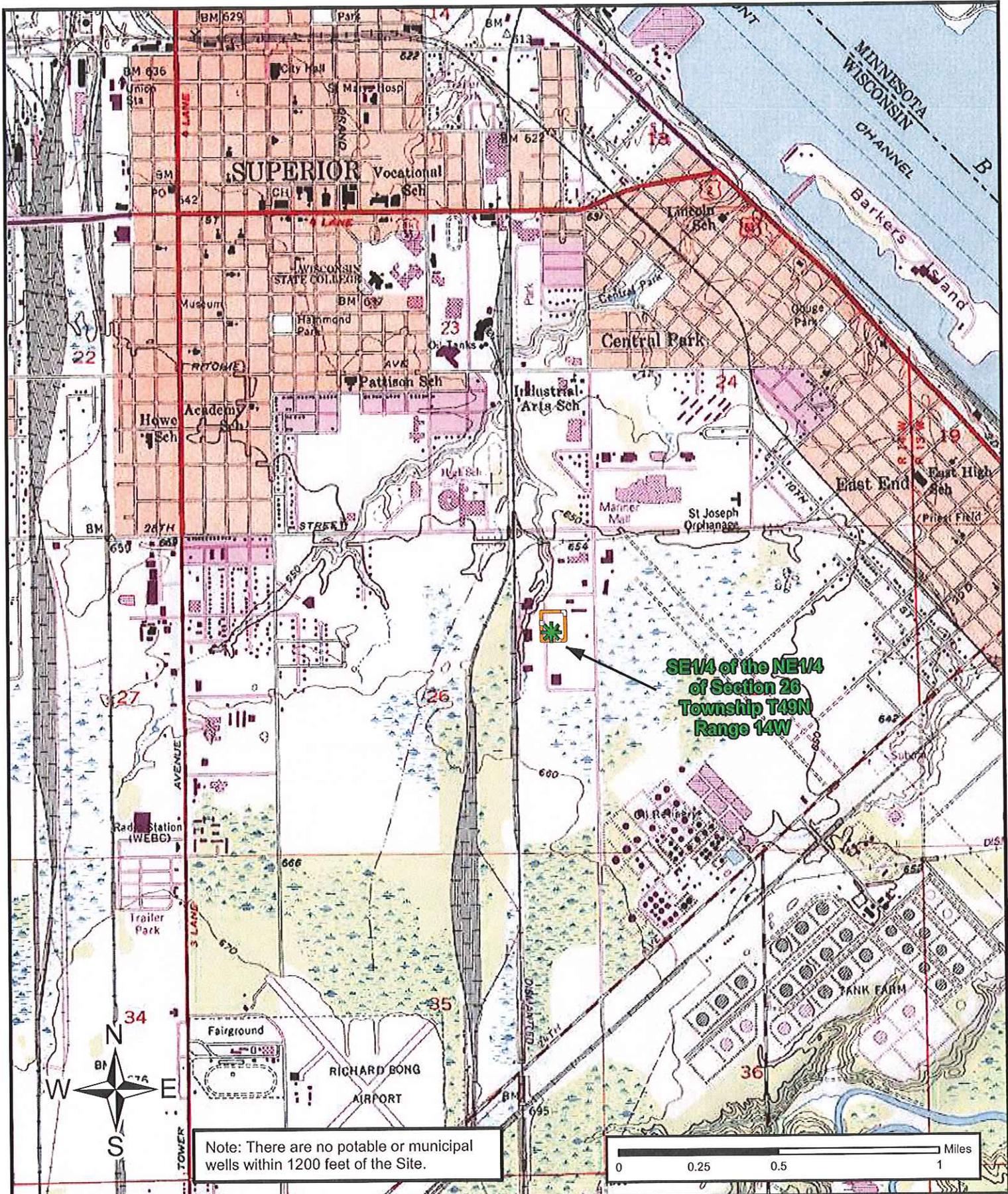
DATE ISSUED: 9/8/2011
 DATE REVISED: Natural Resources
 SCALE: 1:2,700
 DRAWN BY: JPM Engineering Co.
 SERIES: 715-395-5680

Responsible Party
Legal Property Boundary Certification

Nordic Land Superior LLC Property
3116 James Day Avenue
Superior, Wisconsin 54880

I, Christopher Leines (print) hereby certify that the legal descriptions attached to this statement are complete and accurate for all of the properties within or partially within the contaminate site's boundaries that have groundwater contamination exceeding WI Ch. NR 140 enforcement standards and soil contamination that exceeds WI Ch. NR 720 residual soil contamination concentrations at the time site closure it being requested.

Signed by Responsible Party: Chris T Leines Date: 11-7-11

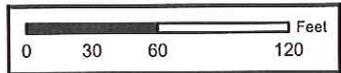
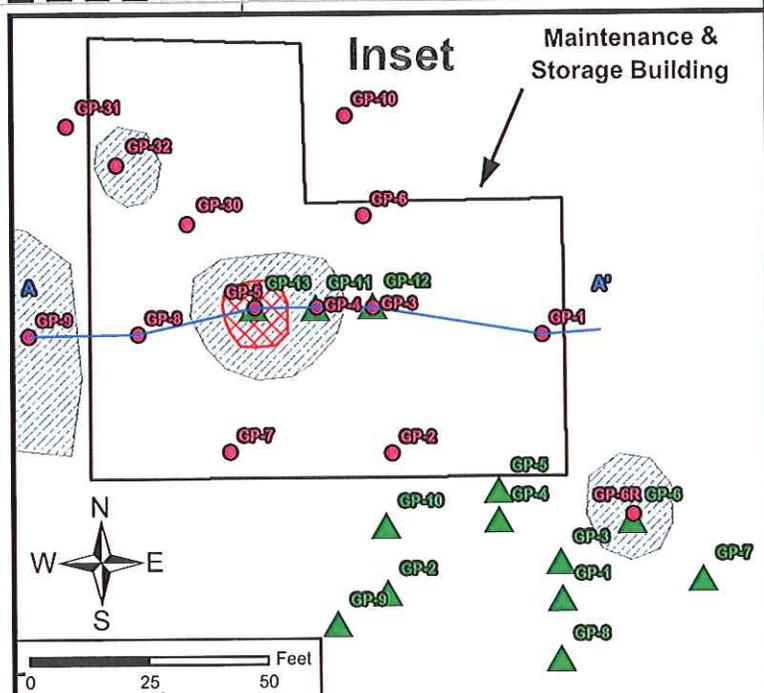
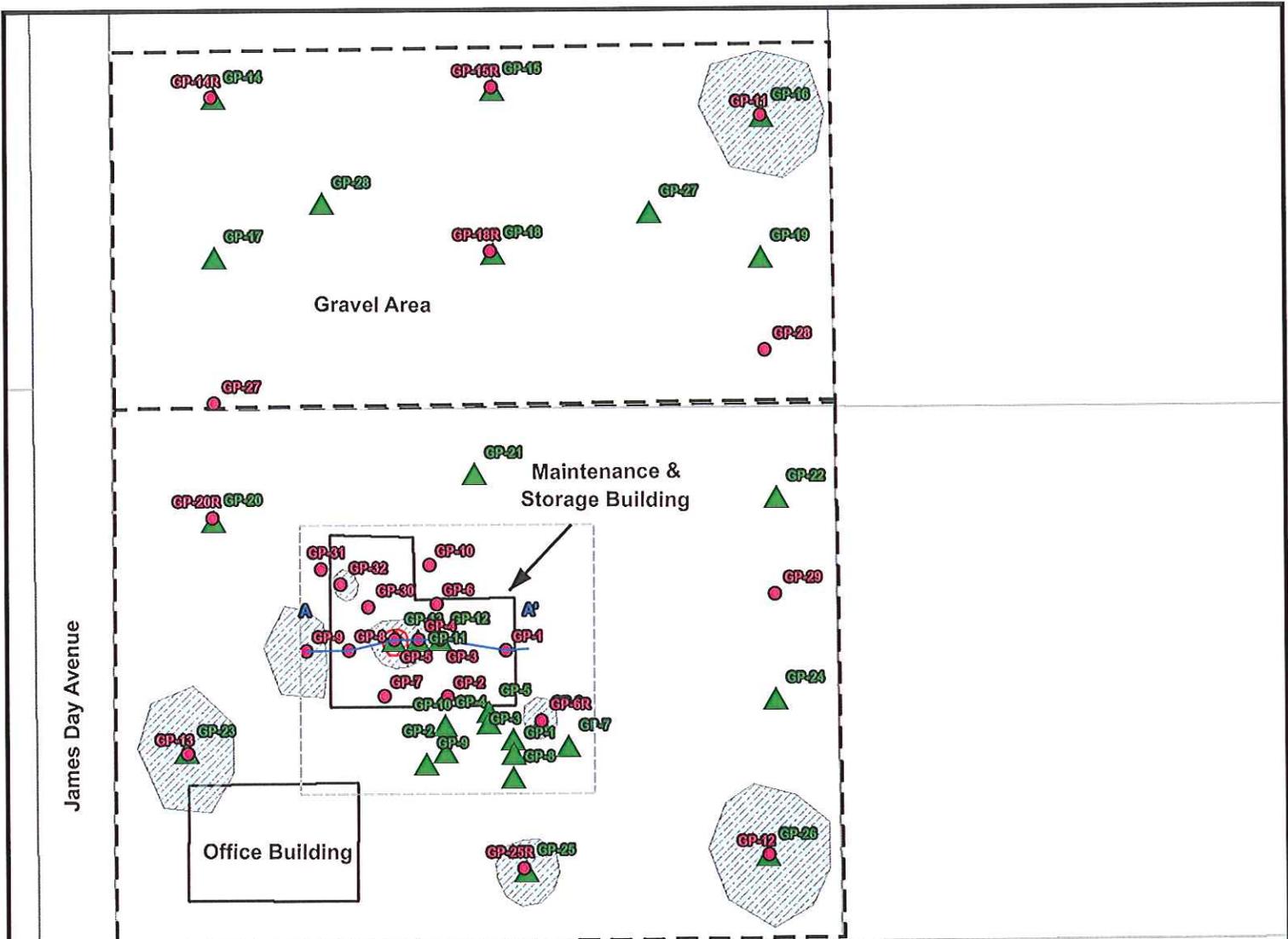


- Legend**
- Site Location
 - Property Outline

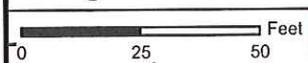
Nordic Land Superior/Minnesota Limited Property

Site Location Map

DATE ISSUED: 6/14/2011	
DATE REVISED:	Natural Resources
SCALE: 1:24,000	
DRAWN BY: JPM	Engineering Co.
SERIES:	715-395-5680



- Legend**
- Approximate Extent of Soil Exceeding Industrial RCL
 - Approximate Extent of Soil Exceeding Non-Industrial RCL
 - 2011 NREC Geoprobe Location
 - 2010 AET Geoprobe Location
 - Cross Section A-A'
 - Extent of Inset
 - Nordic Land LLC Property Boundary
 - Adjacent Property Boundary



James Day Avenue

Gravel Area

Maintenance & Storage Building

Office Building

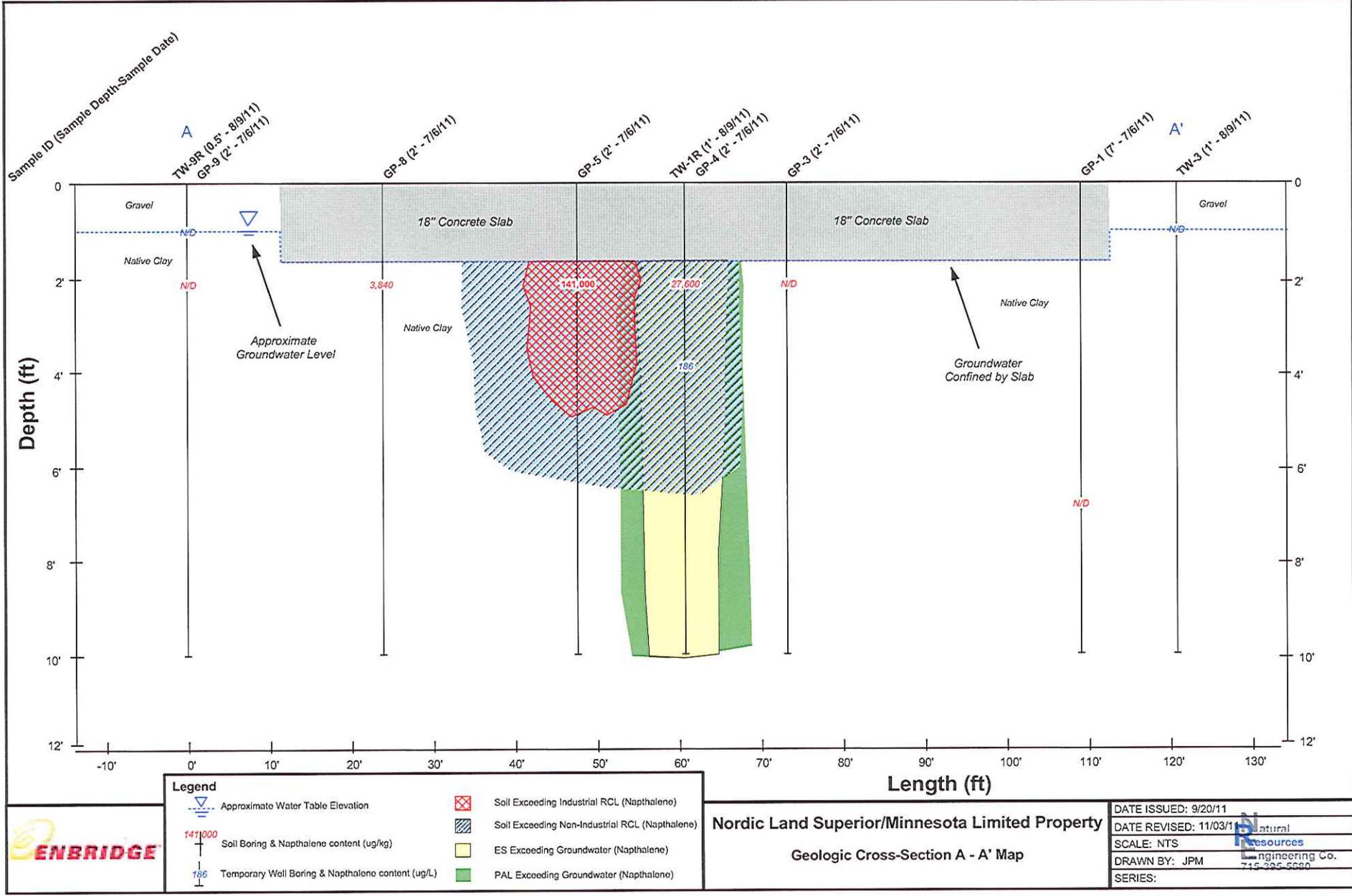
Inset

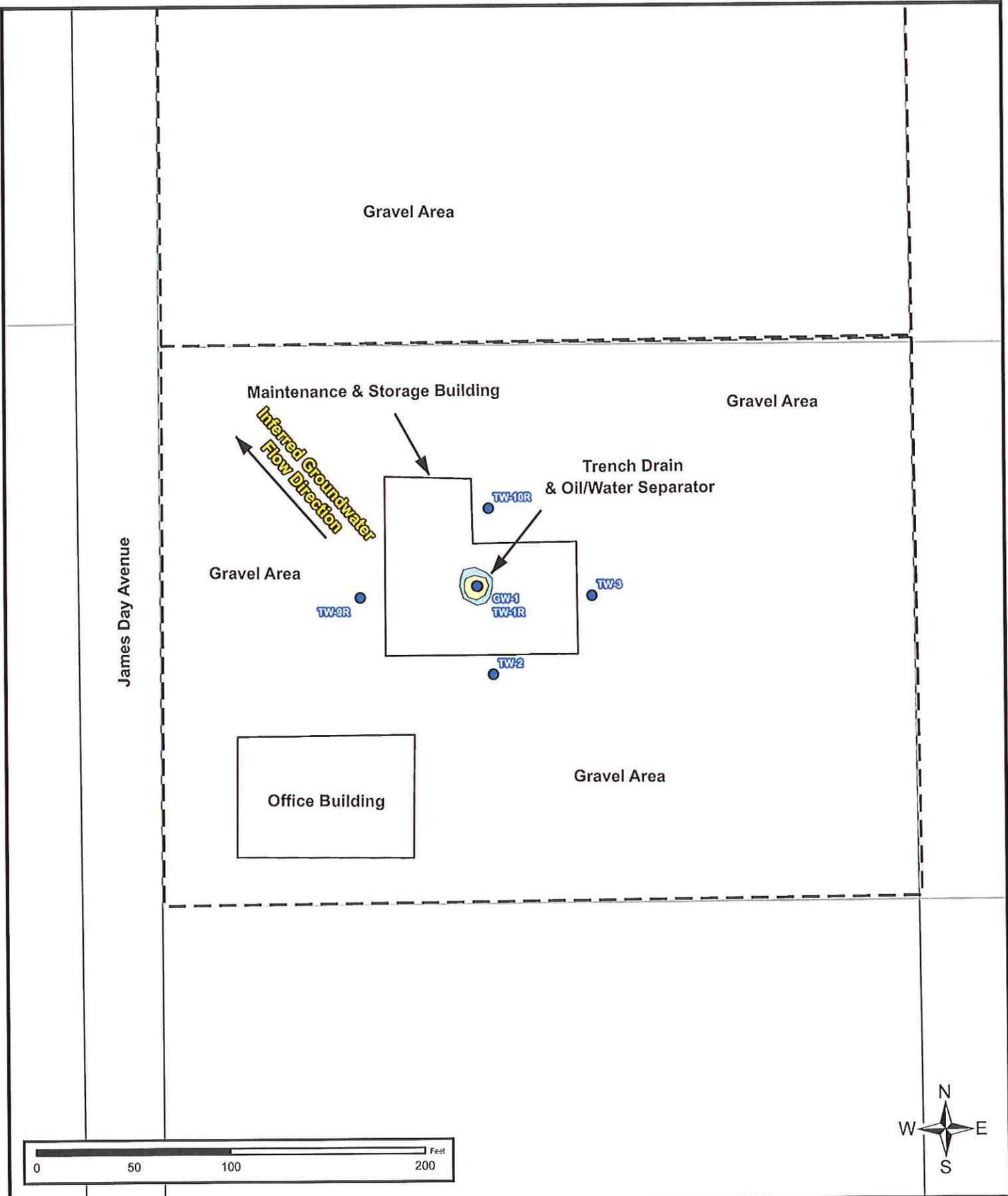
Maintenance & Storage Building

Nordic Land Superior/Minnesota Limited Property
Soil Contamination Contour Map

DATE ISSUED: 7/14/2011
DATE REVISED: 11/08/2011
SCALE: 1:1,000
DRAWN BY: JPM
SERIES: 715-395-5680



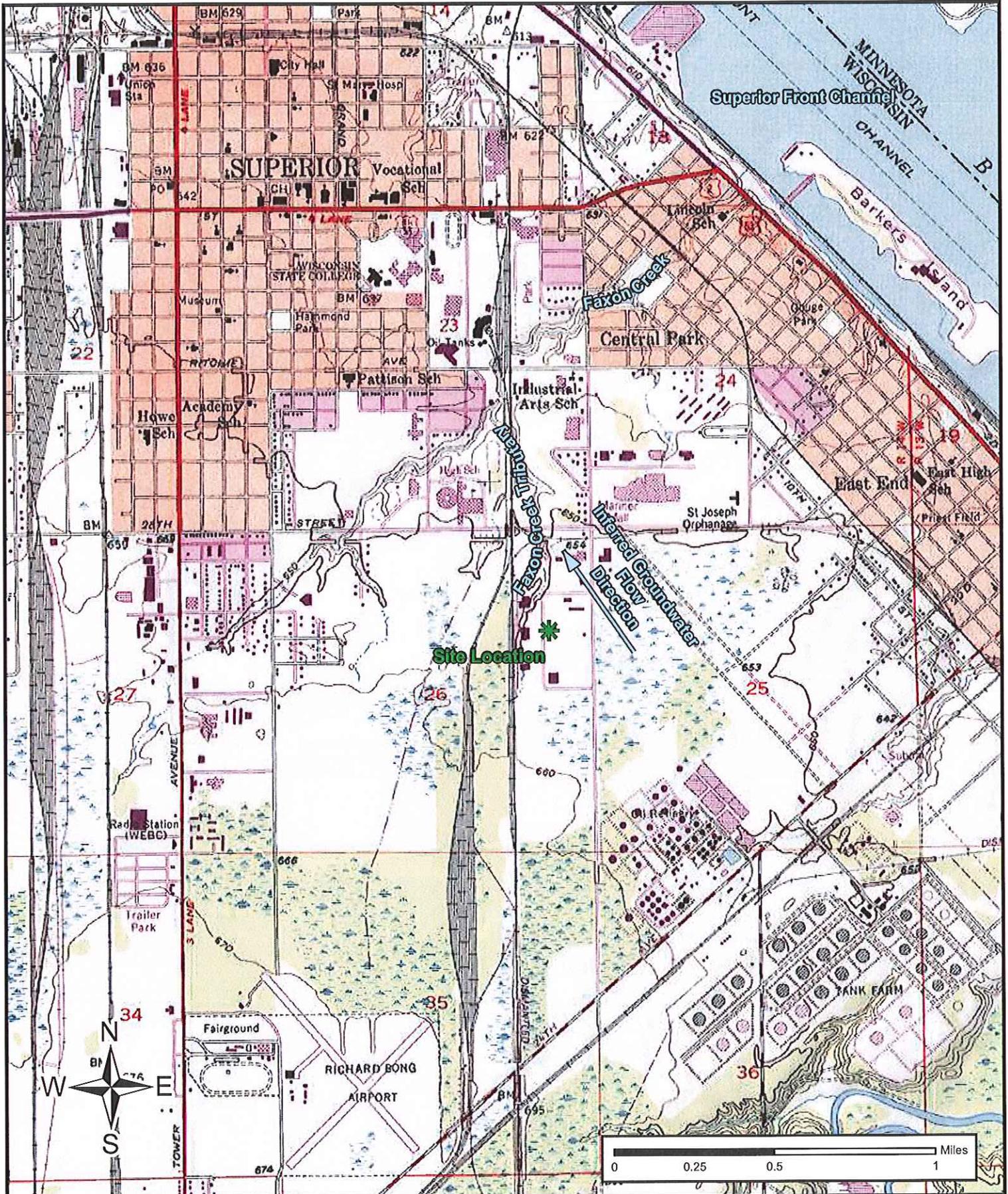




Legend	
	Temporary Monitoring Well
	Approx. Area Exceeding ES (Napthalene)
	Approx. Area Exceeding PAL (Napthalene)

Nordic Land Superior/Minnesota Limited Property
 Groundwater Isoconcentration Map

DATE ISSUED: 7/14/2011	
DATE REVISED: 11/06/2011	
SCALE: 1:750	
DRAWN BY: JPM	
SERIES: 715-395-5680	



Legend
 Site Location

Nordic Land Superior/Minnesota Limited Property
 Groundwater Flow Direction Map

DATE ISSUED: 9/7/2011
 DATE REVISED:
 SCALE: 1:24,000
 DRAWN BY: JPM
 SERIES: 715-395-5680



**Table 1: 2011 Soil Analytical Results (EPA Test Method 8260)
MN Limited, LLC - Nordic Land Superior/ MN Limited Property**

Location	Sample Depth (ft)	Date	Methylene Chloride (µg/kg)	1,3,5-Trimethylbenzene (µg/kg)	1,2,4-Trimethylbenzene (µg/kg)	p-Isopropyltoluene (µg/kg)	Naphthalene (µg/kg)	Ethylbenzene (µg/kg)	Isopropylbenzene (Cumene) (µg/kg)	Propylbenzene (µg/kg)	sec-Butylbenzene (µg/kg)
Groundwater Pathway RCL			1.60E+06	6.60E+03	1.40E+04		400	770	3.7E+04		
Non-Industrial Direct Contact RCL			3.32E+06	1.82E+05	2.19E+05	1.62E+05	2.00E+04	4.80E+05	2.68E+05	2.64E+05	1.45E+05
Industrial RCL			N/A	N/A	N/A	N/A	1.10E+05	N/A	N/A	N/A	N/A
GP-1	7	7/6/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-2	7	7/6/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-3	2	7/6/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-4	2	7/6/2011	N/D	N/D	3,920	376J	27,600	N/D	N/D	N/D	N/D
GP-5	2	7/6/2011	N/D	2,190	18,500	1170J	141,000	N/D	N/D	N/D	N/D
GP-6	2	7/6/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-7	2	7/6/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-8	2	7/6/2011	N/D	N/D	N/D	N/D	3,840	N/D	N/D	N/D	N/D
GP-9	2	7/12/2011	65	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-10	2	7/12/2011	109	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-11	2	7/12/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GP-12	2	7/12/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GP-13	2	7/12/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GP-20R	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-27	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-14R	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-15R	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-18R	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-28	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-29	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-25R	3.0	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-6R	3.0	10/26/11	N/D	N/D	N/D	459	N/D	39.5J	87.5	157	440
GP-31	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-32	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-30	2.5	10/26/11	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D

*The red dots in Figure 2 correspond with the results in this table.

Notes:

Figures in bold and italics represent Industrial RCL exceedences.

Figures in italics exceed the standard for the Groundwater Pathway.

Figures in bold represent Non-Industrial RCL exceedences.

DRO is an indicator parameter, therefore sample figures with findings above NR720 Guidance are not bolded or italicized.

Non-Industrial Direct Contact RCLs were soil saturation levels derived from the EPA's Regional Screening Levels for Chemical Contaminants at Superfund Sites.

Industrial RCLs for Naphthalene are those listed in "Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance"

Industrial RCL calculations for the remaining compounds were not pursued since all levels fell below Non-Industrial RCL criteria.

N/D indicates results fell below detection limits.

N/A indicates the data is not available.

Only compounds with detectable levels from lab analysis 8260 are listed in this table.

The EPA does not provide a means to determine the groundwater pathway RCLs for all the compounds listed in the table.

Table 2: 2011 Soil Analytical Results: (EPA Test Method 8270)
 MN Limited, LLC - Nordic Land Superior/ MN Limited Property

Location	Sample Depth (ft)	Date	DRO (mg/kg)	Acenaphthene (µg/kg)	Acenaphthylene (µg/kg)	Anthracene (µg/kg)	Benzo (a) anthracene (µg/kg)	Benzo (b) pyrene (µg/kg)	Benzo (b) fluoranthene (µg/kg)	Benzo (g,h,i) perylene (µg/kg)	Benzo (k) fluoranthene (µg/kg)	Chrysene (µg/kg)	Dibenz (a,h) anthracene (µg/kg)	Fluoranthene (µg/kg)	Fluorene (µg/kg)	Indeno (1,2,3-cd) pyrene (µg/kg)	1-Methylpyrene (µg/kg)	2-Methylpyrene (µg/kg)	Naphthalene (µg/kg)	Phenanthrene (µg/kg)	Pyrene (µg/kg)
NR 720 Generic RCL			250	3,00E+04	700	3,00E+06	2,E+04	48	3,60E+05	6,80E+06	8,70E+05	3,70E+04	3,80E+04	5,00E+05	1,00E+05	6,80E+05	2,30E+04	2,90E+04	400	1,800	8,70E+06
Groundwater Pathway RCL				9,00E+05	1,80E+04	5,00E+06	88	8.8	88	1,800	880	8,800	8.8	6,00E+05	6,00E+05	88	1,10E+06	6,00E+05	2,00E+04	1,80E+04	5,00E+05
Non-Industrial RCL (µg/kg)				6,00E+07	3,00E+05	3,00E+08	3,000	390	3,900	3,9E+04	3,90E+04	3,90E+05	390	4,00E+07	4,00E+07	3,900	7,90E+07	4,60E+07	1,10E+05	3,90E+05	3,00E+07
Industrial RCL (µg/kg)																					
GP-1	7	7/8/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-2	7	7/8/2011	2	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-3	2	7/8/2011	0.74J	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	205J	N/D	N/D	2,200	2,050	14,600
GP-4	2	7/8/2011	3,860	146J	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	454	788	7,030
GP-5	2	7/8/2011	10,100	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-6	2	7/8/2011	27	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-7	2	7/8/2011	2	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-8	2	7/8/2011	530	N/D	N/D	N/D	N/D	4.4J	N/D	5.4J	N/D	5.4J	N/D	N/D	N/D	N/D	N/D	13.5J	4.3J	38	7.2J
GP-9	2	7/12/2011	N/D	N/D	N/D	N/D	0.1J	35.3J	19.0J	43	30.9J	32.5J	12.8J	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-10	2	7/12/2011	2	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-11	2	7/12/2011	N/A	25.2J	18.5J	35	272	312	242	154	262	263	64	607	24.3J	140	11.7J	6.5J	10.1J	310	501
GP-12	2	7/12/2011	N/A	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-13	2	7/12/2011	N/A	N/D	N/D	N/D	3.4J	N/D	N/D	N/D	N/D	N/D	N/D	N/D	0.047J	N/D	N/D	N/D	56	115	129
GP-14	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-20R	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-27	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-14R	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-15R	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-18R	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-26	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-29	2.5	10/26/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D
GP-25R	3.0	10/26/2011	63.1	N/D	N/D	N/D	0.2J	45.1	33.1	11.2J	44.6	8.8J	N/D	N/D	N/D	17.7J	N/D	3.6J	N/D	N/D	29.9
GP-6R	3.0	10/26/2011	61.5	31.7	12.0J	30.8	17.0J	18.5J	13.8J	11.0J	15.6J	17.4J	N/D	31.9	73.7	8.5J	91.9	13.0J	41.7	102.0	48.8
GP-31	2.5	10/26/2011	8.0	N/D	N/D	N/D	N/D	3.4J	3.1J	4.4J	N/D	4.5J	N/D	N/D	N/D	2.4J	3.5J	7.4J	5.8J	N/D	N/D
GP-32	2.5	10/26/2011	21.8	N/D	N/D	N/D	N/D	10.8J	6.0J	17.7J	5.7J	6.0J	N/D	N/D	N/D	7.8J	5.4J	10.7J	N/D	N/D	7.6J
GP-40	2.5	10/26/2011	735.0	N/D	N/D	4.0J	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	3.0J	6.0J	25.2	N/D	N/D

Notes:
 Figures in bold and italics represent Industrial RCL exceedances.
 Figures in italics exceed the standard for the Groundwater Pathway.
 Figures in bold represent Non-Industrial RCL exceedances.
 DRO is an indicator parameter, therefore sample figures with findings above NR720 Guidance are not bolded or italicized.

Table 2.A
 Summary of Soil Analytical Results
 DRO and PAHs
 MN Ltd, Inc. Property, 3116 James Day Avenue, Superior, WI
 AET No. 03-03930.S.II
 (results in mg/kg)

Sample Location	GP-1		GP-2		GP-3		GP-4		GP-5		GP-6		GP-7	GP-8	GP-9	GP-10	GP-11		GP-12		RCL
Sample Depth (ft)	10 to 12	18 to 20	8 to 10	14 to 16	12 to 14	18 to 20	9	15 to 16	12 to 13	25	3	14 to 16	12 to 14	12 to 14	16	16	1½ to 2	6 to 8	1½ to 2	6 to 8	
DRO	48.6	<12.8	52.7	<10.4	10.9	<11.3	<11.0	<10.9	<11.6	<11.6	3530	<11.6	<11.9	<11.3	<11.8	<11.4	9060	<12.1	217	<11.0	100/250*
PAH	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		ND	ND	ND	100/250*
Acenaphthene																	0.286				60,000
Anthracene																	0.155				300,000
Benzo(a) anthracene																	ND				3.9
Benzo(a) pyrene																	ND				0.39
Benzo(b)fluoranthene																	ND				3.9
Benzo(g,h,i)perylene																	ND				39
Benzo(k)fluoranthene																	ND				39
Chrysene																	ND				390
Fluoranthene																	ND				40,000
Fluorene																	0.446				40,000
Indeno(1,2,3-cd)pyrene																	ND				3.9
Naphthalene																	38.3				110
Phenanthrene																	0.987				390
Pyrene																	0.165				30,000

Sample Location	GP-13		GP-14	GP-15	GP-16	GP-17	GP-18	GP-19	GP-20	GP-21	GP-22	GP-23	GP-24	GP-25	GP-26	GP-27	GP-28	RCL
Sample Depth (ft)	1 to 2	6 to 8	0 to 2	½ to 2	½ to 2	0 to 2	0 to 2	½ to 2	0 to 2	0 to 1½	0 to 2	0 to 2	0 to 2	½ to 2	0 to 1	½ to 2	0 to 2	
DRO	8380	<11.8	17.1	<12.0	13	12.2	<9.2	<10.4	237	<9.7	13.7	156	73	176	9.8	<11.5	10.9	100/250*
PAH		ND	NA	NA			NA	NA	NA	ND	NA		NA	NA		NA	NA	100/250*
Acenaphthene	0.39				ND	ND						ND			ND			6000
Anthracene	0.202				ND	ND						ND			ND			300,000
Benzo(a) anthracene	ND				0.013	ND						ND			0.0261			3.9
Benzo(a) pyrene	ND				0.0141	ND					0.186				0.0228			0.39
Benzo(b)fluoranthene	ND				0.0183	0.0115					0.147				0.0275			3.9
Benzo(g,h,i)perylene	ND				0.0133	0.0108					0.258				0.0155			39
Benzo(k)fluoranthene	ND				ND	ND					ND				0.0134			39
Chrysene	ND				0.013	ND					0.14				0.0232			390
Fluoranthene	ND				0.0213	0.0107					ND				0.0514			40,000
Fluorene	0.652				ND	ND					ND				ND			40,000
Indeno(1,2,3-cd)pyrene	ND				ND	ND					ND				0.0127			3.9
Naphthalene	16.8				ND	ND					ND				ND			110
Phenanthrene	1.21				0.0109	ND					ND				0.0299			390
Pyrene	0.227				0.0222	0.0127					0.22				0.0498			30,000

NA: Not analyzed
 NE: Not established
 Shaded indicates value exceeds RCL or Soil Cleanup Standard
 * Soil Cleanup Standard: Sandy fill/ Clayey Lacustrine Deposits

Table 2.B
 Summary of Soil Analytical Results
 DRO, GRO, PVOC and VOC
 MN Ltd, Inc. Property, 3116 James Day Avenue, Superior, WI
 AET No. 03-03930.S.II
 (results in mg/kg)

Sample Location	GP-1		GP-2		GP-3		GP-4		GP-5		GP-6		GP-7	GP-8	GP-9	GP-10	GP-11		GP-12		RCL	
Sample Depth (ft)	10 to 12	18 to 20	8 to 10	14 to 16	12 to 14	18 to 20	9	15 to 16	12 to 13	25	3	14 to 16	12 to 14	12 to 14	16	16	1½ to 2	6 to 8	1½ to 2	6 to 8		
DRO	48.6	<12.8	52.7	<10.4	10.9	<11.3	<11.0	<10.9	<11.6	<11.6	3530	<11.6	<11.9	<11.3	<11.8	<11.4	9060	<12.1	217	<11.0		100/250*
GRO	9.6	<8.0	<5.6	<6.8	<5.9	<8.4	<6.9	<7.1	<7.6	<7.6	100	<7.7	<7.8	<7.1	<7.4	<6.9	NA	NA	NA	NA		100/250*
VOC																		ND	ND	ND		
n-Butylbenzene																	25.0					NE
sec-Butylbenzene																	0.811					NE
P-Isopropyltoluene																	1.58					NE
Napthalene																	116.0					110
N-Propylbenzene																	1.17					NE
1,2,4-Trimethylbenzene																	58.3					NE
1,3,5-Trimethylbenzene																	6.59					NE
Xylene (Total)																	ND					4.1
PVOC	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND						

Sample Location	GP-13		GP-14	GP-15	GP-16	GP-17	GP-18	GP-19	GP-20	GP-21	GP-22	GP-23	GP-24	GP-25	GP-26	GP-27	GP-28	RCL
Sample Depth (ft)	1 to 2	6 to 8	0 to 2	½ to 2	½ to 2	0 to 2	0 to 2	½ to 2	0 to 2	0 to 1½	0 to 2	0 to 2	0 to 2	½ to 2	0 to 1	½ to 2	0 to 2	
DRO	8380	<11.8	17.1	<12.0	13	12.2	<9.2	<10.4	237	<9.7	13.7	156	73	176	9.8	<11.5	10.9	100/250*
GRO	NA	NA	NA	NA	NA	NA	NA	NA	100/250*									
VOC		ND																
n-Butylbenzene	12.9																	NE
sec-Butylbenzene	0.710																	NE
P-Isopropyltoluene	1.13																	NE
Napthalene	38.0																	110
N-Propylbenzene	ND																	NE
1,2,4-Trimethylbenzene	10.1																	NE
1,3,5-Trimethylbenzene	2.8																	NE
Xylene (Total)	ND																	4.1
PVOC			ND	ND	ND	ND	ND	ND	ND	ND								

ND: Not detected above laboratory reporting limit
 NA: Not analyzed
 NE: Not established
 Shaded indicates value exceeds RCL or Soil Cleanup Standard
 * Soil Cleanup Standard: Sandy fill/ Clayey Lacustrine Deposits

Table 3
Summary of Groundwater Analytical Results
 MN Ltd, Inc. Property, 3116 James Day Avenue, Superior, WI
 AET Project No. 03-03930.S.II
 (results in ug/L)

Sample Location	GP-1	GP-4	GP-11	ES
DRO	5,300	1,100	12,200	NE
GRO	<200	<100	2860	NE
VOCs				
n-Butylbenzene	1.1	<1.0	16.5	NE
sec-Butylbenzene	1.2	<1.0	2.2	NE
Ethylbenzene	1.0	<1.0	<1.0	700
Isopropylbenzene	1.5	<1.0	1.2	NE
Naphthalene	6.7	<4.0	532	40
n-Propylbenzene	1.4	<1.0	5.8	NE
1,2,4-Trimethylbenzene	5.1	<1.0	384	480*
1,3,5-Trimethylbenzene	<1.0	<1.0	5.6	480*
Xylene	<3.0	<3.0	1.8	10
PAHs	NA	NA		
Acenaphthene			0.68	NE
Acenaphthylene			0.16	NE
Fluoranthene			0.074	400
Flourene			0.94	400
Naphthalene			341	40
Phenanthrene			1.3	NE
Pyrene			0.21	250
RCRA Metals	NA	NA		
Arsenic			<10	10
Barium			524	2000
Cadmium			<1	5
Chromium			<10	100
Lead			<3	15
Mercury			<0.20	2
Selenium			<0.5	50
Silver			<10	50

ES: Enforcement Standard

NA: Not analyzed

NE: ES not established

Shaded indicates value exceeds ES

*: ES is the sum of these two analytes

Table 3: July & August 2011 Groundwater Analytical Results: (EPA Test Methods 8260 & 8270)
 MN Limited, LLC - Nordic Land Superior/ MN Limited Property

Location	Date	Acenaphthene (µg/l)	Acenaphthylene (µg/l)	Anthracene (µg/l)	Benzo (a) anthracene (µg/l)	Benzo (a) pyrene (µg/l)	Benzo (b) fluoranthene (µg/l)	Benzo (g,h,i) perylene (µg/l)	Benzo (k) fluoranthene (µg/l)	Chrysene (µg/l)	Fluoranthene (µg/l)	Fluorene (µg/l)	2-Methyl-naphthalene (µg/l)	1-Methyl-naphthalene (µg/l)	Naphthalene (µg/l)	Phenanthrene (µg/l)	Pyrene (µg/l)	1,2,4-Trimethylbenzene (µg/l)	DRO (µg/l)	Chloromethane (µg/l)	Tetrachloroethene (µg/l)	Toluene (µg/l)	Bromodichloromethane (µg/l)	Chloroform (µg/l)	Dibromodichloromethane (µg/l)
PAL (µg/L)	ES (µg/L)	120	1	600	0.0048	0.02	0.02	0.096	0.048	0.02	80	80	140	10	0.96	50	96		3	160	0.06	0.6	6	6	
GW-1 (Method 8270)	7/12/2011	0.093	0.015J	0.015J	0.012J	0.0095J	0.014J	0.015J	0.0076J	0.023J	0.047J	0.095	0.48	0.50	75.7	0.12	0.099	N/D	N/D	N/A	N/A	N/A	N/A	N/A	N/A
GW-1 (Method 8260)	7/12/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/A	N/A	N/A	N/A	N/A	N/A
Trip Blank	7/12/2011	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/A	N/A	N/A	N/A	N/A	N/A
TW-10R (Method 8260)	8/9/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TW-1R (Method 8260)	8/9/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TW-3 (Method 8260)	8/9/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TW-9R (Method 8260)	8/9/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TW-2 (Method 8260)	8/15/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Field Blank	8/9/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Trip Blank	8/9/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Field Blank	8/15/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:
 Bold numbers indicate an Enforcement Standard (ES) exceedance. Italicized numbers indicate a Preventive Action Limit (PAL) exceedance.
 N/D indicates results fell below detection limits.
 N/A indicates Information was not available.