

# GIS REGISTRY

## Cover Sheet

July, 2008  
(RR 5367)

### Source Property Information

BRRTS #: 02-28-001607 & 06-28-198906

CLOSURE DATE: Sep 23, 2008

ACTIVITY NAME: US CHEMICAL

FID #: 128048360

PROPERTY ADDRESS: 316 HART ST

DATCP #:

MUNICIPALITY: WATERTOWN

COMM #:

PARCEL ID #: 291-3429-00001

#### \*WTM COORDINATES:

#### WTM COORDINATES REPRESENT:

X: 623900 Y: 302081

Approximate Center Of Contaminant Source

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

Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

#### Contaminated Media:

Groundwater Contamination > ES (236)

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

Contamination in ROW

Contamination in ROW

Off-Source Contamination

Off-Source Contamination

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

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

#### Land Use Controls:

Soil: maintain industrial zoning (220)

Cover or Barrier (222)

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

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

Structural Impediment (224)

Vapor Mitigation (226)

Site Specific Condition (228)

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*

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 #: 02-28-001607 & 06-28-198906

PARCEL ID #: 291-3429-00001

ACTIVITY NAME: U S CHEMICAL CO

WTM COORDINATES: X: 623900 Y: 302081

**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 #: 1-1 Title: U.S. Chemical Watertown Plant**
- 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` Title: Site Layout 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 #: 1-1 Title: U.S. Chemical Watertown Plant**

BRRTS #: 06-28-198906

ACTIVITY NAME: U S CHEMICAL CO

**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 #: 8**                      **Title: Cross Section AA & BB**

**Figure #: 9**                      **Title: Cross Section CC & DD**

- 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 #: 1-1**                      **Title: U.S. Chemical Watertown Plant**

- 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 #: 1**                      **Title: Low Ground Water Flow**

**Figure #: 2**                      **Title: High Ground Water Flow**

**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 #: 1**                      **Title: Soil Analytical Results**

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

**Table #: 1**                      **Title: Summary of Ground Water VOC Results**

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

**Table #: 1**                      **Title: Monitoring Well Information**

**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 #: 06-28-198906

ACTIVITY NAME: U S CHEMICAL CO

## NOTIFICATIONS

### Source Property

- Letter To Current Source Property Owner:** If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.
- Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying current source property owner.

### Off-Source Property

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

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



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew J. Frank, Secretary  
Lloyd L. Eagan, Regional Director

South Central Region Headquarters  
3911 Fish Hatchery Road  
Fitchburg, Wisconsin 53711-5397  
Telephone 608-275-3266  
FAX 608-275-3338  
TTY Access via relay - 711

March 31, 2008

File Ref: 02-28-001607  
Jefferson County

Tom Miazga  
Hydrite Chemical  
300 North Patrick Blvd  
Brookfield, WI 53094

Subject: Conditional Closure: US Chemical Site, 316 Hart Avenue, Watertown

Dear Mr. Miazga:

On March 27, 2008, the South Central Region Closure Committee reviewed your closure request. The Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the Committee has determined that the contamination on the site 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 with issuance of a Certificate of Completion if the following conditions are satisfied:

### **MONITORING WELL ABANDONMENT**

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

### **VOLUNTARY PARTY LIABILITY EXEMPTION ENVIRONMENTAL INSURANCE APPLICATION**

This site is being closed under the groundwater natural attenuation guidelines. To qualify for a Certificate of Completion environmental liability insurance must be purchased. Enclosed is an application form. Please complete this form and return to the address shown along with the insurance premium. This property is classified as a 4.3 acre light industrial property. Therefore, the premium due is \$12,868. This payment can be made by check written to the Department

### **PAYMENT OF OVERSIGHT FEES**

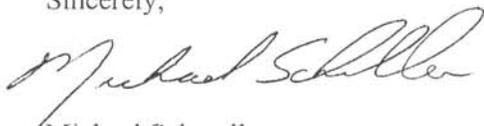
Participation in the VPLE program requires the payment for the staff time involved with overseeing site work. Since July 1998 the Department review fee is \$11,210. A portion of this cost is covered by the initial \$3000 down payment. Therefore, the balance due to the Department at this time is \$8,210. This payment can also be made by check written to the Department.

When the above conditions have been satisfied, your case will be closed and Certificate of Completion will be issued. Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the GIS Registry. To review the site on the GIS Registry web page, visit the RR Sites Map page at:

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

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 608-275-3303.

Sincerely,

A handwritten signature in cursive script that reads "Michael Schmoller". The signature is written in black ink and is positioned above the printed name.

Michael Schmoller  
Hydrogeologist

Cc: Mike Noel, GeoTrans, Inc , 175 North Corporate Drive, Suite 100, Brookfield, WI 53045

March 10, 2008

Ms. Christi Witt  
JohnsonDiversey  
8311 16<sup>th</sup> Street  
Sturtevant, WI 53177

RE: Wisconsin Department of Natural Resources Case Closure for Property Located at  
316 Hart Street, Watertown, Wisconsin

Dear Ms. Witt:

On behalf of Hydrite Chemical Company (Hydrite) we are hereby notifying you that Hydrite is submitting the necessary application for requesting a Certificate of Completion pertaining to the investigation and remediation of soil and groundwater impacts on your property located at 316 Hart Street in Watertown, WI. At the time remediation was completed in 1999 soil sampling data indicated an estimated 7 cubic yards of petroleum-impacted soil (diesel range organics) remained in place. These soils could not be removed because of the building foundation adjacent to the north end of the boiler room. In addition, low levels of volatile organic compounds (VOCs) were detected in groundwater samples from the soil excavation area in 1999. Trichloroethene was detected at 6 ug/L and vinyl chloride was detected at 0.22 ug/L. These residual impacts are being addressed through natural attenuation.

With the Certificate of Completion, all properties within the site boundaries where groundwater impacts exceed chapter NR 140 groundwater enforcement standards or NR 720 soil standards will be listed on the DNR's geographic information system (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps showing the location of properties in Wisconsin where groundwater and soil above the WDNR standards existed at the time that the case was closed. The GIS Registry is available to the general public on the DNR's internet web site.

If you need more information, please feel free to contact me at (262) 792-1282 or you may contact Michael Schmoller at the DNR at (608) 275-3303.

Sincerely,

GeoTrans, Inc.



Michael R. Noel, P.G.  
Vice President, Principal Hydrogeologist

cc: Tom Miazga, Hydrite Chemical Co.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
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Fitchburg, Wisconsin 53711-5397  
Telephone 608-275-3266  
FAX 608-275-3338  
TTY Access via relay - 711

September 23, 2008

File Ref: 06-28-198906  
Jefferson County

Mr. Tom Miazga  
Hydrite Chemical Company  
300 North Patrick Blvd  
Brookfield, WI 53008

Subject: Certificate of Completion: US Chemical Property, 316 Hart Street, Watertown, WI

Dear Mr. Miazga:

The Department of Natural Resources ("the Department") has received your request for a Certificate of Completion for the environmental investigation and cleanup of the property at 316 Hart Street, Watertown, WI. ("the Property"). You have requested that the Department determine whether Hydrite Chemical Company has met the requirements under s. 292.15(2), Wis. Stats. for issuance of a Certificate.

The Property encompasses approximately 4.6 acres and currently is active commercial operation.

Based on the information received by the Department, the Department has determined that the investigation and cleanup of the Property are complete and all the conditions in s. 292.15(2) have been met. Attached is the Certificate of Completion.

The exemption provided by the Certificate of Completion applies to any successor or assignee of Hydrite Chemical Company if the successor or assignee complies with the appropriate conditions of s.292.15(3) Wis.Stats. If you have any questions or concerns about this letter please contact Michael Schmoller at 608-275-3303.

Sincerely

Patrick McCutcheon  
Remediation and Redevelopment Team Supervisor  
South Central Region

Cc Mike Noel, GeoTrans, Inc, 175 North Corporate Drive, Brookfield, WI 53045

**State of Wisconsin**  
**Department of Natural Resources**

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

**Whereas**, Hydrite Chemical Company has applied for an exemption from liability under s. 292.15, Wis. Stats., for property located at 316 Hart Street, City of Watertown, which is commonly referred to as the US Chemical site and further described in the legal description found in Attachment A. The property is partially described as All of Block 17, A.L. Pritchard's Second Addition to the City of Watertown and that part of Chenango Street (vacated) as recorded in Volume 9 of Miscellaneous Deeds on Page 204 in the Office of the Register of Deeds of Jefferson County, Wisconsin, located in the City of Watertown, Jefferson County, Wisconsin hereinafter referred to as "the Property";

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

**Whereas**, Hydrite Chemical Company has submitted to the Wisconsin Department of Natural Resources ("the WDNR") investigation reports and a remedial action plan for the Property which comply with the requirements set forth in chs. NR 700-754, Wis. Adm. Code, consisting, in part, of the documents and reports listed in Attachment B;

**Whereas**, in accordance with s. 292.15(2)(ae), Wis. Stats., the WDNR determined on March 27, 2008, that an environmental investigation has been conducted which adequately identified and evaluated the nature and extent of the hazardous substance discharges on the Property and WDNR has approved of the remedial action plan for the Property;

**Whereas**, on March 27, 2008, the WDNR determined that response actions necessary to restore the environment to the extent practicable with respect to the discharges and minimize the harmful effects from the discharges to air, land, and waters of the state were completed, except with respect to groundwater contaminated with **trichloroethene and vinyl chloride** above the ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standard that the WDNR has determined will be brought into compliance through natural attenuation, in accordance with administrative rules promulgated by the WDNR.

**Whereas**, the Property with groundwater contamination that exceeds a groundwater quality enforcement standard under ch. NR 140, Wis. Adm. Code, will be included on the WDNR's Geographical Information System Registry of Closed Remediation Sites ("the GIS Registry") pursuant to s. 292.12(3), Wis. Stats. **Hydrite Chemical Company** has submitted to the WDNR all the information necessary to be included on the Registry pursuant to s. NR 726.05(2)(a)3. and s. NR 726.05(3)(a)4., Wis. Adm. Code.

**Whereas**, **Hydrite Chemical Company** has paid to the WDNR the appropriate environmental insurance fee and has submitted a complete insurance application form to obtain coverage 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;

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

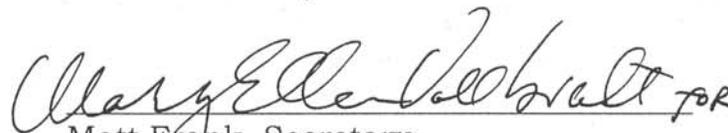
Upon issuance of this Certificate, **Hydrite Chemical Company** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8),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

If natural attenuation fails, the insurance coverage which **Hydrite Chemical Company** obtained under s. 292.15(2)(ae)3m., Wis. Stats., may be used to cover the costs of complying with s. 292.11(2), Wis. Stats., with respect to groundwater contaminated with **trichloroethene and vinyl chloride** above the ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standard. The protection from liability provided under s. 292.15(2), Wis. Stats., does not apply to any person who has obtained a Certificate of Completion by fraud or misrepresentation, or by the knowing failure to disclose material information or under circumstances in which **Hydrite Chemical Company** 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 11 day of September, 2008.

  
Mary Ellen Schvartz FOR  
Matt Frank, Secretary  
Wisconsin Department of Natural Resources

ATTACHMENT A  
LEGAL PROPERTY DESCRIPTION  
US CHEMICAL COMPANY SITE

See attached Warrant Deed Document No. 996398 Recorded with the Jefferson County Register of Deeds on July 1, 1998.

12-

996398

WARRANTY DEED

VOL 1047 PAGE 193

DOCUMENT NO.

This Deed, made between Hydrite Chemical Co. f/k/a United States Chemical Corporation of Wisconsin, a Wisconsin corporation, Grantor, and S.F. Johnson Professional Holdings, Inc., a Wisconsin corporation, Grantee,

Witnesseth, That the said Grantor, for a valuable consideration conveys to Grantee the following described real estate in Jefferson County State of Wisconsin:

RECEIVED FOR RECORD  
at 12:10 o'clock P.M.

JUL 01 1998  
*[Signature]*  
Register of Deeds  
Jefferson County WI

THIS SPACE RESERVED FOR RECORDING DATA

NAME AND RETURN ADDRESS

BEN LEVIN, ATTY  
TOLEY & WEDMUT...  
777 E WISCONSIN  
MILWAUKEE, WI 53202

291-3429-00001  
PARCEL IDENTIFICATION NUMBER

N  
STATE TRANSFER  
Tax Paid  
\$ 8640.00

See Exhibit A attached hereto and incorporated herein by reference

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

Together with all and singular the hereditaments and appurtenances thereunto belonging; and warrants that the title is good, indefeasible in fee simple and free and clear of encumbrances except municipal and zoning ordinances and agreements entered under them, recorded easements for the distribution of utility and municipal services, recorded building and use restrictions and covenants, and general taxes levied in the year of closing and will warrant and defend the same.

Dated this 26<sup>th</sup> day of June 1998.

HYDRITE CHEMICAL CO. f/k/a UNITED STATES CHEMICAL CORPORATION OF WISCONSIN

\_\_\_\_\_  
(SEAL) *[Signature]* (SEAL)

\* By: John A. Honkamp

\_\_\_\_\_  
(SEAL) Itg: President (SEAL)

AUTHENTICATION

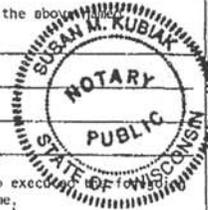
ACKNOWLEDGMENT

Signature(s) \_\_\_\_\_ STATE OF WISCONSIN )  
\_\_\_\_\_  
(Seal) Jefferson County )

authenticated this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_ Personally came before me this 26 day of \_\_\_\_\_ 1998, the above \_\_\_\_\_  
*[Signature]*

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

John A. Honkamp



THIS INSTRUMENT WAS DRAFTED BY

Ann K. Comer, Esq.  
Quarles & Brady

to me known to be the person \_\_\_\_\_ who executed instrument and acknowledged the same;  
Susan M. Kubiak  
Susan M. Kubiak  
Notary Public \_\_\_\_\_ County, Wis

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

My Commission is permanent (If not, state expiration date: 6/26, 192001)

EXHIBIT A

All of Block 17, A. L. Pritchard's Second Addition to the City of Watertown and that part of Chenango Street (vacated) as recorded in Volume 9 of Miscellaneous Deeds on Page 204 in the office of the Register of Deeds of Jefferson County, Wisconsin, located in the City of Watertown, Jefferson County, Wisconsin bounded and described as follows: Commencing at the southwest corner of Block 17; thence East along the south line of Block 17 and its extension, 457.66 feet; thence N 8° 30' E on a line parallel to and 8.50 feet distant from the centerline of a spur track of the Chicago, Milwaukee, St Paul & Pacific Railway, 148.80 feet; thence northwesterly on a curve to the left, said curve being parallel to and 8.50 feet distant from the centerline of a branch spur, to a point in the extension of the north line of Block 17, said point being N 4° 10' W, 134.83 feet; thence N 63° 24' W along the north line of Block 17 and its extension, 524.17 feet to the northwest corner of said block; thence South along the west line of the block, 516.50 feet to the point of beginning.

Further described as:

All of Block 17 of Pritchard's Second Addition to Watertown and located in the SW 1/4 of the SE 1/4 of Section 4, T.8 N., R.15 E., City of Watertown, Jefferson County, Wisconsin and more particularly described as follows:

Beginning at the Southwest corner of said Block 17 of Pritchard's Second Addition;

thence N. 0° 02' 50" E., 516.12 feet, along the West line of said Block 17, to the Northerly line of said Block;

thence S 63° 41' 03" E., 555.56 feet, along said Northerly line of Block 17 and the Southerly line of the C.P Rail System (formerly the C.ST P.&P RR), to the West line of Chenango St ;

thence S. 8° 34' 18" W., 274.29 feet, along the Easterly line of said Block 17 and the W'ly line of Chenango St , to the North line of Hart St ;

thence N. 89° 49' 26" W., 457.53 feet, along the South line of said Block 17 and North line of Hart St , to the Southwest corner of said Block 17 and the place of beginning

ATTACHMENT B  
INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS  
US CHEMICAL COMPANY SITE

1. Remedial Investigation of Hydraulic Oil Contamination, US Chemical Plant, Watertown, WI, Ayres Associates, February 1995
2. Phase II Environmental Site Assessment for Troy Site, Watertown, WI, SC Johnson Wax, RMT, Inc, March 1998
3. Case Closure Submittal and Request for Certificate of Completion, Former US Chemical Facility, Watertown, WI, GeoTrans, Inc March 14, 2008
4. US Chemical Case File, Wisconsin Department of Natural Resources, Case 02-28-001607



EXHIBIT A

All of Block 17, A. L. Pritchard's Second Addition to the City of Watertown and that part of Chenango Street (vacated) as recorded in Volume 9 of Miscellaneous Deeds on Page 204 in the office of the Register of Deeds of Jefferson County, Wisconsin, located in the City of Watertown, Jefferson County, Wisconsin bounded and described as follows: Commencing at the southwest corner of Block 17; thence East along the south line of Block 17 and its extension, 457.66 feet; thence N 8° 30' E on a line parallel to and 8.50 feet distant from the centerline of a spur track of the Chicago, Milwaukee, St. Paul & Pacific Railway, 148.80 feet; thence northwesterly on a curve to the left, said curve being parallel to and 8.50 feet distant from the centerline of a branch spur, to a point in the extension of the north line of Block 17, said point being N 4° 10' W, 134.83 feet; thence N 63° 24' W along the north line of Block 17 and its extension, 524.17 feet to the northwest corner of said block; thence South along the west line of the block, 516.50 feet to the point of beginning.

Further described as:

All of Block 17 of Pritchard's Second Addition to Watertown and located in the SW 1/4 of the SE 1/4 of Section 4, T.8 N., R.15 E., City of Watertown, Jefferson County, Wisconsin and more particularly described as follows:

Beginning at the Southwest corner of said Block 17 of Pritchard's Second Addition;

thence N. 0° 02' 50" E., 516.12 feet, along the West line of said Block 17, to the Northerly line of said Block;

thence S. 63° 41' 03" E., 555.56 feet, along said Northerly line of Block 17 and the Southerly line of the C.P Rail System (formerly the C.ST.P.&P. RR), to the West line of Chenango St.;

thence S. 8° 34' 18" W., 274.29 feet, along the Easterly line of said Block 17 and the W'ly line of Chenango St., to the North line of Hart St.;

thence N. 89° 49' 26" W., 457.53 feet, along the South line of said Block 17 and North line of Hart St., to the Southwest corner of said Block 17 and the place of beginning.

All of Block 17 of Pritchard's Second Addition to Watertown and located in the SW 1/4 of the SE 1/4 of Section 4, T.8 N., R.15 E., City of Watertown, Jefferson County, Wisconsin.

**SURVEYOR'S CERTIFICATE**  
STATE OF WISCONSIN 155  
COUNTY OF JEFFERSON

I, Alden G. Kraeger, Wisconsin Registered Land Surveyor, do hereby certify that by the order of Mr. David Mueller, Milwaukee, WI, I have made a survey of all of Block 17 of Pritchard's Second Addition to Watertown and located in the SW 1/4 of the SE 1/4 of Section 4, T.8 N., R.15 E., City of Watertown, Jefferson County, Wisconsin and more particularly described as follows:

Beginning at the Southwest corner of said Block 17 of Pritchard's Second Addition,

thence N. 0°02'50" E., 519.12 feet, along the West line of said Block 17, to the Northerly line of said Block;

thence S. 63°41'03" E., 555.56 feet, along said Northerly line of Block 17 and the Southerly line of the C.P.R. Rail System, (formerly the C.S.T.P. & P. R.R.), to the West line of Clemons St.;

thence S. 8°34'18" W., 274.29 feet, along the Easterly line of said Block 17 and the Wly line of Clemons St. to the North line of Hart St.;

thence N. 89°59'26" W., 457.53 feet, along the South line of said Block 17 and North line of Hart St., to the Southwest corner of said Block 17 and the place of beginning.

The above described parcel contains approximately 190,638 sq. ft. or 4.3765 acres more or less.

I further certify that I have complied with the applicable provisions of Chapter 236 of the Wisconsin Statutes and the Zoning, Subdivision and Platting Ordinances of the City of Watertown in surveying, locating and mapping the same, and the accompanying map is a true and correct representation of the exterior boundaries of the land surveyed and the division (if any) thereof, and shows the size and location of the property, the location of structures thereon, fences, apparent easements, roadways and visible encroachments if any.

The Hydrex Chemical Co., Quarles & Brady, St. Johnson Professional and Fidelity Land Title, Ltd. This is to certify that this map and the survey on which it is based were made (1) in accordance with the "Minimum Standard Detail Requirements for ALTA/ACSM Land Title Surveys", jointly established and adopted by ALTA and ACSM in 1992, and includes items 1-3, 6-11 & 13 (a) of Table A thereof, and (2) pursuant to the Accuracy Standard as adopted by ALTA and ACSM and in effect on the date of this certification of an urban survey. (See 1992-1993 Edition)

Date: 6/23/78  
Alden G. Kraeger, R.L.S. 1254  
Registration # 76740 sub B



**Utility Contacts:**  
Wisconsin Electric Power Co  
Ernie Meyers  
Delafield Service Center  
S. 13 W. 53800 Hwy 1E  
Delafield, WI 53018  
414-986-5716

Wisconsin Electric Power Co  
Gas Operations  
Lauraine Zieglerbauer  
11 Adkinson Service Center  
1800 Jansville Ave  
Ft. Atkinson, WI 53538  
920-585-4230

Watertown Water Utility  
Mike Cleson  
506 S. First St.  
Watertown, WI 53094  
920-262-4075

Wastewater Treatment Plant  
Paul Langer  
806 Hoffman Dr.  
Watertown, WI 53094  
920-262-4085

City of Watertown  
Howard Brechner  
7915 Powanwood Rd  
Watertown, WI 53188  
414-986-7405

Hydrex Chemical Co  
Attn: David J. Mueller  
108 N. Portlock Blvd  
Brookfield, WI 53005

Quarles & Brady  
Attn: Ann K. Corner  
411 E. Wisconsin Ave  
Milwaukee, WI 53202

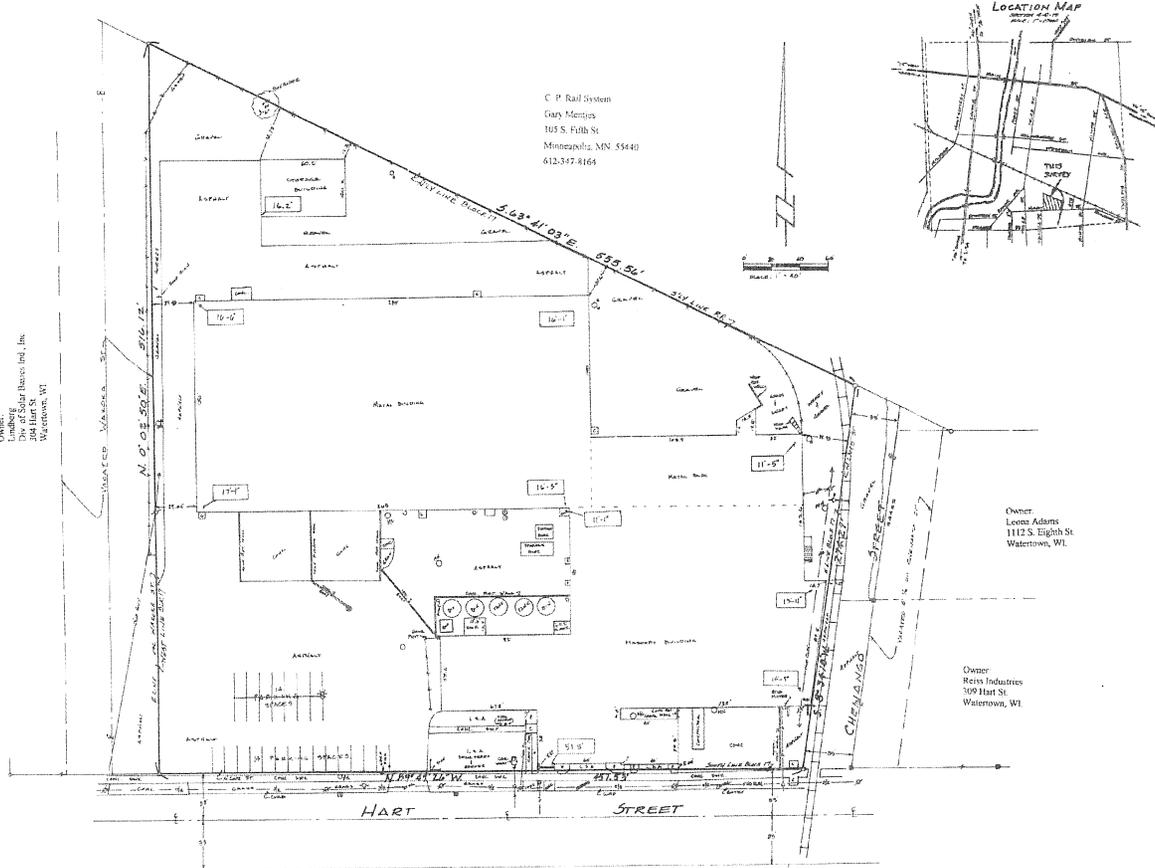
St. Johnson Professional  
Attn: David G. Grant  
P.O. Box 902  
Shurtleff, WI 53177

Fidelity Land Title Ltd  
Attn: Terry Tully  
P.O. Box 404  
Jefferson, WI 53549

Property is entirely in Zone X per the NFIP Flood Insurance Rate Map of Watertown, WI, as Community - Panel Number 550107 0004 C, Rev. 2/16/96

**NOTE:**  
ZONE X REPRESENTS AN AREA DEEMED TO BE OUTSIDE THE SPECIAL FLOODPLAIN

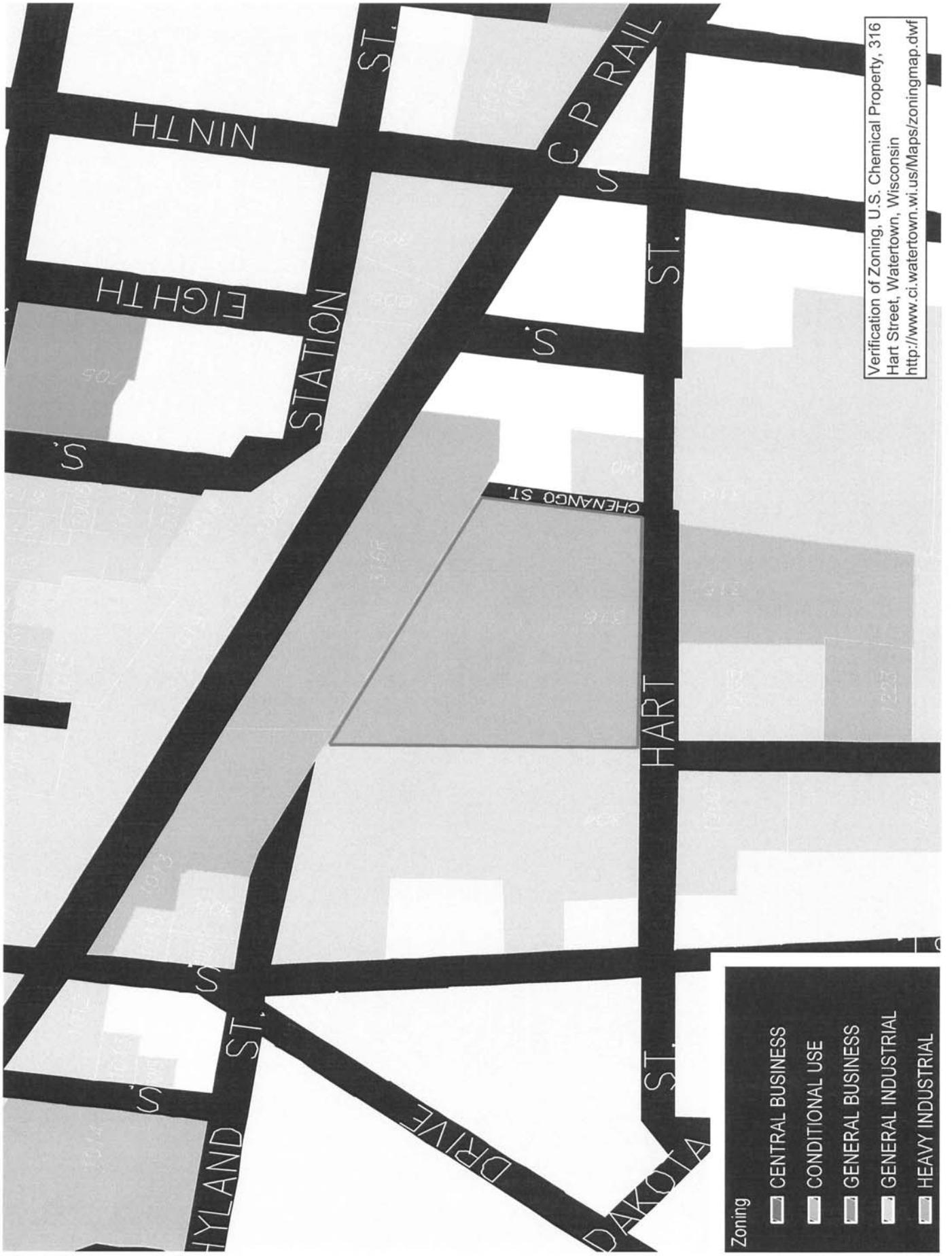
Zoning District - M2  
Minimum lot area - none  
Front setback - 25 feet  
Sideyard setback - none at present  
Rear yard setback - 20 feet  
Height maximum - 60 feet



**LEGEND**

- catch basin
- manhole
- monitoring well
- guard post
- valve
- hydrant
- utility pole
- light pole
- down guy
- emergency wash station
- u/g water line
- u/g gas line
- overhead electric
- overhead electric
- concrete
- concrete
- one retaining wall
- fence line
- planter
- landscaped area
- sidewalk
- air conditioning unit
- building height at eave
- landscaped parking
- iron rod found
- iron pipe found
- found iron rebar set wt. = 1.5 lbs./ft.

TOLERANCES				REVISIONS				U.S. CHEMICAL - WATERTOWN PLANT			
NO.	DATE	BY	DESCRIPTION	NO.	DATE	BY	DESCRIPTION	NO.	DATE	BY	DESCRIPTION
1	6/23/78	AKG	ORIGINAL								
2			REVISION								
3			REVISION								
4			REVISION								
5			REVISION								



- Zoning
- ☐ CENTRAL BUSINESS
  - ☐ CONDITIONAL USE
  - ☐ GENERAL BUSINESS
  - ☐ GENERAL INDUSTRIAL
  - ☐ HEAVY INDUSTRIAL

Verification of Zoning, U.S. Chemical Property, 316  
 Hart Street, Watertown, Wisconsin  
<http://www.ci.watertown.wi.us/Maps/zoningmap.dwf>

## Identify Results



Close

Reformat

Active Layer: [Parcels]

LAYER: Parcels (found features:1)

Feature : 1

**Feature Attribute Table:**

PIN	291-0815-0443-012
Mailing Name 1	SC JOHNSON PROF HOLDING
Mailing Name 2	
Mailing Address	PO BOX 902
Post Office	STURTEVANT
State	WI
ROD Doc#	0996398
Prefix	
Number	316
Suffix	
St Dir	
Street Name	HART ST
Unit	
Post Office	WATERTOWN
Parcel Status	A
Description Year	2000
Acerage	0.0
Tax District	1
Assessment Year	2007
Assessment Acres	4.663
Land Value	0.0
Improvement Value	0.0
Tax Year	2006
General Tax	34320.79
Forest Tax Law	0.0
Woodland Tax Law	0.0
Managed Forest Open	0.0
Managed Forest Closed	0.0
Special Assess Charge	0.0
Est Fare Market Value	1908600.0
Sale Amount	880000.0
Sale Date	19980701
Abbrev Legal 1-2	A.L. PRITCHARDS 2ND ADD., BLOCK 17, ALSO PART OF VAC.

LAYER: MCD Boundaries (found features:0)

LAYER: PLSS Sections (found features:1)

Feature : 1

**Feature Attribute Table:**

SECTION	4
TOWNSHIP	8
RANGE	15

LAYER: PLSS Sections No (found features:0)

WDNR BRRTS Case # 02-28-001607 U.S. Chemical Site, Watertown, WI

Statement by the Responsible Party:

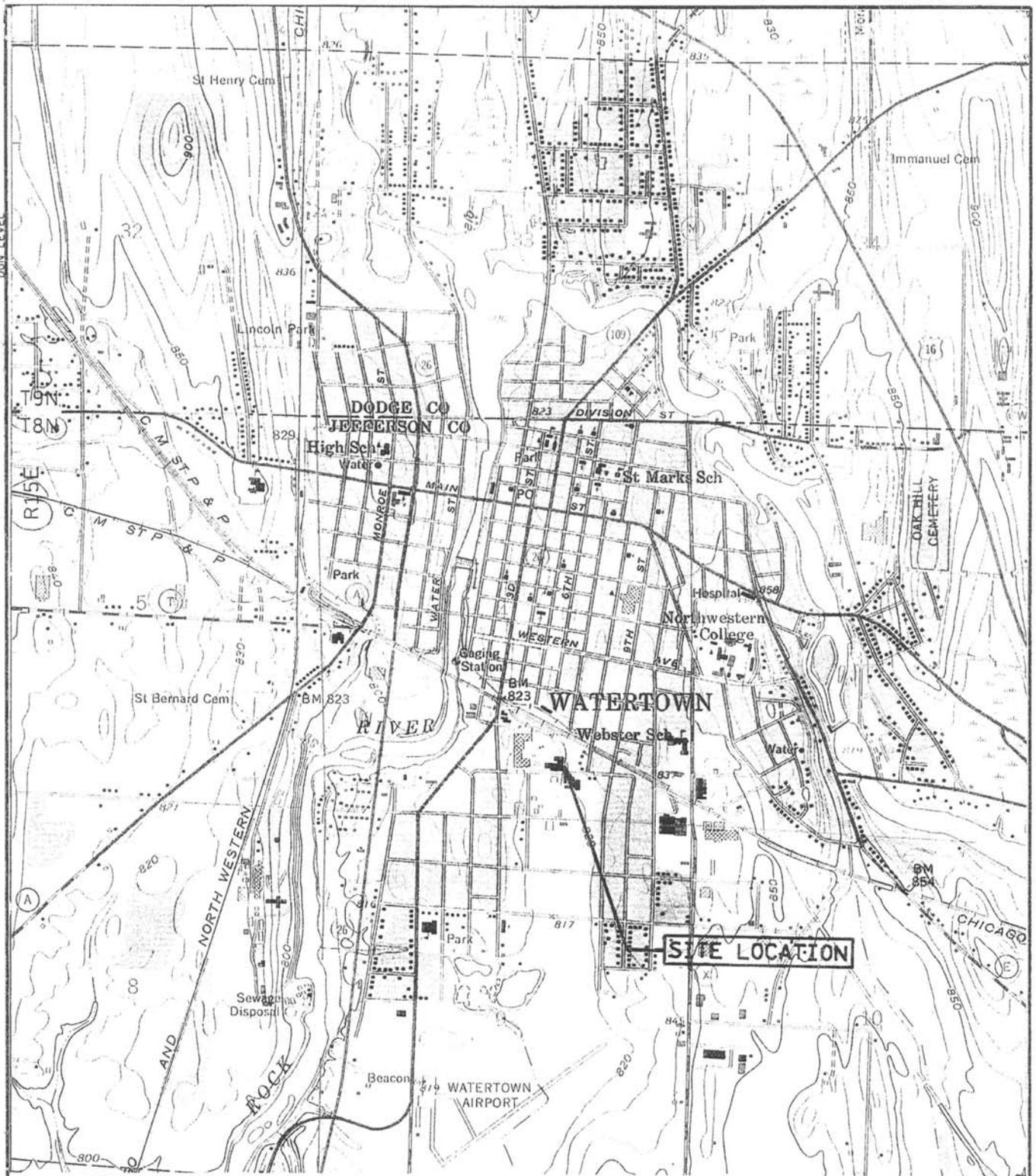
I believe that the legal description has been attached for each property that is within, or partially within, the contaminated site boundary. *(The purpose of this requirement is that a legal description for each of the contaminated properties has been submitted. The RP is not required to attest to the accuracy of the attached legal descriptions.)*

By:  \_\_\_\_\_ for Hydrite Chemical Co.

Print Name : Thomas J. Miazga

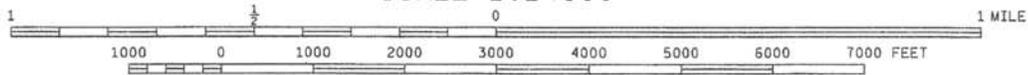
Date: March 12, 2008

\$PENS  
21 JUL 98  
d:\waste\100357\im.dgn  
DGN LEVEL



MAP SOURCE: U.S.G.S. MAP  
WATERTOWN (1971)

SCALE 1:24000



BROWNFIELD SITE CLOSURE  
DOCUMENTATION  
U.S. CHEMICAL  
WATERTOWN, WISCONSIN

DRN. BY: MLE *MLE*  
CHK. BY: JAA *JAA*  
DATE: JULY 1998



LOCATION MAP

FIGURE

1



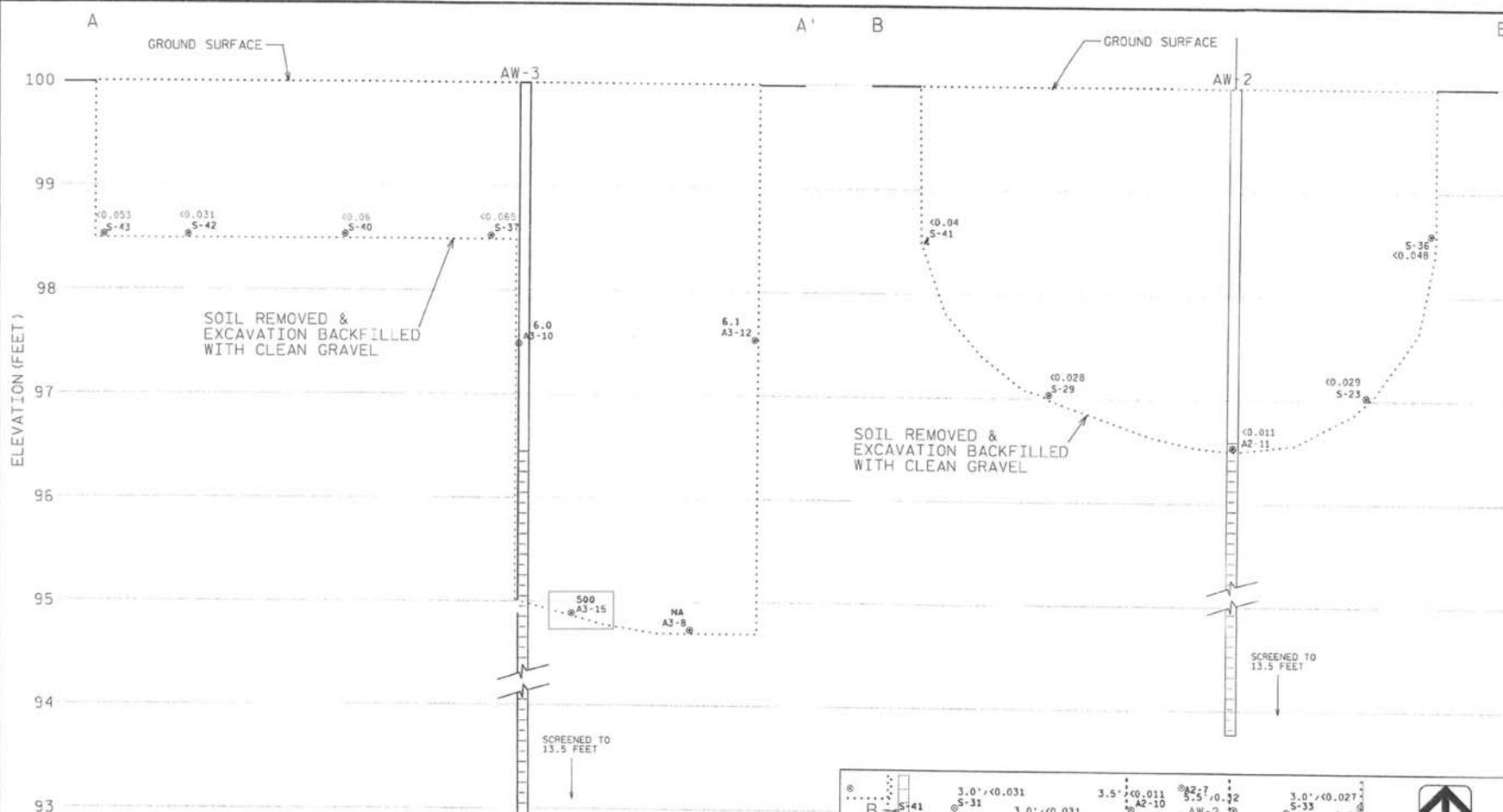


#P/ENR  
28 DEC 98  
00:00:00/00:00:00  
DON LEVIT

LEVD  
LEVA  
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REVA  
REFD  
REVA

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LEVA  
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REVA  
REFD  
REVA

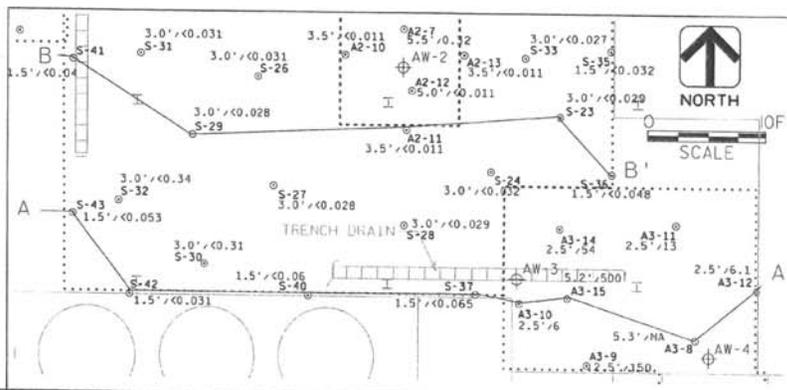
LEVD  
LEVA  
REFD  
REVA  
REFD  
REVA



LEGEND:

FID	FLAME IONIZATION DETECTOR (I.U.)
500	DIESEL RANGE ORGANICS (mg/kg)
<0.028	TCE (ppm)
NA	NOT ANALYZED

SCALE:  
1" = 10' HORIZ.  
1" = 1' VERT.



POST-EXCAVATION  
CROSS SECTION A-A' & B-B'

DRN. BY: JAE  
CHK. BY: JAE  
DATE: DECEMBER 1998  
**AVRES ASSOCIATES**

BROWNFIELD SITE CLOSURE  
DOCUMENTATION  
U.S. CHEMICAL  
WATERTOWN, WISCONSIN

FIGURE  
8

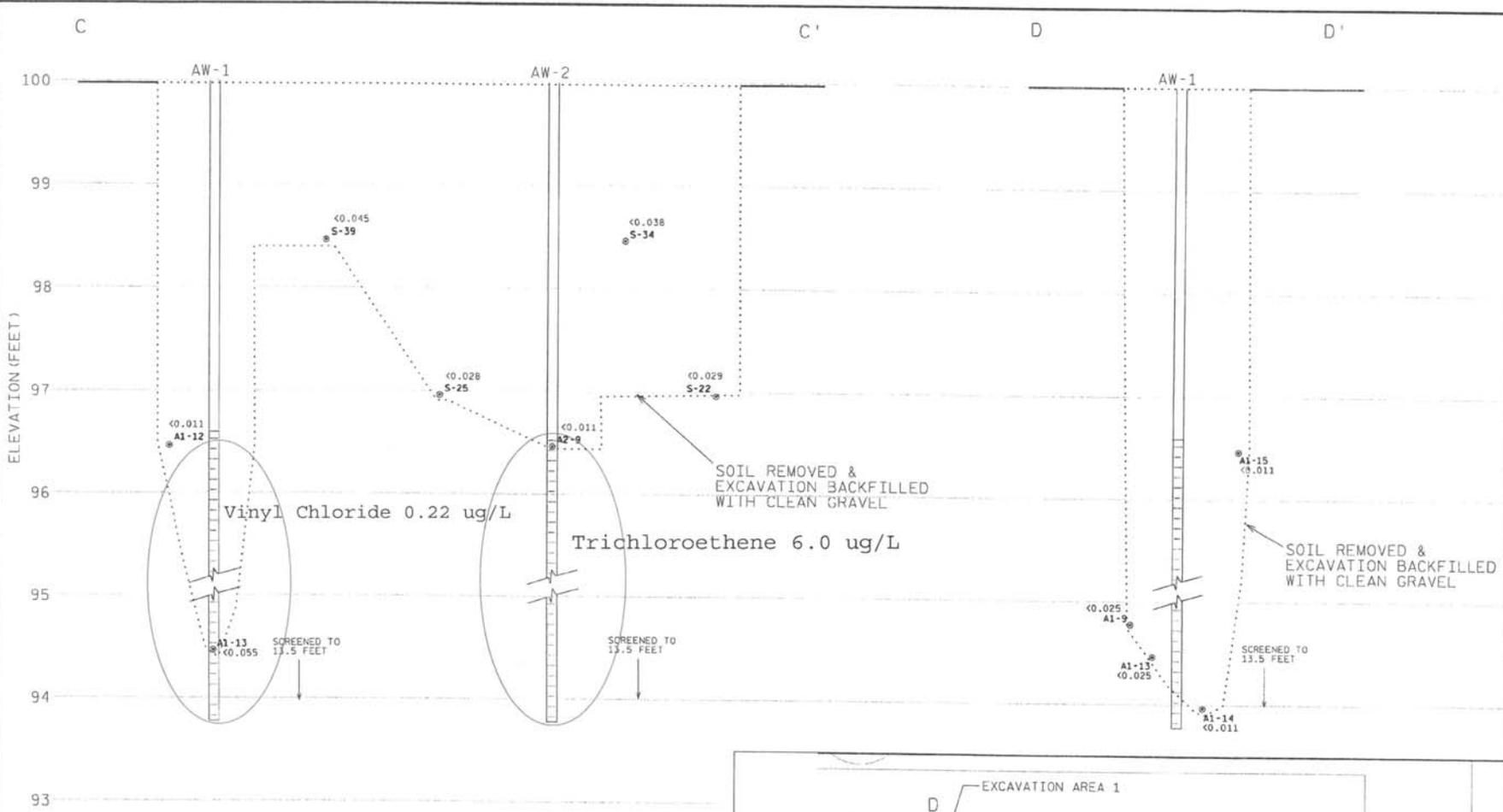
SPERM  
14 DEC 96  
01/waste/000517x3.dgn  
DGN LEVEL

4-LEV2  
4-LEV3  
4-LEV4  
4-LEV5

4-LEV6  
4-LEV7  
4-LEV8  
4-LEV9

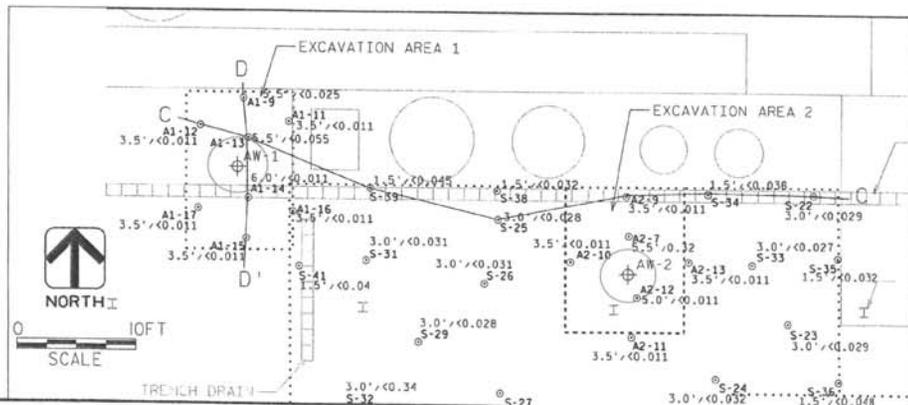
4-LEV0  
4-LEV1  
4-LEV2  
4-LEV3

4-LEV0  
4-LEV1  
4-LEV2  
4-LEV3



LEGEND:	
FID	FLAME IONIZATION DETECTOR (I.U.)
<math>\le 0.04</math>	TCE (ppm)

SCALE:  
1"=10' HORIZ.  
1"=1' VERT.



POST-EXCAVATION  
CROSS SECTION C-C' & D-D'

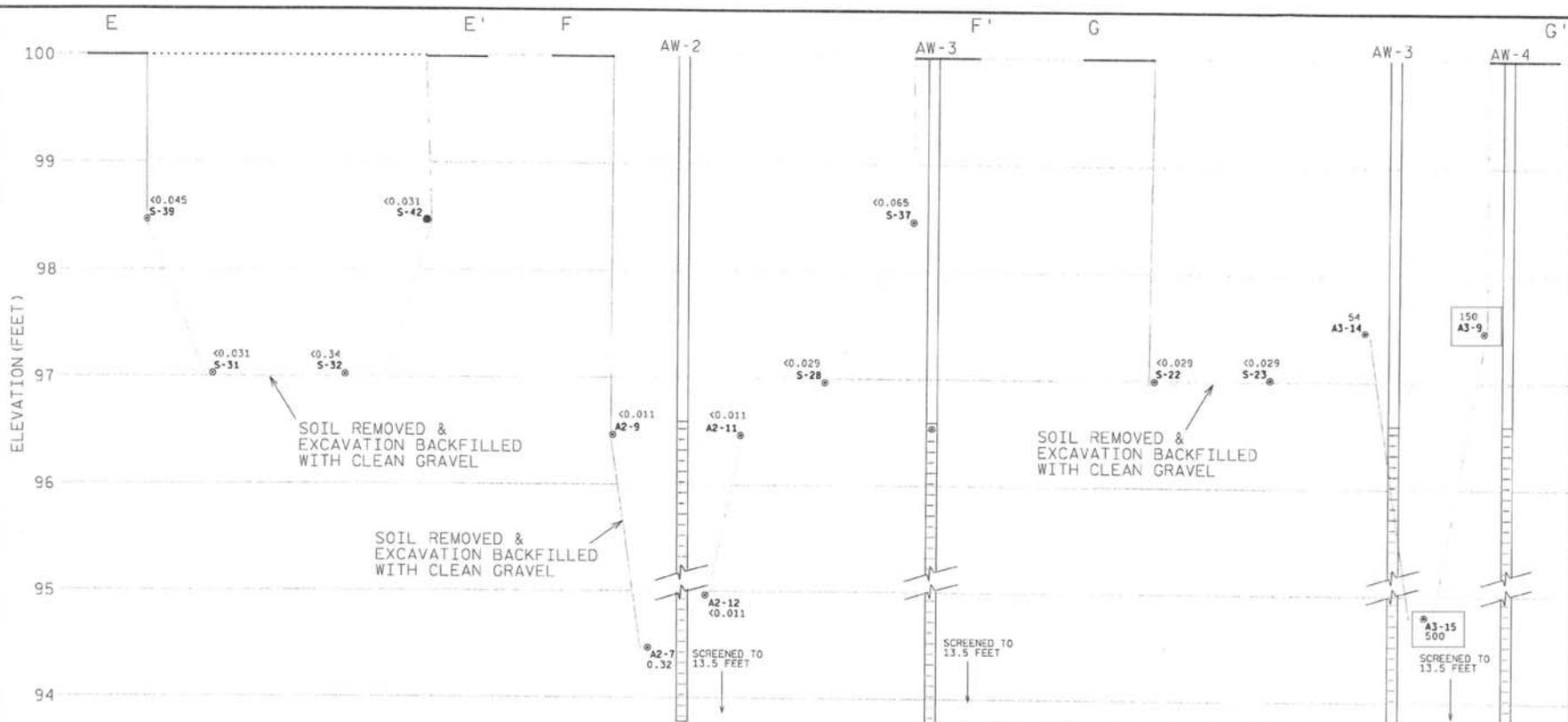
DRN. BY: MLE/MLP  
CHK. BY: JAA/MLP  
DATE: DECEMBER 1998  
**AYRES ASSOCIATES**

BROWNFIELD SITE CLOSURE  
DOCUMENTATION  
U.S. CHEMICAL  
WATERTOWN, WISCONSIN

FIGURE  
9

#FENS  
26 DEC 98  
#LEV01  
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#LEV100

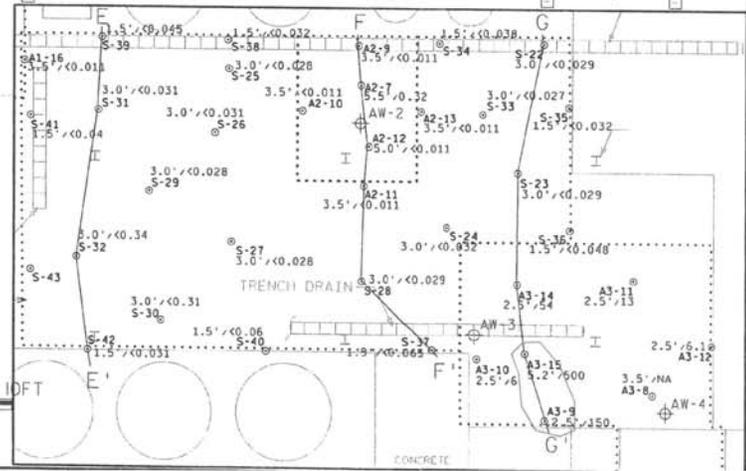
ELEVATION (FEET)



LEGEND:

FID	FLAME IONIZATION DETECTOR (I.U.)
500	DIESEL RANGE ORGANICS (mg/kg)
<0.028	TCE (ppm)
NA	NOT ANALYZED

SCALE:  
1"=10' HORIZ.  
1"=1' VERT.



POST-EXCAVATION  
CROSS SECTION  
E-E', F-F' & G-G'

DR. BY: M.E. J...  
CHK. BY: J.A.A. J...  
DATE: DECEMBER 1998  
**AVRES**  
ASSOCIATES

BROWNFIELD SITE CLOSURE  
DOCUMENTATION  
U.S. CHEMICAL  
WATERTOWN, WISCONSIN

FIGURE  
10



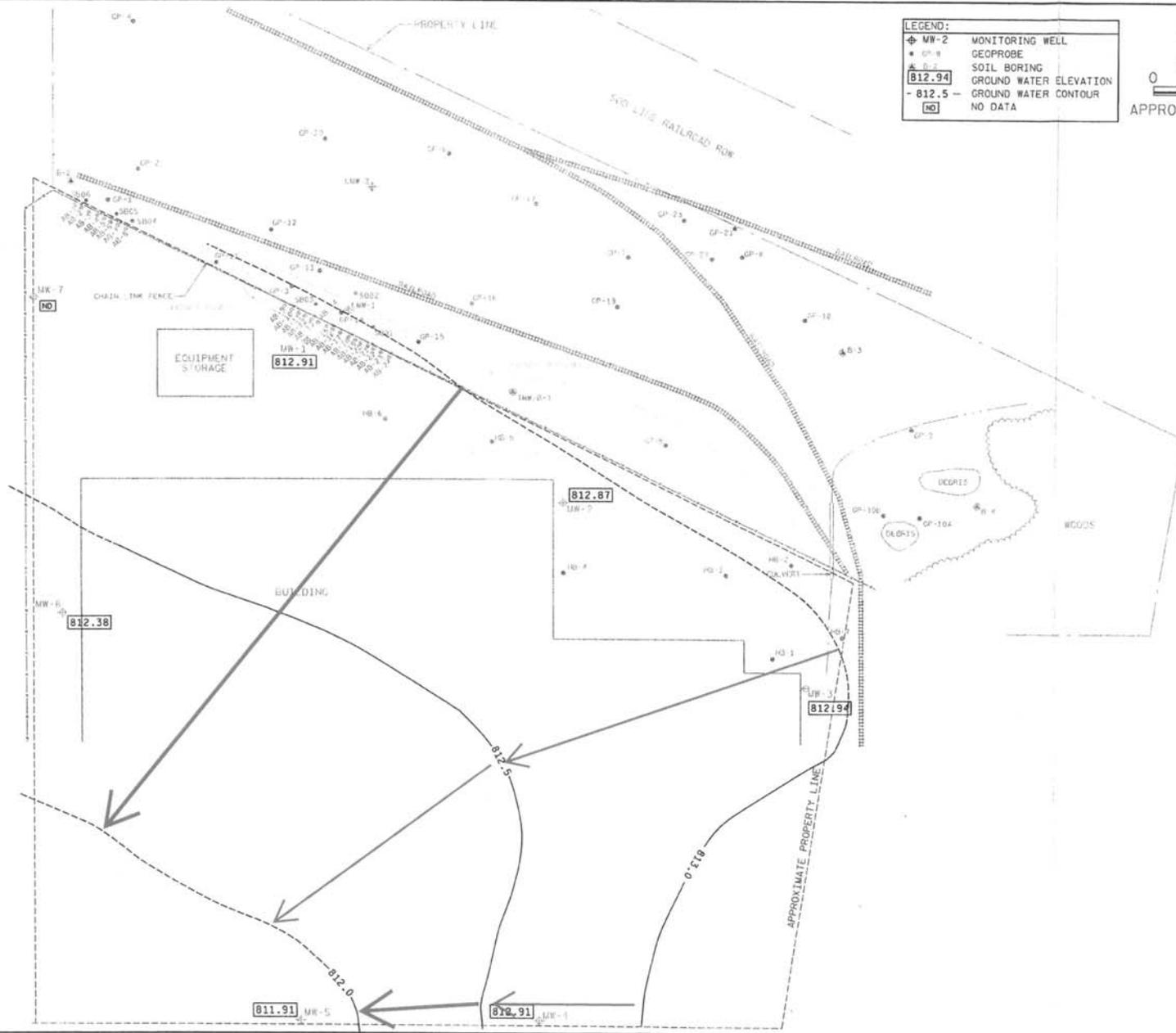
SPENR  
23 JUN 2000  
DRAWN BY: MARS/ELV0035197.dgn  
DGN LEVEL

4-LEVE  
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MAP SOURCE:  
RMT WATER TABLE MAP  
FEBRUARY 1999



LEGEND:  
 MW-2 MONITORING WELL  
 GP-# GEOPROBE  
 812.94 SOIL BORING  
 - 812.5 - GROUND WATER ELEVATION  
 - 812.5 - GROUND WATER CONTOUR  
 NO NO DATA

0 NORTH 60FT  
 APPROXIMATE SCALE

K:\WASTE  
10035197.DGN

LOW GROUND WATER FLOW  
 DECEMBER 4, 1998

DRN. BY: GILL JCS  
 CHK. BY: JAA  
 DATE: JUNE 2000  
 AVRES ASSOCIATES

U.S. CHEMICAL CO.  
 WATERTOWN, WISCONSIN

FIGURE  
 1

SPENB  
25 JUN 2000  
14:00:00 10035708.dgn  
DCN LEVEL

4LEW2  
4LEV09  
4LEV05  
4LEV03

4REF09  
4REF08  
4REF05  
4REF03

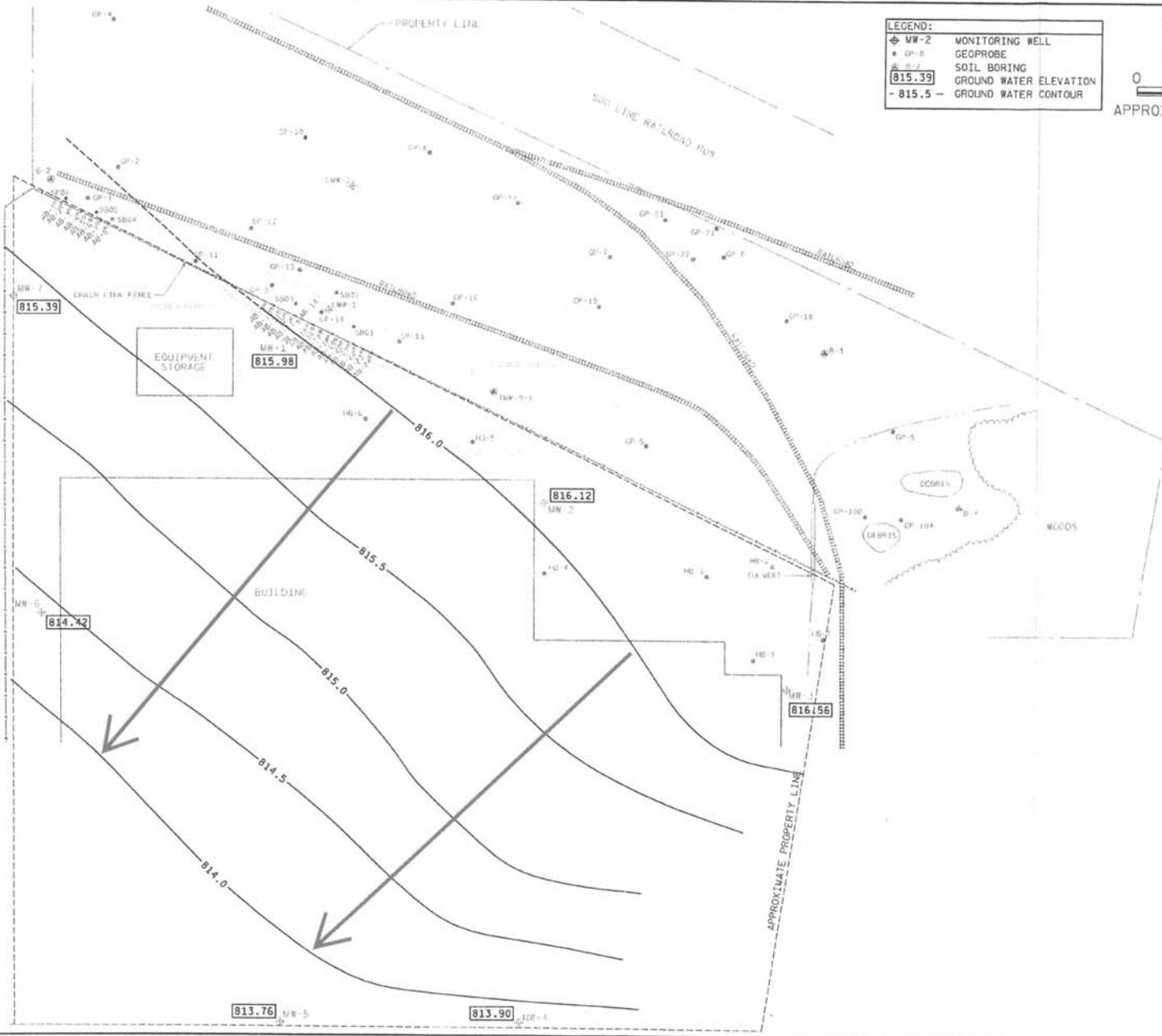
4LEW8  
4LEV08  
4LEV02  
4LEV02

4REF08  
4REF08  
4REF05  
4REF03

4LEW8  
4LEV07  
4LEV04  
4LEV04

4REF08  
4REF07  
4REF04  
4REF04

MAP SOURCE:  
MUNICIPAL MAP  
FEBRUARY 1999



LEGEND:	
⊕ MW-2	MONITORING WELL
• GP-8	GEOPROBE
⊙ SB-2	SOIL BORING
815.39	GROUND WATER ELEVATION
- 815.5 -	GROUND WATER CONTOUR



K:\WASTE\10035708.DGN

HIGH GROUND WATER FLOW  
MAY 24, 2000

DRN. BY: QZE  
CHK. BY: JAA  
DATE: JUNE 2000  
**AVRES ASSOCIATES**

U.S. CHEMICAL CO.  
WATERTOWN, WISCONSIN

FIGURE  
2

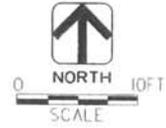
FILE  
DATE: 08  
BY: JAB  
DWG NO: 005700.dwg  
DDI LEVEL

ELEV  
REF: 100  
ELEV: 100  
REF: 100  
ELEV: 100

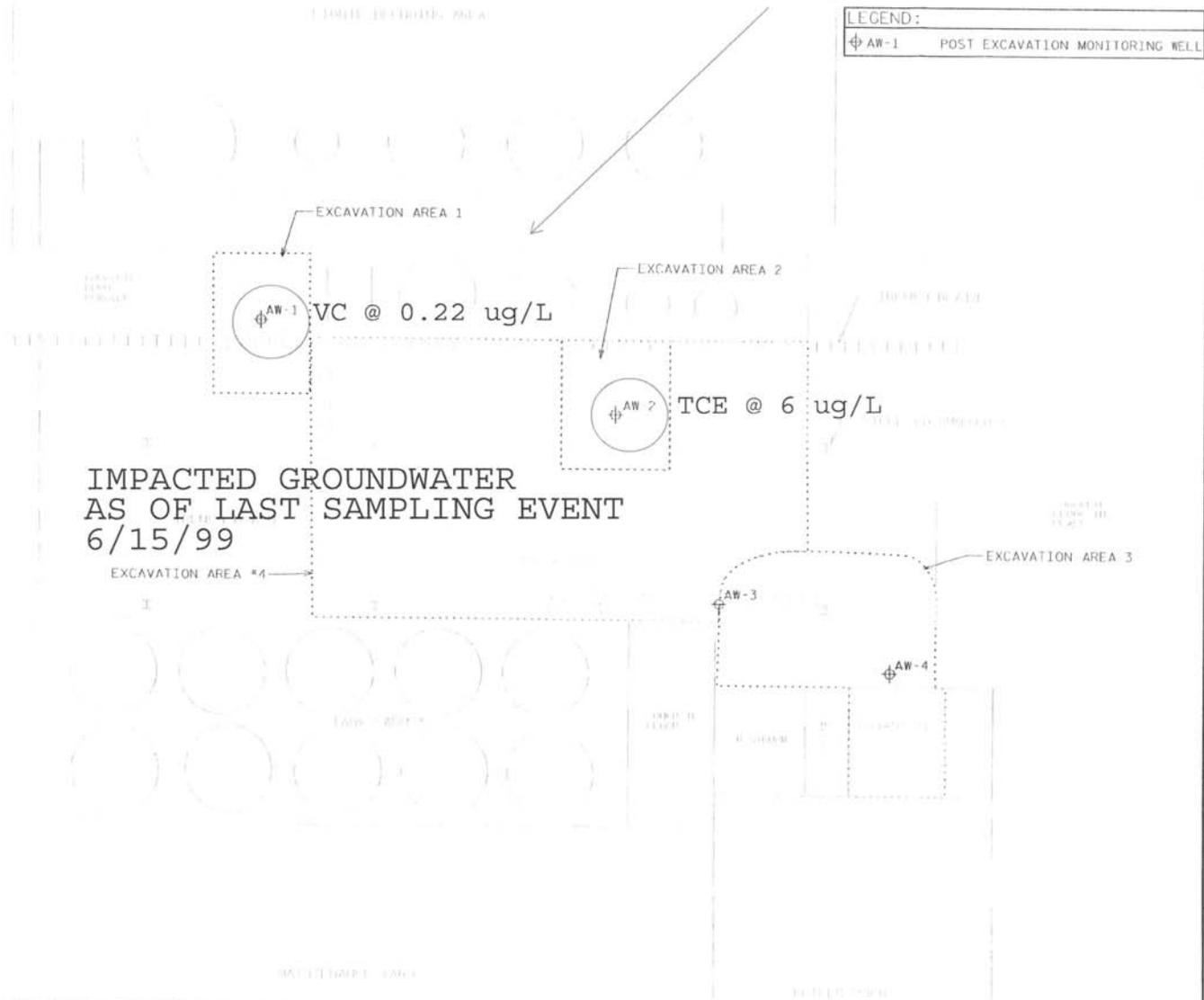
ELEV  
REF: 100  
ELEV: 100  
REF: 100  
ELEV: 100

ELEV  
REF: 100  
ELEV: 100  
REF: 100  
ELEV: 100

# Groundwater Flow Direction



LEGEND:  
⊕ AW-1 POST EXCAVATION MONITORING WELL



IMPACTED GROUNDWATER  
AS OF LAST SAMPLING EVENT  
6/15/99

POST EXCAVATION CONDITIONS  
MONITORING WELL LOCATIONS

DATE: 12/15/99  
BY: JAB  
AVRES ASSOCIATES

BROWNFIELD SITE CLOSURE  
DOCUMENTATION  
U.S. CHEMICAL  
WATERTOWN, WISCONSIN

FIGURE

**TABLE 1**  
**SOIL ANALYTICAL RESULTS**

DATE	LOCATION	DEPTH (feet)	FID/PID RESPONSE	DRO (mg/Kg)
11/09/94	B-1	4-5	540/NR	27.0
11/09/94	B-1	6	1000/0.3	76.5
11/10/94	B-2	4.7	780/23.1	10,600
11/10/94	B-2	7.0	620/6.3	2,000
11/10/94	B-3	4.8	95/NR	ND
11/10/94	B-3	7.5	1.0/NR	ND
11/10/94	B-4	3.0	NA/NR	7.67
11/10/94	Elevator Shaft	NA	NA/NA	24,600

ND - Not Detected

NA - Not Applicable

NR - No Response

FID responses from field were influenced by methane.

PID results from lab, the PID is not sensitive to methane.

G:\jast\050113a1



**TABLE 3**  
**Excavation Area 1, Pre- and Post-Excavation**  
**Soil Volatile Organic Compound Analytical Results (mg/kg)**  
 Field and Fixed-Base Laboratory Analysis  
 U.S. Chemical, Watertown, Wisconsin  
 (Date Sampled June 30 thru July 2, 1998)

Organic Compound	Location of Lab Analysis	NR 720 RCL	Sample Location and Sample Depth															
			Pre-Excavation Sampling						Post-Excavation Sampling									
			A1-1 NE 0.5'	A1-2 Center 0.5'	A1-3 W Wall Back 2.0'	A1-4 E Wall Back 2.0'	A1-5 SW 0.5'	A1-6 SE 0.5'	A1-7 Stockpile No. 1	A1-8 Soil Stockpile	A1-9 Bottom N 5.5'	A1-11 E Side Wall 3.5'	A1-12 W Side Wall 3.5'	A1-13 Bottom N Side 5.5'	A1-14 Bottom S Side 6.0'	A1-15 S Wall 3.5'	A1-16 E Wall 3.5'	A1-17 W Wall 3.5'
Trichloroethene	Field	NS	0.4	0.041	0.18	0.16	<0.025	<0.025	<0.025	--	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
	FB	NS	--	--	--	--	--	--	--	<0.11	--	<0.011	<0.011	<0.055	<0.011	<0.011	<0.011	<0.011
Tetrachloroethene	Field	NS	<0.025	<0.025	<0.120	<0.120	<0.025	<0.025	<0.025	--	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
	FB	NS	--	--	--	--	--	--	--	<0.14	--	<0.014	<0.014	<0.070	<0.014	<0.014	<0.014	<0.014
Ethyl benzene	Field	2.9	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	--	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
	FB	2.9	--	--	--	--	--	--	--	0.81	--	0.084	<0.011	<0.055	<0.011	<0.011	<0.011	<0.011
Total Xylenes	Field	4.1	1.5	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	--	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	FB	4.1	--	--	--	--	--	--	--	<1.14	--	<0.124	<0.114	<0.19	<0.037	<0.037	<0.037	<0.037
1,2,3-Trichlorobenzene	FB	NS	--	--	--	--	--	--	--	<0.14	--	<0.014	<0.014	<0.070	<0.014	<0.014	<0.014	<0.014
1,2,4-Trichlorobenzene	FB	NS	--	--	--	--	--	--	--	<0.11	--	<0.011	<0.011	<0.055	<0.011	<0.011	<0.011	<0.011
1,2,4-Trimethylbenzene	FB	NS	--	--	--	--	--	--	--	0.56	--	0.058	<0.0050	<0.025	<0.0050	<0.0050	<0.0050	<0.0050
1,2-Dichlorobenzene	FB	NS	--	--	--	--	--	--	--	0.68	--	<0.014	<0.014	<0.070	<0.014	<0.014	<0.014	<0.014
Benzene	FB	0.0055	--	--	--	--	--	--	--	<0.040	--	<0.0040	<0.0040	<0.020	<0.0040	<0.0040	<0.0040	<0.0040
Chloromethane	FB	NS	--	--	--	--	--	--	--	0.49	--	0.046	0.11	0.18	<0.027	0.075	0.067	0.051
cis-1,2-Dichloroethene	FB	NS	--	--	--	--	--	--	--	<0.11	--	<0.011	<0.011	<0.055	<0.011	<0.011	<0.011	<0.011
Methylene Chloride	FB	NS	--	--	--	--	--	--	--	0.4	--	0.06	1.3	0.18	0.047	1.4	1.3	0.047
Naphthalene	FB	NS	--	--	--	--	--	--	--	1.3	--	0.15	<0.027	0.6	<0.027	0.12	0.13	0.12
p-Isopropyltoluene	FB	NS	--	--	--	--	--	--	--	16	--	3.3	0.67	5.2	0.017	0.014	0.021	0.028
s-Butylbenzene	FB	NS	--	--	--	--	--	--	--	<0.11	--	<0.011	<0.011	<0.055	<0.011	<0.011	<0.011	<0.011
Styrene	FB	NS	--	--	--	--	--	--	--	<0.11	--	<0.011	<0.011	<0.055	<0.011	<0.011	<0.011	<0.011

< = Not detected at or above this value

-- = Not analyzed

NS = No Standard

Field = Field laboratory analysis, completed by mobile GC lab provided by ECCS labs

FB = Fixed-base lab analysis, completed by Commonwealth Technology Inc.

N = North

S = South

W = West

E = East

NE = Northeast

NW = Northwest

SE = Southeast

SW = Southwest

Note: There were no exceedances of NR 720 Residual Contaminant Levels (RCLs).

**TABLE 4**  
**Excavation Area 2, Pre- and Post-Excavation**  
**Soil Volatile Organic Compound Analytical Results (mg/kg)**  
 Field and Fixed-Base Laboratory Analysis  
 U.S. Chemical, Watertown, Wisconsin  
 (Date Sampled June 30 thru July 2, 1998)

Organic Compound	Location of Lab Anaysis	NR 720 RCL	Sample Location and Sample Depth												
			Pre-Excavation Sampling					Post-Excavation Sampling							
			A2-1 NW 0.5'	A2-2 NE 0.5'	A2-3 Center 1.0'	A2-4 SE 1.0'	A2-5 SW 1.0'	A2-7 Bottom N Middle 5.5'	A2-8 Soil Stockpile	A2-9 N Wall 3.5'	A2-10 W Wall 3.5'	A2-11 S Wall 3.5'	A2-12 S Bottom 5.0'	A2-13 E Wall 3.5'	
Trichloroethene	Field	NS	1.2	0.99	0.35	0.83	0.5	<0.025	--	<0.025	<0.025	<0.025	<0.025	<0.025	
	FB	NS	--	--	--	--	--	0.32	0.48	<0.011	<0.11	<0.011	<0.011	<0.011	
Tetrachloroethene	Field	NS	0.045	<0.025	<0.025	0.031	<0.025	<0.025	--	<0.025	<0.025	<0.025	<0.025	<0.025	
	FB	NS	--	--	--	--	--	<0.014	<0.14	<0.014	<0.14	<0.014	<0.014	<0.014	
Ethyl benzene	Field	2.9	2	1.8	<0.500	<0.500	<0.500	<0.500	--	<0.500	<0.500	<0.500	<0.500	<0.500	
	FB	2.9	--	--	--	--	--	0.16	1	0.083	<0.11	0.074	<0.011	<0.011	
Total Xylenes	Field	4.1	8	6	<1.0	1.3	<1.0	<1.0	--	<1.0	<1.0	<1.0	<1.0	<1.0	
	FB	4.1	--	--	--	--	--	0.56	3	0.192	<0.37	<0.107	<0.037	<0.037	
1,2,3-Trichlorobenzene	FB	NS	--	--	--	--	--	<0.014	<0.14	<0.014	<0.14	0.077	<0.014	<0.014	
1,2,4-Trichlorobenzene	FB	NS	--	--	--	--	--	<0.011	<0.11	<0.011	<0.11	0.086	<0.011	<0.011	
1,2,4-Trimethylbenzene	FB	NS	--	--	--	--	--	0.049	<0.0050	<0.0050	<0.050	0.086	<0.0050	<0.0050	
1,2-Dichlorobenzene	FB	NS	--	--	--	--	--	<0.014	<0.014	<0.014	<0.14	<0.014	<0.014	<0.014	
Benzene	FB	0.0055	--	--	--	--	--	<0.0040	<0.040	<0.0040	<0.040	<0.0040	<0.0040	<0.0040	
Chloromethane	FB	NS	--	--	--	--	--	<0.027	0.59	0.053	0.46	0.045	0.048	0.042	
cis-1,2-Dichloroethene	FB	NS	--	--	--	--	--	0.013	<0.11	<0.011	<0.11	<0.011	<0.011	<0.011	
Methylene chloride	FB	NS	--	--	--	--	--	0.036	0.4	0.039	0.3	0.038	0.034	0.038	
Naphthalene	FB	NS	--	--	--	--	--	0.11	1.2	<0.027	<0.27	0.12	<0.027	<0.027	
p-Isopropyltoluene	FB	NS	--	--	--	--	--	1.1	0.41	0.39	6.1	2.7	0.054	0.18	
s-Butylbenzene	FB	NS	--	--	--	--	--	<0.011	<0.11	<0.011	<0.11	0.072	<0.011	<0.011	
Styrene	FB	NS	--	--	--	--	--	0.05	0.54	<0.011	<0.11	<0.011	<0.011	<0.011	

< = Not detected at or above this value

-- Not analyzed

NS = No Standard

Field = Field laboratory analysis, completed by mobile GC lab provided by ECCS labs

FB = Fixed-base lab analysis, completed by Commonwealth Technology Inc.

N = North

S = South

W = West

E = East

NE = Northeast

NW = Nothwest

SE = Southeast

SW = Southwest

 Exceeds NR 720 RCL (Residual Contaminant Level)

**TABLE 5**  
**Excavation Area 4, Pre- and Post-Excavation**  
**Soil Volatile Organic Compound Analytical Results (mg/kg)**  
**Field and Fixed-Base Laboratory Analysis**

U.S. Chemical, Watertown, Wisconsin  
 Date Sampled June 13, 1998

Organic Compound	Location of Analysis	NR 720 RCL	Sample Location and Sample Depth													
			Pre-Excavation													
			S-1 0.5'-1.0'	S-2 0.5'-1.0'	S-3 0.5'-1.0'	S-4 0.5'-1.0'	S-5 0.5'-1.0'	S-6 0.5'-1.0'	S-7 0.5'-1.0'	S-8 0.5'-1.0'	S-9 0.5'-1.0'	S-10 0.5'-1.0'	S-11 0.5'-1.0'	S-12 0.5'-1.0'	S-13 0.5'-1.0'	S-17 0.5'-1.0'
Trichloroethene	Field	NS	0.21	0.69	0.57	0.68	0.78	0.52	0.29	0.091	0.21	0.62	1.4	0.087	0.048	<0.025
	FB	NS	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Tetrachloroethene	Field	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.12	<0.12	<0.025	<0.025	<0.025
	FB	NS	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichlorobenzene	FB	NS	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	FB	2.9	--	--	--	--	--	--	--	--	--	--	--	--	--	--
P-Isopropyltoluene	FB	NS	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Methylene Chloride	FB	NS	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Naphthalene	FB	NS	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Toluene	FB	1.5	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Xylenes	FB	4.1	--	--	--	--	--	--	--	--	--	--	--	--	--	--

<= Not detected at or above this value  
 -- Not analyzed  
 NS = No standard  
 \* Common lab solvent and contaminant  
 Field = Field laboratory  
 FB = Fixed-base laboratory

N = North  
 S = South  
 W = West  
 E = East

NE = Northeast  
 NW = Northwest  
 SE = Southeast  
 SW = Southwest

Note: There were no exceedances of NR 720 Residual Contaminant Levels (RCLs).  
 Surface soil samples S-10 and S-21 are outside the bounds of Excavation Area 4

Analyzed by Environmental Testing, Inc.

**TABLE 5, cont.**  
**Excavation Area 4, Pre- and Post-Excavation**  
**Soil Volatile Organic Compound Analytical Results (mg/kg)**  
**Field and Fixed-Base Laboratory Analysis**

U.S. Chemical, Watertown, Wisconsin

Date Sampled June 13, 1998

Organic Compound	Location of NR 720 Analysis	RCL	Sample Location and Sample Depth														
			Pre-Excavation				Post-Excavation										
			S-18 0.5'-1.0'	S-19 0.5'-1.0'	S-20 0.5'-1.0'	S-21 0.5'-1.0'	S-22 3'	S-23 3'	S-24 3'	S-25 3'	S-26 3'	S-27 3'	S-28 3'	S-29 3'	S-30 3'	S-31 3'	S-32 3'
Trichloroethene	Field	NS	<0.025	<0.025	0.026	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
	FB	NS	--	--	--	--	<0.029	<0.029	<0.032	<0.028	<0.031	<0.028	<0.029	<0.028	<0.31	<0.031	<0.34
Tetrachloroethene	FIELD	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
	FB	NS	--	--	--	--	<0.029	<0.029	<0.032	<0.028	<0.031	<0.028	<0.029	<0.028	<0.31	<0.031	<0.34
1,2-Dichlorobenzene	FB	NS	--	--	--	--	<0.029	<0.029	<0.032	<0.028	<0.031	<0.028	<0.029	<0.028	<0.31	<0.031	<0.34
Ethylbenzene	FB	2.9	--	--	--	--	<0.029	<0.029	<0.032	<0.028	<0.031	<0.028	<0.029	<0.028	<0.31	<0.031	<0.34
P-Isopropyltoluene	FB	NS	--	--	--	--	0.046	<0.029	<0.032	<0.028	<0.031	0.336	<0.029	0.124	<0.31	125	<0.34
Methylene Chloride	FB	NS	--	--	--	--	0.09*	0.079*	0.085*	0.069*	<0.031	<0.056	<0.058	<0.056	1.6*	<0.062	2.02*
Naphthalene	FB	NS	--	--	--	--	<0.029	<0.029	<0.032	<0.028	<0.031	<0.028	<0.029	0.065	<0.31	<31	<0.34
Toluene	FB	1.5	--	--	--	--	<0.029	<0.029	<0.032	<0.028	<0.031	<0.028	<0.029	<0.028	<0.31	<31	<0.34
Total Xylenes	FB	4.1	--	--	--	--	<0.029	<0.04	<0.045	<0.039	<0.043	<0.039	<0.04	<0.039	<0.44	<0.044	<0.47

<= Not detected at or above this value  
 -- Not analyzed  
 NS = No standard  
 \* Common lab solvent and contaminant  
 Field = Field laboratory  
 FB = Fixed-base laboratory

N = North  
 S = South  
 W = West  
 E = East  
 NE = Northeast  
 NW = Northwest  
 SE = Southeast  
 SW = Southwest

Note: There were no exceedances of NR 720 Residual Contaminant Levels (RCLs).  
 Surface soil samples S-10 and S-21 are outside the bounds of Excavation Area 4

Analyzed by Environmental Testing, Inc.

**TABLE 5, cont.**  
**Excavation Area 4, Pre- and Post-Excavation**  
**Soil Volatile Organic Compound Analytical Results (mg/kg)**  
**Field and Fixed-Base Laboratory Analysis**

U.S. Chemical, Watertown, Wisconsin  
 Date Sampled June 13, 1998

Organic Compound	Location of NR 720 Analysis		Sample Location and Sample Depth														
			Post Excavation														
			S-33 3'	S-34 1.5'	S-35 1.5'	S-36 1.5'	S-37 1.5'	S-38 1.5'	S-39 1.5'	S-40 1.5'	S-41 1.5'	S-42 1.5'	S-43 1.5'	AHB1-1 0.5'-1.0'	AHB2-1 0.5'-1.0'	AHB3-1 0.5'-1.0'	AHB4-1 0.5'-1.0'
Trichloroethene	Field	NS	--	--	--	--	--	--	--	--	--	--	--	<0.025	0.13	0.034	0.033
	FB	NS	<0.027	<0.038	<0.032	<0.048	<0.065	<0.032	<0.045	<0.06	<0.04	<0.031	<0.053	--	--	--	--
Tetrachloroethene	Field	NS	--	--	--	--	--	--	--	--	--	--	--	<0.025	<0.025	<0.025	<0.025
	FB	NS	<0.027	<0.038	<0.032	<0.048	<0.065	<0.032	<0.045	<0.06	<0.04	<0.031	<0.053	--	--	--	--
1,2-Dichlorobenzene	FB	NS	<0.027	<0.038	<0.032	<0.048	<0.065	<0.032	<0.045	<0.06	<0.04	<0.031	<0.053	--	--	--	--
Ethylbenzene	FB	2.9	<0.027	<0.038	<0.032	<0.048	<0.065	<0.032	<0.045	<0.06	<0.04	<0.031	<0.053	--	--	--	--
P-Isopropyltoluene	FB	NS	<0.027	0.15	0.455	0.21	0.415	0.058	<0.045	0.1	<0.04	<0.031	<0.053	--	--	--	--
Methylene Chloride	FB	NS	0.074*	<0.077	0.12*	0.12*	0.24*	<0.063	<0.09	<0.12	0.14*	0.063*	<0.11	--	--	--	--
Naphthalene	FB	NS	<0.027	<0.038	<0.032	<0.048	<0.065	<0.032	<0.045	<0.06	<0.04	<0.031	<0.053	--	--	--	--
Toluene	FB	1.5	<0.027	<0.038	<0.032	<0.048	0.073	<0.032	<0.045	<0.06	<0.04	<0.031	<0.053	--	--	--	--
Total Xylenes	FB	4.1	<0.038	<0.054	<0.045	<0.067	1.01	<0.044	<0.063	0.482	<0.056	<0.044	<0.074	--	--	--	--

<= Not detected at or above this value  
 -- Not analyzed  
 NS = No standard  
 \* Common lab solvent and contaminant  
 Field = Field laboratory  
 FB = Fixed-base laboratory

N = North  
 S = South  
 W = West  
 E = East  
 NE = Northeast  
 NW = Northwest  
 SE = Southeast  
 SW = Southwest

Note: There were no exceedances of NR 720 Residual Contaminant Levels (RCLs).  
 Surface soil samples S-10 and S-21 are outside the bounds of Excavation Area 4

Analyzed by Environmental Testing, Inc.

**TABLE 6**  
**Excavation Area 3, Post Excavation**  
**Soil Volatile Diesel Range Organics and Polynuclear Aromatic Hydrocarbons (mg/kg)**  
 Field and Fixed-Base Laboratory Analysis  
 U.S. Chemical, Watertown, Wisconsin  
 (Date Sampled July 2, 1998)

Compound	Location of Anaysis	NR 720 RCL	Sample Location and Depth															
			A3-1 Shaft W Wall	A3-2 Shaft E Wall	A3-3 Soil Stockpile	A3-4 Bottom Shaft	A3-5 Shaft E Side Wall	A3-6 E Wall Exc. 3.5'	A3-7 N. Wall Exc. 3.5'	A3-8 Bot. Exc. Front 5.3'	A3-9 S Wall Exc. 2.5'	A3-10 W Wall Exc. 2.5'	A3-11 NE Wall Exc. 2.5'	A3-12 E Wall Exc. 2.5'	A3-14 NW Wall Exc. 2.5'	A3-15 Bot. W End Exc. 5.2'	A3-16 Stockpile	
DRO	Field	100/250	3100	20000	11000	10000	13000	6600	12000	15000	<40	<40	<40	<40	<40	2000	3100	
	FB	100/250	--	--	--	3800	--	--	--	--	150	6	13	6.1	54	500	--	
PAH																		
Acenaphthene	FB	NS	--	--	--	<0.76	--	--	--	--	1.3	0.3	<0.095	<0.080	<0.065	<0.061	--	
Benzo(a)anthracene	FB	NS	--	--	--	<0.032	--	--	--	--	<0.0031	0.18	0.036	0.22	<0.0027	<0.0025	--	
Benzo(a)pyrene	FB	NS	--	--	--	2.4	--	--	--	--	1.2	0.31	0.068	0.3	<0.0020	0.097	--	
Benzo(b)fluoranthene	FB	NS	--	--	--	<0.024	--	--	--	--	0.93	0.24	0.044	0.22	<0.0020	<0.0019	--	
Benzo(g,h,i)perylene	FB	NS	--	--	--	<0.065	--	--	--	--	0.77	0.3	<0.0081	<0.0068	<0.0055	<0.0052	--	
Benzo(k)fluoranthene	FB	NS	--	--	--	<0.024	--	--	--	--	0.62	0.16	0.048	0.19	<0.0020	<0.0019	--	
Chrysene	FB	NS	--	--	--	<1.5	--	--	--	--	<0.14	<0.20	<0.18	0.23	<0.12	<0.12	--	
Dibenzo(a,h)anthracene	FB	NS	--	--	--	<3.6	--	--	--	--	<0.36	<0.50	<0.45	0.44	<0.31	<0.29	--	
Fluoranthene	FB	NS	--	--	--	4.4	--	--	--	--	<0.0077	<0.011	<0.0097	<0.0081	<0.0066	0.99	--	
Fluorene	FB	NS	--	--	--	<0.14	--	--	--	--	<0.013	<0.019	<0.017	<0.014	<0.012	0.12	--	
Indeno(1,2,3-cd)pyrene	FB	NS	--	--	--	<0.15	--	--	--	--	0.62	0.19	0.05	0.21	<0.013	<0.012	--	
Naphthalene	FB	NS	--	--	--	2.3	--	--	--	--	<0.048	<0.068	<0.061	<0.051	<0.042	<0.039	--	
Phenathrene	FB	NS	--	--	--	2.4	--	--	--	--	0.77	0.28	<0.0069	0.24	<0.0047	0.35	--	
Pyrene	FB	NS	--	--	--	<0.098	--	--	--	--	2.3	0.83	0.2	0.83	<0.0084	<0.0078	--	

ORGANIC COMPOUNDS		Sample Number
		A3-13
1,2,3-Trichlorobenzene	FB	0.078
1,2,4-Trichlorobenzene	FB	0.140
1,2,4-Trimethylbenzene	FB	0.080
1,2-Dichlorobenzene	FB	32.00
1,3,5-Trimethylbenzene	FB	0.020
1,3-Dichlorobenzene	FB	0.021
1,4-Dichlorobenzene	FB	0.500
Chloromethane	FB	0.049
Ethylbenzene	FB	0.074
Total xylene	FB	0.179
Methylene chloride	FB	0.034
Naphthalene	FB	0.160

< = Not detected at or above this value  
 -- Not analyzed  
 NS = No Standard

N = North  
 S = South  
 W = West  
 E = East  
 NE = Northeast  
 NW = Northwest  
 SE = Southeast  
 SW = Southwest

Field = Field laboratory analysis, completed by mobile GC lab provided by ECCS labs  
 FB = Fixed-base lab analysis, completed by Commonwealth Technology Inc.

Exceeds NR 720 RCL (Residual Contaminant Level)

**TABLE 1  
SOIL ARSENIC CONCENTRATIONS  
U.S. CHEMICAL FACILITY**

**Previously Documented  
Arsenic Standard Exceedances**

**Results from 4/14 - 4/15/98**

LOCATION	DEPTH (feet)	Arsenic (mg/kg)
HA-1	(1-3)	3.7
HA-2	(3-5)	3.8
HA-3	(3-5)	2.6
HA-4	(3-5)	4.8
HA-6	(3-5)	8.4
HA-7	(3-5)	2
GP5A	(3-5)	3.9
HA-9	(5-7)	3.5
HA-10	(1-3)	3.3
HA-11	(3-5)	2.1
HA-12	(3-5)	1.9
HA-15	(3-5)	4.5
HA-15	(5-7)	2.7
W-4	(1-3)	4.7
MW-5	(3-5)	3.1
MW-5	(5-7)	2
MW-6	(3-5)	3.1
MW-6	(5-7)	3.5

3.53 mean

**Background Arsenic Analytical**

**Results from 7/20/99**

LOCATION	DEPTH (feet)	Arsenic (mg/kg)
HB-1	(1-3)	1.3
HB-1	(3-5)	1.3
HB-2	(1-3)	2.3
HB-2	(3-5)	2.0
HB-3	(1-3)	<0.97
HB-3	(3-5)	<0.99
HB-4	(1-3)	3.8
HB-5	(1-3)	1.6
HB-5	(3-5)	1.4
HB-6	(1-3)	2.9
HB-6	(3-5)	1.9
HB-7	(1-3)	27
HB-7	(3-5)	2.9

3.88 mean

NR 720 Soil Standard for Arsenic 1.6 mg/kg
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**TABLE 1**  
**Summary of Ground Water VOC Results (ug/L)**  
**U.S. Chemical, Watertown, Wisconsin**

Analyzed by: En Chem and CTI Labs

(Date Revised June 30, 1999)

		PARAMETER															
		Benzene	Carbon disulfide*	Chlorobenzene	Chloroform	Ethylbenzene	Methylene chloride*	Toluene	Trichloroethene	Total Xylenes	Acetone ***	Vinyl chloride	2-Butanone	2-Hexanone	1,2-Dichloroethene, total	1,1 Dichloroethane	4-Methyl-2-pentanone
AW-1	7/14/98	<22	<20	<22	<20	<25	<19	<20	<24	<62	620	<26	<62	<30	<45	<30	<30
	7/20/98	<22	<20	<22	<20	<25	<19	<20	<24	<62	970	<26	<62	<30	<45	<30	<30
	8/4/98	<1.0	39	<1.0	<2.0	<1.0	46	<2.0	4.0	<3.0	2700	<3.0	NA	<24	2.0	<2.0	<18
	9/9/98	<1.0	<24	<1.0	<2.0	<1.0	<4.0	<2.0	5.0 <sup>J</sup>	3.0	840/2300	5.0 <sup>J</sup>	<33	<24	4.0	<2.0	<18
	10/8/98	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	1.4	4.1	<2.0	820	3.8	<5.0	<5.0	4.8	0.72	<5.0
	11/11/98	<2.2	<2.0	<2.1	<2.0	<2.5	<1.9	<2.0	4.0	<6.2	780	<2.6	<6.2	<3.0	<4.5	<3.0	<3.0
	6/15/99	<0.27	<0.24	<0.23	<0.35	0.51	0.47	0.29	1.8	3.0	98	0.22	<0.89	<0.69	<1.1	0.50	<0.95
	AW-2	7/14/98	1.1	<0.40	<0.43	<0.41	1.8	2.6	2.3	8.6	14	490	1.6	8.1	<0.61	5.9	<0.61
7/20/98		<11	<10	<11	<10	<12	<9.5	<10	16	<31	1400	<13	<31	<15	<22	<15	<15
7/20/98**		1.5	<2.0	<0.50	<1.0	1.0	6.5	2.0	5.0	9.0	1700	<1.5	NA	50	4.0	<1.0	48
8/4/98		<1.0	70	<1.0	<2.0	<1.0	30	2.0	4.0	4.0	2700	<3.0	NA	<24	5.0	<2.0	<18
9/9/98		5	<24	<1.0	<2.0	<1.0	<4.0	<2.0	12	19	1400/6000	5.0 <sup>J</sup>	<33	<24	19	<2.0	<18
10/8/98		1.6	<1.0	<1.0	<1.0	<1.0	<1.0	2.2	5.1	6.7	1,100.0	<2.0	<5.0	<5.0	5.3	<0.61	<5.0
11/11/98		<2.2	<2.0	<2.1	<2.0	<2.5	<1.9	<2.0	<2.4	<6.2	300	<2.6	<6.2	<3.0	<4.5	<3.0	<3.0
6/15/99		0.56	<0.24	<0.23	<0.35	0.76	0.85	1.8	6	13.7	<1.0	<0.20	11	<0.69	2.5	0.55	1
NR 140 ES / PAL	5 / 0.5	NS / NS	NS / NS	6 / 0.6	700 / 140	5 / 0.5	343 / 68.6	5 / 0.5	620 / 124	1000 / 200	0.2 / 0.02	NS / NS	NS / NS	170 / 27	10	NS / NS	

Indicates detect of a compound

Exceeds NR 140 ES

NA = Not Analyzed

NS = No Standard

\* methylene chloride and carbon disulfide are reported as lab contaminants.

\*\* =Collected after additional purging

\*\*\* Acetone results for September 9 round reported as duplicate analysis first value reported by En Chem and second by CTI

<sup>J</sup> Estimated value, compound was detected below the practical quantitation limit.

**TABLE 7**  
**GROUND WATER ANALYTICAL RESULTS**

DATE	LOCATION	DRO (mg/L)	PAH									
			Naphthalene (ug/L)	Benzo (a) Anthracene (ug/L)	Benzo (a) Pyrene (ug/L)	Benzo (b) Fluoranthene (ug/L)	Benzo (k) Fluoranthene (ug/L)	Dibenzo (a,h) Anthracene (ug/L)	Fluoranthene (ug/L)	Phenan- threne (ug/L)	Pyrene (ug/L)	
10-Nov-94	B-1	27,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
11-May-95	B-1	4600	<6.0	<0.14	<0.37	<0.28	<0.18	<1.8	<0.3	<1.7	<0.16	<0.16
06-Dec-95	B-1	3000	<6.0	<0.14	<0.37	<0.28	<0.18	<1.8	<0.3	<1.7	<0.16	<0.16
30-Aug-96	B-1	12	<1.0	<0.050	<0.024	<0.050	<0.050	<0.10	<0.20	<0.40	<0.20	<0.20
27-Dec-96	B-1	3.5	<0.23	<0.081	<0.024	<0.087	<0.046	<0.17	<0.20	<0.038	<0.091	<0.091
17-Mar-97	B-1*	28	<80	<0.24	<0.92	<1.0	<0.85	<2.4	<0.31	<10	<1.2	<1.2
10-Nov-94	B-2*	442,000	48.9	ND	ND	ND	ND	ND	ND	ND	ND	ND
11-May-95	B-2*	NOT SAMPLED, MEASURED 0.75 FOOT FREE PRODUCT										
06-Dec-95	B-2*	NOT SAMPLED, MEASURED 0.30 FOOT FREE PRODUCT										
30-Aug-96	B-2*	1800	<1000	<50	<24	<50	<50	<100	<200	<400	<200	<200
27-Dec-96	B-2*	NOT SAMPLED, MEASURED 0.57 FOOT FREE PRODUCT										
17-Mar-97	B-2*	2000	<8.0	<0.23	<0.91	<1.0	<0.84	<2.3	<0.31	11	<1.2	<1.2

ND-Not Detected

\*Well contained free product

TABLE 7  
(cont.)

DATE	LOCATION	DRO (mg/L)	PAH								
			Naphthalene (ug/L)	Benzo (a) Anthracene (ug/L)	Benzo (a) Pyrene (ug/L)	Benzo (b) Fluoranthene (ug/L)	Benzo (k) Fluoranthene (ug/L)	Dibenzo (a,h) Anthracene (ug/L)	Fluoranthene (ug/L)	Phenan- threne (ug/L)	Pyrene (ug/L)
10-Nov-94	B-3	290	ND	ND	ND	ND	ND	ND	ND	ND	ND
11-May-95	B-3	73	<1.2	<0.027	<0.074	<0.055	<0.035	<0.35	<0.060	<0.33	<0.32
06-Dec-95	B-3	68	<1.2	<0.027	<0.074	<0.055	<0.035	<0.35	<0.060	<0.33	<0.32
30-Aug-96	B-3	<0.10	<1.0	<0.050	<0.024	<0.050	<0.050	<0.10	<0.20	<0.40	<0.20
27-Dec-96	B-3	<0.10	<1.0	<0.050	<0.024	<0.050	<0.050	<0.10	<0.20	<0.40	<0.20
17-Mar-97	B-3	3.9	<0.80	<0.023	<0.091	<0.10	<0.084	<0.23	<0.031	<0.10	<0.12
10-Nov-94	B-4	374	ND	2.19	3.06	2.60	1.36	2.76	7.40	2.56	5.75
11-May-95	B-4	37	<1.2	<0.027	<0.074	<0.055	<0.035	<0.35	0.17	<0.33	<0.32
06-Dec-95	B-4	64	<1.2	0.060	<0.074	<0.36	0.075	<0.35	0.13	<0.33	<0.32
30-Aug-96	B-4	12	<1.0	<0.050	<0.024	<0.050	<0.050	<0.10	<0.20	<0.40	<0.20
27-Dec-96	B-4	<0.10	<1.0	<0.050	<0.024	<0.050	<0.050	<0.10	<0.20	<0.40	<0.20
17-Mar-97	B-4	6.8	<0.8	<0.023	<0.091	<0.10	<0.084	<0.23	<0.031	<0.10	<0.12

ND-Not Detected

**TABLE 8**  
**TREATMENT SYSTEM SAMPLING**  
**PAHS, DRO, AND OIL AND GREASE**

DATE	SAMPLE LOCATION	PAHS DETECTED	ug/L	ES/PAL (ug/L)	DRO* (mg/L)	OIL & GREASE* (mg/L)
12/11/95	Influent	Benzo(a)anthracene	13	NS	15	94
		Benzo(b)fluoranthene	1	NS		
		Benzo(k)fluoranthene	0.67	NS		
		Benzo(a)pyrene	1.3	0.2/0.02		
		Benzo(ghi)perylene	2.5	NS		
		Chrysene	0.54	NS		
		Dibenzo(a,h)anthracene	1.6	NS		
		Fluoranthene	5.8	NS		
		Fluorene	0.59	400/80		
		Indeno(1,2,3-cd)pyrene	0.58	NS		
		Naphthalene	10	40/8		
		Phenanthrene	3.8	NS		
		Pyrene	0.57	NS		
12/11/95	Effluent	Anthracene	0.96	NS	26	36
		Benzo(a)anthracene	18	NS		
		Benzo(a)pyrene	2.7	0.2/0.02		
		Chrysene	4.7	NS		
		Fluoranthene	72	NS		
		Fluorene	7.2	400/80		
		Naphthalene	25	40/8		
		Pyrene	11	NS		
12/18/95	Influent	Phenanthrene	2.8	NS	24	31
12/18/95	Effluent	Fluoranthene	2.9	NS	11	54
		Fluorene	1.2	400/80		
		Phenanthrene	6.1	NS		

NS=No standard  
 NA=Not Analyzed

\* DRO, does not have an established Preventive Action Limit or Enforcement Standard

\*\* The oil and grease discharge standard is 100 mg/l

TABLE 8  
(cont.)

DATE	SAMPLE LOCATION	PAHs DETECTED	ug/L	ES/PAL (ug/L)	DRO* (mg/L)	OIL & GREASE** (mg/L)
3/5/96	Influent	NA	-	-	NA	14
3/5/96	Effluent	NA	-	-	NA	61
6/18/96	Influent	NA	-	-	NA	64
6/18/96	Effluent	NA	-	-	NA	19
8/30/96	Effluent	No PAHs detected	-	-	27	NA
11/13/96	Influent	NA	-	-	NA	70
11/13/96	Effluent	NA	-	-	NA	<5.0
12/27/96	Effluent	No PAHs detected	-	-	0.22	NA
3/17/97	Influent	Phenanthrene	0.39	NS	9.7	NA
		Pyrene	1.9	NS		
		Benzo(a)pyrene	0.24	0.02/0.2		
3/19/97	Influent	NA	NA	-	NA	58
3/19/97	Effluent	NA	NA	-	NA	6.3

NS=No standard  
NA=Not Analyzed

\* DRO does not have an established Preventive Action Limit or Enforcement Standard

\*\* The oil and grease discharge standard is 100 mg/l

TABLE 9  
VOC DETECTS (Results in ug/L)

	NR 140 ES	NR 140 PAL	B-1		B-2		B-3		B-4*	Influent	
			7/18/97	10/16/97	7/18/97	10/16/97	7/18/97	10/16/97	7/18/97	7/18/97	10/16/97
Benzene	5	0.5	1.7	<0.13	0.45	0.63	<0.13	<0.13	<0.13	0.16	<0.13
n-Butylbenzene	NS	NS	<0.37	<0.37	1.1	1.2	<0.37	<0.37	0.77	<0.37	<0.37
Chlorobenzene	NS	NS	20	1.6	0.66	0.80	<0.53	1.9	<0.53	6.8	3.9
Chloroform	6	0.6	0.12	2.8	6.0	0.15	<0.12	<0.12	<0.12	<0.12	<0.12
1,2-Dibromo- 3-Chloropropane	0.2	0.02	<0.10	<0.10	0.25	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
1,2-Dichlorobenzene	600	60	180	35	200	270	0.26	0.22	7.6	58	40
1,3-Dichlorobenzene	1250	125	0.87	0.25	<0.18	<0.18	<0.18	<0.18	0.23	0.50	0.4
1,4-Dichlorobenzene	75	15	24	5.7	51	45	<0.29	<0.29	2.2	9.2	7.1
1,1-Dichloroethane	850	85	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46	<0.46
1,2-Dichloroethane	5	0.5	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
trans-1,2-Dichloroethene	100	20	<0.16	<0.16	0.16	0.16	<0.16	<0.16	<0.16	<0.16	<0.16
1,2-Dichloropropane	5	0.5	<0.45	<0.45	0.98	0.69	<0.45	<0.45	<0.45	<0.45	<0.45
1,3-Dichloropropane	NS	NS	<0.25	<0.25	0.47	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
Di-isopropylether	NS	NS	<0.061	<0.061	0.23	0.17	<0.061	<0.061	<0.061	<0.061	<0.061
Ethylbenzene	700	140	<0.12	<0.12	0.74	0.67	<0.12	<0.12	<0.12	<0.12	<0.12
Isopropylbenzene	NS	NS	<0.13	<0.13	0.60	0.36	<0.13	<0.13	0.39	<0.13	<0.13
p-Isopropyltoluene	NS	NS	<0.30	<0.30	62	63	<0.30	<0.30	<0.30	<0.30	<0.30
Naphthalene	40	8	<0.46	<0.46	1.8	1.8	<0.46	<0.46	0.51	<0.46	<0.46
n-Propylbenzene	NS	NS	0.31	<0.16	0.63	0.65	<0.16	<0.16	<0.16	<0.16	<0.16
Tetrachloroethene	5	0.5	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	0.40	<0.35	<0.35
Toluene	343	68.6	0.69	0.16	7.5	7.8	0.17	0.11	0.13	0.19	0.12
1,2,4-Trichlorobenzene	70	14.0	0.41	<0.38	<0.38	2.7	<0.52	<0.38	0.46	0.44	0.50
Trichloroethene	5	0.5	0.53	<0.20	6.9	5.3	<0.20	0.24	<0.20	<0.20	<0.20
1,2,3-Trichloropropane	NS	NS	<0.54	<0.54	6.7	4.8	0.61	<0.54	<0.54	0.77	<0.54
1,2,4-Trimethylbenzene	NS	NS	<0.34	<0.34	3.2	3.2	<0.34	<0.34	1.1	<0.34	<0.34
1,3,5-Trimethylbenzene	NS	NS	<0.48	<0.48	1.5	<0.48	<0.48	<0.48	0.5	<0.48	<0.48
Vinyl Chloride	0.2	0.02	<0.32	<0.32	0.34	0.59	<0.32	<0.32	<0.32	<0.32	<0.32
Total Xylenes	620	124	<1.8	<1.8	3.3	3.1	<1.8	<1.8	<1.8	<1.8	<1.8
Methyl tert-butyl ether	60	12	2.0	<0.21	1.5	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21

NS = No standard

< = Less than detection limit shown

-- = Not analyzed

µg/L = Micrograms per liter, equivalent to parts per billion

\* B-4 bailed dry and did not recharge in October; therefore, no sample was collected for analysis

 = Exceeds NR 140 enforcement standard (ES)

 = Exceeds NR 140 preventive action limit (PAL)

TABLE 10  
**METALS AND DETECTED VOC COMPOUNDS**  
**GROUNDWATER SAMPLES**  
**U.S. CHEMICAL FACILITY - WATERTOWN, WISCONSIN**

PARAMETER	WELL / SAMPLE DATE														
	W-1	W-2	W-3	W-4	W-5		MW-2	MW-3	MW-4	MW-5		MW-4	NR 140		
	2/13/98	(2/13/98)	(2/13/98)	(2/13/98)	(2/13/98)		(4/17/98)	(4/17/98)	(4/17/98)	(4/17/98)		Dup	ES	PAL	
<b>METALS (ug/l)*</b>															
Arsenic	<4.7	15	<4.7	8.2 Q	12 Q		7.4 Q	<3.3	4.9 Q	<3.3		3.3 Q	50	5	
Barium	200	300	62	190	200		210	150	260	370		260	2,000	400	
Cadmium	0.59 Q	1.1 Q	0.54 Q	0.84 Q	0.52 Q		<0.22	<0.22	<0.22	<0.22		0.36 Q	5	0.5	
Chromium	18	68	5.4	24	3.9		<0.78	<0.78	<0.78	<0.78		<0.78	100	10	
Lead	9.8	36	5.6 Q	12	<2.4		3.1 Q	1.4 Q	0.80 Q	1.1 Q		<0.49	15	1.5	
Selenium	<4.8	<1.7	<4.8	<4.8	<4.8		2.8 Q	4.6	2.7 Q	<2.1			50	10	
Silver	<2.4	<2.4	<2.4	<2.4	<2.4		<0.58	<0.58	0.74 Q	<0.58		<0.58	50	10	
Mercury	<0.080	<0.080	<0.080	<0.080	<0.080		0.080 Q	<0.080	0.090 Q	0.090 Q		0.1 Q	2	0.2	
<b>VOCs (ug/l)</b>															
<b>Detections only</b>															
Acetone	4.5 Q	<3.3	<3.3	<3.3	<4.8 Q		<3.3	<3.3	<3.3	<3.3		N/A	1,000	200	
1,2 Dichloroethane	5.3	<1.0	<1.0	<1.0	<1.0		<1.0	<1.0	<1.0	<1.0		N/A	170	27	
Methylene Chloride	1.6	<0.42	0.51 Q	<0.42	<0.48 Q		<0.42	<0.42	<0.42	<0.42		N/A	5	0.5	
Tetrachloroethene	2.7	<0.44	<0.44	<0.44	<0.44		<0.44	<0.44	<0.44	<0.44		N/A	5	0.5	
Toluene	1.0	0.45 Q	0.56 Q	<0.32	<0.32		<0.32	<0.32	<0.32	<0.32		N/A	343	68.6	
Trichloroethene	3.4	<0.38	<0.38	<0.38	0.82 Q		<0.38	<0.38	<0.38	<0.38		N/A	5	0.5	

**NOTES**

ug/l = micrograms per liter

NR 140 = Chapter NR 140, Wisconsin Administrative Code ES= Enforcement Standard, PAL = Preventive Action Limit

VOCs = Target Compound List Volatile Organic Compounds

Detection limit; compound not detected above detection limit

Groundwater Samples collected by RMT, Inc.

Q = Compound detected at a concentration greater than the detection limit and less than the quantitation limit

N/A = not analyzed

\* Samples W-1 through W-5 were not filtered for metals. Samples MW-1 through MW-4 were filtered for metals.

**TABLE 11**  
**Ground Water VOC Analytical Results (ug/L)**

U.S. Chemical, Watertown, Wisconsin

(Date Revised December 3, 1998)

Sample No.	Sample Date	Organic Compound																	
		Benzene	Carbon disulfide*	Chlorobenzene	Chloroform	Ethylbenzene	Methylene chloride*	Toluene	Trichloroethene	Total Xylenes	Acetone**	Vinyl chloride	2-Butanone	2-Hexanone	4-Bromofluorobenzene	1,2-Dichloroethene, total	Dibromofluoromethane	Toluene-d8	4-Methyl-2-pentanone
AW-1	7/14/98	<22	<20	<22	<20	<25	<19	<20	<24	<62	620	<26	<62	<30	110	<45	122	100	<30
	7/20/98	<22	<20	<22	<20	<25	<19	<20	<24	<62	970	<26	<62	<30	110	<45	90	101	<30
	8/4/98	<1.0	39	<1.0	<2.0	<1.0	46	<2.0	4.0	<3.0	2700	<3.0	--	<24	--	2	--	--	<18
	9/9/98	<1.0	<24	<1.0	<2.0	<1.0	<4.0	<2.0	5.0	3.0	840/2300	5.0 <sup>J</sup>	<33	<24	--	4	--	--	<18
	10/8/98	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	1.4	4.1	<2.0	820	3.8	<5.0	<5.0	--	4.8	--	--	<5.0
	11/11/98	<2.2	<2.0	<2.1	<2.0	<2.5	<1.9	<2.0	4.0	<6.2	780	<2.6	<6.2	<3.0	112	<4.5	101	116	<3.0
AW-2	7/14/98	1.1	<0.40	<0.43	<0.41	1.8	2.6	2.3	8.6	14	490	1.6	8.1	<0.61	121	5.9	118	100	<0.61
	7/20/98	<11	<10	<11	<10	<12	<9.5	<10	16	<31	1400	<13	<31	<15	120	<22	100	93	<15
	7/20/98**	1.5	<2.0	<0.50	<1.0	1.0	6.5	2.0	5.0	9.0	1700	<1.5	--	50	--	4	--	--	48
	8/4/98	<1.0	70	<1.0	<2.0	<1.0	30	2.0	4.0	4.0	2700	<3.0	--	<24	--	5	--	--	<18
	9/9/98	5.0	<24	<1.0	<2.0	<1.0	<4.0	<2.0	12	19	1400/6000	5.0 <sup>J</sup>	<33	<24	--	19	--	--	<18
	10/8/98	1.6	<1.0	<1.0	<1.0	<1.0	<1.0	2.2	5.1	6.7	1100	<2.0	<5.0	<5.0	--	5.3	--	--	<5.0
	11/11/98	<2.2	<2.0	<2.1	<2.0	<2.5	<1.9	<2.0	<2.4	<6.2	300	<2.6	<6.2	<3.0	111	<4.5	92	116	<3.0
AW-3	7/14/98	<0.44	<0.40	17	0.88	0.61	<0.38	1.9	2.8	2.5	9.5	<0.52	17	<0.61	109	3.1	119	95	<0.51
	7/20/98	0.71	<0.40	43	<0.41	0.89	1.2	3.6	2.7	4.2	34	<0.52	<1.2	<0.61	112	2.4	105	98	<0.61
	8/4/98	<1.0	66	29	<2.0	<1.0	26	3.0	2.0	10	58	<3.0	--	<24	--	<2.0	--	--	<18
	9/9/98	<1.0	<24	6.0	<2.0	<1.0	<4.0	<2.0	<2.0	<2.0	14/50	<3.0	<33	<24	--	<2.0	--	--	<18
	10/8/98	<1.0	<1.0	5.8	<1.0	<1.0	<1.0	<1.0	<1.0	<2.0	<5.0	<2.0	<5.0	<5.0	--	<2.0	--	--	<5.0
	11/11/98	Not Sampled																	
AW-4	7/14/98	1.6	<0.40	64	<0.41	1.7	<0.38	8.8	1.8	7.0	11	<0.52	<1.2	<0.61	112	2.6	106	96	<0.61
	7/20/98	1.3	<0.40	54	<0.41	1.6	0.96	7.8	1.9	7.6	19	<0.52	<1.2	<0.61	113	2.3	104	98	<0.61
	8/4/98	<1.0	93	64	<2.0	<1.0	18	4.0	<2.0	12	70	<3.0	--	<24	--	<2.0	--	--	<18
	9/9/98	<1.0	<24	41	<2.0	<1.0	<4.0	<2.0	<2.0	13	<3.1/48	<3.0	<33	<24	--	<2.0	--	--	<18
	10/8/98	<1.0	<1.0	29	<1.0	<1.0	<1.0	<1.0	<1.0	3.3	<5.0	<2.0	<5.0	<2.0	--	<2.0	--	--	<5.0
	11/11/98	See PAH Table																	
NR 140 ES / PAL	5 / 0.5	NS / NS	NS / NS	6 / 0.6	700 / 140	5 / 0.5	343 / 68.6	5 / 0.5	620 / 124	1000 / 200	0.2 / 0.02	NS / NS	NS / NS	NS / NS	170 / 27	NS / NS	NS / NS	NS / NS	

-- Not analyzed  
NS = No Standard

<sup>J</sup> Estimated value, compound was detected below the practical quantitation limit.

\* Methylene chloride and carbon disulfide reported as duplicate analysis.

\*\* Collected after additional purging

\*\*\* Acetone results for 9/9/98 round reported as duplicate analysis; first value reported by En Chem and second by CTI ie. 840/2300

EXCEEDS NR 140 ES (ENFORCEMENT STANDARD)

Analyzed by: En Chem and CTI Labs

**TABLE 12**  
**Ground Water PAH Analytical Results (ug/L)**

U.S. Chemical, Watertown, Wisconsin

(Date Revised December 3, 1998)

Location	PAH	ES / PAL	Date Sampled	
			9/9/98	11/11/98
MW-4	Benzo(a)anthracene	NS	<0.0076	<0.043
	1-Methyl Naphthalene	NS	<0.28	2.8
	2-Methyl Naphthalene	NS	9.9	2.8
	Acenaphthene	NS	<0.56	<0.99
	Acenaphthylene	NS	<0.24	<0.89
	Anthracene	NS	<0.39	<0.044
	Benzo(a)anthracene	NS	<0.0076	<0.043
	Benzo(b)fluoranthene	NS	<0.016	<0.080
	Benzo(g,h,i)perylene	NS	<0.036	<0.090
	Chrysene	NS	<0.053	<0.044
	Benzo(k)fluoranthene	NS	<0.024	<0.040
	Dibenzo(a,h)anthracene	NS	<0.22	<0.090
	Phenanthrene	NS	0.67	0.24
	Ideno(1,2,3-cd)pyrene	NS	<0.017	<0.042
	Benzo(a)pyrene	0.2 / 0.02	<0.019	<0.060
	Fluorene	400 / 80	<0.17	0.75
	Fluoranthene	400 / 80	1.4	<0.095
	Naphthalene	40 / 8	<0.24	10
	Pyrene	250 / 50	2	<0.065
	9,10-Diphenylanthracene	NS	NA	100

NS = No standard

Note: There were no exceedances of the NR 140 Enforcement Standard

**TABLE 1  
MONITORING WELL INFORMATION  
U.S. CHEMICAL**

	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
GROUND SURFACE	818.70	816.62	820.65	817.08	817.17	817.74	818.40
TOP OF CASING	821.38	821.04	822.84	816.52	816.75	820.05	820.76

GROUND WATER ELEVATION

4/22/98	815.23	815.41	815.94	813.69	813.67	814.05	
12/4/98	812.91	812.87	812.94	812.91	811.91	812.38	
11/29/99	812.85	812.80	812.94			812.50	812.87
5/23/00	815.98	816.12	816.56	813.90	813.76	814.42	815.34
6/9/00	815.96	816.04	816.21	813.87	814.10	814.38	815.46

DEPTH TO WATER

4/22/98	6.15	5.63	6.90	2.83	3.08	6.00	
12/4/98	8.45	8.17	9.90	4.61	4.84	7.67	
11/29/99	8.53	8.24	9.90			7.55	7.89
5/23/00	5.40	4.92	6.28	2.62	2.99	5.63	5.42
6/9/00	5.42	5.00	6.63	2.65	3.00	5.67	5.3