GIS REGISTRY
Cover Sheet

July, 2008
(RR 5367)

Source Property Information

CLOSURE DATE: Sep 28, 2009

BRRTS #: 02-44-000598

FID #: 744009530

ACTIVITY NAME: TRIUMPH TWIST DRILL (PIT A) & (PIT B)

DATCP #:

PROPERTY ADDRESS: 1176 COON ST

COMM #:

MUNICIPALITY: RHINELANDER

PARCEL ID #: RH 105 1520

***WTM COORDINATES:**

X: **567318** Y: **573197**

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

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

Land Use Controls:

- [X] Soil: maintain industrial zoning *(220)*

  (***note:*** *soil contamination concentrations between residential 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 or economic development corporation)*

Monitoring wells properly abandoned? *(234)*

(•) Yes ( ) No ( ) N/A

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

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

GIS Registry Checklist

Form 4400-245 (R 4/08)

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

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

BRRTS #: 02-44-000598 PARCEL ID #: RH91051520

ACTIVITY NAME: TRIUMPH TWIST DRILL (PIT A) & (PIT B) WTM COORDINATES: X: 567318 Y: 573197

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 #: NA **Title:**

☒ **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: 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 #: 2&9 **Title: Site Plan, Estimated Extent of Soil w/ DROs**

☒ **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 #: 9 **Title: Estimated Extent of Soil w/ Diesel Range Organics**

BRRTS #: 02-44-000598 ACTIVITY NAME: TRIUMPH TWIST DRILL (PIT A) & (PIT B)

MAPS (continued)

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

Figure #: 6 **Title: 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 #: NA **Title:**

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

Figure #: 7 **Title: Groundwater Contour Map (2/13/96)**

Figure #: 8 **Title: Water Table Contour Map (November 2005)**

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 #: 2 & 4 **Title: Pit A & Pit B - Laboratory Test Results for Soil Samples**

☒ **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 #: 9 **Title: Pit A & Pit B - Laboratory Test Results for Groundwater Samples**

☒ **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 #: 7 **Title: Monitoring Well Data & Grdwtr Elevations (MSL), Cutting Oil Release Monitoring Wells**

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 #: 02-44-000598 ACTIVITY NAME: TRIUMPH TWIST DRILL (PIT A) & (PIT B)

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: NA

☐ **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: NA

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
John Gozdzialski, Regional Director

Northern Region Headquarters
107 Sutliff Ave.
Rhinelander, Wisconsin 54501-3349
Telephone 715-365-8900
FAX 715-365-8932
TTY Access via relay - 711

September 28, 2009

Ian Hainsworth
Precision Twist Drill Co.
301 Industrial Ave.
Crystal Lake, IL 60614

Subject: Final Case Closure with Continuing Obligations for Pit A and Pit B at the Precision Twist Drill Site in Rhinelander, WI (BRRTS # 02-44-000598)

Dear Mr. Hainsworth:

On August 6, 2009, the 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 On August 10, 2009 you were notified that the Closure Committee had granted conditional closure to this case.

On September 23, 2009 the Department received information or documentation indicating that you have complied with the requirements for final closure. The conditions for closure included submitting the proper documentation for the abandonment of the monitoring wells and recovery well associated with the remediation at the above referenced sites

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 GIS Registry. The specific reasons are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed
- If a structural impediment that obstructed a complete site investigation or cleanup is removed or modified, additional environmental work must be completed

This letter and 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 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 http://dnr.wi.gov/org/water/dwg/3300254.pdf or at the web address listed above for the GIS Registry.

Closure Conditions

Please be aware that pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which the current property owner and any subsequent property owners must adhere. You must pass on the information about these continuing obligations 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 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. The Department intends to conduct inspections in the future to ensure that the conditions included in this letter are met.

Residual Soil Contamination

Residual soil contamination remains under the building as indicated on Figure 9: Estimated Extent of Soil with Diesel Range Organics, as located on the property as identified on Figure 2: Site Plan which are attached and were included in the information Gannett Fleming submitted to the Department of Natural Resources. If soil in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Structural Impediments

Structural impediments existing at the time of cleanup as shown on Figure 9: Estimated Extent of Soil with Diesel Range Organics, the existing concrete building floor-slab, made complete remediation of the soil contamination on this property impracticable. Pursuant to s. 292.12(2)(b), Wis. Stats., if the structural impediments on this property that are described above are to be removed, the property owner shall notify the Department of Natural Resources before removal and conduct an investigation of the degree and extent of diesel range organics (DRO) contamination. If contamination is found at that time, the contamination shall be properly remediated in accordance with applicable statutes and rules. If soil in the specific locations described above is excavated, 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.

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:

- Any activity or construction that results in the removal or modification of a structural impediment that obstructed a complete site investigation or cleanup

Please send written notifications in accordance with the above requirements to Wisconsin Department of Natural Resources, attention William Schultz, 107 Sutliff Ave, Rhinelander, WI 54501.

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 William Schultz at (715) 365-8965.

Sincerely,

John Robinson, Team Supervisor
Northern Region Remediation & Redevelopment Program

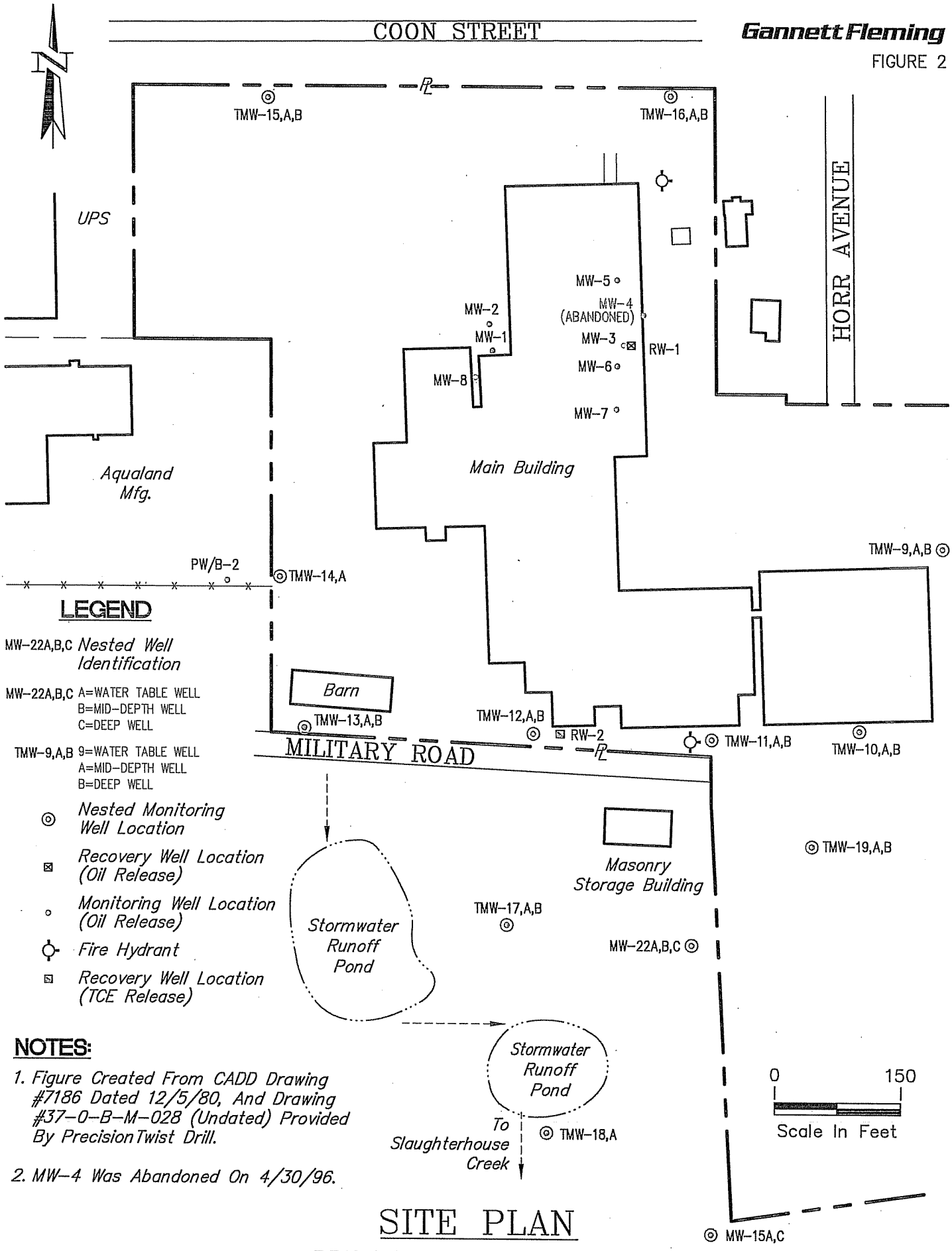
Attachments: Figure 2: Site Plan
Figure 9: Estimated Extent of Soil with Diesel Range Organics

cc: Matthew Miller
Gannett Fleming, Inc.
8025 Excelsior Drive
Madison, WI 53717- 1900

Jason Loppnow, Northern Equipment LLC
6700 Drury Lane Loop
Three lakes, WI 54562

Gannett Fleming

FIGURE 2



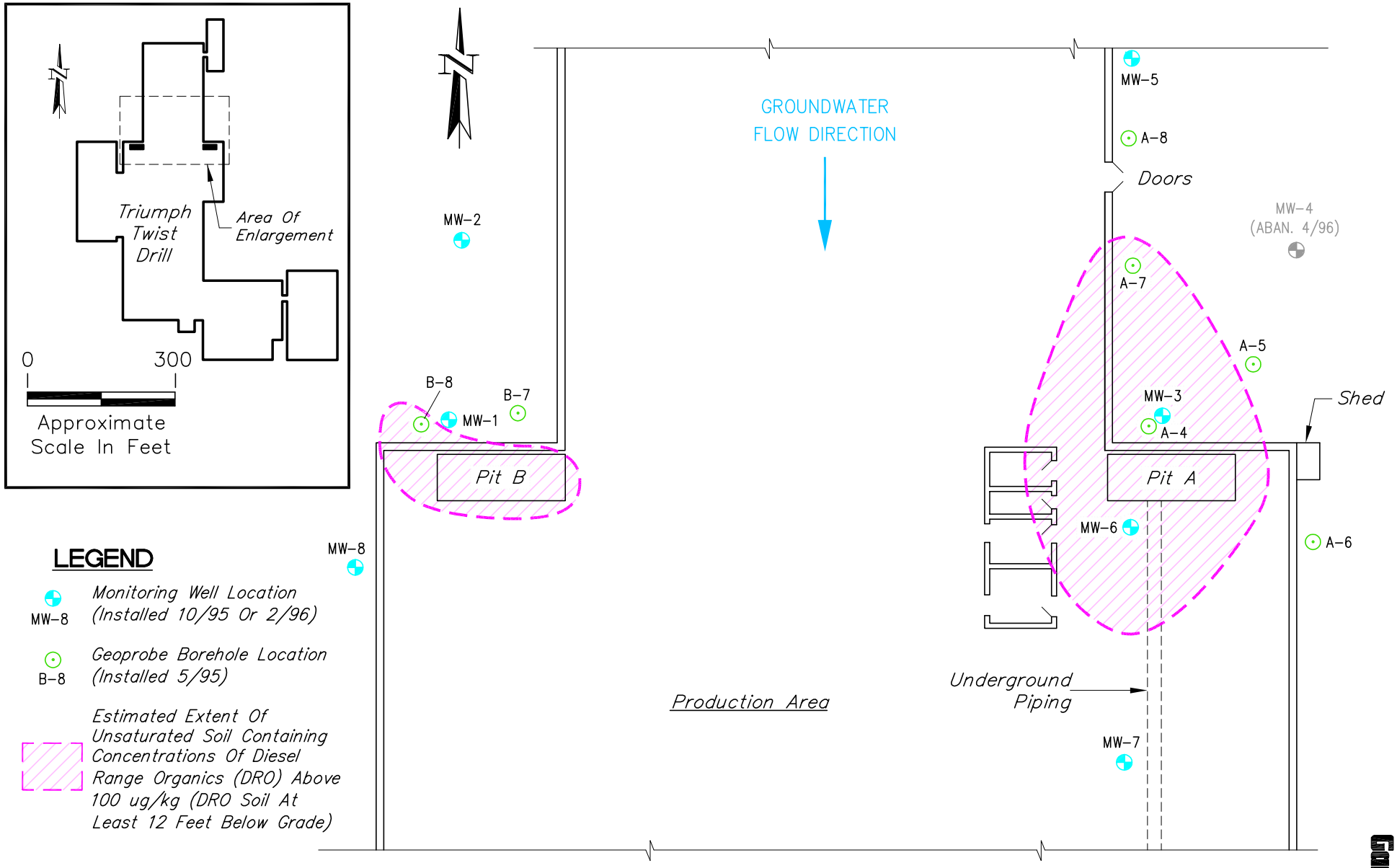
NOTES:

1. Figure Created From CADD Drawing #7186 Dated 12/5/80, And Drawing #37-0-B-M-028 (Undated) Provided By Precision Twist Drill.
2. MW-4 Was Abandoned On 4/30/96.

SITE PLAN

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

042109
34595WDV



ESTIMATED EXTENT OF SOIL WITH DIESEL RANGE ORGANICS

PRECISION TWIST DRILL CO.

RHINELANDER, WISCONSIN

063009
34595WDTT

Gommett Fleming

FIGURE 9

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
John Gozdzialski, Regional Director

Northern Region Headquarters
107 Sutliff Ave.
Rhinelander, Wisconsin 54501-3349
Telephone 715-365-8900
FAX 715-365-8932
TTY Access via relay - 711

September 28, 2007

Mr. Jason Loppnow
6700 Drury Lane Loop
Three Lakes, WI 54562

SUBJECT: Continuing Obligations and Property Owner Requirements for Pits A and B at the former Triumph Twist Drill Facility, 1176 Coon Street, Rhinelander, WI 54501
Parcel Identification Number: RH 9105 1520 Document: 658070
DNR BRRTS Activity #: 02-44-000598

Dear Mr. Loppnow:

The purpose of this letter is to notify you that certain continuing obligations apply to the former Triumph Twist Drill Facility located at 1176 Coon Street, Rhinelander, WI (referred to in this letter as the "Property") due to contamination remaining on the Property. The continuing obligations are part of the cleanup and case closure approved for Pits A and B only, and are not related to continuing cleanup activities associated with TCE contamination on the same property (BRRTS # 02-44-207981). The continuing obligations that apply to the Property are stated as conditions in the attached closure approval letter, and are consistent with s. 292.12, Wis. Stats., and ch. NR 700, Wis. Adm. Code, rule series. They are meant to limit exposure to any remaining environmental contamination at the Property. These continuing obligations will also apply to future owners of the Property, until the conditions no longer exist at the Property.

It is common for properties with approved cleanups to have continuing obligations as part of cleanup/closure approvals. Information on continuing obligations on properties is shown on the Internet at http://dnr.wi.gov/org/aw/rr/gis/index.htm. How to find further information about the closure and residual contamination for this site can be located at http://dnr.wi.gov/org/aw/rr/clean.htm.

The Department reviewed and approved the case closure request regarding the diesel range organics (DRO) in the soils at this site, based on the information submitted by Gannett Fleming. As required by state law, you received notification about the requested closure from the person conducting the cleanup in a certified letter dated April 1, 2009. No further investigation or cleanup is required at this time. However, the closure decision is conditioned on the long-term compliance with certain continuing obligations, as described below.

Continuing Obligations Applicable to Your Property

A number of continuing obligations are described in the attached case closure letter to Ian Hainsworth, dated September 28, 2009.

Residual Soil Contamination

Residual soil contamination remains under the building as indicated on Figure 9: Estimated Extent of Soil with Diesel Range Organics, as located on the property as identified on Figure 2: Site Plan which are attached and were included in the information Gannett Fleming submitted to the Department of Natural Resources. If soil in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Structural Impediments

Structural impediments existing at the time of cleanup as shown on Figure 9: Estimated Extent of Soil with Diesel Range Organics, the existing concrete building floor-slab, made complete remediation of the soil contamination on this property impracticable. Pursuant to s. 292.12(2)(b), Wis. Stats., if the structural impediments on this property that are described above are to be removed, the property owner shall notify the Department of Natural Resources before removal and conduct an investigation of the degree and extent of diesel range organics (DRO) contamination. If contamination is found at that time, the contamination shall be properly remediated in accordance with applicable statutes and rules. If soil in the specific locations described above is excavated, 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.

Property Owner Responsibilities

The owner (you and any subsequent property owner) of this Property is responsible for compliance with these continuing obligations, pursuant to s. 292.12, Wis. Stats. You are strongly encouraged to pass on the information about these continuing obligations to anyone who purchases this property from you (i.e. pass on this letter). For residential property transactions, you are required to make disclosures under Wis. Stats. s. 709.02. You may have additional obligations to notify buyers of the condition of the property and the continuing obligations set out in this letter and the closure letter.

Please be aware that failure to comply with the continuing obligations may result in enforcement action by the Department. The Department intends to conduct inspections in the future to ensure that the conditions included in this letter, including compliance with referenced maintenance plans, are met.

These responsibilities are the property owner's. A property owner may enter into a legally binding agreement (such as a contract) with someone else (the person responsible for the cleanup) to take responsibility for compliance with the continuing obligations. If the person with whom any property owner has an agreement fails to adequately comply with the appropriate continuing obligations, the Department has the authority to require the property owner to complete the necessary work.

A legal agreement between you and another party to carry out any of the continuing obligations listed in this letter does not automatically transfer to a new owner of the property. If a subsequent property owner cannot negotiate a new agreement, the responsibility for compliance with the applicable continuing obligations resides with that Property owner.

You and any subsequent Property owners are responsible for notifying the Department, and obtaining approval, before making any changes to the property that would affect the obligations applied to the Property. Send all written notifications in accordance with the above requirements to Wisconsin DNR, attention: William Schultz, 107 Sutliff Ave., Rhinelander, WI 54501.

Under s. 292.13, Wis. Stats., owners of properties affected by contamination from another property are generally exempt from investigating or cleaning up a hazardous substance discharge that has migrated onto a property from another property, through the soil, groundwater or sediment pathway. However, the exemption under s. 292.13, Wis. Stats., does not exempt the property owner from the responsibility to maintain a continuing obligation placed on the property in accordance with s. 292.12, Wis. Stats. To maintain this exemption, that statute requires the current property owner and any subsequent property owners, to meet the conditions in the statute, including:

- Granting reasonable access to DNR or responsible party, or their contractors;
- Avoiding interference with response actions taken; and
- Avoiding actions that make the contamination worse (e.g., demolishing a structure and causing or worsening the discharges to the environment).

The Department appreciates your efforts. If you have any questions regarding this closure decision or anything outlined in this letter, please contact William Schultz at (715) 365-8965.

Sincerely,

John Robinson
Northern Region Remediation & Redevelopment Team Supervisor

Attachments: Closure letter to Ian Hainsworth with attachments
RR 819 – Continuing Obligations Fact Sheet

cc: Ian Hainsworth
Precision Twist Drill Co.
301 Industrial Ave.
Crystal Lake, IL 60614

Matthew Miller
Gannett Fleming, Inc.
8025 Excelsior Drive
Madison, WI 53717- 1900

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
John Gozdzialski, Regional Director

Northern Region Headquarters
107 Sutliff Ave.
Rhinelander, Wisconsin 54501-3349
Telephone 715-365-8900
FAX 715-365-8932
TTY Access via relay - 711

August 10, 2009

Ian Hainswarth
Precision Twist Drill Co.
301 Industrial Ave.
Crystal Lake, IL 60614

Subject: Conditional Case Closure with Requirements to Achieve Final Closure for Pit A and Pit B at the Precision Twist Drill Site in Rhinelander, WI (BRRTS # 02-44-000598)

Dear Mr. Hainswarth:

On August 6, 2009, the Northern Region Closure Committee reviewed your request for closure of the case described above. The Regional Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the Regional Closure Committee has determined that the cutting oil contamination in the former vicinity of Pit A and Pit B appears to have been investigated and remediated to the extent practicable under site conditions. Your case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code and will be closed if the following conditions are satisfied:

The monitoring wells associated with the Pit A and Pit B site investigation must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted toWilliam Schultz on Form 3300-005 found at http://dnr.wi.gov/org/water/dwg/gw/ or provided by the Department of Natural Resources.

When the above conditions have been satisfied, please submit the appropriate documentation (for example, well abandonment forms, disposal receipts, copies of correspondence, etc.) to verify that applicable conditions have been met, and your case will be closed. Your site will be listed on the DNR Remediation and Redevelopment GIS Registry. Information that was submitted with your closure request application will be included on the GIS Registry. To review the site on the GIS Registry web page, visit the RR Sites Map page at: http://dnr.wi.gov/org/aw/rr/gis/index.htm.

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

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (715) 365-8965.

Sincerely,

William Schultz, PE
Project Manager
Remediation & Redevelopment Program

Enclosure

cc: Matthew Miller
Gannett Fleming, Inc.
8025 Excelsior Drive
Madison, WI 53717- 1900

DOC# 658070
Recorded
JAN. 10, 2008 AT 02:26PM

Thomas H. Leighton

THOMAS H LEIGHTON
RECEIVED
ONEIDA COUNTY, WI
Fee Amount: $15.00
Fee Exempt 77.25-(3)

Document Number

State Bar of Wisconsin Form 6-2003
SPECIAL WARRANTY DEED

Document Name

Recording Area

Name and Return Address

ONEIDA TITLE & ABSTRACT, INC.

THIS DEED, made between Precision Twist Drill, Co.

having a mailing address of 301 Industrial Avenue, Crystal Lake, IL 60012

("Grantor," whether one or more), and Northern Equipment, LLC.

having a mailing address of

("Grantee," whether one or more).

Grantor for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in Oneida County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

See Exhibit "A" and Exhibit "B" attached hereto.

Please note that this Special Warranty Deed shall replace and be used in lieu of the initial Special Warranty Deed (DOC # 648880) recorded on June 5, 2007 in Oneida County, Wisconsin, as Parcel #2 was inadvertently omitted from the legal description attached to the said deed.

Parcel Identification Number (PIN)

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

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances arising by, through, or under Grantor, except:

Dated September 11, 2007

PRECISION TWIST DRILL CO. (SEAL)

Ian Hainsworth, Vice President (SEAL)

(SEAL)

(SEAL)

AUTHENTICATION

Signature(s)

authenticated on

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

THIS INSTRUMENT DRAFTED BY:
Kathleen M. Martin, Esq., Morgan, Lewis & Bockius

ACKNOWLEDGMENT

STATE OF Illinois)
) ss.
McHenry COUNTY)

Personally came before me on 09/19/2007
the above-named Ian Hainsworth as Vice President

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

Notary Public, State of Illinois
My commission (is permanent) (expires: 02/24/2010)

OFFICIAL SEAL
SHARON L MCCLAIN
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:02/24/10

Exhibit A
Legal Description

A parcel of land being a part of the SW 1/4 of the SE 1/4 of Section 5, Township 36 North, Range 9 East and being more particularly described as follows:

Commencing at a point marking the intersection of the Southerly right of way line of Coon Street and the Easterly right of way line of Washington Street; thence easterly along the southerly right of way line of Coon Street a distance of 200.0 feet to a point and the PLACE OF BEGINNING of the parcel to be described; thence continue easterly along the southerly right of way line of Coon Street a distance of 687.8 feet to a point; thence at an angle, from west to south of 90° 53' a distance of 790.0 feet to a stake; thence at an angle from north to west of 86° 09' a distance of 499.5 feet to a stake; thence at an angle from east to north of 92° 19' a distance of 171.5 feet to a stake marking the southeast corner of property of Oneida Paper Company, described in Volume 310 of Deeds, page 195; thence continue along said east line of property of Oneida Paper Company a distance of 291.45 feet to a stake; thence westerly along the northerly line of the property as deeded to Oneida Paper Company a distance of 210.2 feet to a stake marking the southeast corner of lands deeded to United Parcel Service described in Volume 325 of Deeds, page 333; thence northerly along the easterly property line of the lands of the United Parcel Service as deeded a distance of 300.0 feet to a point marking the intersection with the southerly right of way line of Coon Street and the place of beginning.

Subject to a boundary line agreement recorded in Vol. 632 of Records on page 334.

Parcel 2:

A parcel of land being a part of the SE ¼ of the SE ¼ of Section 5 and a part of the NE ¼ of the NE ¼ of Section 8, all in Township 36 North, Range 9 East, and more particularly described as follows:

The point of beginning being an iron pipe marking the Southwest corner of the SE ¼ of the SE ¼ of Section 5, Township 36 North, Range 9 East; thence N. 0° 10' 15" W., a distance of 46.85 feet to an iron pipe; thence N. 0° 48' 30" W., a distance of 368.22 feet to an iron pipe; thence N. 89° 44' 30" E., a distance of 107.75 feet to an iron pipe; thence S. 0° 48' 30" E., a distance of 10.00 feet to an iron pipe; thence N. 89° 44' 30" E., a distance of 420.03 feet to an iron pipe; thence S. 0° 53' 15" E., a distance of 881.60 feet to an iron pipe; thence S. 81° 55' 10" W., a distance of 509.60 feet to an iron pipe; thence N. 3° 19' 40" W., a distance of 546.70 feet to the point of beginning.

Being in Oneida County, Wisconsin.

EXHIBIT B

Permitted Encumbrances

1. Public or private rights, if any, in such portions of the subject premises as may be presently used, laid out or dedicated in any manner whatsoever, for road and/or highway purposes.

2. Agreement, conditions and restrictions contained in Warranty Deed executed by Oneida County, a municipal Corporation, State of Wisconsin, to Triumph Twist Drill Company, dated October 20, 1971 and recorded October 21, 1971 in vol. 329 of Deeds on page 57 as Document No. 239068, reciting as follows: "That prior to closing zoning of the premises is changed to I 2 General Industrial District; however, buyer will agree not to use the premises for manufacturing of heavy trucks, a foundry plant, to manufacture asphalt, to manufacture steel, to process rubber, to refine oil, to manufacture or process chemicals, to manufacture abrasives and to manufacture stone products." Providing for no forfeiture or reversion of title in case of violation.

3. Rights of the public in any portions of the subject premises lying within the limits of Vaughn Street, not vacated.

4. Easements and rights incidental thereto in connection with the continued use and right of entrance, maintenance, construction and repair of municipal or utility facilities as may exist underground or overground in or on that portion of the subject premises which ere formerly a part of streets and alleys in part of East End Addition now vacated.

5. Terms and conditions of Boundary Line agreement executed by and between DPC of Milwaukee, Inc., a Wisconsin corporation and Triumph Twist Drill Company, an Illinois corporation dated January 30, 1991 and recorded February 21, 1991 in Vol. 632 of Records on page 334 as Document No. 391554.

PRECISION TWIST DRILL CO.

PRECISION TWIST DRILL CO.
CRYSTAL LAKE, ILLINOIS

GIS REGISTRATION STATEMENT

For
Property Located At:

1176 Coon Street
Rhinelander, Wisconsin 54501

WDNR BRRTS/Activity # 02-44-000598

WDNR Activity Name: Triumph Twist Drill (Pits A & B)

Parcel ID: RH 9105 1520

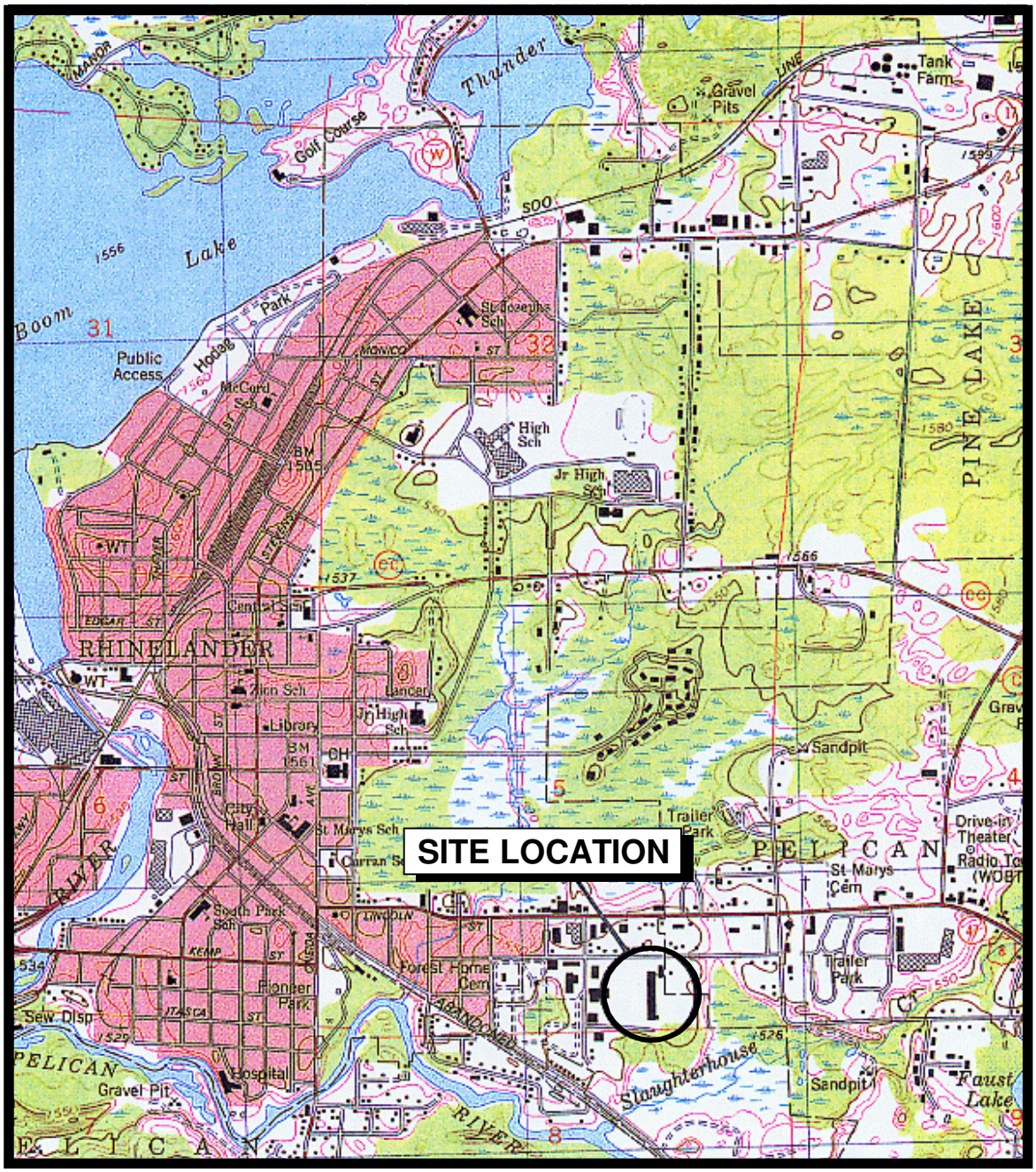
To the best of my knowledge, I believe that the attached legal description and deed provided to the Wisconsin Department of Natural Resources for the Geographic Information System (GIS) registration of properties at 1176 Coon Street, City of Rhinelander, Oneida County, Wisconsin, is complete and accurate for the property associated with the Triumph Twist Drill Cutting Oil release site (BRRTS # 02-44-000598) in the City of Rhinelander, Oneida County, Wisconsin. This legal description represents all properties known to be within, or partially within, the cutting oil contaminated site boundary.

Signed:

I Hainsworth — 3-18-09

Ian Hainsworth, Precision Twist Drill Co. — Date

301 Industrial Avenue • Crystal Lake, IL 60012
P.O. Box 9000 • Crystal Lake, IL 60039-9000
www.precisiontwistdrill.com



SCALE: 1 INCH = 2000 FEET
CONTOUR INTERVAL = 10 FEET

7.5 MIN TOPOGRAPHIC MAP
RHINELANDER, WISCONSIN
1982

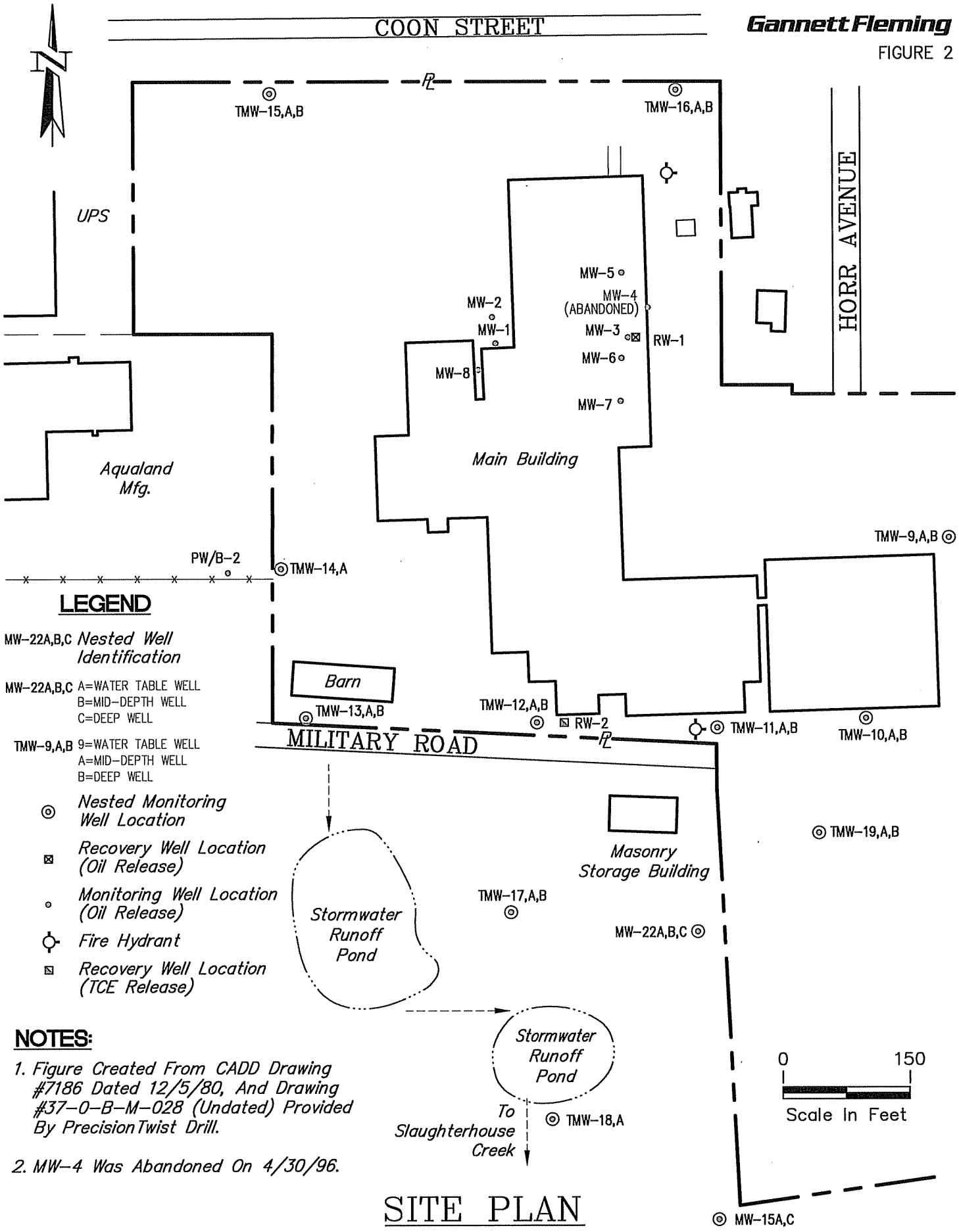
LOCATION MAP

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

041409
34595.000-REV_1

Gannett Fleming

FIGURE 2



LEGEND

MW-22A,B,C *Nested Well Identification*

MW-22A,B,C A=WATER TABLE WELL
B=MID-DEPTH WELL
C=DEEP WELL

TMW-9,A,B 9=WATER TABLE WELL
A=MID-DEPTH WELL
B=DEEP WELL

Nested Monitoring Well Location

Recovery Well Location (Oil Release)

Monitoring Well Location (Oil Release)

Fire Hydrant

Recovery Well Location (TCE Release)

NOTES:

1. *Figure Created From CADD Drawing #7186 Dated 12/5/80, And Drawing #37-0-B-M-028 (Undated) Provided By Precision Twist Drill.*
2. *MW-4 Was Abandoned On 4/30/96.*

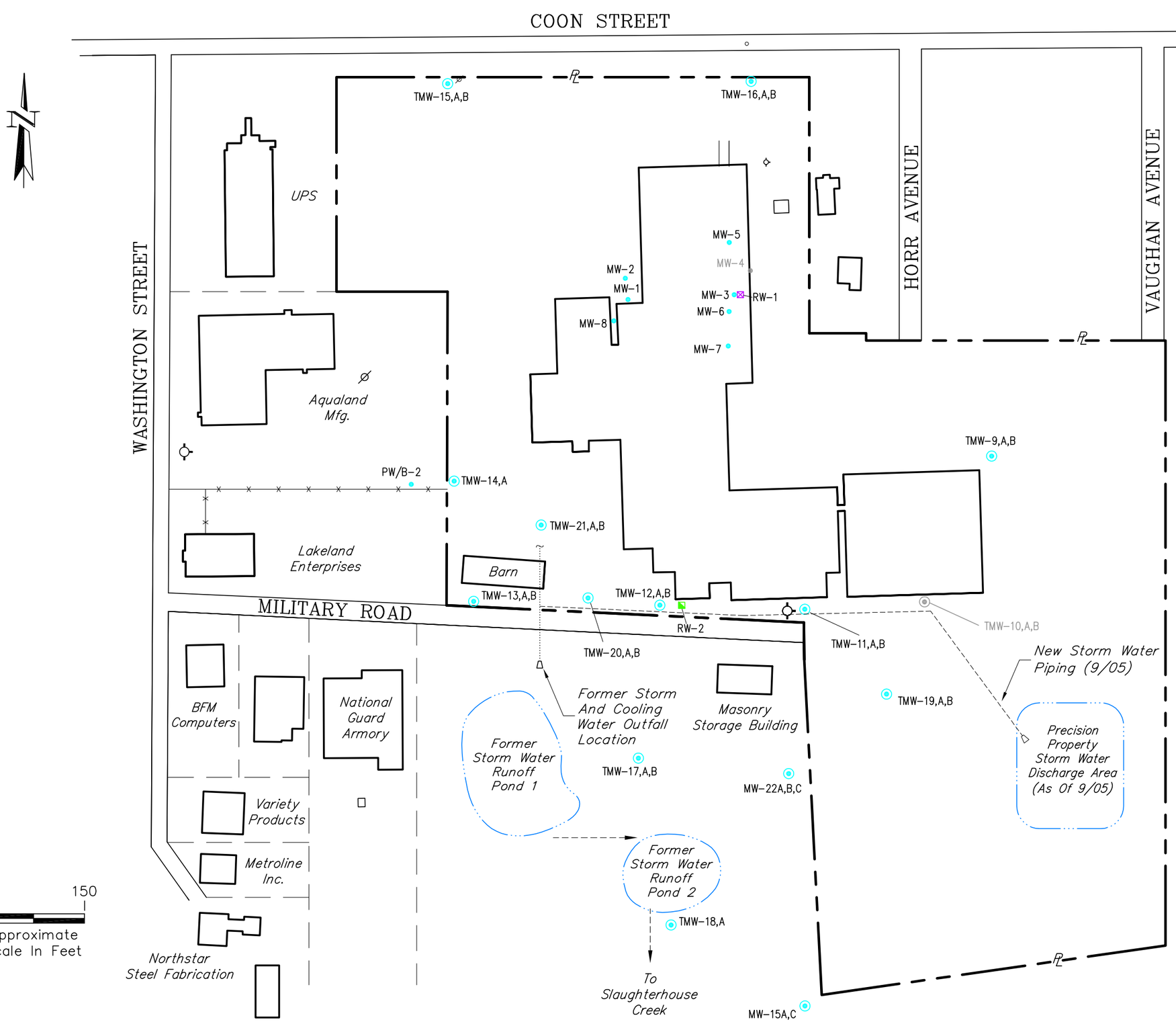
SITE PLAN

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

042109
34595WDV

Gannett Fleming

FIGURE 2



LEGEND

MW-22A,B,C *Nested Well Identification*

MW-22A,B,C A=WATER TABLE WELL
B=MID-DEPTH WELL
C=DEEP WELL
— RHINELANDER LANDFILL WELLS

TMW-9,A,B 9=WATER TABLE WELL
A=MID-DEPTH WELL
B=DEEP WELL
— PRECISION TWIST DRILL WELLS

- *Nested Monitoring Well (TCE Release)*
- *Recovery Well (TCE Release)*
- *Monitoring Well (Cutting Oil Release)*
- *Recovery Well (Cutting Oil Release)*
- *Fire Hydrant*
- *Light Pole*

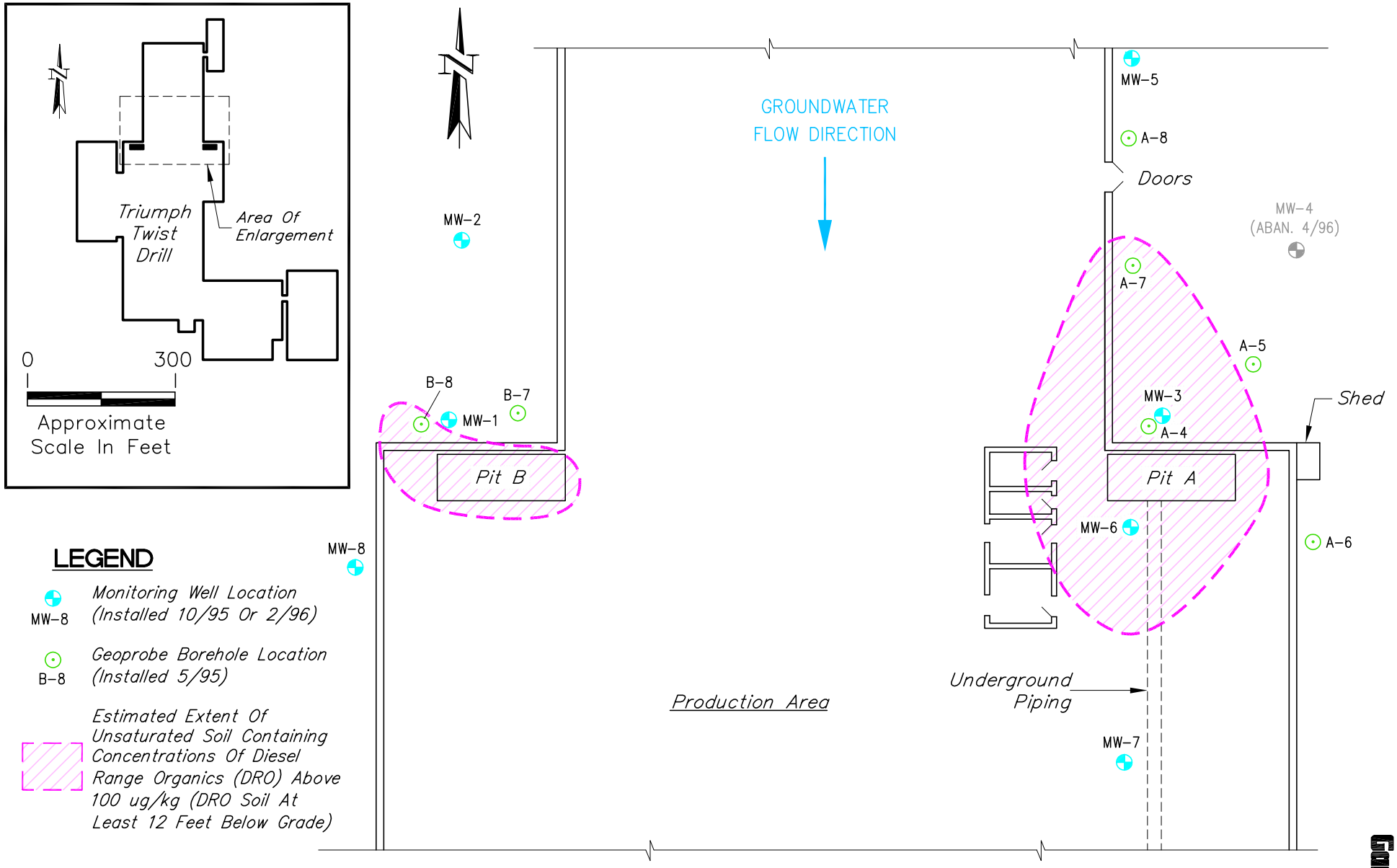
NOTES:

1. *Figure Created From CADD Drawing #7186 Dated 12/5/80, And Drawing #37-0-B-M-28 (Undated) Provided by Triumph Twist Drill.*
2. *MW Well Nests 15 & 22 Are Landfill/WDNR Wells.*
3. *TMW Well Nests 9-16 Installed July/Aug. '99.*
4. *TMW Well Nests 17 & 18 Installed Aug. '00.*
5. *TMW Well Nest 19 Installed Jan. '01.*
6. *RW-2 Installed May '01.*
7. *TMW Well Nests 20 & 21 Installed Feb. '05.*
8. *Shaded Wells Have Been Abandoned.*

SITE PLAN WITH WELL LOCATIONS

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

063009
34595WEC



ESTIMATED EXTENT OF SOIL WITH DIESEL RANGE ORGANICS

PRECISION TWIST DRILL CO.

RHINELANDER, WISCONSIN

063009
34595WDTT

Gommett Fleming

FIGURE 9

Gannett Fleming

FIGURE 6

A — A'

North

Elevation (Feet Above MSL)

1555
1550
1545
1540
1535
1530
1525
1520

MW-5 | A-8 | A-7 | A-4/MW-3 | MW-6 | MW-7

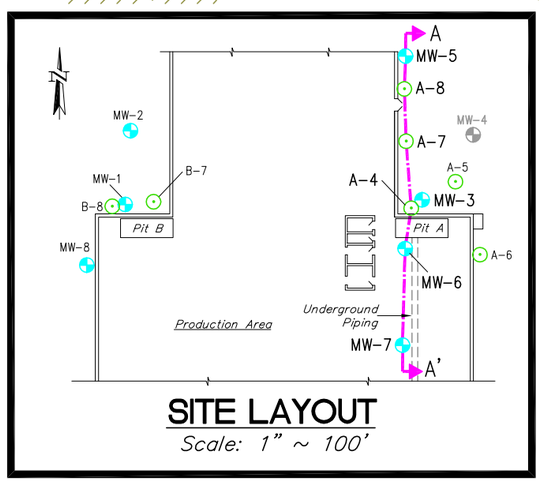
Grade | Grade

Pit A

A-2

Estimated Extent Of Soils Above NR 720 RCLs For DRO (Includes Smear Zone)

SP | SM/ML | SP/SM/ML | ML/CL



SITE LAYOUT

Scale: 1" ~ 100'

LEGEND

Geologic Units

- SP — *Fine And Very Fine Sands*
- SP/SM/ML — *Fine Sand And Silt*
- ML/CL — *Silts And Clays*
- *Geologic Contact*
- *Water Table*
- *Perched Water Table*

Well Construction

- MW-6 — *Well Identification*
- *Well Casing*
- *Screened Interval*

NOTE:

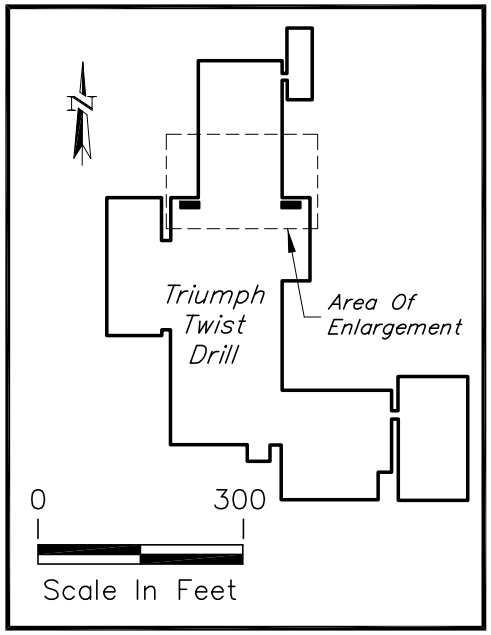
Perched Groundwater Elevations Based On Observations Made By EDER While Drilling. Groundwater Elevations Based On Measurements Made By NORTHERN LAKE SERVICES On 3/28/96.

Horizontal Scale: 1" = 10'
Vertical Scale: 1" = 5'
Vertical Exaggeration: 2x

CROSS SECTION A–A'

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

022709
345955WDU



NOTE:
Groundwater Contours Based On Elevations Measured 2/13/96

LEGEND

- *Groundwater Contour With Flow Direction*
- MW-8 (1529.63) *Monitoring Well Location With Groundwater Elevation (Installed September 1995)*
- *Geoprobe Borehole Location (Installed May 1995)*
- --UG-- *Underground Gas Service*

GROUNDWATER CONTOUR MAP (2/13/96)

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

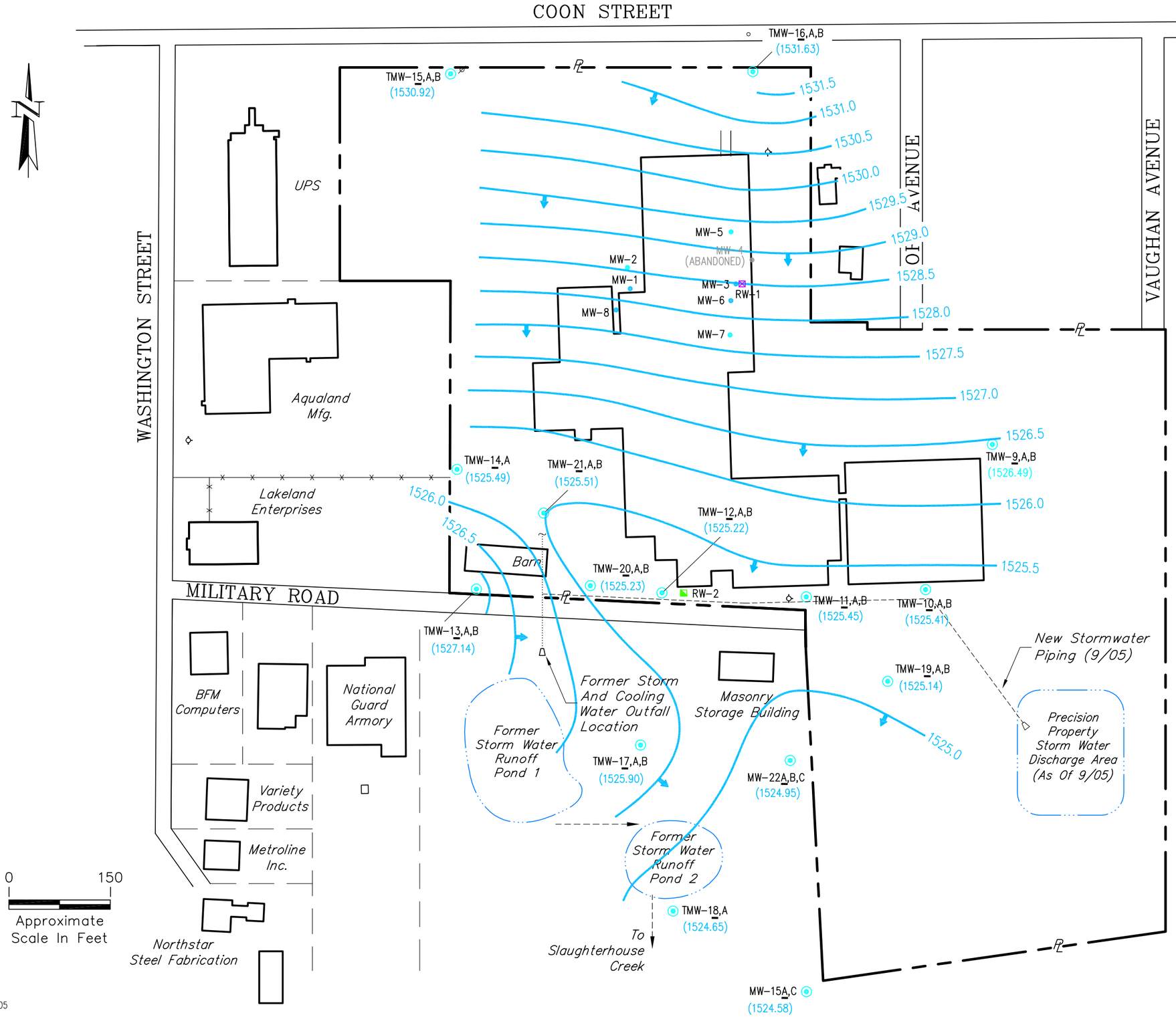
041409
34595WDZ

Gannett Fleming

FIGURE 7

Gannett Fleming

FIGURE 8



LEGEND

- 1527.0 — Water Table Contour With Flow Direction (Dashed Where Inferred)
- (1526.49) Groundwater Elevation (NM = Not Measured)
- MW-22A,B,C Nested Well Identification With Well Sampled Underlined
- MW-22A,B,C (A=WATER TABLE WELL, B=MID-DEPTH WELL, C=DEEP WELL) — RHINELANDER LANDFILL WELLS
- TMW-9,A,B (9=WATER TABLE WELL, A=MID-DEPTH WELL, B=DEEP WELL) — PRECISION TWIST DRILL WELLS
- Nested Monitoring Well Location
- Recovery Well Location (Oil Release)
- Monitoring Well Location (Oil Release)
- Recovery Well Location (TCE Release)
- Fire Hydrant
- Light Pole

NOTES:

1. Figure Created From CADD Drawing #7186 Dated 12/5/80, And Drawing #37-0-B-M-028 (Undated) Provided By Triumph Twist Drill.
2. Groundwater Contours Based On Elevations Measured On 11/1/05 With RW-2 Pumping.

WATER TABLE CONTOUR MAP (NOVEMBER 2005)

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

_wt_11-05
042109
34595WDM

Gannett Fleming

TRIUMPH TWIST DRILL
RHINELANDER, WISCONSIN

TABLE 2

PIT A - LABORATORY TEST RESULTS FOR SOIL SAMPLES
SUMMARY OF DETECTED COMPOUNDS

Sample ID	Parameter/NR 720 RCL							
	DRO/100	Benzene/0.0055	Ethylbenzene/2.9	1,2,4-TMB/NS	1,3,5-TMB/NS	Xylenes/4.1	Toluene/1.5	TCE/NS
A-1 2.5	**26,900**[1,2]	**0.046**	<0.2	<0.2	<0.2	<0.2	<0.39	0.041
A-2 4.5	**50,100**[1,2]	**0.047**	<0.19	<0.19	<0.19	<0.19	<0.39	0.087
A-2 6.5	**1,790**[1,2]	**0.049**	<0.22	<0.22	<0.22	<0.22	<0.44	<0.045
A-2 8.5	27.3[1,2,3]	<0.0009	<0.0043	<0.0043	<0.0043	<0.0043	<0.0087	<0.0009
A-3 6.5	67.1[1,2]	<0.0011	<0.0056	<0.0056	<0.0056	<0.0056	<0.011	<0.0011[8]
A-3 8.5	9.15[2,4]	<0.001	<0.0049	<0.0049	<0.0049	<0.0049	0.025	<0.001[8]
A-4 14	**17,100**[7]	<0.0007	<0.0038	<0.0038	<0.0038	<0.0038	<0.0076	<0.0007
A-4 18	**65,000**[2,7]	0.003[3]	0.0117[3]	0.0192	<0.0038	0.0633	0.0495	0.0353[5]
A-5 13	10.8[2,7]	<0.0010	<0.0051	<0.0051	<0.0051	<0.0051	<0.0100	<0.0010
A-5 16	<5.0	<0.001	<0.005	<0.005	<0.005	<0.005	<0.010	<0.001
A-6 14	<5.0	<0.0008	<0.004	<0.004	<0.004	<0.004	<0.0080	<0.0008
A-6 18	<5.0	<0.0010	<0.0053	<0.0053	<0.0053	<0.0053	<0.0100	<0.0010
A-7 16	<5.0	<0.0008	<0.0043	<0.0043	<0.0043	<0.0043	<0.0087	<0.0008
A-7 21	**1,320**[2,7]	0.005[3]	0.0055[3]	0.0446[3]	0.0507[3]	0.0076[3]	0.0403	0.0015
A-8 16	<5.0	<0.0008	<0.0041[6]	<0.0041	<0.0041	<0.0041	<0.0083	<0.0008
A-8 20	<5.0	<0.0011	<0.0054[6]	<0.0054	<0.0054	<0.0054	<0.0110	<0.0011

Sample ID	Parameter/NR 720 RCL							
	DRO/100	Benzene/0.0055	Ethylbenzene/2.9	1,2,4-TMB/NS	1,3,5-TMB/NS	Xylenes/4.1	Toluene/1.5	TCE/NS
MW-6 10	5.73(11)	NA	NA	NA	NA	NA	NA	NA
MW-6 15	**46,090**(7,9)	NA	NA	NA	NA	NA	NA	NA
MW-7 15	9.74(7,9,10)	NA	NA	NA	NA	NA	NA	NA
MW-7 20	<5.0	NA	NA	NA	NA	NA	NA	NA

NOTES:
All units are in mg/kg (ppm).
Results calculated on a dry weight basis.
A-1, A-2, and A-3 samples collected with a hand auger in February 1995.
A-4 through A-8 samples collected with a Geoprobe in May 1995.
MW-6 and MW-7 samples were collected using hollow-stem augers and a split-spoon sampler in February 1996.
A-4 14 designates the sample collected at 14 feet below grade from borehole A-4.
NR 720 RCL - Natural Resources Code 720 Residual Cleanup Levels
DRO - Diesel range organics.
TCE - Trichloroethylene.
NA - Not analyzed.
NS - No NR 720 RCL established.
Results in bold exceed NR 720 RCLs.

FOOTNOTES:
(1) The chromatogram is not distinct for diesel. It has characteristics of a product which has significant peaks within the DRO window.
(2) The chromatogram also contained significant peaks outside the DRO window.
(3) Recovery of surrogate was high. Results for sample may also be biased high.
(4) The chromatogram is not distinct for diesel or any common petroleum product. All peaks within the DRO window were quantitated.
(5) Check standard for this analyte exhibited a high bias. Sample results may be biased high.
(6) Matrix spike had low recovery. Results may be biased low.
(7) Chromatogram is characteristic for a heavier petroleum product other than diesel.
(8) Matrix spike had a high recovery. Results may be biased high.
(9) The chromatogram contains significant peaks and a raised baseline outside the DRO window.
(10) The recovery of the surrogate was low. Result for sample may also be biased low.
(11) The chromatogram was not distinct for diesel or any single common petroleum product.

Gannett Fleming

TRIUMPH TWIST DRILL
RHINELANDER, WISCONSIN

TABLE 4

PIT B - LABORATORY TEST RESULTS FOR SOIL SAMPLES
SUMMARY OF DETECTED COMPOUNDS

Sample ID	Parameter/NR 720 RCL		
	DRO/100	1,2,4-TMB/NS	TCE/NS
B-1 2.5	27.9[1,2]	<0.0039	<0.0008
B-1 6.5	15.3[1,2]	<0.0049	<0.0009
B-1 8.5	<5.0	<0.0045	<0.0009
B-2 6.0	<5.0	<0.0042	<0.0008
B-2 8.5	<5.3	<0.0046	<0.0009
B-2 10.5	6.03[2,4]	<0.0055	<0.0011
B-3 2.5	6.34[2,4]	<0.0081	<0.0016
B-3 4.5	10.6[2,4]	<0.0042	<0.0008
B-3 6.0	5.55[2,4]	<0.0051	<0.001
B-4 0.5	**190[1,2,3]**	<0.0049	<0.001
B-5 2.5	<5.3	<0.0043	<0.0008
B-6 2.5	**1,470[1,2]**	0.0052	0.012
B-6 4.5	63.6[1,2]	<0.004	<0.0008
B-6 6.0	28.5[1,2,3]	<0.0054	<0.0011
B-7 14	<5.0	<0.0046	<0.0009
B-7 18	<5.0	<0.0056	<0.0011
B-8 16	15.5[2,4]	<0.0044	<0.0009
B-8 18	**1,030[2,5]**	<0.005	<0.001
MW-8 15	4.90[2,4]	NA	NA
MW-8 20	<5.0	NA	NA

Table 4 Continued . . .

NOTES:

All units are in mg/kg (ppm).
Results calculated on a dry weight basis.
B-1 through B-6 samples collected with a hand auger in February 1995.
B-7 and B-8 samples collected with a Geoprobe in May 1995.
MW-8 samples collected with a hollow-stem auger and split-spoon sampler in February 1996.
B-7 10 designates the sample collected at 10 feet below grade from B-7.
NR 720 RCL = Natural Resources Code 720 Residual Contaminant Levels
DRO = Diesel range organics.
TMB = Trimethylbenzene.
TCE = Trichloroethylene.
NA = Not analyzed.
NS = No NR 720 RCL established.
Results in bold exceed NR 720 RCLs.

FOOTNOTES:

(1) The chromatogram is not distinct for diesel. It has characteristics of a product which has significant peaks within the DRO window.
(2) The chromatogram also contained significant peaks outside the DRO window.
(3) Recovery of surrogate was high. Results for sample may also be biased high.
(4) The chromatogram is not distinct for diesel or any common petroleum product. All peaks within the DRO window were quantitated.
(5) The chromatogram is characteristic for a heavier petroleum product other than diesel (i.e. motor oil, hydraulic oil, etc.)

Gannett Fleming

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

TABLE 7

MONITORING WELL DATA AND GROUNDWATER ELEVATIONS (MSL)
CUTTING OIL RELEASE MONITORING WELLS

MW-1	Elevation (MSL)	
Surface Elevation		NS
Top of Casing		1557.50
Top of Screen Elevation		1541.60
Bottom of Screen Elevation		1526.60
Measurement Date	DTW (ft)	Groundwater Elevation (MSL)
04/28/99-04/29/99	28.22	1529.28
08/10/99	27.64	1529.86
08/31/99	27.51	1529.99
12/14/99-12/15/99	28.09	1529.41
03/15/00	28.55	1528.95
08/08/00	27.18	1530.32
10/03/00-10/04/00	26.88	1530.62
01/10/01-01/11/01	27.42	1530.08
04/09/01-04/10/01	27.91	1529.59
08/13/01-08/14/01	27.12	1530.38
10/01/01-10/02/01	27.05	1530.45
11/16/01	27.25	1530.25
01/30/02	27.58	1529.92
03/20/02	27.89	1529.61
07/23/02	25.98	1531.52
11/05/02	25.41	1532.09
03/11/03	26.86	1530.64
07/15/03	26.61	1530.89
10/28/03	26.9	1530.60
03/03/04	27.73	1529.77
05/12/04	27.08	1530.42
10/12/04	26.46	1531.04
04/26/05	27.23	NM
11/02/05	NM	NM
01/04/06	27.39	1530.11
05/01/06	27.64	1529.86
09/18/06	26.57	1530.93
08/28/07	27.21	1530.29
09/11/08	26.67	1530.83

MW-2	Elevation (MSL)	
Surface Elevation		NS
Top of Casing		1554.40
Top of Screen Elevation		1540.50
Bottom of Screen Elevation		1525.50
Measurement Date	DTW (ft)	Groundwater Elevation (MSL)
04/28/99-04/29/99	24.63	1529.77
08/10/99	24.51	1529.89
08/31/99	24.40	1530.00
12/14/99-12/15/99	24.91	1529.49
03/15/00	25.25	1529.15
08/08/00	24.91	1529.49
10/03/00-10/04/00	23.80	1530.60
01/10/01-01/11/01	24.30	1530.10
04/09/01-04/10/01	24.69	1529.71
08/13/01-08/14/01	24.01	1530.39
10/01/01-10/02/01	NM	NM
11/16/01	23.99	1530.41
01/30/02	NM	NM
03/20/02	24.63	1529.77
07/23/02	22.71	1531.69
11/05/02	22.21	1532.19
03/11/03	23.33	1531.07
07/15/03	23.18	1531.22
10/28/03	23.4	1531.00
03/03/04	24.42	1529.98
05/12/04	23.71	1530.69
10/12/04	23.21	1531.19
04/26/05	NM	NM
11/02/05	Dry	--
01/04/06	24.05	1530.35
05/01/06	24.40	1530.00
09/18/06	23.28	1531.12
08/28/07	23.91	1530.49
09/11/08	23.35	1531.05

TABLE 7

MONITORING WELL DATA AND GROUNDWATER ELEVATIONS (MSL)
CUTTING OIL RELEASE MONITORING WELLS

MW-3	Elevation (MSL)	
Surface Elevation		NS
Top of Casing		NS
Top of Screen Elevation		
Bottom of Screen Elevation		
Measurement Date	DTW (ft)	Groundwater Elevation (MSL)
04/28/99-04/29/99	0.1 ft of product	
08/10/99	NM	
08/31/99	0.1 ft of product	
12/14/99-12/15/99	0.42 ft of product	
03/15/00	0.1 ft of product	
08/08/00	NM	
10/03/00-10/04/00	NM	
01/10/01-01/11/01	NM	
04/09/01-04/10/01	NM	
08/13/01-08/14/01	0.96 ft of product	
11/16/01	5.69 ft of product	
03/20/02	30.75	
07/23/02	2.15 ft of product	
11/05/02	Approx 1.0 ft of product	
03/11/03	0.85 ft of product	
07/15/03	0.59 ft of product.	
10/28/03	1.98 ft of product	
03/03/04	0.85 ft of product	
05/12/04	26.21	
10/12/04	26.24	
01/11/05	Approx 0.29 ft of product	
02/08/05	Approx 1.0 ft of product	
02/23/05	0.10 ft of product	
04/26/05	Approx 0.62 ft of product	
11/02/05	Approx 0.01 ft of product	
01/04/06	Approx 0.02 ft of product	
05/01/06	Approx. 0.01 ft of product	
05/16/06	Sheen	
06/14/06	Approx. 0.01 ft of product	
07/18/06	Sheen	
08/03/06	Approx. 0.01 ft of product	
09/18/06	Approx. 0.15 ft of product	
11/14/06	Approx. 0.15 ft of product	
11/28/06	Approx. 0.01 ft of product	
12/19/06	Approx. 0.08 ft of product	
01/03/07	Approx. 0.02 ft of product	
02/15/07	Approx. 0.06 ft of product	
03/15/07	Approx. 0.02 ft of product	
04/11/07	Sheen	
04/25/07	Sheen	
06/12/07	Sheen	
07/31/07	Sheen	
08/28/07	27.08	
10/23/07	Sheen	
11/28/07	Approx. 0.03 ft of product	
01/03/08	Approx. 0.01 ft of product	
04/16/08	Sheen	
06/16/08	Sheen	
07/22/08	Sheen	
09/11/08	Sheen	
12/04/08	Approx. 0.01 ft of product	
01/08/09	Sheen	
01/27/09	Sheen	

MW-6	Elevation (MSL)	
Surface Elevation		NS
Top of Casing		1554.38
Top of Screen Elevation		1569.38
Bottom of Screen Elevation		1554.38
Measurement Date	DTW (ft)	Groundwater Elevation (MSL)
04/28/99-04/29/99	0.1 ft of product	
08/10/99	NM	
08/31/99	0.18 ft of product	
12/14/99-12/15/99	0.46 ft of product	
03/15/00	0.1 ft of product	
08/08/00	NM	
10/03/00-10/04/00	NM	
01/10/01-01/11/01	NM	
04/09/01-04/10/01	NM	
08/13/01-08/14/01	0.01 ft of product	
11/16/01	0.1 ft of product	
01/30/02	NM	
03/20/02	28.16	1526.22
07/23/02	24.98	1529.40
11/05/02	24.81	1529.57
03/11/03	27.45	1526.93
07/15/03	0.02 ft of product	
10/28/03	0.30 ft of product	
03/03/04	2.03 ft of product	
05/12/04	25.7	1528.68
10/12/04	26.78	1527.60
02/08/05	0.62 ft of product	
02/23/05	0.18 ft of product	
04/26/05	0.46 ft of product	
11/02/05	1.47 ft of product	
01/04/06	0.60 ft of product	
05/01/06	No product present	
05/16/06	Sheen	
06/14/06	24.39	1529.99
07/18/06	Sheen	
08/03/06	Sheen	
09/18/06	Approx. 0.01 ft of product	
11/14/06	Approx. 0.31 ft of product	
11/28/06	Approx. 0.01 ft of product	
12/19/06	Approx. 0.50 ft of product	
01/03/07	Approx. 0.42 ft of product	
02/15/07	Approx. 1.1 ft of product	
03/15/07	Approx. 0.50 ft of product	
04/11/07	Approx. 0.12 ft of product	
04/25/07	Approx. 0.06 ft of product	
06/12/07	Approx. 0.04 ft of product	
07/31/07	Sheen	
08/28/07	27.04	1527.34
10/23/07	Sheen	
11/28/07	Sheen	
01/03/08	Approx. 0.01 ft of product	
04/16/08	Approx. 1.0 ft of product	
06/16/08	Sheen	
07/22/08	Sheen	
09/11/08	26.48	1527.90
12/04/08	Approx. 0.01 ft of product	
01/08/09	Approx. 0.01 ft of product	
01/27/09	Approx. 0.01 ft of product	

TABLE 7

MONITORING WELL DATA AND GROUNDWATER ELEVATIONS (MSL)
CUTTING OIL RELEASE MONITORING WELLS

MW-5	Elevation (MSL)	
Surface Elevation		NS
Top of Casing		1557.45
Top of Screen Elevation		1543.10
Bottom of Screen Elevation		1528.10
Measurement Date	DTW (ft)	Groundwater Elevation (MSL)
04/28/99-04/29/99	24.69	1532.76
08/10/99	24.20	1533.25
08/31/99	24.14	1533.31
12/14/99-12/15/99	24.61	1532.84
03/15/00	24.96	1532.49
08/08/00	23.34	1534.11
10/03/00-10/04/00	22.84	1534.61
01/10/01-01/11/01	23.80	1533.65
04/09/01-04/10/01	24.28	1533.17
08/13/01-08/14/01	23.11	1534.34
10/01/01-10/02/01	NM	NM
11/16/01	23.25	1534.20
03/20/02	24.06	1533.39
07/23/02	20.90	1536.55
11/05/02	20.86	1536.59
03/11/03	22.60	1534.85
07/15/03	21.81	1535.64
10/28/03	22.54	1534.91
03/03/04	23.73	1533.72
05/12/04	22.72	1534.73
10/12/04	22.4	1535.05
02/08/05	NM	NM
04/26/05	23.25	1534.20
11/02/05	28.70	1528.75
01/04/06	23.35	1534.10
05/01/06	23.56	1533.89
09/18/06	22.54	1534.91
08/28/07	22.54	1534.91
09/11/08	26.48	1530.97

MW-7	Elevation (MSL)	
Surface Elevation		NS
Top of Casing		1554.41
Top of Screen Elevation		1539.40
Bottom of Screen Elevation		1524.40
Measurement Date	DTW (ft)	Groundwater Elevation (MSL)
04/28/99-04/29/99	26.34	1528.07
08/10/99	25.02	1529.39
08/31/99	24.52	1529.89
12/14/99-12/15/99	25.49	1528.92
03/15/00	26.20	1528.21
08/08/00	23.64	1530.77
10/03/00-10/04/00	23.48	1530.93
01/10/01-01/11/01	24.82	1529.59
04/09/01-04/10/01	25.83	1528.58
08/13/01-08/14/01	23.77	1530.64
10/01/01-10/02/01	23.71	1530.70
11/16/01	24.11	1530.30
01/30/02	24.49	1529.92
03/20/02	25.19	1529.22
07/23/02	22.52	1531.89
11/05/02	22.23	1532.18
03/11/03	24.25	1530.16
07/15/03	23.23	1531.18
10/28/03	23.74	1530.67
03/03/04	25.06	1529.35
05/12/04	23.6	1530.81
10/12/04	23.17	1531.24
04/26/05	23.70	1530.71
11/02/06	23.31	1531.10
01/04/06	23.92	1530.49
05/01/06	23.67	1530.74
09/18/06	22.98	1531.43
08/28/07	23.91	1530.50
09/11/08	22.89	1531.52

TABLE 7

MONITORING WELL DATA AND GROUNDWATER ELEVATIONS (MSL)
CUTTING OIL RELEASE MONITORING WELLS

MW-8	Elevation (MSL)	
Surface Elevation		NS
Top of Casing		1556.96
Top of Screen Elevation		1539.70
Bottom of Screen Elevation		1524.70
Measurement Date	DTW (ft)	Groundwater Elevation (MSL)
04/28/99-04/29/99	28.02	1528.94
08/10/99	27.36	1529.6
08/31/99	27.18	1529.78
12/14/99-12/15/99	27.84	1529.12
03/15/00	28.25	1528.71
08/08/00	26.70	1530.26
10/03/00-10/04/00	26.35	1530.61
01/10/01-01/11/01	NM	NM
04/09/01-04/10/01	25.47	1531.49
08/13/01-08/14/01	24.42	1532.54
10/01/01-10/02/01	NM	NM
11/16/01	24.63	1532.33
01/30/02	NM	NM
03/20/02	25.56	1531.40
07/23/02	23.65	1533.31
11/05/02	23.11	1533.85
03/11/03	24.31	1532.65
07/15/03	24.11	1532.85
10/28/03	24.36	1532.60
03/03/04	25.38	1531.58
05/12/04	24.46	1532.50
10/12/04	23.98	1532.98
04/26/05	NM	NM
11/02/05	Dry	
01/04/06	NM	NM
05/01/06	25.18	1531.78
09/18/06	24.02	1532.94
08/28/07	24.63	1532.33
09/11/08	24.1	1532.86

NOTES:
DTW = Depth of water from top of casing.
NS = Not surveyed.

Gannett Fleming

PRECISION TWIST DRILL CO.
RHINELANDER, WISCONSIN

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-1 10 feet Upgradient from Former Pit B								NR 140 ES	NR 140 PAL
	09/12/95	02/12/96	09/24/96	10/30/97	03/12/98	02/09/99	04/28/99	08/31/99		
DRO	222	339	364	468	<27	315	390	524	NS	NS
PAHs (EPA Method 8310)										
Acenaphthene	NA	<0.22	NA	<0.22	<0.54	<0.1	<0.1	<0.1	NS	NS
Acenaphthylene	NA	<0.28	NA	<0.16	<0.23	<0.1	<0.1	<0.1	NS	NS
Anthracene	NA	<0.22	NA	<0.06	<0.037	<0.09	<0.09	<0.09	3,000	600
Benzo(a)Anthracene	NA	<0.1	NA	<0.12	<0.0073	<0.05	<0.05	<0.05	NS	NS
Benzo(a)Pyrene	NA	<0.2	NA	<0.06	<0.018	<0.04	<0.04	<0.04	0.2	0.02
Benzo(b)Fluoranthene	NA	<0.16	NA	<0.06	<0.015	<0.04	<0.04	<0.04	0.2	0.02
Benzo(k)Fluoranthene	NA	<0.16	NA	<0.12	<0.023	<0.06	<0.06	<0.06	NS	NS
Benzo(ghi)Perylene	NA	<0.32	NA	<0.10	<0.035	<0.06	<0.06	<0.06	NS	NS
Chrysene	NA	<0.12	NA	<0.08	<0.051	<0.05	<0.05	<0.05	0.2	0.02
Dibenzo(a,h)Anthracene	NA	<0.4	NA	<0.12	<0.21	<0.1	<0.1	<0.1	NS	NS
Fluoranthene	NA	<0.3	NA	<0.08	<0.018	<0.06	<0.06	<0.06	400	80
Fluorene	NA	<0.16	NA	<0.08	<0.16	<0.07	<0.07	<0.07	400	80
Indeno(1,2,3-cd)Pyrene	NA	<0.34	NA	<0.08	<0.016	<0.07	<0.07	<0.07	NS	NS
1-Methyl Naphthalene	NA	<0.3	NA	<0.12	<0.27	<0.09	<0.09	<0.09	NS	NS
Naphthalene	NA	<0.18	NA	<0.10	<0.23	<0.08	<0.08	<0.08	40	8
Phenanthrene	NA	<0.18	NA	<0.16	<0.096	<0.08	<0.08	<0.08	NS	NS
Pyrene	NA	<0.3	NA	<0.34	<0.017	<0.11	<0.11	<0.11	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-1 10 feet Upgradient from Former Pit B							NR 140 ES	NR 140 PAL
	03/11/03	07/15/03	10/12/04	11/02/05	09/18/06	08/28/07	09/11/08		
DRO	349	264(2)	270	<143	527	442	1,180	NS	NS
PAHs (EPA Method 8310)									
Acenaphthene	<0.06	<0.06	<0.075	<0.06	<0.062	<0.067	<0.062	NS	NS
Acenaphthylene	<0.06	<0.06	<0.075	<0.06	<0.062	<0.067	<0.062	NS	NS
Anthracene	<0.05	<0.05	<0.0625	<0.09	<0.094	<0.100	<0.094	3,000	600
Benzo(a)Anthracene	<0.04	<0.04	<0.05	<0.1	<0.104	<0.111	<0.104	NS	NS
Benzo(a)Pyrene	<0.017	<0.017	<0.0212	<0.017	<0.021	<0.022	<0.021	0.2	0.02
Benzo(b)Fluoranthene	<0.04	<0.04	<0.05	<0.02	<0.021	<0.022	<0.021	0.2	0.02
Benzo(k)Fluoranthene	<0.04	<0.04	<0.05	<0.07	<0.073	<0.078	<0.073	NS	NS
Benzo(ghi)Perylene	<0.05	<0.05	<0.0625	<0.06	<0.062	<0.067	<0.062	NS	NS
Chrysene	<0.05	<0.05	<0.0625	<0.02	<0.021	<0.022	<0.021	0.2	0.02
Dibenzo(a,h)Anthracene	<0.06	<0.06	<0.075	<0.11	<0.115	<0.122	<0.115	NS	NS
Fluoranthene	<0.06	<0.06	<0.075	<0.12	<0.125	<0.133	<0.125	400	80
Fluorene	<0.12	<0.12	<0.15	<0.12	<0.125	<0.133	<0.125	400	80
Indeno(1,2,3-cd)Pyrene	<0.05	<0.05	<0.0625	<0.12	<0.125	<0.133	<0.125	NS	NS
1-Methyl Naphthalene	<0.08	<0.08	<0.1	<0.08	<0.083	<0.089	<0.083	NS	NS
Naphthalene	<0.1	<0.1	<0.125	<0.11	<0.115	<0.122	<0.115	40	8
Phenanthrene	<0.08	<0.08	<0.1	<0.11	<0.115	<0.122	<0.115	NS	NS
Pyrene	<0.09	<0.09	<0.113	<0.1	<0.104	<0.111	<0.104	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-2 50 feet Upgradient from Former Pit B									NR 140 ES	NR 140 PAL
	08/14/01	11/16/01	03/20/02	07/23/02	11/05/02	03/11/03	07/15/03	10/12/04	09/18/06		
DRO	216	216	145	130	156	<100	<100	<100	<100	NS	NS
PAHs (EPA Method 8310)											
Acenaphthene	<0.1	<0.1	<0.06	<0.053	<0.06	<0.0924	<0.06	<0.084	<0.062	NS	NS
Acenaphthylene	<0.15	<0.15	<0.06	<0.16	<0.06	<0.0924	<0.06	<0.084	<0.062	NS	NS
Anthracene	<0.09	<0.09	<0.05	<0.024	<0.05	<0.077	<0.05	<0.07	<0.093	600	3,000
Benzo(a)Anthracene	<0.03	<0.03	<0.04	<0.03	<0.04	<0.0616	<0.04	<0.056	<0.103	NS	NS
Benzo(a)Pyrene	*0.051*	<0.02	<0.017	<0.022	<0.017	<0.0261	<0.017	<0.0238	<0.021	0.02	0.2
Benzo(b)Fluoranthene	*0.049*	<0.02	<0.04	<0.036	<0.04	<0.0616	<0.04	<0.056	<0.021	0.02	0.2
Benzo(k)Fluoranthene	0.042	<0.03	<0.04	<0.067	<0.04	<0.0616	<0.04	<0.056	<0.072	NS	NS
Benzo(ghi)Perylene	<0.09	<0.09	<0.05	<0.087	<0.05	<0.077	<0.05	<0.07	<0.062	NS	NS
Chrysene	*0.032*	<0.02	<0.05	<0.022	<0.05	<0.077	<0.05	<0.07	<0.021	0.02	0.2
Dibenzo(a,h)Anthracene	<0.06	<0.06	<0.06	<0.036	<0.06	<0.0924	<0.06	<0.084	<0.113	NS	NS
Fluoranthene	0.088	<0.03	<0.06	<0.053	<0.06	<0.0924	<0.06	<0.084	<0.124	80	400
Fluorene	<0.11	<0.11	<0.12	<0.025	<0.12	<0.185	<0.12	<0.168	<0.124	80	400
Indeno(1,2,3-cd)Pyrene	<0.06	<0.06	<0.05	<0.03	<0.05	<0.077	<0.05	<0.07	<0.124	NS	NS
1-Methyl Naphthalene	<0.13	<0.13	<0.08	<0.095	<0.08	<0.123	<0.08	<0.112	<0.082	NS	NS
Naphthalene	<0.06	<0.06	<0.1	<0.067	<0.1	<0.154	<0.1	<0.14	<0.113	8	40
Phenanthrene	<0.11	<0.11	<0.08	<0.036	<0.08	<0.123	<0.08	<0.112	<0.113	NS	NS
Pyrene	<0.1	<0.1	<0.09	<0.13	<0.09	<0.139	<0.09	<0.126	<0.103	50	250

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-3 10 Feet Upgradient from Former Pit A									NR 140 ES	NR 140 PAL
	09/12/95	10/30/97	09/01/99	09/08/00	04/11/01	08/14/01	11/16/01	03/20/02	07/23/02		
DRO	520	(1)	(1)	1,340,000	6,520,000	6,660,000	(1)	221,000	1,000,000	NS	NS
PAHs (EPA Method 8310)											
Acenaphthene	NA	NA	(1)	<7.00	<30.0	<40.0	(1)	NA	<0.053	NS	NS
Acenaphthylene	NA	NA	(1)	<10.5	<45.0	<60.0	(1)	NA	<0.16	NS	NS
Anthracene	NA	NA	(1)	<6.30	<27.0	<36.0	(1)	NA	<0.024	3,000	600
Benzo(a)Anthracene	NA	NA	(1)	<2.10	<9.00	<12.0	(1)	NA	<0.03	NS	NS
Benzo(a)Pyrene	NA	NA	(1)	<1.40	<6.00	<8.00	(1)	NA	<0.022	0.2	0.02
Benzo(b)Fluoranthene	NA	NA	(1)	<1.40	<6.00	<8.00	(1)	NA	<0.036	0.2	0.02
Benzo(k)Fluoranthene	NA	NA	(1)	<2.10	<9.00	<12.0	(1)	NA	<0.067	NS	NS
Benzo(ghi)Perylene	NA	NA	(1)	<6.30	<27.0	<36.0	(1)	NA	<0.087	NS	NS
Chrysene	NA	NA	(1)	<1.40	<6.00	<8.00	(1)	NA	<0.022	0.2	0.02
Dibenzo(a,h)Anthracene	NA	NA	(1)	<4.20	<18.0	<24.0	(1)	NA	<0.036	NS	NS
Fluoranthene	NA	NA	(1)	<2.10	<9.0	<12.0	(1)	NA	<0.053	400	80
Fluorene	NA	NA	(1)	<7.70	<33.0	<44.0	(1)	NA	<0.025	400	80
Indeno(1,2,3-cd)Pyrene	NA	NA	(1)	<4.20	<18.0	<24.0	(1)	NA	<0.03	NS	NS
1-Methyl Naphthalene	NA	NA	(1)	<9.10	<39.0	64.0	(1)	NA	4.6	NS	NS
2-Methyl Naphthalene	NA	NA	(1)	<8.40	36.1	113	(1)	NA	5.0	NS	NS
Naphthalene	NA	NA	(1)	<4.20	*20.4*	**199**	(1)	NA	1.6	40	8
Phenanthrene	NA	NA	(1)	<7.70	34.3	<44.0	(1)	NA	27	NS	NS
Pyrene	NA	NA	(1)	<7.00	<30.0	<40.0	(1)	NA	<0.13	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-4		NR 140 ES	NR 140 PAL
	09/12/95	02/12/96		
DRO	<100	131	NS	NS
PAHs (EPA Method 8310)				
Acenaphthene	NA	NA	NS	NS
Acenaphthylene	NA	NA	NS	NS
Anthracene	NA	NA	3,000	600
Benzo(a)Anthracene	NA	NA	NS	NS
Benzo(a)Pyrene	NA	NA	0.2	0.02
Benzo(b)Fluoranthene	NA	NA	0.2	0.02
Benzo(k)Fluoranthene	NA	NA	NS	NS
Benzo(ghi)Perylene	NA	NA	NS	NS
Chrysene	NA	NA	0.2	0.02
Dibenzo(a,h)Anthracene	NA	NA	NS	NS
Fluoranthene	NA	NA	400	80
Fluorene	NA	NA	400	80
Indeno(1,2,3-cd)Pyrene	NA	NA	NS	NS
1-Methyl Naphthalene	NA	NA	NS	NS
Naphthalene	NA	NA	40	8
Phenanthrene	NA	NA	NS	NS
Pyrene	NA	NA	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-5 90 Feet Upgradient from Former Pit A								NR 140 ES	NR 140 PAL
	03/15/00	09/08/00	04/10/01	08/14/01	11/16/01	03/20/02	07/23/02	11/05/02		
DRO	<100	<100	<100	206	<100	<100	<100	117	NS	NS
PAHs (EPA Method 8310)										
Acenaphthene	<0.1	<0.14	<0.1	<0.1	<0.1	<0.06	<0.053	<0.06	NS	NS
Acenaphthylene	<0.15	<0.21	<0.15	<0.15	<0.15	<0.06	<0.16	<0.06	NS	NS
Anthracene	<0.09	<0.126	<0.09	<0.09	<0.09	<0.05	<0.024	<0.05	3,000	600
Benzo(a)Anthracene	<0.03	<0.042	<0.03	<0.03	<0.03	<0.04	<0.03	<0.04	NS	NS
Benzo(a)Pyrene	<0.02	<0.028	<0.02	<0.02	<0.02	<0.017	<0.022	<0.017	0.2	0.02
Benzo(b)Fluoranthene	<0.02	<0.028	<0.02	<0.02	<0.02	<0.04	<0.036	<0.04	0.2	0.02
Benzo(k)Fluoranthene	<0.03	<0.042	<0.03	<0.03	<0.03	<0.04	<0.067	<0.04	NS	NS
Benzo(ghi)Perylene	<0.09	<0.126	<0.09	<0.09	<0.09	<0.05	<0.087	<0.05	NS	NS
Chrysene	<0.02	<0.028	<0.02	<0.02	<0.02	<0.05	<0.022	<0.05	0.2	0.02
Dibenzo(a,h)Anthracene	<0.06	<0.084	<0.06	<0.06	<0.06	<0.06	<0.036	<0.06	NS	NS
Fluoranthene	<0.03	<0.042	<0.03	<0.03	<0.03	<0.06	<0.053	<0.06	400	80
Fluorene	<0.11	<0.154	<0.11	<0.11	<0.11	<0.12	<0.025	<0.12	400	80
Indeno(1,2,3-cd)Pyrene	<0.06	<0.084	<0.06	<0.06	<0.06	<0.05	<0.03	<0.05	NS	NS
1-Methyl Naphthalene	<0.13	<0.182	<0.13	<0.13	<0.13	<0.08	<0.095	<0.08	NS	NS
2-Methyl Naphthalene	<0.12	<0.168	<0.12	<0.12	<0.12	<0.11	<0.096	<0.11	NS	NS
Naphthalene	<0.06	<0.084	<0.06	<0.06	<0.06	<0.1	<0.067	<0.1	40	8
Phenanthrene	<0.11	<0.154	<0.11	<0.11	<0.11	<0.08	<0.036	<0.08	NS	NS
Pyrene	<0.1	<0.14	<0.1	<0.1	<0.1	<0.09	<0.13	<0.09	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-6 5 Feet Downgradient from Former Pit A								NR 140 ES	NR 140 PAL
	02/13/96	02/09/99	09/01/99	09/08/00	04/10/01	08/14/01	11/16/01	03/20/02		
DRO	6,770	1,220,000	(1)	505,000	1,630,000	724,000	241,000	510,000	NS	NS
PAHs (EPA Method 8310)										
Acenaphthene	<0.11	NA	(1)	<4.20	<9.00	<6.00	<0.2	<1.80	NS	NS
Acenaphthylene	<0.14	NA	(1)	<6.30	<13.5	<9.00	<0.3	<1.80	NS	NS
Anthracene	<0.11	NA	(1)	5.48	<8.10	<5.40	<0.18	<1.50	3,000	600
Benzo(a)Anthracene	<0.05	NA	(1)	<1.26	<2.70	<1.80	<0.06	<1.20	NS	NS
Benzo(a)Pyrene	<0.1	NA	(1)	<0.84	<1.80	<1.20	<0.04	<.051	0.2	0.02
Benzo(b)Fluoranthene	<0.08	NA	(1)	<0.84	<1.80	<1.20	<0.04	<1.20	0.2	0.02
Benzo(k)Fluoranthene	<0.08	NA	(1)	<1.26	<2.70	<1.80	<0.06	<1.20	NS	NS
Benzo(ghi)Perylene	<0.16	NA	(1)	<3.78	<8.10	<5.40	<0.18	<1.50	NS	NS
Chrysene	<0.06	NA	(1)	<0.84	<1.80	<1.20	<0.04	<1.50	0.2	0.02
Dibenzo(a,h)Anthracene	<0.2	NA	(1)	<2.52	<5.40	<3.60	<0.12	<1.80	NS	NS
Fluoranthene	<0.15	NA	(1)	<1.26	<2.70	<1.80	<0.06	<1.80	400	80
Fluorene	<0.08	NA	(1)	<4.62	<9.90	<6.60	<0.22	<3.60	400	80
Indeno(1,2,3-cd)Pyrene	<0.17	NA	(1)	<2.52	<5.40	<3.60	<0.12	<1.50	NS	NS
1-Methyl Naphthalene	0.221	NA	(1)	<5.46	17	<7.80	<0.26	5.57	NS	NS
2-Methyl Naphthalene	<0.09	NA	(1)	<5.04	11.9	10.7	<0.24	8.16	NS	NS
Naphthalene	0.209	NA	(1)	<2.52	6.11	<3.60	<0.12	<3.00	40	8
Phenanthrene	0.265	NA	(1)	4.67	11.6	<6.60	1.32	3.96	NS	NS
Pyrene	<0.15	NA	(1)	<4.20	<9.00	<6.00	0.453	<2.70	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-6 5 Feet Downgradient from Former Pit A							NR 140 ES	NR 140 PAL
	04/26/05	11/02/05	09/18/06	08/28/07	9/11/08				
DRO	2,124,193	3,023,321	66,600	98,900	72,400			NS	NS
PAHs (EPA Method 8310)									
Acenaphthene	<25.6	<42.0	<0.062	<0.06	<0.612			NS	NS
Acenaphthylene	<25.6	<42.0	<0.062	<0.06	<0.612			NS	NS
Anthracene	<21.3	<63.0	<0.094	<0.09	<0.918			3,000	600
Benzo(a)Anthracene	<17.0	<70.0	<0.104	<0.10	<1.02			NS	NS
Benzo(a)Pyrene	<7.24	<11.9	<0.021	<0.02	<0.204			0.2	0.02
Benzo(b)Fluoranthene	<8.52	<14.0	<0.021	<0.02	<0.204			0.2	0.02
Benzo(k)Fluoranthene	<17.0	<49.0	<0.073	<0.07	<0.714			NS	NS
Benzo(ghi)Perylene	<21.3	<42.0	<0.062	<0.06	<0.612			NS	NS
Chrysene	<8.52	<14.0	<0.021	<0.02	<0.204			0.2	0.02
Dibenzo(a,h)Anthracene	<25.6	<77.0	<0.115	<0.11	<1.12			NS	NS
Fluoranthene	<25.6	<84.0	<0.125	<0.12	<1.22			400	80
Fluorene	<51.1	<84.0	<0.125	<0.12	<1.22			400	80
Indeno(1,2,3-cd)Pyrene	<21.3	<84.0	<0.125	<0.12	<1.22			NS	NS
1-Methyl Naphthalene	<34.1	<56.0	<0.083	<0.08	<0.816			NS	NS
2-Methyl Naphthalene	<46.9	<77.0	<0.115	<0.11	<1.12			NS	NS
Naphthalene	<42.6	<77.0	<0.115	<0.11	<1.152			40	8
Phenanthrene	51.6	<77.0	<0.115	<0.11	<1.12			NS	NS
Pyrene	<38.3	<70.0	<0.104	<0.10	<1.02			250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-7 60 Feet Downgradient from Former Pit A								NR 140 ES	NR 140 PAL
	03/15/00	09/08/00	04/10/01	08/14/01	11/16/01	03/20/02	07/23/02	11/05/02		
DRO	<100	<100	<100	134	<100	<100	<100	<100	NS	NS
PAHs (EPA Method 8310)										
Acenaphthene	<0.1	<0.13	<0.1	<0.1	<0.1	<0.06	<0.265	<0.06	NS	NS
Acenaphthylene	<0.15	<0.195	<0.15	<0.15	<0.15	<0.06	<0.8	<0.06	NS	NS
Anthracene	<0.09	<0.117	<0.09	<0.09	<0.09	<0.05	<0.12	<0.05	3,000	600
Benzo(a)Anthracene	<0.03	<0.039	<0.03	<0.03	<0.03	<0.04	<0.15	<0.04	NS	NS
Benzo(a)Pyrene	<0.02	<0.026	<0.02	<0.02	<0.02	<0.017	<0.11	<0.017	0.2	0.02
Benzo(b)Fluoranthene	<0.02	<0.026	<0.02	<0.02	<0.02	<0.04	<0.18	<0.04	0.2	0.02
Benzo(k)Fluoranthene	<0.03	<0.039	<0.03	<0.03	<0.03	<0.04	<0.335	<0.04	NS	NS
Benzo(ghi)Perylene	<0.09	<0.117	<0.09	<0.09	<0.09	<0.05	<0.435	<0.05	NS	NS
Chrysene	<0.02	<0.026	<0.02	<0.02	<0.02	<0.05	<0.11	<0.05	0.2	0.02
Dibenzo(a,h)Anthracene	<0.06	<0.078	<0.06	<0.06	<0.06	<0.06	<0.18	<0.06	NS	NS
Fluoranthene	<0.03	<0.039	<0.03	<0.03	<0.03	<0.06	<0.265	<0.06	400	80
Fluorene	<0.11	<0.143	<0.11	<0.11	<0.11	<0.12	<0.125	<0.12	400	80
Indeno(1,2,3-cd)Pyrene	<0.06	<0.078	<0.06	<0.06	<0.06	<0.05	<0.15	<0.05	NS	NS
1-Methyl Naphthalene	<0.13	<0.169	<0.13	<0.13	<0.13	<0.08	<0.475	<0.08	NS	NS
2-Methyl Naphthalene	<0.12	<0.156	<0.12	<0.12	<0.12	<0.11	<0.48	<0.11	NS	NS
Naphthalene	<0.06	<0.078	<0.06	<0.06	<0.06	<0.1	<0.335	<0.1	40	8
Phenanthrene	<0.11	<0.143	<0.11	<0.11	<0.11	<0.08	<0.18	<0.08	NS	NS
Pyrene	<0.1	<0.13	<0.1	<0.1	<0.1	<0.09	<0.65	<0.09	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-8							NR 140	NR 140
	02/13/96	09/24/96	10/30/97	03/12/98	02/09/99	04/28/99	08/31/99	ES	PAL
DRO	347	119	126	<27	533	1,180	<100	NS	NS
PAHs (EPA Method 8310)									
Acenaphthene	NA	NA	<0.11	<0.54	<0.1	<0.1	<0.1	NS	NS
Acenaphthylene	NA	NA	<0.08	<0.23	<0.1	<0.1	<0.1	NS	NS
Anthracene	NA	NA	<0.03	<0.037	<0.09	<0.09	<0.09	3,000	600
Benzo(a)Anthracene	NA	NA	<0.06	<0.0073	<0.05	<0.05	<0.05	NS	NS
Benzo(a)Pyrene	NA	NA	<0.03	<0.018	<0.04	<0.04	<0.04	0.2	0.02
Benzo(b)Fluoranthene	NA	NA	<0.03	<0.015	<0.04	<0.04	<0.04	0.2	0.02
Benzo(k)Fluoranthene	NA	NA	<0.06	<0.023	<0.06	<0.06	<0.06	NS	NS
Benzo(ghi)Perylene	NA	NA	<0.05	<0.035	<0.06	<0.06	<0.06	NS	NS
Chrysene	NA	NA	<0.04	<0.051	<0.05	<0.05	<0.05	0.2	0.02
Dibenzo(a,h)Anthracene	NA	NA	<0.06	<0.21	<0.1	<0.1	<0.1	NS	NS
Fluoranthene	NA	NA	<0.04	<0.018	<0.06	<0.06	<0.06	400	80
Fluorene	NA	NA	<0.04	<0.16	<0.07	<0.07	<0.07	400	80
Indeno(1,2,3-cd)Pyrene	NA	NA	<0.04	<0.016	<0.07	<0.07	<0.07	NS	NS
1-Methyl Naphthalene	NA	NA	<0.06	<0.27	<0.09	<0.09	<0.09	NS	NS
Naphthalene	NA	NA	<0.05	<0.23	<0.08	<0.08	<0.08	40	8
Phenanthrene	NA	NA	<0.08	<0.096	<0.08	<0.08	<0.08	NS	NS
Pyrene	NA	NA	<0.16	<0.017	<0.11	<0.11	<0.11	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Monitoring Well MW-8 25 Feet Down/Side Gradient from Former Pit B							NR 140 ES	NR 140 PAL
	03/11/03	07/15/03	10/12/04	09/18/06	09/18/06-D	08/28/07	09/11/08		
DRO	641	1,030	458	139	252	273	247	NS	NS
PAHs (EPA Method 8310)									
Acenaphthene	<0.0666	<0.0684	<0.066	<0.062	NA	<0.072	<0.061	NS	NS
Acenaphthylene	<0.0666	<0.0684	<0.066	<0.062	NA	<0.072	<0.061	NS	NS
Anthracene	<0.0555	<0.057	<0.055	<0.094	NA	<0.108	<0.092	3,000	600
Benzo(a)Anthracene	<0.0444	<0.0456	<0.044	<0.104	NA	<0.120	<0.102	NS	NS
Benzo(a)Pyrene	<0.0188	<0.0193	<0.0187	<0.021	NA	<0.024	<0.020	0.2	0.02
Benzo(b)Fluoranthene	<0.0444	<.0456	<0.044	<0.021	NA	<0.024	<0.020	0.2	0.02
Benzo(k)Fluoranthene	<0.0444	<0.0456	<0.044	<0.073	NA	<0.084	<0.071	NS	NS
Benzo(ghi)Perylene	<0.0555	<0.057	<0.055	<0.062	NA	<0.072	<0.061	NS	NS
Chrysene	<0.0555	<0.057	<0.055	<0.021	NA	<0.024	<0.020	0.2	0.02
Dibenzo(a,h)Anthracene	<0.0666	<0.0684	<0.066	<0.115	NA	<0.133	<0.112	NS	NS
Fluoranthene	<0.0666	<0.0684	<0.066	<0.125	NA	<0.145	<0.122	400	80
Fluorene	<0.133	<0.137	<0.132	<0.125	NA	<0.145	<0.122	400	80
Indeno(1,2,3-cd)Pyrene	<0.0555	<0.137	<0.055	<0.125	NA	<0.145	<0.122	NS	NS
1-Methyl Naphthalene	<0.0888	<0.0912	<0.088	<0.083	NA	<0.096	<0.082	NS	NS
2-Methyl Naphthalene	<0.122	<0.125	<0.121	<0.115	NA	<0.133	<0.112	NS	NS
Naphthalene	<0.111	<0.114	<0.11	<0.115	NA	<0.133	<0.112	40	8
Phenanthrene	<0.0888	<0.0912	<0.088	<0.115	NA	<0.133	<0.112	NS	NS
Pyrene	<0.0999	<0.103	<0.099	<0.104	NA	<0.120	<0.102	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

Parameter	Recovery Well RW-1 10 Feet Upgradient from Former Pit A								NR 140 ES	NR 140 PAL
	08/14/01	11/16/01	03/20/02	07/23/02	09/19/02	11/05/02	03/11/03	07/15/03		
DRO	3,140	230	588	114,000	10,300	80,900	1,530	33,900(2)	NS	NS
PAHs (EPA Method 8310)										
Acenaphthene	<0.1	<0.1	<0.06	<0.053	NA	<0.06	<1.20	<0.06	NS	NS
Acenaphthylene	<0.15	<0.15	<0.06	<0.16	NA	<0.06	<1.20	<0.06	NS	NS
Anthracene	<0.09	<0.09	<0.05	<0.024	NA	<0.05	<1.00	<0.05	3,000	600
Benzo(a)Anthracene	<0.03	<0.03	<0.04	<0.03	NA	<0.04	<0.8	<0.04	NS	NS
Benzo(a)Pyrene	<0.02	<0.02	<0.017	<0.022	NA	<0.017	<0.34	<0.017	0.2	0.02
Benzo(b)Fluoranthene	<0.02	<0.02	<0.04	<0.036	NA	<0.04	<0.8	<0.04	0.2	0.02
Benzo(k)Fluoranthene	<0.03	<0.03	<0.04	<0.067	NA	<0.04	<0.8	<0.04	NS	NS
Benzo(ghi)Perylene	<0.09	<0.09	<0.05	<0.087	NA	<0.05	<1.00	<0.05	NS	NS
Chrysene	<0.02	<0.02	<0.05	<0.022	NA	<0.05	<1.00	<0.05	0.2	0.02
Dibenzo(a,h)Anthracene	<0.06	<0.06	<0.06	<0.036	NA	<0.06	<1.20	<0.06	NS	NS
Fluoranthene	<0.03	<0.03	<0.06	<0.053	NA	<0.06	<1.20	<0.06	400	80
Fluorene	<0.11	<0.11	<0.12	<0.025	NA	<0.12	<2.40	<0.12	400	80
Indeno(1,2,3-cd)Pyrene	<0.06	<0.06	<0.05	<0.03	NA	<0.05	<1.00	<0.05	NS	NS
1-Methyl Naphthalene	<0.13	<0.13	<0.08	<0.095	NA	<0.08	<1.60	<0.08	NS	NS
2-Methyl Naphthalene	<0.12	<0.12	<0.11	<0.096	NA	<0.11	<2.20	<0.11	NS	NS
Naphthalene	<0.06	<0.06	<0.1	<0.067	NA	<0.1	<2.00	<0.1	40	8
Phenanthrene	<0.11	<0.11	<0.08	<0.036	NA	<0.08	<1.60	<0.08	NS	NS
Pyrene	<0.1	<0.1	<0.09	<0.13	NA	<0.09	<1.80	<0.09	250	50

TABLE 9

DRO & PAH LABORATORY TEST RESULTS FOR GROUNDWATER SAMPLES (µg/ℓ)

NOTES:
All units are in µg/ℓ, parts per billion.
DRO = Diesel range organics.
PAH = Polycyclic aromatic hydrocarbons.
NR 140 PAL = NR Code 140 preventive action limits; concentrations that exceed the NR 140 PALs are italicized.
NR 140 ES = NR Code 140 enforcement standards' concentrations that exceed the NR 140 ES are in bold.
NS = No NR 140 standard established.
NA = Sample not analyzed for this parameter.
J = Estimated concentration between limit of detection and limit of quantitation.

FOOTNOTES:
(1) Insufficient volume of water in well to analyze for this parameter on this date.
(2) The DRO results for MW-1 and RW-1 appear to have been switched either due to a labeling error in the field or laboratory. The results indicated on the table are consistent with the range detected in previous samples and are what we believe to be the correct results.

Gannett Fleming

GANNETT FLEMING, INC.
8025 Excelsior Drive
Madison, WI 53717-1900
Office: (608) 836-1500
Fax: (608) 831-3337
www.gannettfleming.com

US Mail Certified Return Receipt Requested

April 1, 2009
File # 34595.000

Mr. Jason Loppnow
6700 Drury Lane Loop
Three Lakes, WI 54562

Re: Case Closure Notification to Current Owner
Former Triumph Twist Drill Facility
1176 Coon Street, Rhinelander, WI 54501
Parcel ID: RH 9105 1520 Document: 658070
WDNR BRRTS # 02-44-000598

Dear Mr. Loppnow:

On behalf of Precision Twist Drill Co. (PTD), Gannett Fleming, Inc., as PTD's environmental consultant, is informing you that we are submitting a closure request for the historical release of cutting oil from concrete below-grade tank containment Pits A & B at the former Triumph Twist Drill facility in Rhinelander to the Wisconsin Department of Natural Resources (WDNR). Closure means that the WDNR will not require any further clean-up action related to these historical releases. Note that this closure request does not include the current on-going cleanup of trichloroethylene (TCE) at this property, which the WDNR is also overseeing.

Soil samples collected in 1995 at containment Pits A & B indicated that soil more than 12 feet below grade contained diesel range organics (DRO) that were above the NR 720 residual clean-up level (RCL) of 100 mg/kg. The DROs are associated with the cutting oil that was released. Figure 1 (attached) from our closure request package shows the estimated extent of soil above 100 mg/kg at the time of the 1995 sampling. No further soil sampling was conducted. The source of the cutting oil (the tanks in Pits A & B) was removed in 1994, and the pits were filled with sand and covered with concrete. Recent monitoring of the eight monitoring wells that were installed during the investigation of the pits shows that they no longer contain recoverable amounts of free product, and no NR140 groundwater standards are being exceeded.

Since you are now the owner of the former Triumph Twist Drill property where the contamination occurred, you or any subsequent owner of this property would need to properly characterize and dispose of any soil below 12 feet if removed by excavation in accordance with applicable local, state, and federal law.

The WDNR will not review the closure request for at least 30 days after the date of this letter. As an affected property owner, you have a right to contact the WDNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If

Mr. Jason Loppnow
6700 Drury Lane Loop
Three Lakes, WI 54562
April 1, 2009

you would like to submit any information to the WDNR that is relevant to this closure request, you should mail that information to: Mr. William Schultz, P.E., WDNR, 107 Sutliff Ave., Rhinelander, WI, 54501.

If this case is closed, the small areas around former Pits A & B, shown on Figure 1, will be listed on the WDNR's Geographic Information System (GIS) Registry of Closed Remediation Sites with remaining soil contamination. The information on the GIS Registry includes maps showing the locations of properties in Wisconsin where contamination above regulatory standards was found at the time that the case was closed. This GIS Registry is available to the general public on the WDNR's internet web site.

Once the WDNR makes a decision on the closure request, it will be documented in a letter. If the WDNR grants closure, you may obtain a copy of this letter by requesting a copy from me, by writing to the agency address given above or by accessing the WDNR GIS Registry of Closed Remediation Sites on the internet. A copy of the closure letter is included as part of the site file on the GIS Registry of Closed Remediation Sites at:

http://www.dnr.wi.gov/org/aw/rr/gis/index.htm

If you need more information, you may contact me at Gannett Fleming, Inc., 8025 Excelsior Drive, Madison, WI 53717, (608) 836-1500 or you may contact Mr. William Schultz, P.E., WDNR, 107 Sutliff Ave., Rhinelander, WI, 54501, (715) 365-8965.

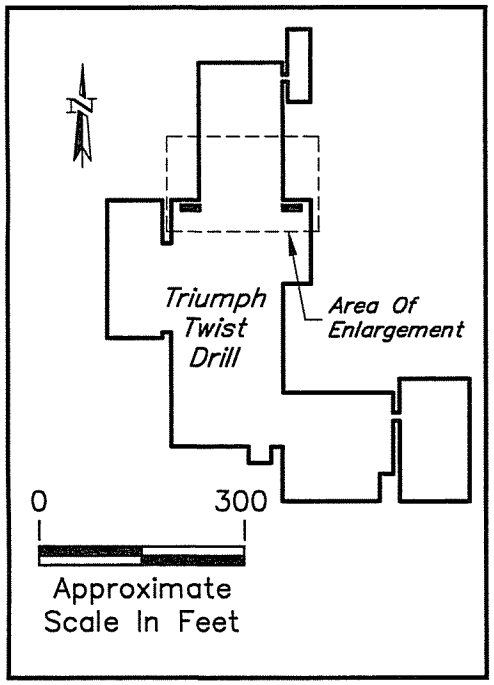
Sincerely,

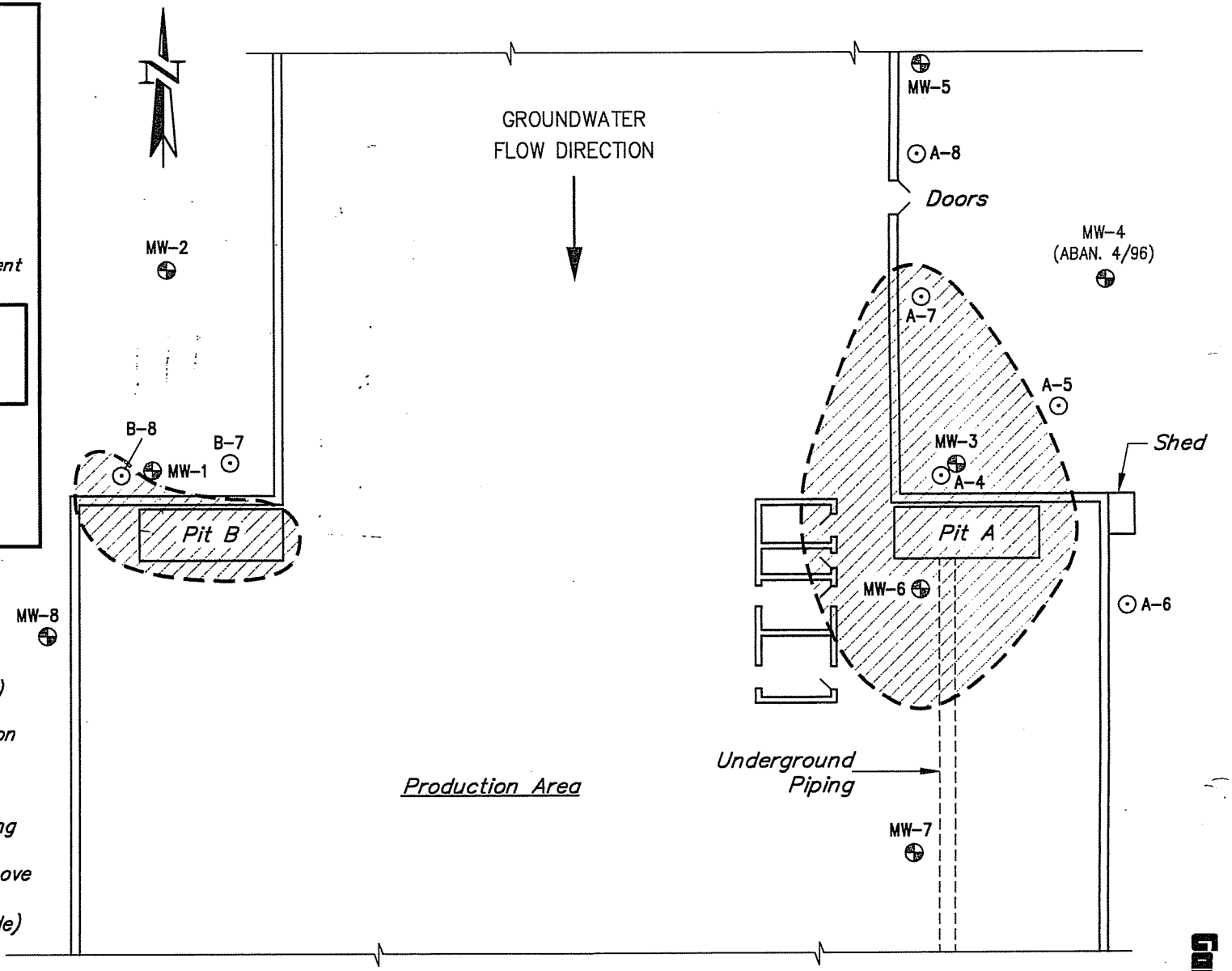
GANNETT FLEMING, INC.

Dennis F. Kugle

MBM/DFK/jec
Enc.

cc: William Schultz (WDNR)
Ian Hainsworth (Precision)
John McAleese (Morgan, Lewis & Bockius)





LEGEND

- MW-8 — Monitoring Well Location (Installed 10/95 Or 2/96)
- B-8 — Geoprobe Borehole Location (Installed 5/95)
- Estimated Extent Of Unsaturated Soil Containing Concentrations Of Diesel Range Organics (DRO) Above 100 ug/kg (DRO Soil At Least 12 Feet Below Grade)

0 30

Approximate Scale In Feet

L:\DRAFTING\34500\34595\34595WDTT.dwg, 3/31/09 11:37:16 AM, \\gfman01\dPRS9946-PCL

PRE-REMEDIAL SAMPLING LOCATIONS AND ESTIMATED EXTENT OF SOIL WITH DIESEL RANGE ORGANICS

FORMER TRIUMPH TWIST DRILL CO.
RHINELANDER, WISCONSIN

031309
34595WDTT

Gannett Fleming

FIGURE 1