GIS REGISTRY
Cover Sheet

August 2011
(RR-5367)

Source Property Information

CLOSURE DATE: Sep 1, 2011

BRRTS #: **02-46-553689**

FID #: 246083420

ACTIVITY NAME: Orion Corp

DATCP #:

PROPERTY ADDRESS: 1111 Cedar Creek Road

PECFA#:

MUNICIPALITY: Grafton

PARCEL ID #: 377580 (100400042000 from Ozaukee County GIS)

***WTM COORDINATES:**

X: **686004** Y: **320262**

** 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:

[X] Groundwater Contamination > ES *(236)*

- [ ] Contamination in ROW
- [ ] Off-Source Contamination

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

[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" form)*

Land Use Controls:

- [ ] N/A (*Not Applicable*)
- [ ] Soil: maintain industrial zoning *(220)*

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

- [ ] Structural Impediment *(224)*
- [ ] Site Specific Condition *(228)*
- [X] Cover or Barrier *(222)*

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

- [ ] Vapor Mitigation *(226)*
- [ ] Maintain Liability Exemption *(230)*

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

Monitoring Wells:

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

(●) Yes ( ) No ( ) N/A

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

PLEASE ASSEMBLE IN THIS ORDER

GIS Registry Checklist

Form 4400-245 (R 8/11)

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 #: 02-46-553689 *(No Dashes)* PARCEL ID #: 100400042000

ACTIVITY NAME: ORION CORP WTM COORDINATES: X: 686004 Y: 320262

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

- [x] **Closure Letter**
- [x] **Maintenance Plan** (*if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.*)
- [ ] **Continuing Obligation Cover Letter** (for property owners affected by residual contamination and/or continuing obligations)
- [ ] **Conditional Closure Letter**
- [ ] **Certificate of Completion (COC)** (for VPLE sites)

SOURCE LEGAL DOCUMENTS

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

  Figure #: **Title: Ozaukee County GIS**
- [x] **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

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

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

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

  Figure #: 1 **Title: Site Location Map**
- [x] **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**
- [x] **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 #: 5 **Title: Soil Isoconcentrations Above Fractured Bedrock**

BRRTS #: 02-46-553689 ACTIVITY NAME: ORION CORP

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 #: 7 **Title: Cross Section A-A**

Figure #: 8 **Title: Cross Section B-B**

☒ **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 #: 4 A, B, C **Title: Groundwater Isoconcentration**

☒ **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 #: 3 J **Title: Ground Water Elevatations**

Figure #: **Title:**

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

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

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

Table #: 1 **Title: Summary of Soil Sample 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 #: 2 **Title: Summary of Groundwater Sample Analytical 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 #: 3 **Title: Summary of Groundwater Depths and Elevations**

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 #: 02-46-553689 ACTIVITY NAME: ORION CORP

NOTIFICATIONS

Source Property

☒ **Not Applicable**

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

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

Off-Source Property

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

☒ **Not Applicable**

☐ **Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.
Note: *Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.*

Number of "Off-Source" Letters:

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

☐ **Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies).** This does not apply to right-of-ways.
Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*

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

Figure #: **Title:**

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

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

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Plymouth Service Center
1155 Pilgrim Rd.
Plymouth WI 53073

Scott Walker, Governor
Cathy Stepp, Secretary
John Hammen, Acting Regional Director
Telephone 920-892-8756
FAX 920-892-6638
TTY Access via relay - 711

September 1, 2011

Ridge Braunschweig
CPL Industries, Inc.
11501 N. Port Washington Road, Suite 201
Mequon, WI 53092

Dear Mr. Braunschweig:

Subject: Final case closure with continuing obligations, CPL Industries (Orion Corporation), 111 Cedar Creek Road, Grafton, file reference FID #246083420, BRRTS #0246553689 and BRRTS #0746555373.

On August 2, 2011, the Southeast Region Closure Committee reviewed your 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. After this review I asked you to have your consultant provide some modified maps and do some additional work regarding soils at the site that were in exceedance of the direct contact soil standards. Your consultant did the requested work and provided me with the subsequent documentation shortly after I made the request.

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

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

- Residual soil contamination exists that must be properly managed should it be excavated or removed
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier
- Groundwater contamination is present above Chapter NR 140 enforcement standards

All information pertaining to this site, including the cap maintenece plan is on file at the Plymouth Regional DNR office, at 1155 Pilgrim Road, Plymouth, Wisconsin. This letter and information that was

submitted with your closure request application, including the cap maintenance plan, will be included on the GIS Registry, in a PDF attachment. To review the sites on the GIS Registry web page, visit the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm. If any party intends to construct or reconstruct a water supply well, that party will need prior Department approval in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at 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 (Sites with residual contamination), compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. You must pass on both the information about these continuing obligations and your cap maintenance plan to the next property owner or owners. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 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 including compliance with the attached cap maintenance plan is met.

Soil Cap

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement or other impervious cap that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and in the location specified just off the pavement on the south end of the paved area, to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

Soil contamination remains at various locations on the site as shown on the attached maps and in the information submitted to the Department of Natural Resources. If soil in the specific locations shown on the attached maps is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to people.

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

Prohibited Activities

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

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

Residual Groundwater Contamination

Groundwater impacted by chlorinated solvent and PAH contamination greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code, is present on this property as shown on the attached maps.

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:

- Disturbance, construction on, change or removal in whole or part of pavement, an engineered cover or a soil barrier that must be maintained over contaminated soil.

Please send written notifications in accordance with the above requirements to

Victoria Stovall
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
PO Box 12436
Milwaukee, WI 53212

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

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

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact John Feeney in the Plymouth office at 920-892-8756 extension 3023.

Sincerely,

John Feeney for

Frances Koonce Sub-Team Supervisor
Southeast Region Remediation & Redevelopment Program

Attachment

Cap Maintenance Plan which includes remaining soil contamination maps, remaining groundwater contamination maps, and extent of cap map
Factsheet RR-819

Cc: Key Engineering, LTD
SER File

COVER (BARRIER OR CAP) MAINTENANCE PLAN

May 31, 2011

Property Located at:

1111 Cedar Creek Road, Grafton, Wisconsin

FID # 246083420, WDNR BRRTS # 02-46-553689

Legal Description: See attached deed for legal description;

Tax Number: 100400042000

A site map is presented as Figure 1.

Introduction

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

More site-specific information about this property may be found in:

The case file in the Wisconsin Department of Natural Resources (WDNR) region name regional office

BRRTS on the Web (WDNR's internet based data base of contaminated sites):

http://botw.dnr.state.wi.us/botw/GetActivityDetail.do?adn=0246553689&siteId=1390300&crumb=1&s=B

Geographic information systems (GIS) registry PDF file for further information on the nature and extent of contamination:

[Note: to be assigned]

The WDNR project manager for Ozaukee County:

Mr. John Feeney
Phone: (920) 892-8756 Ext 3023

Description of Contamination

The property was originally developed in 1973; operations consisted of the production of bearings and bearing assemblies. The original building footprint was expanded several times, with the most recent expansion being along the southern portion of the building in 2007.

Phase I/II Environmental Site Assessment Activities

Key Engineering Group (KEY) was retained by CPL Industries (CPL) to complete a Phase I Environmental Site Assessment (ESA) in October, 2008. The Phase I ESA concluded that the following recognized environmental condition (REC) existed:

- The property's historical use of oils products and degreasing solvents since 1973. The facility had no records of disposal activities, volumes of products purchased or used or the companies which provided the materials and disposal services between 1973 and the early 1990's. Degreasing operations and solvent use were somewhat unclear prior to the 1990's.

The Phase I ESA REC triggered Phase II ESA activities. Conestoga Rovers & Associates (CRA) was retained by the buyer (John Crane) to conduct a Phase II ESA to evaluate soil and groundwater quality. The Phase II ESA activities were conducted by CRA in February 2009.

CRA advanced six soil probes throughout the property to depths between three and twenty feet below ground surface (bgs). Temporary groundwater monitoring wells were installed at four of six probe locations. Groundwater was encountered between three to twelve feet below bgs. All soil and groundwater samples submitted for analysis were analyzed for volatile organic compounds (VOCs), gasoline range organics (GRO), diesel range organics (DRO), polycyclic aromatic hydrocarbons (PAH) and Resource Conservation and Recovery Act (RCRA) metals.

The analytical results indicated that there were limited concentrations of VOC and PAH in soil and groundwater at select locations. No GRO or DRO was detected in any soil samples collected, and several RCRA metals were detected within a range commonly understood to be background for this general vicinity.

The WDNR was notified of the observed VOC release on April 24, 2009.

Site Investigation Summary

A site investigation was conducted by KEY between March, 2009 and June, 2009 with groundwater monitoring conducted between March, 2009 and December, 2009. KEY installed a total of 18 borings, 10 temporary monitoring wells, eight NR 141 groundwater monitoring wells, and one NR 141 piezometer. To define the horizontal extent of chlorinated solvent to the west, one soil boring/temporary well (KTW-4) was placed off-site at the adjacent property to the immediate west. Laboratory analysis of groundwater within temporary well KTW-1 suggests off-site contamination was present and possibly migrating to CPL from the neighboring Portal Industries property to the west.

Soil analytical results indicated concentrations of cis-1, 2-DCE and trichloroethene (TCE) in soils on the southwestern portion of the property and at the offsite location to the immediate west (Portal Industries). Further, tetrachloroethene (PCE) and TCE were detected in groundwater on the southwest portion of the property. The concentrations were detected in a saturated soil sample collected directly above encountered bedrock at a depth of 18 feet below grade. Offsite concentrations in saturated soil were higher than soil concentrations at the property. KEY submitted a status report to the WDNR dated August 25, 2009 which opined that the chlorinated hydrocarbons observed in the southwest portion of the property likely originated from an off-site source to the west.

Three temporary wells (KTW-4, KTW-5 and KTW-9) yielded detectable concentrations of PCE along the southern portion of the property. Groundwater at these well locations was encountered at approximately five feet bgs. Various PAH compounds (benzo(a)pyrene, benzo(b)fluoranthene and chrysene) were detected at levels above their respective NR 140 enforcement standards (ES) in temporary monitoring wells KTW-5 and KTW-7. Similarly, these same three compounds appeared in MW-8 at levels above their respective NR 140 preventive action limit (PAL). Given the temporary nature of this well, it is KEY's opinion that the observed PAH in these wells is bias-high and directly related to suspended solids within the groundwater matrix, and not dissolved phase.

Depth to groundwater was observed between four and seven feet bgs. Groundwater flow direction was consistently south over all groundwater sampling events. Based on the analytical results, it appeared that the extent of PCE and TCE in groundwater was defined to the north, south and east. The concentrations of PCE and TCE in groundwater were only detected along the southwestern area of the property.

KEY performed slug-out bail testing on monitor wells MW-1 through MW-4. Recovery of the groundwater was monitored to within 90% of its initial hydrostatic head. Recovery information was placed into a drawdown versus time graph. Data from within this graph was utilized to estimate hydraulic conductivity with a Bouwer and Rice methodology. The average hydraulic conductivity for all wells tested is estimated at 6.65 E-3 centimeters per second (cm/sec).

During the site investigation, depth to groundwater was monitored on several occasions. Hydraulic gradient across the study area was observed to be approximately 0.02 feet per foot (ft/ft), traveling in a southerly direction. The hydraulic gradient was observed to be fairly flat beneath the footprint of the building, which is likely due to the impervious nature of the overlying structure and associated pavement. The gradient was observed to increase near the pervious surfaces and steep grade changes along the southern portions of the subject site. The observed average hydraulic conductivity for the four wells tested (MW-1 through MW-4) was estimated at 6.65 E-3 cm/sec. Assuming an effective porosity for the silty sand of 0.35, KEY estimates a groundwater seepage velocity of 3.8 E-4 cm/sec, or approximately 395 feet per year (ft/yr) in a southerly direction.

KEY installed a nested piezometer (PZ-1) in close proximity to MW-1. The piezometer was installed to a depth of 46 feet with a 5 foot screen. Analytical results indicated that no chlorinated hydrocarbons have migrated vertically to the depth of the piezometer well screen.

Observations of hydrostatic head during the site investigation suggested that the groundwater elevation within PZ-1 was 3.03 feet higher than that of MW-1. When comparing well screen observations, there is an observed positive vertical gradient of 0.12 ft/ft. A positive vertical gradient should hinder a vertical migration of more dense contaminants.

Petroleum related contamination was also detected at the property. As such, additional investigation and sampling was conducted to define the degree and extent of the petroleum and identify a potential source. Concentrations of petroleum related PAH and petroleum VOCs, including benzene, benzo(a)pyrene, benzo(a)fluoranthene and chrysene, were present at elevated levels in groundwater in MW-8, KTW-5 and KTW-7. Site investigation groundwater data suggested that the concentrations within the above identified well locations were minimal. The detected petroleum contamination is located along the southeastern section of the building (which was recently constructed in 2007). Low levels of benzene, benzo(a)pyrene, benzo(a)fluoranthene and chrysene were also observed in groundwater from MW-5 and MW-6, located to the north.

The degree and extent of the detected petroleum contamination in the vicinity of MW-8 appeared to be isolated within an immediate area around the southeastern section of the property. The source of this contamination was unknown, although it does appear to originate on the subject site. Benzene previously detected in groundwater at MW-8 was not detected during the subsequent groundwater sampling event (December, 2009) of the site investigation. Several PAH compounds were detected; however, all were observed to be only slightly above their respective NR 140 PAL and below their ES. PAH in groundwater was not detected at MW-4, the down gradient well to the south.

Based on the soil data, it was KEY's opinion that the highest levels of contamination detected in the soil beyond the western boundaries of the subject site is not a release associated with the CPL Industries facility. It was also KEY's opinion that the observed chlorinated hydrocarbons in soil and groundwater from KTW-5 may be originating from the CPL Industries release, and are commingled with the neighboring western release identified.

For details regarding the aforementioned observations and findings, KEY would direct the WDNR to our Site Investigation Report dated May 6, 2010.

Remedial Action

KEY performed a total of seven to eight natural attenuation sampling events from the groundwater monitoring wells and the piezometer between March, 2009 through January, 2011. The sampling events represent two years of quarterly groundwater sampling. The purpose of the monitoring was to assess groundwater quality over time, and the presence of naturally occurring conditions that might support natural attenuation of contaminated groundwater.

Groundwater Flow Direction

Groundwater flow was observed to be north to south (southward) during all sampling events. Hydraulic gradient was consistently measured to be approximately 0.02 ft/ft in a southerly direction, with a much steeper gradient observed along the southern boundary, which is consistent with site topography. As a result of field observations, KEY remains of the opinion that seepage velocity is still 395 feet per year as identified in our *Site Investigation Report.*

Groundwater Monitoring Results

Groundwater data is summarized as follows:

Piezometer PZ-1

Piezometer PZ-1 was sampled for VOCs a total of seven events, and PAH for the final event. The only exceedance of an NR 140 (Table 1) PAL was in July 23, 2009 sampling event (1.46 micrograms per liter (ug/l)). Due to the elevated TCE value during the July 23, 2009 event, PZ-1 was re-sampled on August 8, 2009, which revealed no detection, to within laboratory analytical detection limits. The five subsequent sampling events to July 23, 2009 revealed all VOCs to be below the limits of laboratory detection.

The PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification). None of the detected PAH analytes were above NR 140 PAL values.

Well MW-1

Monitor well MW-1 was sampled for VOCs a total of eight events, and PAH for the final event. Of the VOC sampling, both tetrachloroethene (PCE) and TCE was observed above NR 140 (Table 1) ES in the initial March 9, 2009 sampling event. The seven subsequent sampling events exhibited both PCE and TCE well below an ES, with only one sampling occurrence (July 6, 2010 at 1.4 ug/l) above PAL. The two most recent sampling events exhibited both PCE and TCE at levels below laboratory method detection limits.

The PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification). None of the detected PAH analytes were above NR 140 PAL values

Well MW-2

Monitor well MW-2 was sampled for VOCs a total of eight events, and PAH for the final event. Of the VOC sampling, both PCE and TCE were observed above NR 140 (Table 1) ES. Both cis 1,2 dichloroethene (DCE) and 1,2 dichloroethane (DCA) was observed above NR 140 PAL values. KEY evaluated the statistical trend of TCE and PCE in MW-2. Statistical analyses would suggest that the PCE and TCE offer no trend to within a 90% confidence limit. It is KEY's opinion that MW-2 is influenced by the neighboring release on the Portal Industries property, and that the hydrostatic influence of the nearby stormwater drainage ditch. During the last sampling event, only TCE was observed at a level (6.4 ug/l) marginally above its NR 140 ES of 5 ug/l.

The PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification). None of the detected PAH analytes were above NR 140 PAL values

Well MW-3

Monitor well MW-3 was sampled for VOCs a total of eight events, and PAH for the final event. Of the VOC sampling, only DCA marginally exceeded a PAL in the July 6, 2010 sampling event. The final sampling event exhibited all VOC values below a limit of laboratory detection. Chloromethane was observed to exceed a PAL with a "J" flag on two events; however, chloromethane is a common laboratory artifact and is not thought to be a true impact to local groundwater quality.

The PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification). None of the detected PAH analytes were above NR 140 PAL values.

Well MW-4

Monitor well MW-4 was sampled for VOCs a total of eight events, and PAH for the last five events. Of the VOC sampling, only DCA marginally exceeded a PAL in the April 6 and July 23, 2009 (both "J" flagged) events and October 5, 2010 sampling event (1.3 ug/l). The final sampling event exhibited all VOC values below a limit of laboratory detection. Chloromethane was observed to exceed a PAL with a "J" flag on one event (December 10, 2009), however, chloromethane is a common laboratory artifact and is not thought to be a true impact to local groundwater quality.

The PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification). None of the detected PAH analytes were above NR 140 PAL values.

Well MW-5

Monitor well MW-5 was sampled for VOCs over seven sampling events, and PAH for six of the seven sampling events. Of the VOC sampling, only chloromethane was observed to exceed a PAL with a "J" flag on one event, however, chloromethane is a common laboratory artifact and is not thought to be a true impact to local groundwater quality.

The PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification). None of the detected PAH analytes were above NR 140 PAL values.

Well MW-6

Monitor well MW-6 was sampled for VOCs and PAH over seven sampling events. Of the VOC sampling, only chloromethane was observed to exceed a PAL (1.3 ug/l on December 10, 2010 and 0.38"J" on March 23, 2010), however, chloromethane is a common laboratory artifact and is not thought to be a true impact to local groundwater quality.

Of the PAH analysis, only benzo(a)pyrene and benzo(b)fluoranthene exceeded a PAL in the July 6, 2010 event. The remaining PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification).

MW-7

Monitor well MW-7 was sampled for VOCs a total of seven events, and PAH for the final event. Of the VOC sampling, only chloromethane was observed to exceed a PAL with a "J" flag on one event, however, chloromethane is a common laboratory artifact and is not thought to be a true impact to local groundwater quality.

The PAH data revealed several compounds which were "J" flagged (above a limit of detection, but below the limits of proper quantification). None of the detected PAH analytes were above NR 140 PAL values.

Well MW-8

Monitor well MW-8 was sampled for VOCs and PAH a total of seven events. Of the VOC sampling, only benzene was observed above NR 140 (Table 1) ES in the initial April 6, 2009 sampling event. The seven subsequent sampling events exhibited benzene below laboratory method detection limits. Chloromethane was observed to exceed a PAL with a "J" flag on one event (December 10, 2010), however, chloromethane is a common laboratory artifact and is not thought to be a true impact to local groundwater quality.

The PAH data revealed benzo(a)pyrene, benzo(b)fluoranthene and chrysene above their respective PALs during the July 23, 2009, December 10, 2009 and March 23, 2009 sampling events and only benzo(b)fluoranthene during the July 6, 2010 sampling event. During the two most recent sampling events (October 5, 2010 and January 7, 2011) several PAH compounds

were observed at "J" flagged (above a limit of detection, but below the limits of proper quantification) values below their respective PALs.

Temporary Monitoring Wells KTW-1 through KTW-10

During the site investigation, several temporary monitoring wells were placed to provide a rudimentary evaluation of groundwater quality. Though these wells do provide useful information, they should not be considered in making a case closure decision. However, KEY will discuss the data to assist the WDNR in understanding the various decisions which went into the placement of NR 141 compliant wells, which are appropriate for consideration in case closure decision. All of the temporary well information was placed within the *Site Investigation Report* dated May 6, 2010.

Groundwater analysis was conducted at several temporary installed monitoring well locations during the Phase II ESA and early stages of the site investigation activities. Temporary wells were installed on March 9, 2009 and between April 1 and April 3, 2009.

KTW-1 was located about 30 feet up gradient of MW-1 and was sampled for analysis on March 9, 2009. A detectable concentration of TCE was indicated at 1.2 ug/l, above its respective PAL of 0.5 ug/l.

KTW-2 was replaced with MW-8 located to the northeast of MW-1. KTW-2 was sampled for analysis on March 9, 2009. There were no detectable concentrations of chlorinated hydrocarbons in the groundwater. Concentrations of several petroleum related compounds were detected, including benzene at 113 ug/l, naphthalene at 14.4J ug/l, ethylbenzene at 118 ug/l, toluene at 645 ug/l, trimethylbenzenes at 734 ug/l, and xylenes at 546 ug/l, and other related compounds were detected. The benzene and trimethylbenzenes concentrations exceeded their respective ES for each of the detected parameters. Naphthalene exceeded its PAL. KEY would note that MW-8 exhibited only benzene above an ES in the initial sampling event (April 9, 2009), then all VOCs were either below laboratory detection limits, with the exception of a "J" flagged chloromethane (0.59 ug/l J) observed on December 10, 2009.

KTW-3 was sampled for analysis on April 1, 2009. The results indicated detections of cis-1,2 DCE at 25.2 ug/l and TCE at 2.8 ug/l. Both compounds detected exceed their respective PAL standards. KTW-3 was located about 40 feet to the south and directly down-gradient of MW-2. The chlorinated solvents within KTW-3 are believed to originate from the neighboring Portal Industries property.

KTW-4 was located on the adjacent property (Portal Industries). KTW-4 was located about 50 feet west of the CPL Industries building and about 90 feet side gradient of MW-2 and 125 feet side-gradient to up-gradient of KTW-3. KTW-4 was sampled for analysis on April 4, 2009. Concentrations of PCE at 1.7 ug/l (above the PAL of 0.5 ug/l) and TCE at 0.48(J) ug/l were detected at this off site groundwater sampling location. There were no other contaminants detected in the groundwater at KTW-4. The chlorinated solvents within KTW-4 are believed to originate from the neighboring Portal Industries property.

KTW-5 was located inside the building about 130 feet side-gradient of MW-1 and to the northwest. KTW-5 was sampled for analysis on April 2, 2009. This well location is in an area that had previously been asphalt surface since 1973 and was part of a 15,784 square feet building expansion in 2007. Groundwater results indicated detectable concentrations of PCE at 8.6 ug/l and TCE at 17.1 ug/l. Both compounds exceed their respective ES standards. PAH compounds

detected in KTW-5 consisted of chrysene at 1.10 ug/l, benzo(a)pyrene at 0.910 ug/l and benzo(a)fluoranthene at 0.970 ug/l. All three compounds detected exceed their respective groundwater ES standard. Other PAH compounds were detected at low levels and none exceeded their applicable groundwater quality standards. The origin of VOC and PAH within this temporary well is unknown, however, downgradient well MW-2 would appear to define its lateral extent.

KTW-6 was located inside the building (about 80 feet side gradient and northeast of MW-1) and in the same general recently expanded building (circa 2007). KTW-6 was sampled on April 2, 2009. TCE was detected at 1.70 ug/l which exceed its respective groundwater PAL. No other VOCs were detected. All concentrations of PAH compounds detected were very low and J-Flagged by the laboratory and none exceeded any applicable groundwater standards.

KTW-7 was located down gradient of MW-8 about 40 feet to the south and 80 feet east of MW-1. KTW-7 was sampled for analysis on April 1, 2009. There were no detectable concentrations of chlorinated compounds registered. Benzene was detected at 1.8 ug/l which exceeded its respective PAL standard. PAH compounds detected included chrysene at 0.370 ug/l, benzo(a)pyrene at 0.390 ug/l and benzo(a)fluoranthene at 0.520 ug/l. All three compounds exceed their respective groundwater ES. All other PAH compounds detected were very low and did not exceed any applicable standards.

KTW-8 was also located inside the 2007 building expansion area. KTW-8 was placed about 60 feet up-gradient of MW-1 and sampled for analysis on April 2, 2009. PCE was detected at 0.500 "J" ug/l and TCE at 11.4 ug/l. PCE meets its respective PAL standard and TCE exceeds its applicable groundwater ES. No other VOCs were detected in KTW-8. Several PAH compounds were J-Flagged and detected below their laboratory level of quantification.

KTW-9 was located inside the older section of the building about 210 feet up-gradient of MW-1 and along the inside west wall. KTW-9 was sampled for analysis on April 2, 2009. PCE was detected at 0.590 "J" ug/l, slightly above the PAL. No other VOC were detected in KTW-9 and there were no detectable concentrations of PAH compounds registered.

KTW-10 was located within an older section of the building about 90 feet up-gradient of KTW-8 and 150 feet up-gradient of MW-1. KTW-10 was sampled for analysis on April 2, 2009. PCE was detected at 1.1 ug/l which is above its respective PAL standard. No other VOCs were detected in KTW-10. Only one PAH compound, anthracene, was detected at 0.0300 "J" ug/l, which does not exceed any applicable standard.

Temporary well data was presented in our *Site Investigation Report* dated May 6, 2010.

Natural Attenuation

Natural attenuation indicator parameters suggest ideal temperature, pH and oxidation reduction potential during most of the sampling events. Dissolved oxygen appears elevated in all sampling events. Elevated dissolved oxygen is consistent with soil types observed during the site investigation, which included silty sand, sandy silt and mottled fill consisting of clay, gravel and sand. Elevated dissolved oxygen can hinder reductive dechlorination of the more complex hydrocarbons (PCE, TCE and DCE). However, elevated dissolved oxygen will benefit reductive dechlorination when the more complex hydrocarbons eventually reduce to vinyl chloride.

Conclusions

VOC Contamination – With the exception of MW-2, all wells were observed to be at values below laboratory method detection limits during the final sampling event. With the exception of MW-2 and MW-4, all wells were observed to be at values below laboratory method detection limits during the last two sampling events. During the last sampling event, MW-2 exhibited TCE marginally above NR 140 ES (observed at 6.4 ug/l with an ES of 5 ug/l). Four of the eight sampling events for MW-2 exhibited TCE below its NR 140 ES. PCE was observed in MW-2 to exceed the NR 140 ES during the October 2010 sampling event, then was observed below laboratory method detection limits during the final sampling event. It is KEY's opinion that the TCE and PCE in MW-2 is likely originating from the neighboring Portal Industries release which was documented in our *Site Investigation Report.* Further, KEY is of the opinion that the fluctuating levels of TCE and PCE are directly related to the close proximity of MW-2 to a stormwater spillway which drains the entire Portal Industries lot (estimated at 1.93 acres), and the western portion of the CPL lot (estimated drainage of 2 acres from the 6.6 acre lot). The influx and variability of stormwater can flush potential contaminants within the vadose zone, which will lead to variable levels of dissolved phase contaminants in local groundwater. Statistical analysis of TCE in MW-2 would suggest that there is no established trend. Natural attenuation data would suggest that the site conditions for reductive dechlorination of MW-2 are less than ideal. Reductive dechlorination of MW-2 will also be hindered by the presence of elevated soil contamination (TCE source) on top of bedrock at the neighboring Portal Industries property (KTW-4, 512 ug/kg at 17 to 19 feet below grade) which was reported in the site investigation.

PAH Contamination – During the last sampling event, all monitor wells and the piezometer exhibited PAH at values which were below a laboratory method detection limit, or "J" flagged at values well below respective NR 140 PALs. It is KEY's opinion that the PAH contamination at the site is minimal (below NR 140 PAL) and stable.

Description of the cap to be maintained

The cap consists of the existing building and asphalt pavement, located as shown on the attached Figure ~~2.~~ 1. Also includes a small area beyond the asphalt - see figure.

Cover Barrier Purpose

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

Annual Inspection

The cap overlying the contaminated groundwater plume and soil, and as depicted in Figure 2 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be

effectively minimized will be documented. Attachment 1 is the cap inspection form. A log of the inspections and any repairs will be maintained by the property owner and is included in attachment 2. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be kept at the address of the property owner and available for submittal or inspection by WDNR representatives upon their request.

Note: The WDNR may, in some instances, require in the case closure letter that the inspection log be submitted at least annually after every inspection. If the case closure letter requires that, then add the following sentence to the paragraph above: A copy of the inspection log must be submitted to the WDNR at least annually after every inspection.

Maintenance Activities

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

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

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

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

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

Amendment or Withdrawal of Maintenance Plan

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

Contact Information

May 24, 2011

Site Operator:

Mr. Scott Payne
Director of Operations
John Crane Orion
1111 Cedar Creek Road
Grafton, Wisconsin 53024
(262) 204-3224

Signature:

_____

Property Owner:

Mr. Ridge Braunschweig
CPL Industries
11501 North Port Washington Road, Suite 201
Mequon, Wisconsin 53092
(262) 478-0775

Signature:

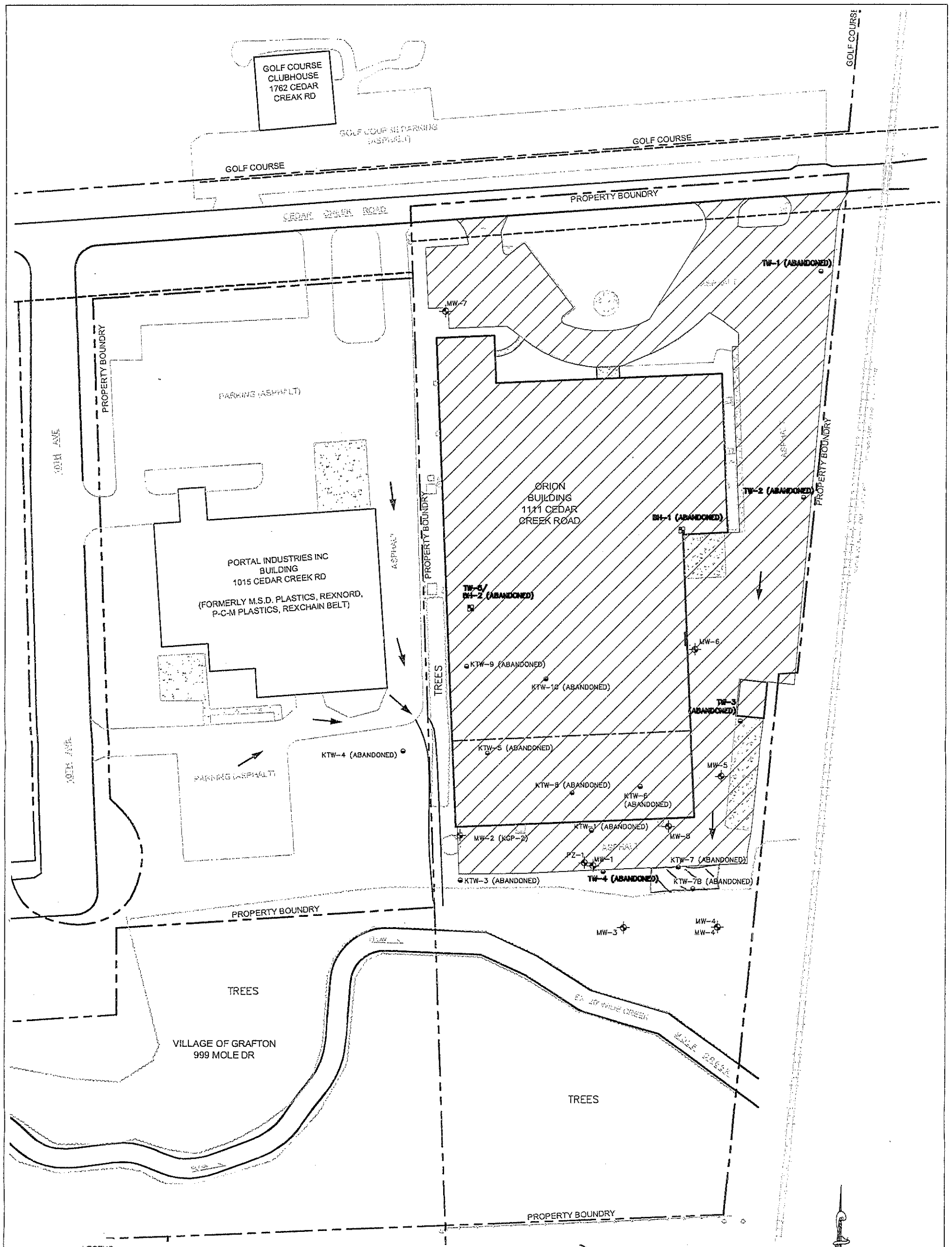
_____

Consultant:

Key Engineering Group, Ltd.
735 North Water Street, Suite 510
Milwaukee, WI 53202
(414) 224-8300

WDNR:

Victoria Stovall
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin 53212-3128
(414) 263-8500



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DESIGNED BY KWW	DATE 7/29/2011
DRAWN BY SAO	PROJECT 1809011
APPROVED BY KWW	SHEET NO. 1
CADFILE G:\ACAD\1809011\FIGURE 10_11_12_13_14.dwg XREF LMAN	

FIGURE ~~12~~ 1
EXTENT OF SITE CAP
CRA – PHASE II (2/17/2009)
1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.
735 NORTH WATER STREET, SUITE 510
MILWAUKEE, WI 53202
414.224.8300 (tel) - 414.224.8383 (fax)

Aug 23, 2011 – 2:36pm G:\ACAD\1809011\FIGURE 10_11_12_13_14.dwg

ATTACHMENT 1
CAP MAINTENANCE INSPECTION FORM

Orion Corp
1111 Cedar Creek Road
Grafton, Wisconsin
BRRTS #: 02-46-553689
FID #: 246083420

PAVEMENT AND BUILDING AREA COVER:

INSPECTION CRITERIA	COMMENTS	MAINTENANCE ACTION REQUIRED
Evidence of Cracking		
Evidence of Potholes		

Limitations to
Observation:_____

_____

_____

Completed by:

_____

Date:

_____

ATTACHMENT 2
CAP MAINTENANCE LOG

Orion Corp
1111 Cedar Creek Road
Grafton, Wisconsin
BRRTS #: 02-46-553689 and FID #: 246083420

Repair / Maintenance Description:		Date of Discovery:
Contractor / Individual Performing Repairs:		Date of Repair:
Inspector Name (Print)	Inspector Signature	Date of Inspection:

Repair / Maintenance Description:		Date of Discovery:
Contractor / Individual Performing Repairs:		Date of Repair:
Inspector Name (Print)	Inspector Signature	Date of Inspection:

Repair / Maintenance Description:		Date of Discovery:
Contractor / Individual Performing Repairs:		Date of Repair:
Inspector Name (Print)	Inspector Signature	Date of Inspection:

DOCUMENT NO. 377580

STATE BAR OF WISCONSIN FORM 1 — 1982
WARRANTY DEED
VOL 564 PAGE 990

THIS SPACE RESERVED FOR RECORDING DATA

RECORDED

1986 SEP 16 AM 10: 40

Ronald H. Voigt
REGISTER OF DEEDS
OZAUKEE COUNTY, WI

TRANSFER
$2,100.00
FEE

This Deed, made between CHARLES P. LABAHN, Grantor, and ORION CORPORATION, a Delaware Corporation, Grantee,

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

RETURN TO
Peter J. Lettenberger
Quarles & Brady
~~411 East Wisconsin Ave.~~
Milwaukee, WI 53202

Tax Parcel No: 84-

That part of the Northwest One-quarter (1/4) of the Northeast Fractional One-quarter (1/4) of Section Thirteen (13) Township Ten (10) North, Range Twenty-one (21) East, in the Village of Grafton, Ozaukee County, State of Wisconsin bounded and described as follows:

Commencing at the N.W. corner of the N.E. Frac. 1/4 of said Section 13, thence due East 644.00 feet along the North line of said 1/4 Section to the point of beginning of the parcel of land to be described; thence S. 1°46'30" W. 904.00 feet on a line parallel to the West line of said 1/4 Section, thence S. 88°11' E. 245.84 feet to a point in the Westerly boundary line of the Chicago, Milwaukee, St. Paul & Pacific R.R. right-of-way, said point being N. 88°11' W. 49.95 feet from the center line of said right-of-way, thence N. 9°33'30" E. 480.00 feet along the Westerly line of said right-of-way, thence due East 16.73 feet, thence N. 9°33'30" E. 444.15 feet along the Westerly line of said right-of-way to a point in the North line of said 1/4 Section, said point being due West 33.46 feet from the center line of said right-of-way, thence due West 387.91 feet along the North line of said 1/4 Section, said line being the center line of Cedar Creek Road to the point of beginning, containing 6.60 acres of land, more or less.

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

Together with all and singular the hereditaments and appurtenances thereunto belonging;
And Grantor warrants that the title is good, indefeasible in fee simple and free and clear of encumbrances except municipal and zoning ordinances, recorded easements for public utilities, recorded building and use restrictions and covenants and general taxes levied in the year 1986
and will warrant and defend the same.

Dated this 28th day of August, 19 86

(SEAL) Charles P. LaBahn (SEAL)

* * Charles P. LaBahn

(SEAL) (SEAL)

* *

AUTHENTICATION

Signature(s)

authenticated this day of, 19

*

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

THIS INSTRUMENT WAS DRAFTED BY
David J. Winkler, Quarles & Brady,
411 E. Wisconsin Avenue, Milwaukee, WI

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

ACKNOWLEDGMENT

STATE OF WISCONSIN } ss.
Ozaukee County.

Personally came before me this 28th day of August, 19 86 the above named Charles P. LaBahn

to me known to be the person who executed the foregoing instrument and acknowledge the same.

Laurie Morrison

*

Notary Public Ozaukee County, Wis.
My Commission is permanent. (If not, state expiration date: 4/22, 19 90.)

*Names of persons signing in any capacity should be typed or printed below their signatures.

Orion

Union Cemetery
Cemetery Cedarburg
Grave
Section
Cemetery
Annotation
Cadastral
PLSS Corner
Road Centerline
Parcel Line
Extended Parc
Tie Line
Extended Tie L
Meander Line
Plat Closure Li
Historical Parc
Parcel Line
Easement Lines
Easement Lea
Easement Line
Water Body
Note Lines
Information Lin
Tie Hook
Sections
Parcel
Parks
Corporate Limits

SCALE 1 : 2,520

200 0 200 400 600

FEET

N

CPL

CPL Industries, Inc.

Ridge A. Braunschweig
Executive Vice President
Chief Financial Officer

Reference: *Geographic Information System Registry*
CPL Industries, Inc.
1111 Cedar Creek Road
Grafton, Wisconsin

To Whom it May Concern:

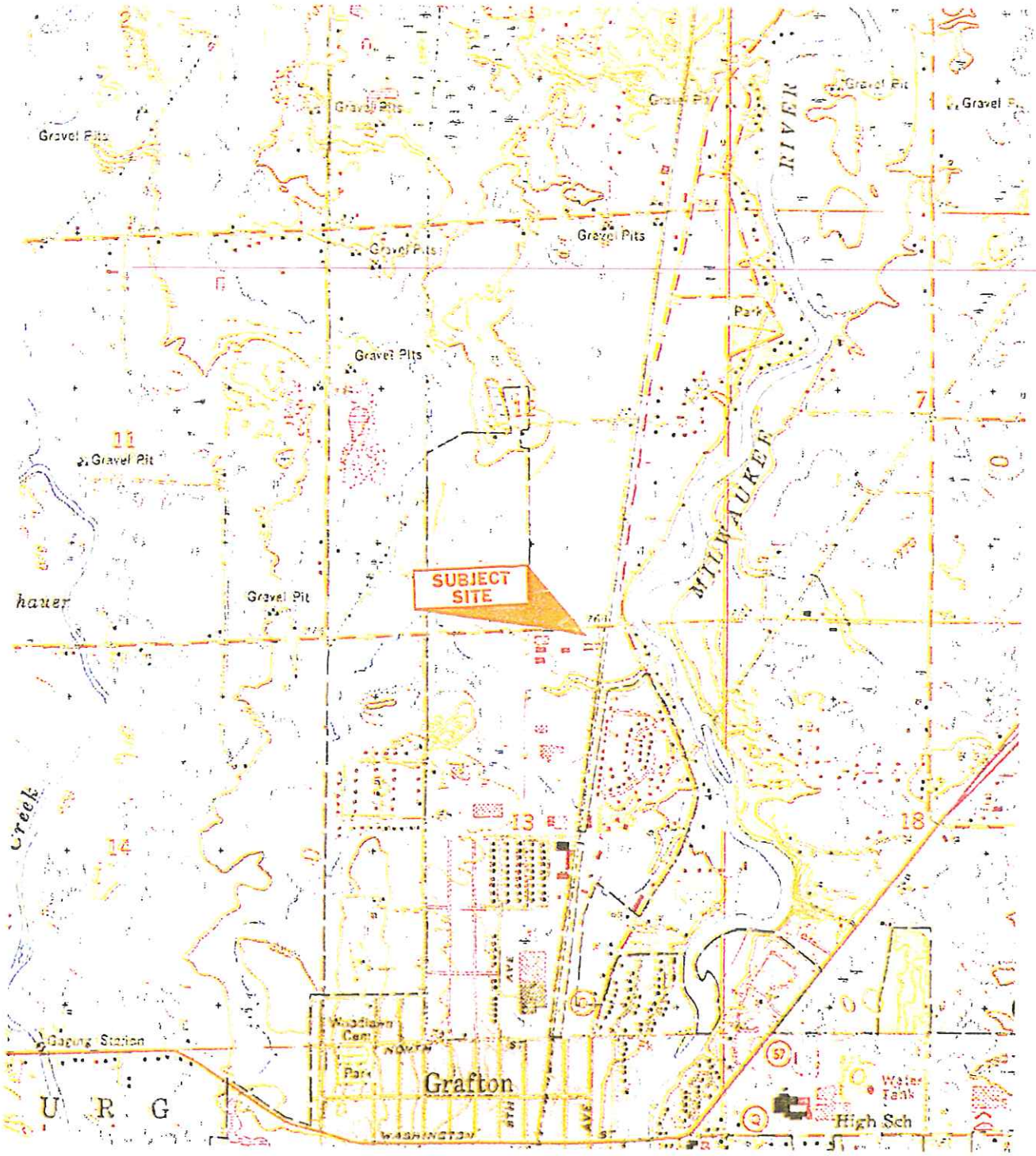
I, Ridge Braunschweig of CPL Industries, Inc., representative of the responsible party do hereby declare to the best of my knowledge that the attached legal property description represents completely and accurately the above reference property for which I am requesting listing on the Wisconsin Department of Natural Resources Geographic Information System Registry of Closed Remediation Sites.

Please find a copy of the legal description as stated in the property deed for the above reference property.

Signed: Ridge Braunschweig Date: 5-24-2011

Mr. Ridge Braunschweig
Executive Vice President & CFO
CPL Industries, Inc.
11501 N. Port Washington Road, Suite 201
Mequon, Wisconsin 53092

11501 North Port Washington Road • Suite 201 • Mequon, WI 53092
262-478-0805 • 262-478-0808 Fax • email: rbraunschweig@cplii.com



SOURCE:
USGS
Cedarburg, Wisconsin 7.5 Minute Series
Quadrangle Map 1959, Photorevised 1971 and 1976, Minor Revision 1994

SCALE IN FEET
0 2000'

2002 Key Engineering Group Ltd.

DESIGNED BY	DATE
MCB	03/05/09
DRAWN BY	PROJECT
	1809011
APPROVED BY	SHEET NO.
MCB	1

H:\PROJECTS\2008\EM\1809011\1809011 Figure 1 grafton.doc

FIGURE 1
SITE LOCATION MAP
ORION - GRAFTON
1111 CEDAR CREEK ROAD
GRAFTON, WISCONSIN

KEY ENGINEERING GROUP LTD.

GOLF COURSE CLUBHOUSE 1762 CEDAR CREAK RD

GOLF COURSE PARKING (ASPHALT)

GOLF COURSE

GOLF COURSE

GOLF COURSE

CEDAR CREEK ROAD

PROPERTY BOUNDRY

LANDSCAPED

ASPHALT

TW-1 (ABANDONED)

MW-7

PROPERTY BOUNDRY

PARKING (ASPHALT)

10TH AVE

ORION BUILDING 1111 CEDAR CREEK ROAD

TW-2 (ABANDONED)

BH-1 (ABANDONED)

ASPHALT

PROPERTY BOUNDRY

PORTAL INDUSTRIES INC BUILDING 1015 CEDAR CREEK RD

(FORMERLY M.S.D. PLASTICS, REXNORD, P-C-M PLASTICS, REXCHAIN BELT)

ASPHALT

PROPERTY BOUNDRY

BH-2 (ABANDONED)

MW-6

KTW-9 (ABANDONED)

KTW-10 (ABANDONED)

TREES

TW-3 (ABANDONED)

10TH AVE

KTW-4 (ABANDONED)

KTW-5 (ABANDONED)

(1500 SQUARE METER EXPANSION 2007)

MW-5

PARKING (ASPHALT)

KTW-8 (ABANDONED)

KTW-6 (ABANDONED)

SURFACE DRAINAGE DITCH

MW-2 (KGP-2)

KTW-1 (ABANDONED)

KTW-2 MW-8

ASPHALT

PZ-1

MW-1

KTW-3 (ABANDONED)

TW-4 (ABANDONED)

KTW-7 (ABANDONED)

PROPERTY BOUNDRY

MW-3

MW-4

FLOW

TREES

EX. 20' WIDE CREEK

MOLE CREEK

VILLAGE OF GRAFTON 999 MOLE DR

TREES

FLOW

PROPERTY BOUNDRY

LEGEND

PROPERTY BOUNDRIES

TREE LINE

SURFACE DRAINAGE FLOW DIRECTION

MONITORING WELL

TEMP WELL

BORE HOLE

SCALE IN FEET

80' 0 80'

© 2005 Key Engineering Group Ltd.

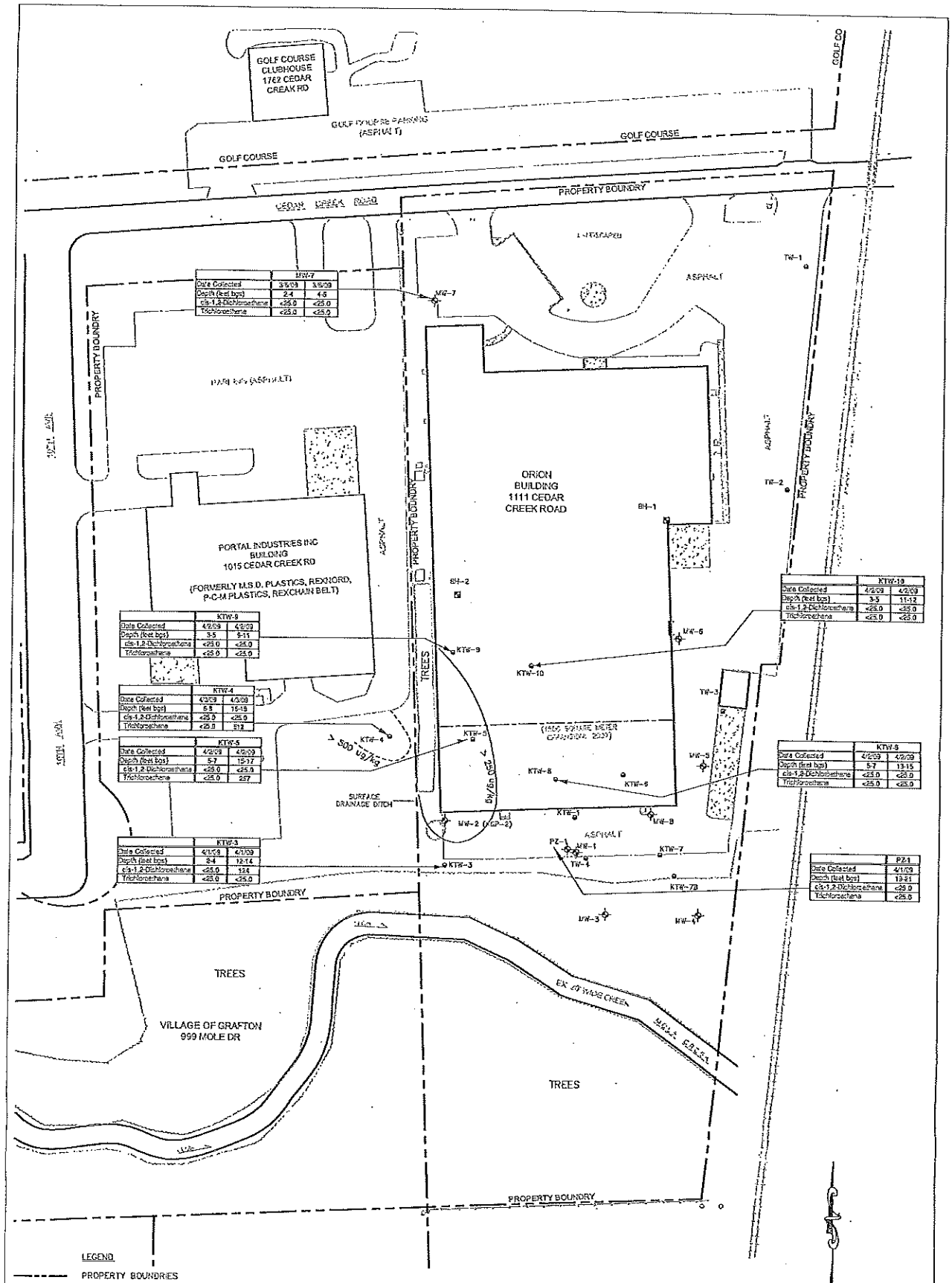
DESIGNED BY AMB	DATE 2/5/10
DRAWN BY AMB	PROJECT 1809011
APPROVED BY KWW	SHEET NO. 1
CADFILE G:\ACAD\1809011\FIGURE 2.dwg XREF LMAN	

Apr 19, 2011 – 7:38am G:\ACAD\1809011\FIGURE 2.dwg

FIGURE 2
SITE LAYOUT

1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.
735 NORTH WATER STREET, SUITE 510
MILWAUKEE, WI 53202
414.224.8300 (tel) - 414.224.8383 (fax)



	MW-7	
Date Collected	3/6/09	3/6/09
Depth (feet bgs)	2-4	4-6
cis-1,2-Dichloroethene	<25.0	<25.0
Trichloroethene	<25.0	<25.0

	KTW-9	
Date Collected	4/2/09	4/2/09
Depth (feet bgs)	3-5	9-11
cis-1,2-Dichloroethene	<25.0	<25.0
Trichloroethene	<25.0	<25.0

	KTW-4	
Date Collected	4/3/09	4/3/09
Depth (feet bgs)	5-8	15-18
cis-1,2-Dichloroethene	<25.0	<25.0
Trichloroethene	<25.0	512

	KTW-5	
Date Collected	4/2/09	4/2/09
Depth (feet bgs)	5-7	15-17
cis-1,2-Dichloroethene	<25.0	<25.0
Trichloroethene	<25.0	257

	KTW-3	
Date Collected	4/1/09	4/1/09
Depth (feet bgs)	8-4	12-14
cis-1,2-Dichloroethene	<25.0	134
Trichloroethene	<25.0	<25.0

	KTW-10	
Date Collected	4/3/09	4/3/09
Depth (feet bgs)	3-5	11-12
cis-1,2-Dichloroethene	<25.0	<25.0
Trichloroethene	<25.0	<25.0

	KTW-8	
Date Collected	4/6/09	4/6/09
Depth (feet bgs)	5-7	13-15
cis-1,2-Dichloroethene	<25.0	<25.0
Trichloroethene	<25.0	<25.0

	PZ-1
Date Collected	4/1/09
Depth (feet bgs)	13-21
cis-1,2-Dichloroethene	<25.0
Trichloroethene	<25.0

LEGEND

- PROPERTY BOUNDRIES
- TREE LINE
- MONITORING WELL
- TEMP WELL
- BORE HOLE
- SURFACE DRAINAGE FLOW

SOIL ISOCONCENTRATIONS

- ALL DETECTIONS ARE IN ug/kg
- NO GENERIC RCLs CURRENTLY EXIST UNDER WDNR GUIDLINES FOR TCE AND CIS 1,2 DCE
- ISOCONTOUR LINES WERE CALCULATED FROM MOST RECENT DATA

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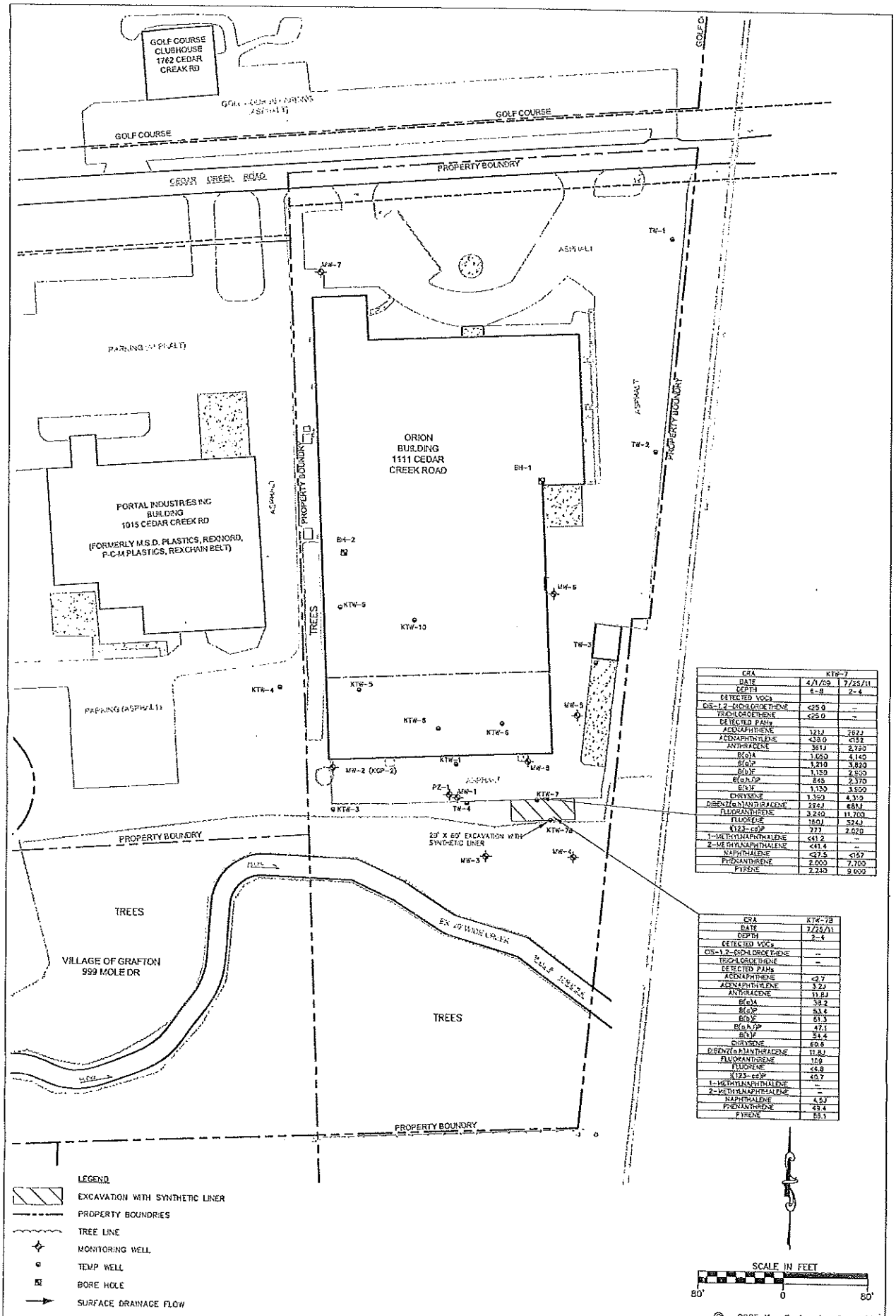
DESIGNED BY KWW	DATE 8/23/2011
DRAWN BY SAD	PROJECT 1609011
APPROVED BY KWW	SHEET NO. 1
CADFILE G:\ACAD\1609011\FIGURE 5.dwg	
XREF LMAP	

FIGURE 5
SOIL ISOCONCENTRATIONS ABOVE FRACTURED BEDROCK – DETECTED CHLORINATED VOCs: APRIL 2009
1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.

Aug 23, 2011 – 2:12pm G:\ACAD\1609011\FIGURE 5.dwg



CRA	KTW-7	
DATE	4/1/09	7/25/11
DEPTH	6-8	2-4
DETECTED VOCs		
CIS-1,2-DICHLOROETHENE	<25.0	--
TRICHLOROETHENE	<25.0	--
DETECTED PAHs		
ACENAPHTHENE	121J	282J
ACENAPHTHYLENE	<38.0	<152
ANTHRACENE	361J	2,730
B(a)A	1,050	4,140
B(a)P	1,210	3,820
B(b)F	1,150	2,900
B(ghi)P	845	2,370
B(k)F	1,130	3,600
CHRYSENE	1,390	4,310
DIBENZ(a,h)ANTHRACENE	282J	685J
FLUORANTHRENE	3,240	11,700
FLUORENE	160J	524J
I(123-cd)P	777	2,020
1-METHYLNAPHTHALENE	<41.2	--
2-METHYLNAPHTHALENE	<41.4	--
NAPHTHALENE	<37.5	<152
PHENANTHRENE	2,000	7,700
PYRENE	2,240	9,600

CRA	KTW-7B
DATE	7/25/11
DEPTH	2-4
DETECTED VOCs	
CIS-1,2-DICHLOROETHENE	--
TRICHLOROETHENE	--
DETECTED PAHs	
ACENAPHTHENE	<2.7
ACENAPHTHYLENE	3.2J
ANTHRACENE	11.8J
B(a)A	34.2
B(a)P	53.4
B(b)F	61.3
B(ghi)P	47.1
B(k)F	54.4
CHRYSENE	60.6
DIBENZ(a,h)ANTHRACENE	11.8J
FLUORANTHRENE	109
FLUORENE	<4.8
I(123-cd)P	40.7
1-METHYLNAPHTHALENE	--
2-METHYLNAPHTHALENE	--
NAPHTHALENE	4.5J
PHENANTHRENE	43.4
PYRENE	88.1

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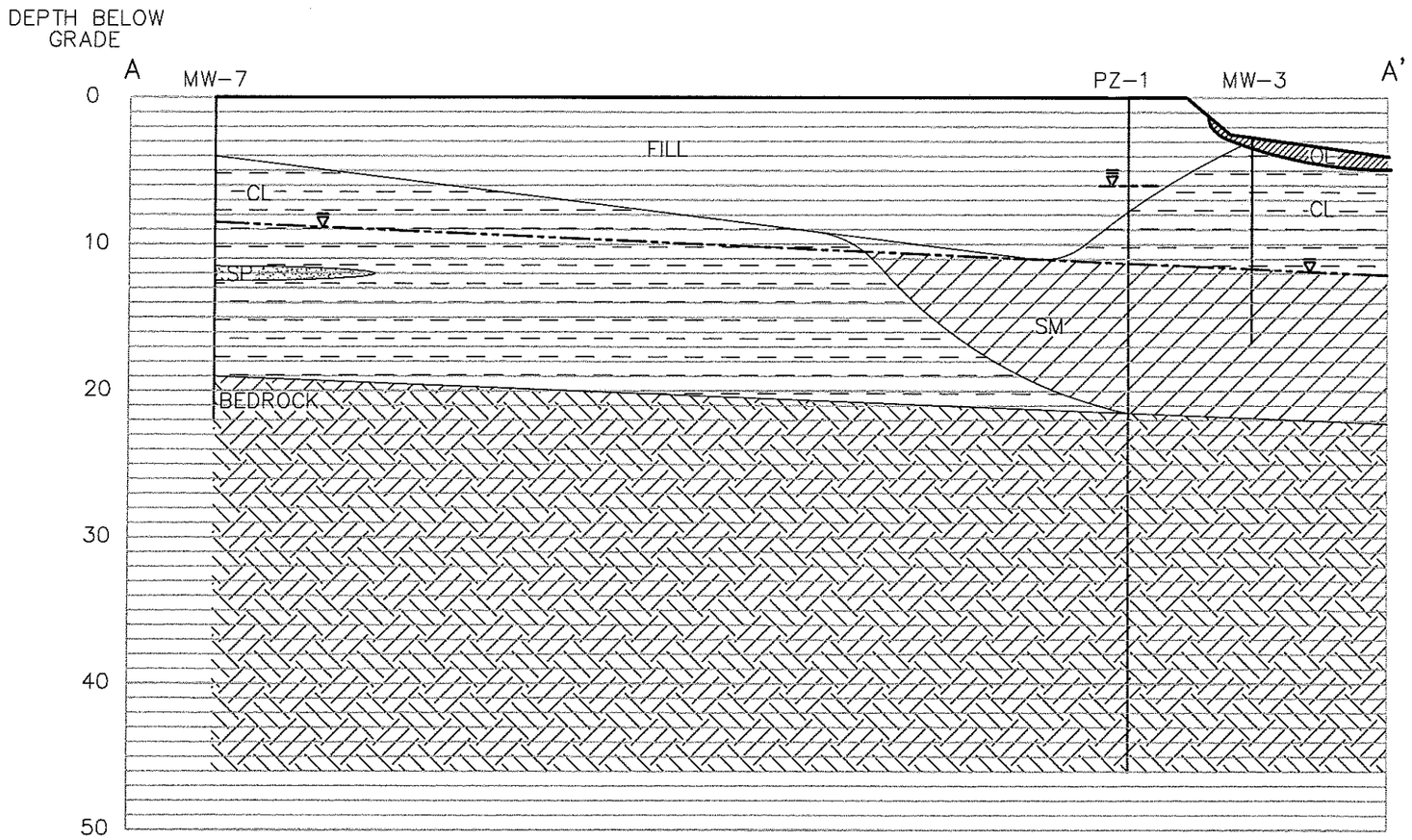
DESIGNED BY	DATE
KWW	7/29/2011
DRAWN BY	PROJECT
SAD	1809011
APPROVED BY	SHEET NO.
KWW	1

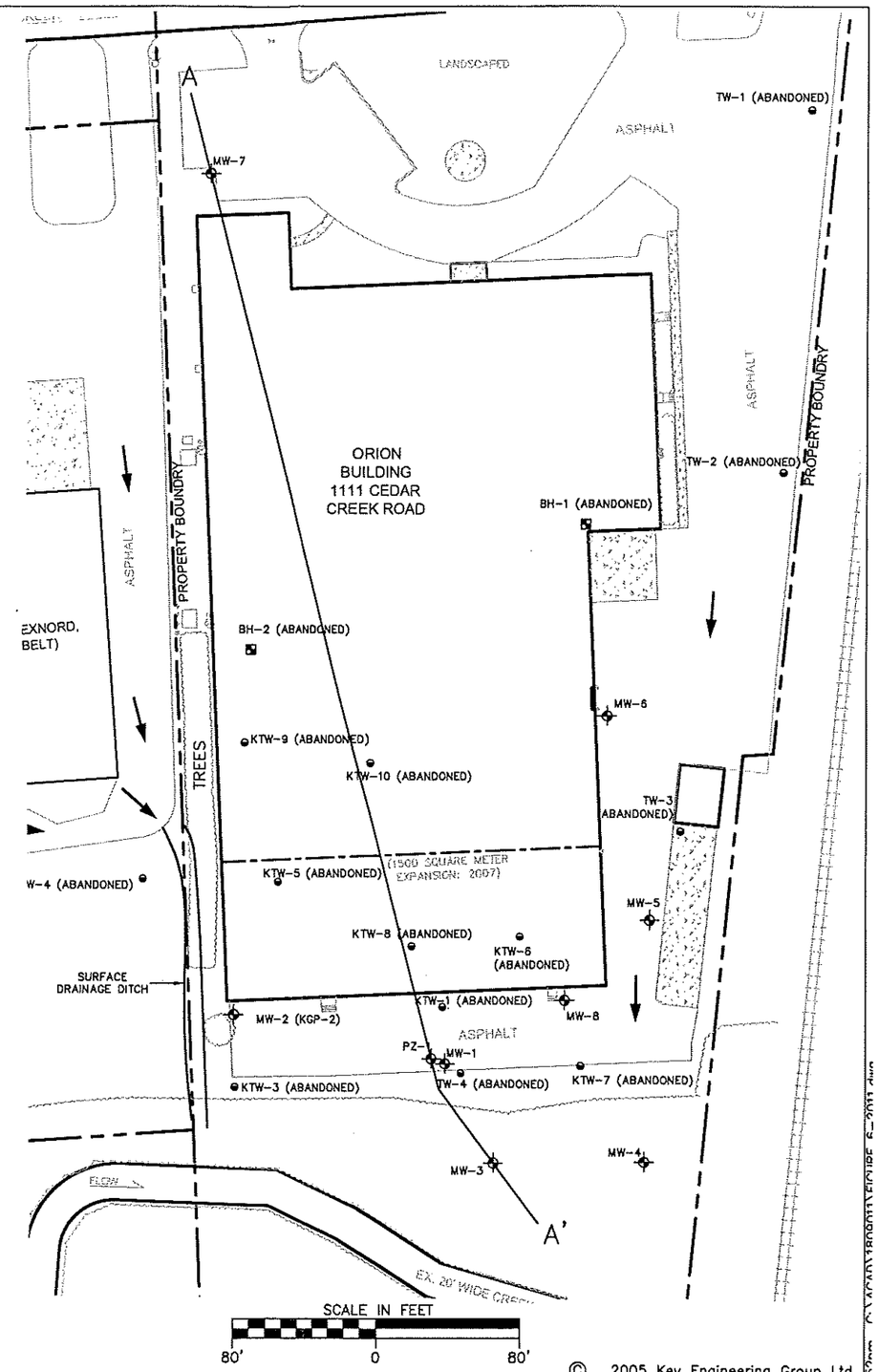
CADFILE G:\ACAD\1809011\FIGURE 10_11_12_13_14.dwg
XREF
LMAP

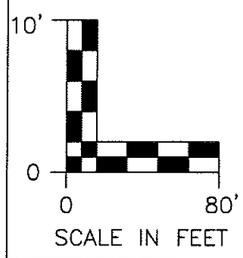
FIGURE 13
PAH SOIL ANALYSIS
CPL INDUSTRIES
1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.

Aug 23, 2011 – 2:33pm G:\ACAD\1809011\FIGURE 10_11_12_13_14.dwg







LEGEND

- OL ORGANIC SILTS
- CL LOW PLACTICITY CLAY
- SP POORLY GRADED SAND
- SM SILTY SANDS
- ▽ SHALLOW HYDROSTATIC HEAD
- ▽ DEEPER HYDROSTATIC HEAD

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DESIGNED BY DJG	DATE 5/24/2011
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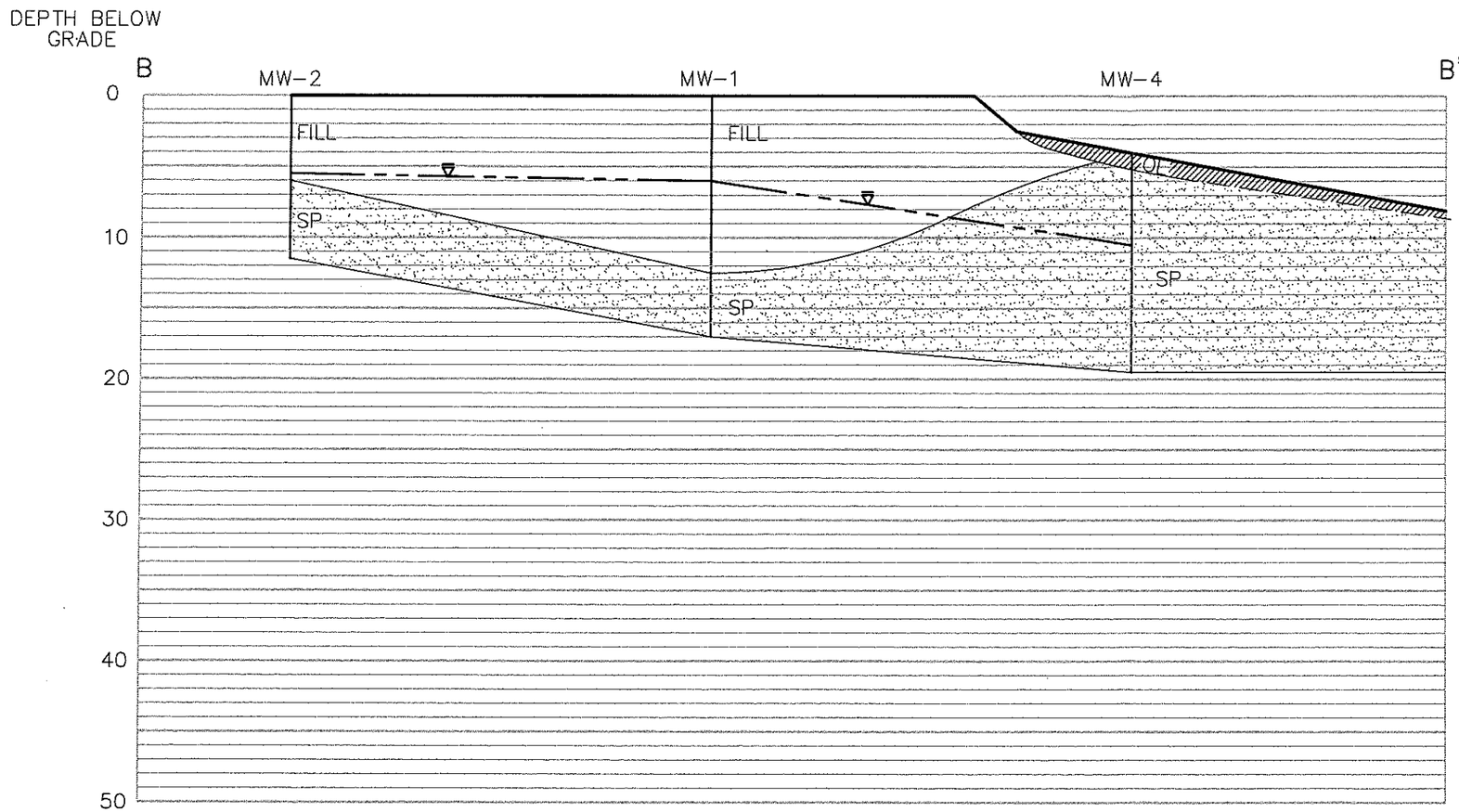
APPROVED BY DJG	SHEET NO.

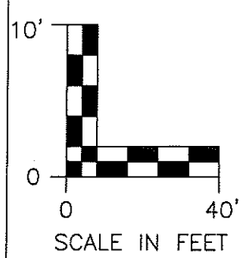
CADFILE G:\ACAD\1809011\FIGURE 6-2011.dwg
XREF F:\DMO\Projects\1705016.1 New Image Car Wash\Newimage.dwg
LMAN

FIGURE 7
GEOLOGIC CROSS-SECTION MAP A-A'

1111 CEDAR CREEK ROAD
GRAFTON, WISCONSIN

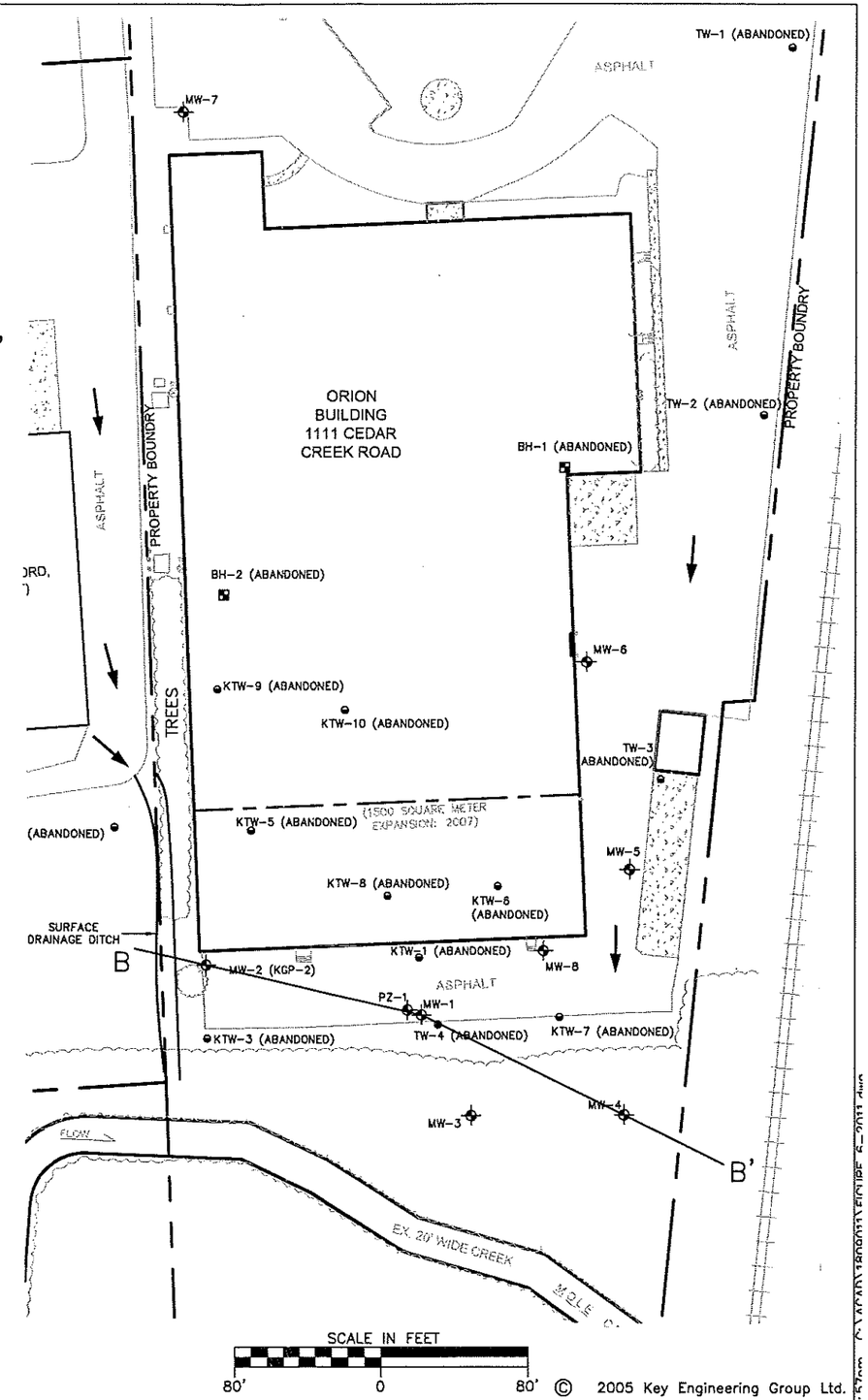
KEY ENGINEERING GROUP LTD.
735 NORTH WATER STREET, SUITE 510
MILWAUKEE, WI 53202
414.224.8300 (tel) - 414.224.8383 (fax)





LEGEND

OL	ORGANIC SILTS
CL	LOW PLACTICITY CLAY
SP	POORLY GRADED SAND
SM	SILTY SANDS
▽	DEEPER HYDROSTATIC HEAD



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APPROVED BY DJG	SHEET NO.

CADFILE G:\ACAD\1809011\FIGURE 8-2011.dwg
XREF F:\DMO\Projects\1705016.1 New Image Car Wash\NewImage.dwg
LMAN

FIGURE 8
GEOLOGIC CROSS-SECTION MAP B-B'

1111 CEDAR CREEK ROAD
GRAFTON, WISCONSIN

KEY ENGINEERING GROUP LTD.
734 NORTH WATER STREET, SUITE 510
MILWAUKEE, WI 53202
414.224.8300 (tel) - 414.224.8383 (fax)

GOLF COURSE CLUBHOUSE 1762 CEDAR CREAK RD

GOLF COURSE PARKING (ASPHALT)

GOLF CO

GOLF COURSE

GOLF COURSE

PROPERTY BOUNDRY

CEDAR CREEK ROAD

LANDSCAPED

ASPHALT

TW-1

MW-7

PROPERTY BOUNDRY

PARKING (ASPHALT)

ORION BUILDING 1111 CEDAR CREEK ROAD

BH-1

TW-2

PROPERTY BOUNDRY

ASPHALT

PORTAL INDUSTRIES INC BUILDING 1015 CEDAR CREEK RD

(FORMERLY M.S.D. PLASTICS, REXNORD, P-C-M PLASTICS, REXCHAIN BELT)

ASPHALT

PROPERTY BOUNDRY

BH-2

MW-6

KTW-9

KTW-10

TREES

TW-3

KTW-5

(1999 SOUTHWEST WATER EXPANSION 2007)

MW-5

KTW-4

PARKING (ASPHALT)

PCE = 0.5

PCE = 5.0

KTW-8

KTW-6

SURFACE DRAINAGE DITCH

KTW-1

MW-8

MW-2 (KGP-2) (5.8)

ASPHALT

PZ-1

MW-1

KTW-7

TW-4

KTW-3

KTW-7B

PROPERTY BOUNDRY

MW-3

MW-4

TREES

EX. 20' WIDE CREEK

MOLE CREEK

VILLAGE OF GRAFTON 999 MOLE DR

TREES

PROPERTY BOUNDRY

LEGEND

- PROPERTY BOUNDRIES
- TREE LINE
- MONITORING WELL
- TEMP WELL
- BORE HOLE
- SURFACE DRAINAGE FLOW

GROUND WATER ISOCONCENTRATIONS

- ALL DETECTIONS ARE IN ug/l
- NR140 PREVENTATIVE ACTION LIMIT (PAL) = 0.5 ug/L
- NR140 ENFORCEMENT STANDARD (ES) = 5.0 ug/L
- (ND) INDICATES NO DETECT
- (J) INDICATES LABORATORY RESULTS BETWEEN DETECTION AND QUANTIFICATION LIMITS
- (–) INDICATES THAT MONITORING WELL WAS NOT SAMPLED IN THAT ROUND
- ISOCONTOUR LINES WERE CALCULATED FROM MONITORING WELL DATA AS WELL AS TEMP WELL DATA

SCALE IN FEET

80' 0 80'

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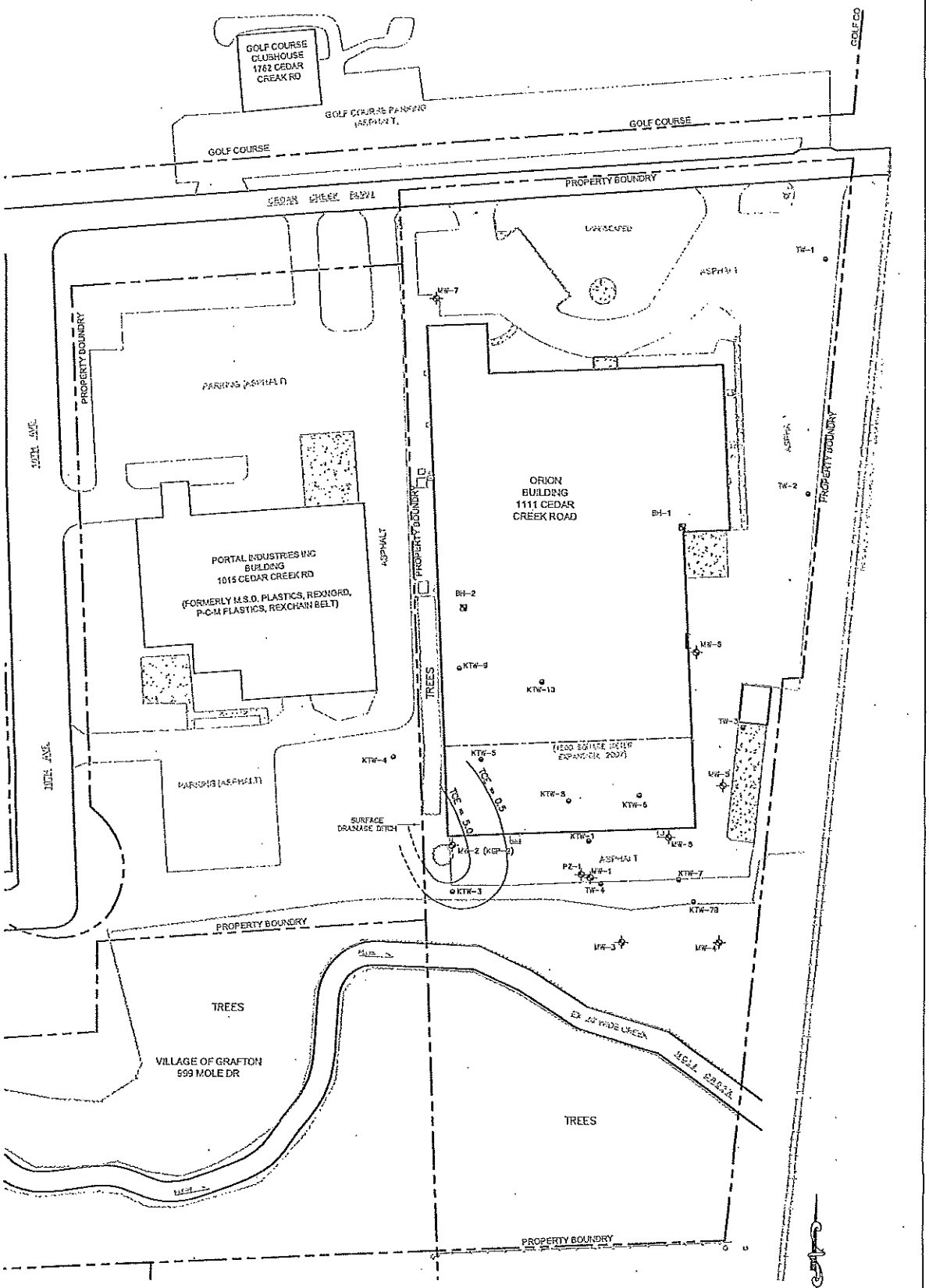
DESIGNED BY DJG	DATE 4/19/2011
DRAWN BY SAO	PROJECT 1809011
APPROVED BY DJG	SHEET NO. 1
CADFILE G:\ACAD\1809011\FIGURE 4A-2011.dwg XREF LMAN	

FIGURE 4A
GROUNDWATER ISOCONCENTRATION
TETRACHLOROETHENE (PCE): OCTOBER, 2010
1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.
735 NORTH WATER STREET, SUITE 510
MILWAUKEE, WI 53202
414.224.8300 (tel) - 414.224.8303 (fax)

Aug 23, 2011 – 1:56pm G:\ACAD\1809011\FIGURE 4A-2011.dwg



LEGEND

- PROPERTY BOUNDRIES
- TREE LINE
- MONITORING WELL
- TEMP WELL
- BORE HOLE
- SURFACE DRAINAGE FLOW

GROUND WATER ISOCONCENTRATIONS

- ALL DETECTIONS ARE IN ug/l
- NR140 PREVENTATIVE ACTION LIMIT (PAL) = 0.5 ug/L
- NR140 ENFORCEMENT STANDARD (ES) = 5.0 ug/L
- (ND) INDICATES NO DETECT
- (J) INDICATES LABORATORY RESULTS BETWEEN DETECTION AND QUANTIFICATION LIMITS
- (--) INDICATES THAT MONITORING WELL WAS NOT SAMPLED IN THAT ROUND
- ISOCONTOUR LINES WERE CALCULATED FROM MONITORING WELL DATA AS WELL AS TEMP WELL DATA

SCALE IN FEET

80' 0 80'

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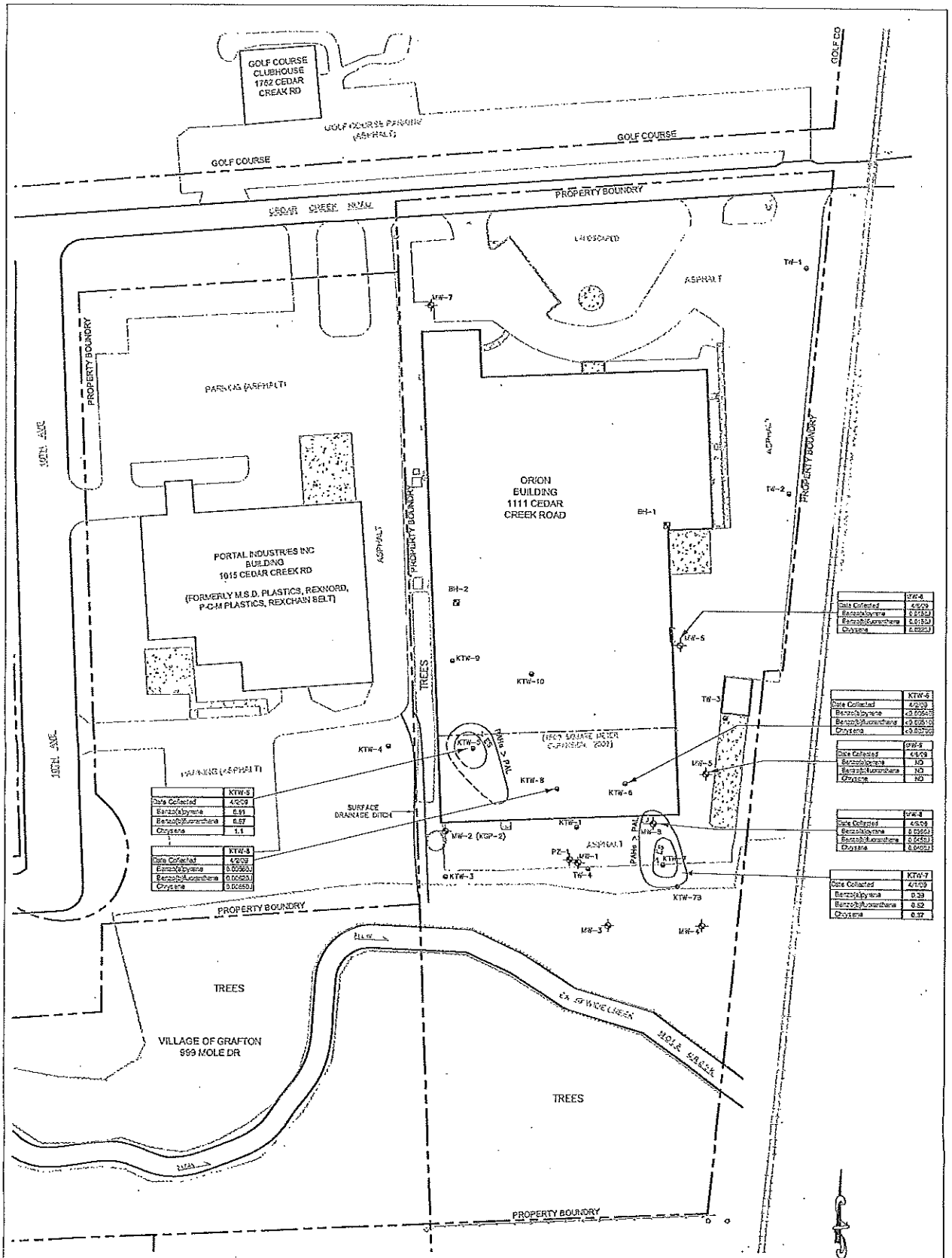
APPROVED BY KWW	SHEET NO. 1

CADFILE G:\ACAD\1809011\FIGURE 4B-2011.dwg
XREF
LRAN

FIGURE 4B
GROUNDWATER ISOCONCENTRATION
TRICHLOROETHENE (TCE): JANUARY, 2011
1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.

Aug 23, 2011 - 2:05pm G:\ACAD\1809011\FIGURE 4B-2011.dwg



	KTW-4
Date Collected	4/9/09
Benzo(a)pyrene	0.07(J)
Benzo(b)fluoranthene	0.01(J)
Chrysene	0.02(J)

	KTW-5
Date Collected	4/2/09
Benzo(a)pyrene	<0.005(J)
Benzo(b)fluoranthene	<0.005(J)
Chrysene	<0.007(J)

	MW-5
Date Collected	4/9/09
Benzo(a)pyrene	ND
Benzo(b)fluoranthene	ND
Chrysene	ND

	KTW-8
Date Collected	4/2/09
Benzo(a)pyrene	0.91
Benzo(b)fluoranthene	0.67
Chrysene	1.1

	MW-3
Date Collected	4/9/09
Benzo(a)pyrene	0.03(J)
Benzo(b)fluoranthene	0.04(J)
Chrysene	0.04(J)

	KTW-6
Date Collected	4/2/09
Benzo(a)pyrene	0.005(J)
Benzo(b)fluoranthene	0.005(J)
Chrysene	0.005(J)

	KTW-7
Date Collected	4/1/09
Benzo(a)pyrene	0.39
Benzo(b)fluoranthene	0.52
Chrysene	0.37

LEGEND

- PROPERTY BOUNDRIES
- TREE LINE
- MONITORING WELL
- TEMP WELL
- BORE HOLE
- SURFACE DRAINAGE FLOW

GROUND WATER ISOCONCENTRATIONS

- ALL DETECTIONS ARE IN ug/l
- NR140 PREVENTATIVE ACTION LIMIT (PAL) = 0.02 ug/L
- NR140 ENFORCEMENT STANDARD (ES) = 0.2 ug/L
- (ND) INDICATES NO DETECT
- (J) INDICATES LABORATORY RESULTS BETWEEN DETECTION AND QUANTIFICATION LIMITS
- ISOCONTOUR LINES WERE CALCULATED FROM MOST RECENT MONITORING WELL DATA AS WELL AS AVAILABLE TEMP WELL DATA

SCALE IN FEET
80' 0 80'

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DESIGNED BY KWW	DATE 8/23/2011
DRAWN BY SAO	PROJECT 1809011
APPROVED BY KWW	SHEET NO. 1
CADFILE G:\ACAD\1809011\FIGURE 4D.dwg	

FIGURE 4D
GROUNDWATER ISOCONCENTRATION
PAHs: APRIL 2009
1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.

Aug 23, 2011 - 2:09pm G:\ACAD\1809011\FIGURE 4D.dwg

GOLF COURSE CLUBHOUSE 1762 CEDAR CREAK RD

GOLF COURSE PARKING (ASPHALT)

GOLF COURSE

CEDAR CREEK ROAD

PROPERTY BOUNDRY

LANDSCAPED

ASPHALT

TW-1 (ABANDONED)

MW-7 (764.56)

PARKING (ASPHALT)

10TH AVE

764

ORION BUILDING 1111 CEDAR CREEK ROAD

GROUND WATER FLOW DIRECTION

763

TW-2 (ABANDONED)

BH-1 (ABANDONED)

PORTAL INDUSTRIES INC BUILDING 1015 CEDAR CREEK RD

(FORMERLY M.S.D. PLASTICS, REXNORD, P-C-M PLASTICS, REXCHAIN BELT)

BH-2 (ABANDONED)

762

(761.61) MW-6

KTW-9 (ABANDONED)

761

KTW-10 (ABANDONED)

760

TW-3 ABANDONED

759

KTW-4 (ABANDONED)

KTW-5 (ABANDONED)

(1500 SQUARE METER EXPANSION: 2007)

758

(756.56) MW-5

757

KTW-8 (ABANDONED)

KTW-6 (ABANDONED) 756

SURFACE DRAINAGE DITCH

KTW-1 (ABANDONED)

(755.36) MW-8

MW-2 (KGP-2) (756.26)

755

PZ-1

MW-1 (754.86)

754

KTW-3 (ABANDONED) 753

TW-4 (ABANDONED)

KTW-7 (ABANDONED)

752

751

750

MW-4 (750.26)

MW-3 (749.86)

FLOW

TREES

EX. 20' WIDE CREEK

MOLE CREEK

VILLAGE OF GRAFTON 999 MOLE DR

LEGEND

PROPERTY BOUNDRIES

TREE LINE

MONITORING WELL

TEMP WELL

BORE HOLE

760 CONTOUR LINE

GROUND WATER FLOW DIRECTION

*ALL ELEVATIONS ARE NOTED AS ABOVE SEA LEVEL

SCALE IN FEET

80' 0 80'

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DESIGNED BY SAO	DATE 4/18/11
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APPROVED BY KWW	SHEET NO. 1
CADFILE G:\ACAD\1809011\FIGURE 3J.dwg XREF LMAN	

Apr 20, 2011 – 10:38am G:\ACAD\1809011\FIGURE 3J.dwg

FIGURE 3J
GROUND WATER ELEVATIONS (01/07/11)

1111 CEDAR CREEK ROAD
GRAFTON, WI 53024

KEY ENGINEERING GROUP LTD.
735 NORTH WATER STREET, SUITE 510
MILWAUKEE, WI 53202
414.224.8300 (tel) - 414.224.8383 (fax)

TABLE 1

SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS

CPL Industries - GRAFTON
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION											GENERIC RCLs	
	PZ-1	KGP-1/MW-1		KGP-2/MW-2		KGP-3/MW-3	KGP-4/MW-4	MW-5	MW-6	MW-7		PROTECTION OF GROUNDWATER	DIRECT CONTACT (INDUSTRIAL)
Date Collected	4/1/09	3/6/09	3/6/09	3/6/09	3/6/09	3/6/09	3/6/09	4/1/09	4/1/09	4/1/09	4/1/09	---	---
Depth (feet bgs)	19-21	2-4	6-8	2-4	4-6	2.5-5	2-4	5-7	5-7	6-8	16.5-18	---	---
Detected VOCs (µg/kg)													
cis-1,2-Dichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Trichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Detected PAHs (µg/kg)													
Acenaphthene	---	---	---	---	---	---	---	<1.1	<1.0	---	---	38,000 (2)	60,000,000 (2)
Acenaphthylene	---	---	---	---	---	---	---	<2.1	<1.9	---	---	700 (2)	360,000 (2)
Anthracene	---	---	---	---	---	---	---	<5.6	<5.0	---	---	3,000,000 (2)	300,000,000 (2)
Benzo(a)anthracene	---	---	---	---	---	---	---	<10.1	<9.2	---	---	17,000 (2)	3,900 (2)
Benzo(a)pyrene	---	---	---	---	---	---	---	<4.4	<4.0	---	---	48,000 (2)	390 (2)
Benzo(b)fluoranthene	---	---	---	---	---	---	---	<6.9	<6.2	---	---	360,000 (2)	3,900 (2)
Benzo(g,h,i)perylene	---	---	---	---	---	---	---	<5.1	<4.6	---	---	6,800,000 (2)	39,000 (2)
Benzo(k)fluoranthene	---	---	---	---	---	---	---	<7.5	<6.8	---	---	870,000 (2)	39,000 (2)
Chrysene	---	---	---	---	---	---	---	<4.2	<3.8	---	---	37,000 (2)	390,000 (2)
Dibenz(a,h)anthracene	---	---	---	---	---	---	---	<5.7	<5.1	---	---	38,000 (2)	390 (2)
Fluoranthene	---	---	---	---	---	---	---	5.4 J	2.6 J	---	---	500,000 (2)	40,000,000 (2)
Fluorene	---	---	---	---	---	---	---	<1.1	<1.0	---	---	100,000 (2)	40,000,000 (2)
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	---	<5.1	<4.6	---	---	680,000 (2)	3,900 (2)
1 - Methylnapthalene	---	---	---	---	---	---	---	2.8 J	<2.0			23,000 (2)	70,000,000 (2)
2-Methylnaphthalene	---	---	---	---	---	---	---	4.2 J	<2.0	---	---	20,000 (2)	40,000,000 (2)
Naphthalene	---	---	---	---	---	---	---	2.4 J	<1.4	---	---	400 (2)	110,000 (2)
Phenanthrene	---	---	---	---	---	---	---	5.1 J	2.6 J	---	---	1,800 (2)	390,000 (2)
Pyrene	---	---	---	---	---	---	---	4.8 J	2.0 J	---	---	8,700,000 (2)	30,000,000 (2)

Notes:

Bold concentrations exceed protection of groundwater
Boxed concentrations exceed General RCLs direct contact (industrial)
--- - not analyzed or no standard established
bgs - below ground surface
mg/kg - milligrams per kilogram
mg/l - milligrams per liter
ND - not detected
PAHs - polynuclear aromatic hydrocarbons
RCL - residual contaminant level
µg/kg - micrograms per kilogram
VOCs - volatile organic compounds

TABLE 1 (CONTINUED)

SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

Parameter	SAMPLE IDENTIFICATION																GENERIC RCLs	
	KGP-5	KGP-6	KTW-3		KTW-4 *		KTW-5		KTW-6	KTW-7	KTW-8		KTW-9		KTW-10		PROTECTION OF GROUNDWATER	DIRECT CONTACT (INDUSTRIAL)
Date Collected	3/6/09	3/6/09	4/1/09	4/1/09	4/3/09	4/3/09	4/2/09	4/2/09	4/2/09	4/1/09	4/2/09	4/2/09	4/2/09	4/2/09	4/2/09	4/2/09		
Depth (feet bgs)	4-6	4-6	2-4	12-14	6-8	16-18	5-7	15-17	5-7	6-8	5-7	13-15	3-5	9-11	3-5	11-12		
Detected VOCs (µg/kg)																		
cis-1,2-Dichloroethene	<25.0	<25.0	<25.0	124	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	—	—
Trichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	512	<25.0	257	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	—	—
Detected PAHs (µg/kg)																		
Acenaphthene	—	—	—	—	—	—	—	—	2.90J	121J	<1.20	<1.00	<1.10	<1.00	<1.10	<1.10	38,000 (2)	60,000,000 (2)
Acenaphthylene	—	—	—	—	—	—	—	—	<1.90	<38.0	<2.10	<1.90	<2.00	<1.90	<2.00	<1.90	700 (2)	360,000 (2)
Anthracene	—	—	—	—	—	—	—	—	7.80J	361J	<5.70	<5.10	<5.30	<5.20	<5.40	<5.20	3,000,000 (2)	300,000,000 (2)
Benzo(a)anthracene	—	—	—	—	—	—	—	—	13.7J	1,050	<10.5	<9.30	<9.70	<9.50	<9.90	<9.50	17,000 (2)	3,900 (2)
Benzo(a)pyrene	—	—	—	—	—	—	—	—	13.3J	**1,210**	<4.60	<4.00	<4.20	<4.10	<4.30	<4.10	48,000 (2)	390 (2)
Benzo(b)fluoranthene	—	—	—	—	—	—	—	—	13.0J	1,150	<7.10	<6.30	<6.60	<6.40	<6.70	<6.50	360,000 (2)	3,900 (2)
Benzo(g,h,i)perylene	—	—	—	—	—	—	—	—	9.60J	845	<5.30	<4.70	<4.90	<4.80	<5.00	<4.80	6,800,000 (2)	39,000 (2)
Benzo(k)fluoranthene	—	—	—	—	—	—	—	—	12.8J	1,130	<7.80	<6.90	<7.20	<7.00	<7.40	<7.10	870,000 (2)	39,000 (2)
Chrysene	—	—	—	—	—	—	—	—	19.0	1,390	<4.30	<3.80	<4.00	<3.90	<4.10	<3.90	37,000 (2)	390,000 (2)
Dibenz(a,h)anthracene	—	—	—	—	—	—	—	—	<5.20	294 J	<5.90	<5.20	<5.40	<5.30	<5.50	<5.30	38,000 (2)	390 (2)
Fluoranthene	—	—	—	—	—	—	—	—	49.3	3,240	6.30J	<1.20	<1.30	<1.20	<1.30	<1.30	500,000 (2)	40,000,000 (2)
Fluorene	—	—	—	—	—	—	—	—	4.60J	160J	<1.10	<1.00	<1.10	<1.00	<1.10	<1.00	100,000 (2)	40,000,000 (2)
Indeno(1,2,3-cd)pyrene	—	—	—	—	—	—	—	—	8.70J	777	<5.30	<4.70	<4.90	<4.80	<5.00	<4.80	680,000 (2)	3,900 (2)
1 - Methylnapthalene	—	—							<2.1	<41.2	<2.3	<2.0	<2.1	<2.1	<2.2	<2.1	23,000 (2)	70,000,000 (2)
2-Methylnaphthalene	—	—	—	—	—	—	—	—	3.40J	<41.4	<2.30	<2.10	<2.20	<2.10	<2.20	<2.10	20,000 (2)	40,000,000 (2)
Naphthalene	—	—	—	—	—	—	—	—	11.6J	<27.5	1.60J	<1.40	<1.40	3.20J	<1.50	<1.40	400 (2)	110,000 (2)
Phenanthrene	—	—	—	—	—	—	—	—	46.3	2,000	4.20J	<2.20	<2.30	<2.30	<2.40	<2.30	1,800 (2)	390,000 (2)
Pyrene	—	—	—	—	—	—	—	—	32.7	2,240	4.50J	<1.10	<1.20	<1.20	<1.20	<1.20	8,700,000 (2)	30,000,000 (2)

Notes:

Bold concentrations exceed General RCLs Direct Contact (Industrial)
Boxed concentrations protection of groundwater
— - not analyzed or no standard established
(1) - NR 720 generic RCLS
(2) - Suggested generic RCLs PAHs Interim Guidance (WDNR), Publication RR-519-97, April 1997 corrected).
bgs - below ground surface
mg/kg - milligrams per kilogram
mg/l - milligrams per liter
PAHs - polynuclear aromatic hydrocarbons
RCL - residual contaminant level
µg/kg - micrograms per kilogram
VOCs - volatile organic compounds

TABLE 2

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	SAMPLE IDENTIFICATION								NR 140	
	MW-1								ES	PAL
Date Collected	3/9/09	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)									---	---
Benzene	<0.41	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	<0.24	<0.5	<0.24	**0.34 J**	<0.24	<0.24	<0.24	3	0.3
1,2-Dichloroethane	**0.86 J**	<0.36	<0.43	<0.36	<0.36	<0.36	<0.36	<0.36	5	0.5
1,1-Dichloroethane	<0.75	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.57	7	0.7
cis-1,2-Dichloroethene	6.2	<0.830	<0.68	1.1	<0.83	0.87 J	<0.83	1.1	70	7
trans-1,2-Dichloroethene	<0.89	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	<0.54	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	**8.7**	<0.450	<0.42	<0.45	<0.45	**1.4**	<0.45	<0.45	5	0.5
Toluene	<0.67	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	<0.86	---	<0.86	<0.86	<0.86	---	---	---	---
Trichloroethene	**17.8**	<0.480	<0.39	<0.48	<0.48	**1.3**	<0.48	<0.48	5	0.5
Trimethylbenzenes	<1.8	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)										
Acenaphthene	---	---	---	---	---	---	---	<0.0053	---	---
Acenaphthylene	---	---	---	---	---	---	---	<0.0042	---	---
Anthracene	---	---	---	---	---	---	---	<0.0067	3,000	600
Benzo(a)anthracene	---	---	---	---	---	---	---	<0.0042	---	---
Benzo(a)pyrene	---	---	---	---	---	---	---	<0.0033	0.2	0.02
Benzo(b)fluoranthene	---	---	---	---	---	---	---	<0.0040	0.2	0.02
Benzo(g,h,i)perylene	---	---	---	---	---	---	---	<0.0056	---	---
Benzo(k)fluoranthene	---	---	---	---	---	---	---	<0.0051	---	---
Chrysene	---	---	---	---	---	---	---	0.0067 J	0.2	0.02
Dibenz(a,h)anthracene	---	---	---	---	---	---	---	<0.0037	---	---
Fluorene	---	---	---	---	---	---	---	<0.0056	400	80
Fluoranthene	---	---	---	---	---	---	---	0.0082 J	400	80
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	---	<0.0055	---	---
1-Methylnaphthalene	---	---	---	---	---	---	---	<0.0058	---	---
2-Methylnaphthalene	---	---	---	---	---	---	---	0.0078 J	---	---
Naphthalene	---	---	---	---	---	---	---	0.013 J	100	10
Phenanthrene	---	---	---	---	---	---	---	<0.0094	---	---
Pyrene	---	---	---	---	---	---	---	0.0065 J	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	PZ-1								NR 140	
									ES	PAL
Date Collected	4/6/09	7/23/09	8/7/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)									---	---
Benzene	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	---	5	0.5
Chloromethane	<0.24	<0.5	<0.24	**0.30 J**	**0.29 J**	<0.24	<0.24	---	3	0.3
1,2-Dichloroethane	<0.36	<0.43	<0.36	<0.36	<0.36	<0.36	<0.36	---	5	0.5
1,1-Dichloroethane	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	---	850	85
1,1-Dichloroethene	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.57	---	7	0.7
cis-1,2-Dichloroethene	<0.830	<0.68	<0.83	<0.83	<0.83	<0.83	<0.83	---	70	7
trans-1,2-Dichloroethene	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	---	100	20
Ethylbenzene	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	---	700	140
Isopropylbenzene	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---	---
Naphthalene	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	---	100	10
n-Propylbenzene	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---	---
Tetrachloroethene	<0.450	<0.42	<0.45	<0.45	<0.45	<0.45	<0.45	---	5	0.5
Toluene	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	---	1,000	200
Styrene	<0.86	---	<0.86	<0.86	<0.86	<0.86	<0.86	---	---	---
Trichloroethene	<0.480	***1.46 ****	<0.48	<0.48	<0.48	<0.48	<0.48	---	5	0.5
Trimethylbenzenes	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	---	480	96
Xylenes	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	---	10,000	1,000
PAHs (µg/l)										
Acenaphthene	---	---	---	---	---	---	---	0.0066 J	---	---
Acenaphthylene	---	---	---	---	---	---	---	<0.0040	---	---
Anthracene	---	---	---	---	---	---	---	<0.0063	3,000	600
Benzo(a)anthracene	---	---	---	---	---	---	---	<0.0040	---	---
Benzo(a)pyrene	---	---	---	---	---	---	---	<0.0032	0.2	0.02
Benzo(b)fluoranthene	---	---	---	---	---	---	---	<0.0038	0.2	0.02
Benzo(g,h,i)perylene	---	---	---	---	---	---	---	<0.0053	---	---
Benzo(k)fluoranthene	---	---	---	---	---	---	---	<0.0048	---	---
Chrysene	---	---	---	---	---	---	---	0.0042 J	0.2	0.02
Dibenz(a,h)anthracene	---	---	---	---	---	---	---	<0.0035	---	---
Fluorene	---	---	---	---	---	---	---	<0.0053	400	80
Fluoranthene	---	---	---	---	---	---	---	0.018 J	400	80
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	---	<0.0052	---	---
1-Methylnaphthalene	---	---	---	---	---	---	---	0.0092 J	---	---
2-Methylnaphthalene	---	---	---	---	---	---	---	0.011 J	---	---
Naphthalene	---	---	---	---	---	---	---	0.054	100	10
Phenanthrene	---	---	---	---	---	---	---	0.026 J	---	---
Pyrene	---	---	---	---	---	---	---	0.014 J	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	MW-2								NR 140	
									ES	PAL
Date Collected	3/9/09	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)									---	---
Benzene	<0.41	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	0.25 J	<0.5	<0.24	**0.32 J**	<0.24	<0.24	<0.24	3	0.3
1,2-Dichloroethane	<0.36	<0.36	**0.95 J**	<0.36	<0.75	**0.71 J**	**1.4**	<0.36	5	0.5
1,1-Dichloroethane	0.94 J	<0.75	0.74 J	<0.75	<0.75	0.78 J	1.6	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.57	<0.47	<0.57	<0.57	<0.57	0.81 J	<0.57	7	0.7
cis-1,2-Dichloroethene	**15.7**	<0.830	**10.7**	<0.83	<0.83	**9.8**	**22.0**	1.0	70	7
trans-1,2-Dichloroethene	<0.89	<0.89	0.64 J	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	<0.54	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	<0.45	<0.450	**1.87**	<0.45	<0.45	**2.4**	**5.8**	<0.45	5	0.5
Toluene	<0.67	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	<0.86	---	<0.86	<0.86	<0.86	<0.86	<0.86	---	---
Trichloroethene	**18.1**	**3.90**	**33**	**2.7**	**3.2**	**46.3**	**98.8**	**6.4**	5	0.5
Trimethylbenzenes	<1.8	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)										
Acenaphthene	---	---	---	---	---	---	---	<0.0050	---	---
Acenaphthylene	---	---	---	---	---	---	---	<0.0040	---	---
Anthracene	---	---	---	---	---	---	---	<0.0063	3,000	600
Benzo(a)anthracene	---	---	---	---	---	---	---	0.0097 J	---	---
Benzo(a)pyrene	---	---	---	---	---	---	---	0.014 J	0.2	0.02
Benzo(b)fluoranthene	---	---	---	---	---	---	---	0.017 J	0.2	0.02
Benzo(g,h,i)perylene	---	---	---	---	---	---	---	0.012 J	---	---
Benzo(k)fluoranthene	---	---	---	---	---	---	---	0.013 J	---	---
Chrysene	---	---	---	---	---	---	---	0.017 J	0.2	0.02
Dibenz(a,h)anthracene	---	---	---	---	---	---	---	<0.0035	---	---
Fluorene	---	---	---	---	---	---	---	<0.0053	400	80
Fluoranthene	---	---	---	---	---	---	---	0.027 J	400	80
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	---	0.0098 J	---	---
1-Methylnaphthalene	---	---	---	---	---	---	---	<0.0055	---	---
2-Methylnaphthalene	---	---	---	---	---	---	---	0.0054 J	---	---
Naphthalene	---	---	---	---	---	---	---	0.0085 J	100	10
Phenanthrene	---	---	---	---	---	---	---	0.012 J	---	---
Pyrene	---	---	---	---	---	---	---	0.021 J	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	SAMPLE IDENTIFICATION								NR 140	
	MW-3								ES	PAL
Date Collected	3/9/09	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)									---	---
Benzene	<0.41	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	<0.24	<0.5	**0.47 J**	**0.52 J**	<0.24	<0.24	<0.24	3	0.3
1,2-Dichloroethane	<0.36	<0.36	<0.43	<0.36	<0.36	**1.1**	<0.36	<0.36	5	0.5
1,1-Dichloroethane	<0.75	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.57	7	0.7
cis-1,2-Dichloroethene	<0.83	<0.83	<0.68	<0.83	<0.83	5.4	0.94 J	<0.83	70	7
trans-1,2-Dichloroethene	<0.89	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	<0.54	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	<0.45	<0.450	<0.42	<0.45	<0.45	<0.45	<0.45	<0.45	5	0.5
Toluene	<0.67	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	<0.86	---	<0.86	<0.86	<0.86	<0.86	<0.86	---	---
Trichloroethene	<0.48	<0.480	<0.39	<0.48	<0.48	<0.48	<0.48	<0.48	5	0.5
Trimethylbenzenes	<1.8	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)										
Acenaphthene	---	---	---	---	---	---	---	0.0057 J	---	---
Acenaphthylene	---	---	---	---	---	---	---	<0.0039	---	---
Anthracene	---	---	---	---	---	---	---	0.0061 J	3,000	600
Benzo(a)anthracene	---	---	---	---	---	---	---	0.015 J	---	---
Benzo(a)pyrene	---	---	---	---	---	---	---	0.0091 J	0.2	0.02
Benzo(b)fluoranthene	---	---	---	---	---	---	---	0.0069 J	0.2	0.02
Benzo(g,h,i)perylene	---	---	---	---	---	---	---	0.013 J	---	---
Benzo(k)fluoranthene	---	---	---	---	---	---	---	0.0053 J	---	---
Chrysene	---	---	---	---	---	---	---	0.015 J	0.2	0.02
Dibenz(a,h)anthracene	---	---	---	---	---	---	---	<0.0034	---	---
Fluorene	---	---	---	---	---	---	---	0.0091 J	400	80
Fluoranthene	---	---	---	---	---	---	---	0.025 J	400	80
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	---	<0.0050	---	---
1-Methylnaphthalene	---	---	---	---	---	---	---	0.077	---	---
2-Methylnaphthalene	---	---	---	---	---	---	---	0.12	---	---
Naphthalene	---	---	---	---	---	---	---	0.026 J	100	10
Phenanthrene	---	---	---	---	---	---	---	0.043 J	---	---
Pyrene	---	---	---	---	---	---	---	0.050 J	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	MW-4								NR 140	
									ES	PAL
Date Collected	3/9/09	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	2/23/11	---	---
Detected VOCs (µg/l)									---	---
Benzene	<0.41	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	<0.24	<0.5	**0.36 J**	<0.24	<0.24	<0.24	<0.24	3	0.3
1,2-Dichloroethane	<0.36	**0.88 J**	**0.62 J**	<0.36	<0.36	<0.36	**1.3**	<0.36	5	0.5
1,1-Dichloroethane	<0.75	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.57	7	0.7
cis-1,2-Dichloroethene	<0.83	5.80	2.29	<0.83	1.5	<0.83	5.6	<0.83	70	7
trans-1,2-Dichloroethene	<0.89	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	<0.54	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	<0.45	<0.450	<0.42	<0.45	<0.45	<0.45	<0.45	<0.45	5	0.5
Toluene	<0.67	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	<0.86	---	<0.86	<0.86	<0.86	<0.86	<0.86	---	---
Trichloroethene	<0.48	<0.480	<0.39	<0.48	<0.48	<0.48	<0.48	<0.48	5	0.5
Trimethylbenzenes	<1.8	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)										
Acenaphthene	---	---	---	<0.0045	<0.0045	<0.0047	<0.0045	<0.0048	---	---
Acenaphthylene	---	---	---	<0.0036	<0.0036	<0.0037	<0.0036	<0.0038	---	---
Anthracene	---	---	---	<0.0057	<0.0057	<0.0059	<0.0057	<0.0061	3,000	600
Benzo(a)anthracene	---	---	---	<0.0036	<0.0036	<0.0037	<0.0036	<0.0038	---	---
Benzo(a)pyrene	---	---	---	<0.0029	<0.0029	<0.0029	<0.0029	<0.0030	0.2	0.02
Benzo(b)fluoranthene	---	---	---	<0.0034	<0.0034	<0.0035	<0.0034	<0.0036	0.2	0.02
Benzo(g,h,i)perylene	---	---	---	<0.0048	<0.0048	0.0050 J	<0.0048	<0.0051	---	---
Benzo(k)fluoranthene	---	---	---	<0.0044	<0.0044	<0.0045	<0.0044	<0.0046	---	---
Chrysene	---	---	---	<0.0035	<0.0035	0.0063 J	<0.0035	<0.0037	0.2	0.02
Dibenz(a,h)anthracene	---	---	---	<0.0032	<0.0032	<0.0033	<0.0032	<0.0034	---	---
Fluorene	---	---	---	<0.0048	<0.0048	<0.0049	<0.0048	<0.0051	400	80
Fluoranthene	---	---	---	<0.0044	<0.0044	0.0049 J	<0.0044	<0.0047	400	80
Indeno(1,2,3-cd)pyrene	---	---	---	<0.0047	<0.0047	<0.0048	<0.0047	<0.0050	---	---
1-Methylnaphthalene	---	---	---	<0.0050	<0.0050	0.0054 J	<0.0050	<0.0053	---	---
2-Methylnaphthalene	---	---	---	0.0075 J	0.0052 J	0.0097 J	0.0090 J	0.0043 J	---	---
Naphthalene	---	---	---	0.010 J	0.013 J	0.019 J	0.0098 J	0.0085 J	100	10
Phenanthrene	---	---	---	<0.0081	<0.0081	<0.0083	<0.0081	<0.0086	---	---
Pyrene	---	---	---	<0.0047	<0.0047	0.0051 J	<0.0047	<0.0050	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	MW-5							NR 140	
								ES	PAL
Date Collected	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)								---	---
Benzene	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	<0.5	**0.47 J**	<0.24	<0.24	<0.24	<0.24	3	0.3
1,2-Dichloroethane	<0.36	<0.43	<0.36	<0.36	<0.36	<0.36	<0.36	5	0.5
1,1-Dichloroethane	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.57	7	0.7
cis-1,2-Dichloroethene	<0.830	<0.68	<0.83	<0.83	<0.83	<0.83	<0.83	70	7
trans-1,2-Dichloroethene	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	<0.450	<0.42	<0.45	<0.45	<0.45	<0.45	<0.45	5	0.5
Toluene	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	---	<0.86	<0.86	<0.86	<0.86	<0.86	---	---
Trichloroethene	<0.480	<0.39	<0.48	<0.48	<0.48	<0.48	<0.48	5	0.5
Trimethylbenzenes	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)									
Acenaphthene	<0.0088	---	<0.0045	<0.0045	<0.0045	<0.0045	0.0081 J	---	---
Acenaphthylene	<0.0056	---	<0.0036	<0.0036	<0.0036	<0.0036	<0.0037	---	---
Anthracene	<0.00730	---	<0.0057	<0.0057	<0.0057	<0.0057	<0.0058	3,000	600
Benzo(a)anthracene	<0.00390	---	<0.0036	<0.0036	<0.0036	<0.0036	<0.0037	---	---
Benzo(a)pyrene	<0.00610	---	<0.0029	<0.0029	<0.0029	<0.0029	<0.0029	0.2	0.02
Benzo(b)fluoranthene	<0.00580	---	<0.0034	<0.0034	<0.0034	<0.0034	<0.0035	0.2	0.02
Benzo(g,h,i)perylene	<0.00700	---	<0.0048	<0.0048	<0.0048	<0.0048	<0.0049	---	---
Benzo(k)fluoranthene	<0.00880	---	<0.0044	<0.0044	<0.0044	<0.0044	<0.0045	---	---
Chrysene	<0.00790	---	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035	0.2	0.02
Dibenz(a,h)anthracene	<0.00490	---	<0.0032	<0.0032	<0.0032	<0.0032	<0.0033	---	---
Fluorene	<0.0071	---	<0.0048	<0.0048	<0.0048	<0.0048	<0.0049	400	80
Fluoranthene	0.00670J	---	<0.0044	0.0054 J	0.0060 J	<0.0044	<0.0045	400	80
Indeno(1,2,3-cd)pyrene	<0.00410	---	<0.0047	<0.0047	<0.0047	<0.0047	<0.0048	---	---
1-Methylnaphthalene	0.0260J	---	0.0059 J	<0.0050	0.0056 J	0.0051 J	0.020 J	---	---
2-Methylnaphthalene	0.036 J		0.011 J	0.0048 J	0.011 J	0.010 J	0.018 J	---	---
Naphthalene	0.0450J	---	0.013 J	0.0075 J	0.021 J	0.014 J	0.23	100	10
Phenanthrene	0.0150J	---	<0.0081	<0.0081	<0.0081	<0.0081	<0.0082	---	---
Pyrene	<0.00760	---	<0.0047	<0.0047	<0.0047	<0.0047	<0.0048	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	MW-6							NR 140	
								ES	PAL
Date Collected	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)								---	---
Benzene	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	<0.5	**1.3**	**0.38 J**	<0.24	<0.24	<0.24	3	0.3
1,2-Dichloroethane	<0.36	<0.43	<0.36	<0.36	<0.36	<0.36	<0.36	5	0.5
1,1-Dichloroethane	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.75	7	0.7
cis-1,2-Dichloroethene	<0.830	<0.68	<0.83	<0.83	<0.83	<0.83	<0.83	70	7
trans-1,2-Dichloroethene	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	<0.450	<0.42	<0.45	<0.45	<0.45	<0.45	<0.45	5	0.5
Toluene	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	---	<0.86	<0.86	<0.86	<0.86	<0.86	---	---
Trichloroethene	<0.480	<0.39	<0.48	<0.48	<0.48	<0.48	<0.48	5	0.5
Trimethylbenzenes	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)									
Acenaphthene	0.030 J	<0.009	<0.0045	<0.0045	<0.0045	<0.0045	0.0064 J	---	---
Acenaphthylene	<0.0056	<0.011	<0.0036	<0.0036	<0.0036	0.0082 J	0.0040 J	---	---
Anthracene	0.0140J	<0.01	<0.0057	<0.0057	0.0063 J	0.0062 J	0.019 J	3,000	600
Benzo(a)anthracene	0.0150J	<0.017	<0.0036	0.015 J	0.031 J	0.020 J	0.11	---	---
Benzo(a)pyrene	0.0150J	<0.014	0.0046 J	0.029 J	**0.049**	0.036 J	0.17	0.2	0.02
Benzo(b)fluoranthene	0.0150J	<0.018	0.0048 J	0.022 J	**0.047**	0.036 J	0.22	0.2	0.02
Benzo(g,h,i)perylene	0.0130J	<0.018	<0.0048	0.030 J	0.051	0.040 J	0.15	---	---
Benzo(k)fluoranthene	0.0160J	<0.029	<0.0044	0.029 J	0.040 J	0.029 J	0.14	---	---
Chrysene	**0.0220J**	<0.01	0.0047 J	0.026 J	**0.044 J**	0.032 J	0.18	0.2	0.02
Dibenz(a,h)anthracene	<0.00490	<0.019	<0.0032	0.0046 J	0.011 J	0.0076 J	0.035 J	---	---
Fluorene	0.022 J	<0.013	<0.0048	<0.0048	<0.0048	<0.0048	0.0067 J	400	80
Fluoranthene	0.0580	<0.013	0.0057 J	0.034 J	0.067	0.033 J	0.31	400	80
Indeno(1,2,3-cd)pyrene	0.00880J	<0.019	<0.0047	0.018 J	0.032 J	0.027 J	0.12	---	---
1-Methylnaphthalene	0.0430J	<0.013	0.0053 J	<0.0050	0.0088 J	<0.0050	0.0064 J	---	---
2-Methylnaphthalene	0.043 J	<0.019	0.010 J	<0.0039	0.012 J	0.0061 J	0.0098 J	---	---
Naphthalene	0.0340J	<0.024	0.018 J	0.0060 J	0.042 J	0.012 J	0.25 J	100	10
Phenanthrene	0.0500J	<0.015	<0.0081	<0.0081	0.022 J	0.010 J	0.11	---	---
Pyrene	0.0550	<0.012	0.0086 J	0.031 J	0.059	0.036 J	0.22	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	MW-7							NR 140	
								ES	PAL
Date Collected	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)								---	---
Benzene	<0.410	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	**0.52 J**	<0.24	0.82 J	<0.24	<0.24	<0.24	3	0.3
1,2-Dichloroethane	<0.36	<0.43	<0.36	<0.36	<0.36	<0.36	<0.36	5	0.5
1,1-Dichloroethane	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.57	7	0.7
cis-1,2-Dichloroethene	<0.830	<0.68	<0.83	<0.83	<0.83	<0.83	<0.83	70	7
trans-1,2-Dichloroethene	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	<0.540	<0.87	<0.54	<0.54	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	<0.450	<0.42	<0.45	<0.45	<0.45	<0.45	<0.45	5	0.5
Toluene	<0.670	<0.51	<0.67	<0.67	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	---	<0.86	<0.86	<0.86	<0.86	---	---	---
Trichloroethene	<0.480	<0.39	<0.48	<0.48	<0.48	<0.48	<0.48	5	0.5
Trimethylbenzenes	<1.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)									
Acenaphthene	---	---	---	---	---	---	<0.0052	---	---
Acenaphthylene	---	---	---	---	---	---	<0.0041	---	---
Anthracene	---	---	---	---	---	---	<0.0065	3,000	600
Benzo(a)anthracene	---	---	---	---	---	---	<0.0041	---	---
Benzo(a)pyrene	---	---	---	---	---	---	<0.0033	0.2	0.02
Benzo(b)fluoranthene	---	---	---	---	---	---	<0.0039	0.2	0.02
Benzo(g,h,i)perylene	---	---	---	---	---	---	<0.0055	---	---
Benzo(k)fluoranthene	---	---	---	---	---	---	<0.0050	---	---
Chrysene	---	---	---	---	---	---	<0.0040	0.2	0.02
Dibenz(a,h)anthracene	---	---	---	---	---	---	<0.0036	---	---
Fluorene	---	---	---	---	---	---	<0.0054	400	80
Fluoranthene	---	---	---	---	---	---	<0.0050	400	80
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	<0.0053	---	---
1-Methylnaphthalene	---	---	---	---	---	---	0.0070 J	---	---
2-Methylnaphthalene	---	---	---	---	---	---	0.014 J	---	---
Naphthalene	---	---	---	---	---	---	0.015 J	100	10
Phenanthrene	---	---	---	---	---	---	<0.0092	---	---
Pyrene	---	---	---	---	---	---	<0.0054	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	MW-8							NR 140	
								ES	PAL
Date Collected	4/6/09	7/23/09	12/10/09	3/23/10	7/6/10	10/5/10	1/7/11	---	---
Detected VOCs (µg/l)								---	---
Benzene	**15.6**	<0.41	<0.41	0.47 J	<0.41	<0.41	<0.41	5	0.5
Chloromethane	<0.24	<0.5	**0.59 J**	<0.24	<0.24	0.43 J	<0.24	3	0.3
1,2-Dichloroethane	<0.36	<0.43	<0.36	<0.36	<0.36	<0.36	<0.36	5	0.5
1,1-Dichloroethane	<0.75	<0.44	<0.75	<0.75	<0.75	<0.75	<0.75	850	85
1,1-Dichloroethene	<0.57	<0.47	<0.57	<0.57	<0.57	<0.57	<0.57	7	0.7
cis-1,2-Dichloroethene	<0.830	<0.68	<0.83	<0.83	<0.83	<0.83	<0.83	70	7
trans-1,2-Dichloroethene	<0.89	<0.61	<0.89	<0.89	<0.89	<0.89	<0.89	100	20
Ethylbenzene	2.70	<0.87	<0.54	0.82 J	<0.54	<0.54	<0.54	700	140
Isopropylbenzene	<0.59	<0.39	<0.59	<0.59	<0.59	<0.59	<0.59	---	---
Naphthalene	<0.89	<1.7	<0.89	<0.89	<0.89	<0.89	<0.89	100	10
n-Propylbenzene	<0.81	<0.33	<0.81	<0.81	<0.81	<0.81	<0.81	---	---
Tetrachloroethene	<0.450	<0.42	<0.45	<0.45	<0.45	<0.45	<0.45	5	0.5
Toluene	29.3	<0.51	<0.67	1.3	<0.67	<0.67	<0.67	1,000	200
Styrene	<0.86	---	<0.86	<0.86	<0.86	<0.86	<0.86	---	---
Trichloroethene	<0.480	<0.39	<0.48	<0.48	<0.48	0.52 J	<0.48	5	0.5
Trimethylbenzenes	53.8	<2.6	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	49.1	<2.13	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)									
Acenaphthene	<0.0086	<0.0009	<0.0045	<0.0045	<0.0045	<0.0045	<0.0046	---	---
Acenaphthylene	<0.0055	<0.011	<0.0036	<0.0036	<0.0036	<0.0036	<0.0037	---	---
Anthracene	<0.00720	<0.01	<0.0057	0.012 J	0.0057 J	<0.0057	<0.0058	3,000	600
Benzo(a)anthracene	0.0220J	0.071	0.034 J	0.059	0.027 J	<0.0036	<0.0037	---	---
Benzo(a)pyrene	**0.0360J**	**0.123**	**0.052**	**0.084**	**0.043 J**	0.0045 J	0.0043 J	0.2	0.02
Benzo(b)fluoranthene	**0.0450J**	**0.194**	**0.055**	**0.087**	**0.048**	0.0056 J	0.0047 J	0.2	0.02
Benzo(g,h,i)perylene	0.0340J	0.115	0.031 J	0.072	0.038 J	0.0058 J	<0.0049	---	---
Benzo(k)fluoranthene	0.0400J	0.09 J	0.045 J	0.12	0.041 J	0.0059 J	0.0048 J	---	---
Chrysene	**0.0400J**	**0.136**	**0.051**	0.10	**0.042 J**	0.0059 J	0.0055 J	0.2	0.02
Dibenz(a,h)anthracene	0.00690J	0.021 J	0.0077 J	0.030 J	0.0094 J	<0.0032	<0.0033	---	---
Fluorene	<0.0069	<0.013	<0.0048	<0.0048	<0.0048	<0.0048	<0.0049	400	80
Fluoranthene	0.0670	0.20	0.071	0.10	0.054	0.0064 J	0.0075 J	400	80
Indeno(1,2,3-cd)pyrene	0.0290J	0.094	0.025 J	0.061	0.031 J	<0.0047	<0.0048	---	---
1-Methylnaphthalene	0.16	<0.013	<0.0050	<0.0050	0.012 J	<0.0050	<0.0051	---	---
2-Methylnaphthalene	0.012 J	<0.019	0.0059 J	<0.0039	0.0092 J	0.0071 J	0.0087 J	---	---
Naphthalene	0.073	<0.024	0.019 J	0.011 J	0.047	0.010 J	0.014 J	100	10
Phenanthrene	0.0210J	0.042 J	0.016 J	0.016 J	0.013 J	<0.0081	<0.0082	---	---
Pyrene	0.0660	0.187	0.071	0.094	0.047	0.0062 J	0.0074 J	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
* - Due to likely cross contamination in the 7/23/09 groundwater sampling results, PZ-1 was immediately resampled on 8/7/09 and again anaylzed for VOCs. The laboratory results confirmed that no TCE detections are present in groundwater collected from PZ-1

TABLE 2 (CONTINUED)

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETER	SAMPLE IDENTIFICATION										NR 140	
	KTW-1	*KTW-2	KTW-3	KTW-4	KTW-5	KTW-6	KTW-7	KTW-8	KTW-9	KTW-10	ES	PAL
Date Collected	3/9/09	3/9/09	4/1/09	4/3/09	4/2/09	4/2/09	4/1/09	4/2/09	4/2/09	4/2/09	—	—
Detected VOCs (µg/l)											—	—
Benzene	<0.41	**113**	<0.410	<0.410	<0.410	<0.410	**1.80**	<0.410	<0.410	<0.410	5	0.5
1,1-Dichloroethane	<0.75	<3.8	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75		
1,1-Dichloroethene											7	0.7
cis-1,2-Dichloroethene	<0.83	<4.2	**25.2**	<0.830	3.10	<0.830	<0.830	<0.830	<0.830	<0.830	70	7
Ethylbenzene	<0.54	118	<0.540	<0.540	<0.540	<0.540	<0.540	<0.540	<0.540	<0.540	700	140
Isopropylbenzene	<0.59	4.6 J	<0.59	<0.59	<0.59	<0.59	<0.59	<0.59	<0.59	<0.59		
Naphthalene	<0.89	14.4 J	<0.89	<0.89	<0.89	<0.89	<0.89	<0.89	<0.89	<0.89		
n-Propylbenzene	<0.81	60.7	<0.81	<0.81	<0.81	<0.81	<0.81	<0.81	<0.81	<0.81		
Tetrachloroethene	<0.45	<2.2	<0.450	**1.70**	**8.60**	<0.450	<0.450	**0.500J**	**0.590J**	<0.450	5	0.5
Toluene	<0.67	**645**	<0.670	<0.670	<0.670	<0.670	<0.670	<0.670	<0.670	<0.670	1,000	200
Styrene	<0.86	20.0	<0.86	<0.86	<0.86	<0.86	<0.86	<0.86	<0.86	<0.86		
Trichloroethene	**1.2**	<2.4	**2.80**	0.480J	**17.1**	**1.70**	<0.480	**11.4**	<0.480	**1.10**	5	0.5
Trimethylbenzenes	<1.8	**734**	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	480	96
Xylenes	<2.63	546	<2.63	<2.63	<2.63	<2.63	<2.63	<2.63	<2.63	<2.63	10,000	1,000
PAHs (µg/l)												
Acenaphthylene												
Anthracene	—	—	—	—	0.240J	0.00810J	0.0570	0.0120J	<0.00660	0.0300J	3,000	600
Benzo(a)anthracene	—	—	—	—	0.780	<0.00350	0.250	0.00620J	<0.00350	<0.00400	—	—
Benzo(a)pyrene	—	—	—	—	**0.910**	<0.00540	**0.390**	0.00560J	<0.00550	<0.00620	0.2	0.02
Benzo(b)fluoranthene	—	—	—	—	**0.970**	<0.00510	**0.520**	0.00620J	<0.00520	<0.00590	0.2	0.02
Benzo(g,h,i)perylene	—	—	—	—	0.610	<0.00620	0.380	<0.00630	<0.00630	<0.00720	—	—
Benzo(k)fluoranthene	—	—	—	—	0.840	<0.00780	0.350	<0.00780	<0.00780	<0.00900	—	—
Chrysene	—	—	—	—	**1.10**	<0.00700	**0.370**	0.00850J	<0.00710	<0.00810	0.2	0.02
Dibenz(a,h)anthracene	—	—	—	—	0.170J	<0.00430	0.0950	<0.00430	<0.00430	<0.00500	—	—
Fluorene	—	—	—	—	0.18 J	0.12 J	0.027 J	0.026 J	<0.0063	<0.0072	400	80
Fluoranthene	—	—	—	—	2.50	0.0170J	0.710	0.0350J	<0.00540	<0.00620	400	80
Indeno(1,2,3-cd)pyrene	—	—	—	—	0.540	<0.00360	0.330	<0.00360	<0.00360	<0.00420	—	—
1-Methylnaphthalene	—	—	—	—	<0.0510	<0.00950	<0.00960	<0.00960	<0.00960	<0.0110	—	—
Naphthalene	—	—	—	—	<0.0880	<0.0160	<0.0170	0.0290J	<0.0170	<0.0190	100	10
Phenanthrene	—	—	—	—	1.90	0.0420J	0.270	0.0790	<0.00750	<0.00860	—	—
Pyrene	—	—	—	—	2.10	0.0130J	0.580	0.0260J	<0.00680	<0.00780	250	50

Notes:

Bold concentrations exceed NR 140 PAL
Boxed concentrations exceed NR 140 ES
— - not analyzed, not applicable or no standard established
DRO - diesel range organics
ES - enforcement standard
GRO - gasoline range organics
J - Results between the limit of detection and limit of quantitation

PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds
** - KTW-2 converted to MW-8*

TABLE 2

SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS

CPL INDUSTRIES
1111 Cedar Creek Road
Grafton, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION					NR 140	
	TW-1	TW-2	TW-3	TW-4	TW-5	ES	PAL
Date Collected	2/17/09	2/17/09	2/17/09	2/17/09	2/17/09	---	---
Detected VOCs (µg/l)							
Benzene	0.230 J					5	0.5
2-Butanone (MEK)	2.19 J						
Chloroform	0.360 J	0.430 J	0.330 J		0.430 J	6	0.6
Dichlorodifluoromethane	<0.390	0.450 J	<0.390		0.580 J	1,000	200
Methylene Chloride	0.520 J	0.620 J	**0.880**		0.720 J	5	0.5
Toluene	0.430 J					1,000	200
Arsenic			0.00117			10	1
Barium	0.155	0.194	0.226		0.192	2,000	400
Cadmium	0.000561					5	0.5
Lead	<0.00400		0.00487			15	1.5
Zinc	<0.0200	0.0354	0.128		0.0323		
Detected Dissolved Metals (µg/l)							
Barium		0.185	0.169		0.182	2,000	400
Zinc		0.0305	0.0411		0.0308		
Detected PAHs (µg/l)							
Acenaphthene	---	0.0380 J	<0.00890		0.0315 J	---	---
Acenaphthylene	---	0.00767 J	<0.00710		<0.00710	---	---
Anthracene	---	0.0205 J	<0.00810		0.0164 J	3,000	600
Benzo(a)anthracene	---	0.0318 J	0.0109 J		0.0275 J	---	---
Benzo(a)pyrene	---	0.0167 J	<0.00850		0.0154 J	0.2	0.02
Benzo(b)fluoranthene	---	0.0186 J	<0.00990		0.0175 J	0.2	0.02
Benzo(g,h,i)perylene	---	0.0103 J	<0.00550		0.0109 J	---	---
Benzo(k)fluoranthene	---	0.0117 J	<0.00790		0.00996 J	---	---
Chrysene	---	0.0205 J	<0.00530		0.0186 J	0.2	0.02
Fluoranthrene	---	0.0932 J	<0.0120		0.0972 J	400	80
Fluorene	---	0.0334 J	<0.00530		0.0264 J	400	80
Indeno(1,2,3-cd)pyrene	---	0.0108 J	<0.00690		0.0101 J	---	---
2-Methyl Naphthalene	---	0.0171 J	<0.00570		0.00969 J	---	---
Naphthalene	---	0.0293 J	0.00692 J		0.0234 J	100	10
Phenanthrene	---	0.120	<0.0110		0.124	---	---
Pyrene	---	0.0603 J	<0.0130		0.0607 J	250	50

Notes:

Bold concentrations exceed NR 140 PAL
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
µg/l - micrograms per liter
VOCs - volatile organic compounds

TABLE 3

SUMMARY OF GROUNDWATER DEPTHS AND ELEVATIONS

CPL INDUSTRIES - GRAFTON
1111 Cedar Creek Road
Grafton, Wisconsin

WELL IDENTIFICATION (DATE MEASURED)	TOP OF WELL CASING ELEVATION (FEET MSL)	GROUND SURFACE ELEVATION (FEET MSL)	DEPTH TO GROUNDWATER (FEET)	GROUNDWATER ELEVATION (FEET MSL)
PZ-1				
4/3/2009	761.90	762.23	6.68	755.22
4/6/2009			6.22	755.68
4/14/2009			6.67	755.23
4/20/2009			6.82	755.08
7/23/2009			9.27	752.63
12/10/2009			9.25	752.65
3/23/2010			6.80	755.10
7/9/2010			8.77	753.13
10/5/10			8.28	753.62
1/7/11			7.65	754.25
MW-1				
3/9/2009	761.84	762.21	5.02	756.82
3/13/2009			5.73	756.11
4/6/2009			5.90	755.94
4/14/2009			6.53	755.31
4/20/2009			6.00	755.84
7/23/2009			7.21	754.63
12/10/2009			6.16	755.68
3/23/2010			6.60	755.24
7/6/2010			6.78	755.06
10/5/10			7.30	754.54
1/7/11			7.16	754.68
MW-2				
3/9/2009	762.02	762.45	3.62	758.40
3/13/2009			3.80	758.22
4/6/2009			4.15	757.87
4/14/2009			4.65	757.37
4/20/2009			4.46	757.56
7/23/2009			6.37	755.65
12/10/2009			4.83	757.19
3/23/2010			5.00	757.02
7/6/2010			5.76	756.26
10/5/10			6.16	755.86
1/7/11			5.74	756.28
MW-3				
3/9/2009	757.99	754.90	4.82	753.17
3/13/2009			6.35	751.64
4/6/2009			7.24	750.75
4/14/2009			8.11	749.88
4/20/2009			6.73	751.26
7/23/2009			8.58	749.41
12/10/2009			6.73	751.26
3/23/2010			7.50	750.49
7/6/2010			8.69	749.30
10/5/10			8.93	749.06
1/7/11			8.01	749.98
MW-4				
3/9/2009	758.18	755.21	4.36	753.82
3/13/2009			5.09	753.09
4/6/2009			6.24	751.94
4/14/2009			7.44	750.74
4/20/2009			4.15	754.03
7/23/2009			4.24	753.94
12/10/2009			4.64	753.54
3/23/2010			6.30	751.88
7/6/2010			8.55	749.63
10/5/10			9.22	748.96
1/7/11			7.90	750.28

TABLE 3 (CONTINUED)

SUMMARY OF GROUNDWATER DEPTHS AND ELEVATIONS

CPL INDUSTRIES - GRAFTON
1111 Cedar Creek Road
Grafton, Wisconsin

WELL IDENTIFICATION (DATE MEASURED)	TOP OF WELL CASING ELEVATION (FEET MSL)	GROUND SURFACE ELEVATION (FEET MSL)	DEPTH TO GROUNDWATER (FEET)	GROUNDWATER ELEVATION (FEET MSL)
MW-5				
4/3/2009	764.26	764.97	4.74	759.52
4/6/2009			4.96	759.30
4/14/2009			5.72	758.54
4/20/2009			5.99	758.27
7/23/2009			7.78	756.48
12/10/2009			6.47	757.79
3/23/2010			5.80	758.46
7/6/2010			6.79	757.47
10/5/10			7.94	756.32
1/7/11			7.58	756.68
MW-6				
4/3/2009	768.91	766.51	5.30	763.61
4/6/2009			6.49	762.42
4/14/2009			5.84	763.07
4/20/2009			5.65	763.26
7/23/2009			6.95	761.96
12/10/2009			6.34	762.57
3/23/2010			6.20	762.71
7/6/2010			6.34	762.57
10/5/10			7.33	761.58
1/7/11			7.30	761.61
MW-7				
4/3/2009	774.69	774.99	6.39	768.30
4/6/2009			6.82	767.87
4/14/2009			7.65	767.04
4/20/2009			7.65	767.04
7/23/2009			10.28	764.41
12/10/2009			9.94	764.75
3/23/2010			9.00	765.69
7/6/2010			10.11	764.58
10/5/10			10.26	764.43
1/7/11			10.11	764.58
MW-8				
4/3/2009	763.11	763.81	5.80	757.31
4/6/2009			6.41	756.70
4/14/2009			6.99	756.12
4/20/2009			5.87	757.24
7/23/2009			7.60	755.51
12/10/2009			6.54	756.57
3/23/2010			6.95	756.16
7/6/2010			7.42	755.69
10/5/10			8.10	755.01
1/7/11			7.73	755.38