# GIS REGISTRY
## Cover Sheet

March, 2010
(RR 5367)

## Source Property Information

CLOSURE DATE: Mar 31, 2010

**BRRTS #:** 02-52-543766

FID #: 252243090

ACTIVITY NAME: RACINE GAS LIGHT FORMER

DATCP #:

PROPERTY ADDRESS: Water and Grand (601 Water St, 621 Water St, and 513 Grand Ave)

COMM #:

MUNICIPALITY: Racine

PARCEL ID #: 00028001, 00028002, 00022000

***WTM COORDINATES:**

X: **701092** Y: **252865**

** 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)*

- [X] 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)*

- [X] 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*)
- [X] 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*

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

# GIS Registry Checklist

Form 4400-245 (R 4/08) 

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

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

BRRTS #: 02-52-543766 PARCEL ID #: 00028001, 00028002, 00022000

ACTIVITY NAME: Former Racine Water & Grand MGP site WTM COORDINATES: X: 701092 Y: 252865

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

☒ **Closure Letter**

☒ **Maintenance Plan** *(if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)*

☒ **Conditional Closure Letter**

☐ **Certificate of Completion (COC)** for VPLE sites

## SOURCE LEGAL DOCUMENTS

☒ **Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
***Note:*** *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*

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

**Figure #:** **Title:**

☒ **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

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

Maps must be no larger than 8.5 x 14 inches unless the map is submitted electronically.

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

**Figure #: 1** **Title: Site Location Map**

☒ **Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.

**Figure #: 14** **Title: Post-Remedial Residuals Site-Map**

☒ **Soil Contamination Contour Map:** For sites closing with residual soil contamination, this map is to show the location of all contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL)as determined under s. NR 720.09, 720.11 and 720.19.

**Figure #: 10 / 11** **Title: Post-Remedial Unsaturated Soil Benzene Conc. Contour Map / Saturated Soil Benzene Conc**

BRRTS #: 02-52-543766 ACTIVITY NAME: Former Racine Water & Grand MGP site

## 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 #: Sheet 4** **Title: Post-Remedial Geological Cross Sections A-A' and B-B'**

**Figure #: Sheet 5** **Title: Post-Remedial Geological Cross Sections C-C'**

☒ **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 #: 13** **Title: Residual Groundwater Contamination Extent**

☒ **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 #: 12** **Title: Groundwater Elevation Contours, September 29-30, 2008**

**Figure #:** **Title:**

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

Tables must be no larger than 8.5 x 14 inches unless the table is submitted electronically. Tables must not contain shading and/or cross-hatching. The use of **BOLD** or *ITALICS* is acceptable.

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

**Table #: 8** **Title: Summary of Soil Remaining 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 #: 5, 6, and 7** **Title: Groundwater Laboratory Analytical Results - VOCs, Cyanide, Metals & Phenolics; PAHs; RNA**

☒ **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 #: 4** **Title: Groundwater Elevations and Monitoring Well Construction Information**

## IMPROPERLY ABANDONED MONITORING WELLS

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.
***Note:*** *If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.*

☒ **Not Applicable**

☐ **Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.
***Note:*** *If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.*

**Figure #:** **Title:**

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

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

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

BRRTS #: 02-52-543766 ACTIVITY NAME: Former Racine Water & Grand MGP site

## NOTIFICATIONS

**Source Property**

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

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

**Off-Source Property**

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

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

**Number of "Off-Source" Letters:**

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

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

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

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

**State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES**

Jim Doyle, Governor
Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-3128
FAX 414-263-8606
Telephone 414-263-8500
TTY Access via relay - 711

March 31, 2010

Mark Collins
WE Energies
231 West Michigan Street
Milwaukee, WI 53203

See file for cap maintenance plan

Dear Mr. Collins:

SUBJECT: Case closure, Racine Gas Light, Water and Grand, Racine, file reference BRRTS #0252543766, FID #252243090.

On January 5, 2010 the Southeast Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On January 8, I sent you a letter notifying you that the department had conditionally closed your case pending monitoring well abandonment. On March 19, your consultant sent me well abandonment forms documenting that the wells had been abandoned at the site.

Based on the correspondence and data provided, it appears that your case meets the closure requirements in ch. NR 726, Wisconsin Administrative Code. The department considers this case closed and no further investigation or remediation is required at this time, however, you and future property owners must comply with certain continuing obligations as explained in this letter.

GIS Registry

This site will be listed on the Remediation and Redevelopment Program's GIS Registry. The specific reasons 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

This letter and information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm. If the property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line http://dnr.wi.gov/org/water/dwg/3300254.pdf or at the web address listed above for

the GIS Registry.

Closure Conditions

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

Cover or Barrier

Direct Contact Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the earthen cap that currently exists in the 621 Water Street location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil beneath the cap in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

Impervious Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement or other impervious cap that currently exists in the right-of-way location shown on the attached map shall serve 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 to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

Industrial Zoning

Soil contamination remains on 601 Water Street, and 513 Grand Avenue in concentrations that meet the industrial soil standards, and above the residential standards. Therefore, pursuant to s. NR 726.05(8)(b)1., Wis.

Adm. Code, these properties may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) the property owner provides notification to the Department of Natural Resources of the change in land use and an investigation is conducted, to determine the degree and extent of contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If soil in the specific locations [shown on the attached map and] described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

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

Residual Groundwater Contamination

Groundwater impacted by mgp residuals greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code, is present both on this contaminated property and off this contaminated property. Off property owners have been notified of the presence of groundwater contamination. For more detailed information regarding the locations where groundwater samples have been collected (i.e., monitoring well locations) and the associated contaminant concentrations, refer to the Remediation and Redevelopment Program's GIS Registry at the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm.

Dewatering Permits

The department's Watershed Management Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits or to the ground surface. This includes discharges from construction related dewatering activities, including utility and building construction.

Based on the concentrations of contaminants remaining in groundwater at this location, it appears likely that dewatering activities would require a permit from the Watershed Management Program. If you or any other person plan to conduct such activities, you or that person must contact that program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at http://www.dnr.state.wi.us/org/water/wm/ww/

Post-Closure Notification Requirements

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

- Any activity or construction that results in the removal or modification of a structural impediment that obstructed a complete site investigation or cleanup.
- Development, construction or other changes, including zoning changes, that change the land use from industrial to non-industrial.

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

Please send written notifications in accordance with the above requirements to the Southest Region Program Assistant.

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 at 920-892-8756, extension 3023.

Sincerely,

Frances M. Koonce

Frances Koonce, Subteam Supervisor
Southeast Remediation & Redevelopment Program

Attachments – soil management and cap maintenance plan

Cc: NRT
SER File

# Maintenance and Soils Management Plan

**June 2009**

**Property:** **601 Water Street**
**Parcel ID 00022000**
**Industrial Zoning (I2)**

City of Racine, Wisconsin
Racine County
SW ¼, Section 9, T3N, R23E
(Refer to attached figures)

Legal Description:
Lots 1 and 2 and the East fifty-eight and five tenths (58.5) feet of Lots 10 and 11, Block 4, Harbor Addition, according to the recorded plat thereof. Said land being a subdivision of a part of the Southwest 1/4 of Sections 9, Township 3 North, Range 23 East, City of Racine, Racine County, Wisconsin.

Property Owner (as of June 2009):
Mark T. Ulinski
6820 Beechnut Drive
Racine, WI 53402

**WDNR Case:** Former Racine Water Street and Grand Avenue Manufactured Gas Plant (MGP)
BRRTS# 02-52-543766
FID #252243090

MGP Responsible Party:
We Energies
333 W. Everett St.
Milwaukee, WI 53203
Contact: Mr. Mark Collins
(414) 221-2162

Wisconsin Department of Natural Resources (WDNR) Contact:
Mr. John Feeney
Hydrogeologist
Wisconsin Department of Natural Resources – Southeast Region
1155 Pilgrim Parkway
Plymouth WI 53073
920-892-8756 Ext.3023

## Introduction

This Maintenance and Soils Management Plan ("Plan") has been prepared for the above-referenced property ("Property") to be implemented as part of the case closure for the Property as shown on the attached map (Figure 1). A copy of this Plan is to be kept on file: (1) by the Wisconsin Department of Natural Resources (WDNR), Southeast Region; (2) by the Property Owner, including future Property owners; (3) by the Property Manager, if any; and (4) by We Energies. The Plan shall be made available by the Property Owner to prospective purchasers, contractors, utilities and maintenance personnel, and any other public or private persons or entities authorized to perform work at the Property. Summary reports are on file with the WDNR and are available upon request (WDNR file reference: Former Racine Gas Light, BRRTS # 02-52-543766).

## Plan Purpose and Site Information

The purpose of this Plan is to document the responsibilities associated with the land use controls applicable to the Property and to identify how to properly manage residual MGP-impacted soil, in-situ stabilized/solidified (ISS) soil, and historic fill material (in the subsurface) at the Property (*see* Appendix A - Definitions).

Residual soil and groundwater impacts and the ISS treated soil extent are shown on Figures 2 and 3. Table 1 provides a summary of the remaining soil analytical results.

## Responsibilities

1) Maintain the existing building. If the building is proposed to be removed, notification to WDNR is necessary. The WDNR may require additional investigation and/or remediation in the area of the building as prior sampling and cleanup of the contamination under and around the foundation was restricted due to the building's presence. The Property Owner would be responsible for contamination other than MGP-related impacts, if discovered. We Energies would be responsible for MGP-related impacts, if discovered.

2) Avoid disturbing residual MGP- impacted and ISS treated soil: The Property Owner shall avoid disturbing the residual MGP-impacted and ISS treated soil. The approximate known locations of these areas are shown on Figures 2 and 3.

3) Properly manage soils if disturbance cannot be avoided. If disturbance cannot be avoided, the Property Owner shall notify We Energies ahead of time of the proposed work so assistance can be provided for proper handling and disposal of the materials. Soil disturbing activities shall not be conducted until written approval is obtained from WDNR. Proper material management includes, but is not limited to:

A) Segregation of the material removed as historic fill, residual MGP-impacted soil, or ISS treated soil in order to properly characterize and manage the material. All excavated materials must be managed in accordance with NR 718, WAC.

B) ISS treated soil or residual MGP-impacted soil may be excavated, but must be properly characterized, managed, and disposed as Special Waste. We Energies will coordinate the waste profiling, manifesting and disposal of residual MGP-impacted soil at a designated disposal facility.

C) If removal of ISS treated soil is required, it shall be conducted by the Property Owner in a manner that does not have an adverse impact to the environment. For any work that disturbs the ISS treated soil adjacent to residual MGP-impacted soil (i.e. installation of a new utility service), a vertical cutoff collar shall be installed at the interface of the ISS treated soil and the residual MGP-impacted soil that consists of flowable fill, concrete, or bentonite.

D) All MGP-impacted groundwater or storm water/surface water that is removed during construction requires special handling and disposal. Such water must be managed in accordance with an approved local or state discharge permit.

4) Retain industrial zoning. The Property shall remain subject to industrial zoning and land use unless WDNR approval is granted to change the land use condition. Any additional investigation and remedial action activities that may be necessary due to such a change would be the Property Owner's responsibility.

5) Site improvements. Prior to implementing any site improvements, the Property Owner shall determine whether planned site improvements require WDNR written approval. Site improvements include, but are not limited to, landscaping (i.e. installing trees, shrubs, fence, retaining walls, etc.); and constructing or placing a building or other structure.

A) If a building is proposed to be constructed on the property, the Property Owner is responsible for reviewing the potential impact of subsurface conditions on building construction methods.

B) Site improvements shall be designed to avoid disturbance to the residual MGP-impacted and ISS treated soils. Historic fill materials shall be managed in accordance with WDNR regulations and guidance.

6) Inform construction workers of the known contaminated materials. Inform contractors or other construction or maintenance workers of the known residual MGP-impacted soils and other subsurface materials such that the contractor can prepare a site-specific health and safety plan, appropriate for the work being performed. All workers shall take precautions to protect themselves from exposures to the contaminated materials. All contractor personnel conducting or

participating in work in areas that may have contaminated materials must be HAZWOPER-trained as required by 29 CFR 1910.120.

7) Documentation. Following completion of any work disturbing MGP-impacted or ISS treated soil performed at the Property, a brief report shall be prepared. The report shall describe the work performed, identify the person(s) whom performed the work and the date of the work, and confirmation that this Plan was adhered to in completing the work. A copy of the report shall be kept on file by the Property Owner and the Property Manager, if any, and a copy shall be filed with the WDNR.

**Amendment or Withdrawal of Plan**

This Plan can be amended or withdrawn by the Property Owner or We Energies with the written approval of the WDNR.

Attachments: Appendix A – Definitions
Figure 1 – Land Use Controls
Figure 2 – Post-Remedial Residuals Site Map
Figure 3 – Post-Remedial Saturated Soil Residual Impacts Contour Map
Table 1 – Summary of Soil Remaining Analytical Results

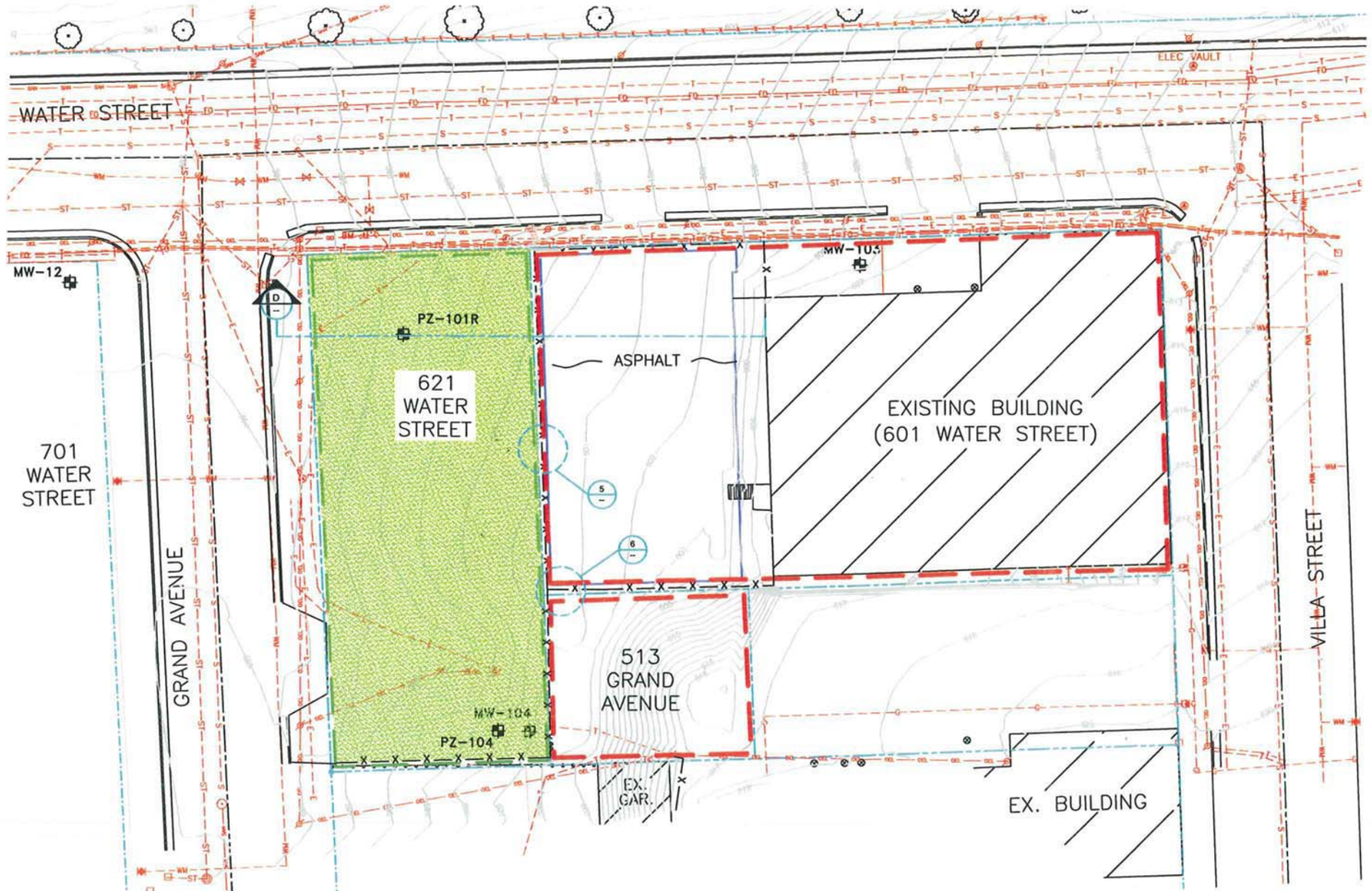
## APPENDIX A

### Definitions

"**Residual MGP-impacted soil**" is defined as: soils containing evidence of coal tar including odor and/or visual tar or staining. Contaminants of concern (COCs) include benzene, toluene, ethylbenzene, and xylenes (BTEX), and polynuclear aromatic hydrocarbons (PAHs).

"**ISS treated soil**" is defined as: MGP-contaminated soil that was mixed with cement-based stabilizing reagents during remedial action activities conducted by We Energies. The ISS treated soil is located within the ISS Treatment Area beneath the existing pavement on the Property, as shown in the attached map (Figure 2). The top elevation of the ISS soil is at 595.5 feet (NGVD29 datum), or approximately 4.5 feet below ground surface, on the property (Figure 1). Bottom elevation ranges between 569 and 563 feet, or approximately 31 to 37 feet below ground surface, within the ISS Treatment Area on the Property.

"**Historic fill material**" is defined as: fill materials (not impacted by MGP tar residual) that are present in the shallow subsurface such as foundry sand, coal fines and/or any fill material containing residual contaminants. The fill material was placed on the property to raise the elevation sometime after decommissioning the MGP. Within the ISS treatment area, the historic fill is present at 2 feet below ground surface (bgs) to depths of approximately 4.5 to 7 feet bgs and is underlain by ISS material. In areas outside the ISS treatment area, the historic fill is present near the ground surface to depths of 15 to 20 feet bgs. Refer to Table 1 for historic fill soil quality data. Fill material of this nature is common in urban industrial areas. Fill materials may contain residual concentrations of BTEX, PAHs, lead, and arsenic.




GENERAL NOTES:
1. BEARING BASIS: GRID NORTH, WISCONSIN COORDINATE SYSTEM, SOUTH ZONE.
2. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.
3. THE EXACT LOCATION OF UNDERGROUND STRUCTURES OR FACILITIES SHOWN ON THE PLANS ARE BASED ON AVAILABLE RECORDS AT THE TIME OF PREPARATION AND ARE NOT GUARANTEED TO BE COMPLETE OR CORRECT.
4. BENCHMARK 1: HYDRANT LOCATED AT SOUTHEAST CORNER OF WATER STREET AND GRAND AVENUE, ELEVATION = 597.45.

SOURCE NOTES:
1. THIS DRAWING WAS DEVELOPED FROM A DRAWING BY MIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, JOB 2004.133, DRAWING NAME 2004133.DWG, DATED 05-04-04, REVISED JANUARY 2005.
2. MONITORING WELLS SURVEYED BY MIELSEN MADSEN & BARBER S.C., RACINE, WISCONSIN, SEPTEMBER 2004.
3. PORTIONS OF THIS DRAWING PROVIDED BY MIDWEST ENGINEERING SERVICES, INC., PROJECT NO. 7-11017, FIGURE NO. 2, DATED 3/27/01, DIGITAL FILE SITE.DWG.
4. PORTIONS OF SANITARY AND STORM SEWER FROM MAP PROVIDED BY CITY OF RACINE.
5. SB-104-106, SB-108, AND SB-110-121 SURVEYED BY MIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, APRIL 2005.
6. MW-12 FIELD MEASURED BY NATURAL RESOURCE TECHNOLOGY, INC., APRIL 2005.
7. MW-10 TAKEN FROM DRAWING "BOREHOLE AND MONITORING WELL LOCATIONS", FIGURE 3, BY EDER ASSOCIATES, MADISON, WISCONSIN.
8. ESTIMATED LOCATION OF FORMER GAS HOLDER REVISED OCTOBER 2005 BY NRT FOLLOWING TEST PIT EXCAVATION.
9. APPROXIMATE LOCATION OF MW-1 AND BUILDINGS AT 701 WATER ST. FROM A DRAWING BY EDER ASSOCIATES.
10. FINAL GRADE FROM A DRAWING BY MIELSEN MADSEN AND BARBER S.C. CONSULTING CIVIL ENGINEERS AND LAND SURVEYERS, RACINE WISCONSIN. JOB 2006.206 DRAWING NAME 2006206.

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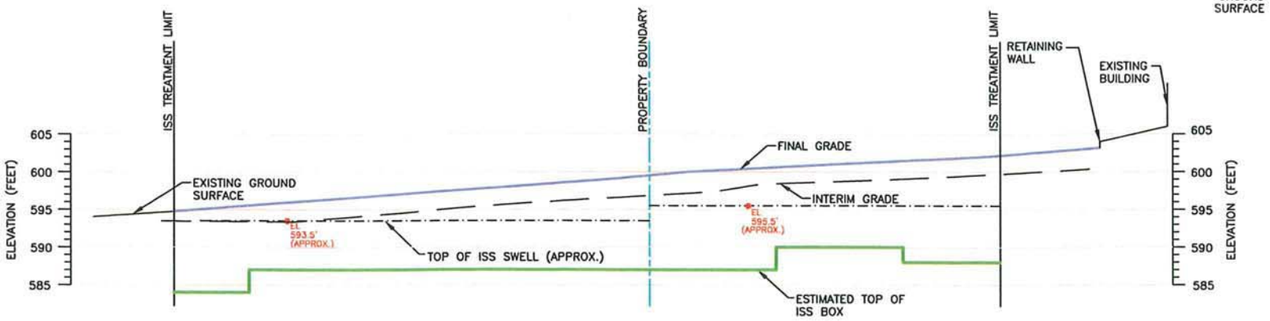
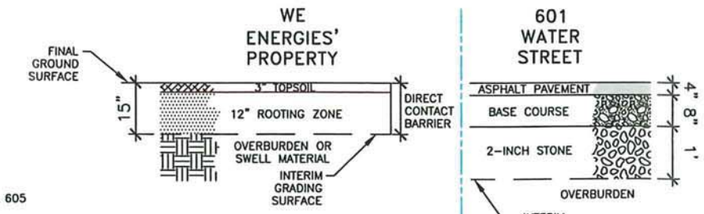
SCALE IN FEET

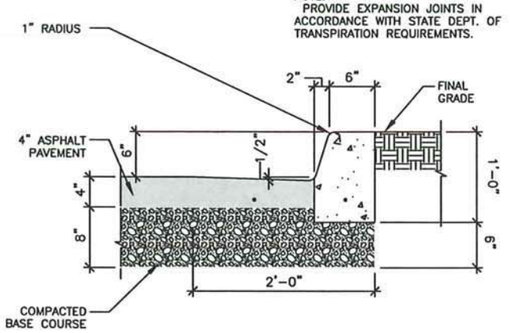
LEGEND
- DIRECT CONTACT BARRIER
- EXISTING CONTOURS
- PROPERTY BOUNDARY
- INDUSTRIAL ZONED PROPERTY
- COMMERCIAL/BUSINESS ZONED PROPERTY
- STREET RIGHT-OF-WAY
- MW-103 MONITORING WELL
- PZ-106 PIEZOMETER
- EXISTING FENCE
- OVERHEAD ELECTRIC LINE
- SANITARY MANHOLE
- STORM MANHOLE
- CATCH BASIN
- HYDRANT
- VALVE BOX
- WATER SHUT OFF
- GAS METER
- GAS SHUT OFF
- ELEC MANHOLE
- POWER POLE
- SIGN
- GUARD POST
- GUARD RAIL
- CONIFEROUS TREE
- DECIDUOUS TREE
- MGP MANUFACTURED GAS PLANT
- ST STORM SEWER LINE
- S SANITARY SEWER LINE
- G GAS MAIN
- E ELECTRIC LINE
- FO FIBER OPTIC LINE
- T TELEPHONE LINE
- W WATERMAIN
- SAN SANITARY (CITY RACINE WITH YEAR)
- ASPHALT




D SITE RESTORATION SECTION
-- HORIZONTAL SCALE: 1"=10'
VERTICAL SCALE: 1"=10'
VERTICAL EXAGGERATION=1




5 SITE RESTORATION DETAIL
-- NOT TO SCALE




6 CONCRETE CURB AND GUTTER DETAIL
-- NOT TO SCALE

NATURAL RESOURCE TECHNOLOGY

| | |
|---|---|
| PROJECT NO. 1696/9.0 | LAND USE CONTROLS |
| DRAWN BY: KNW 3/19/09 | SITE CLOSURE REQUEST |
| CHECKED BY: HMS 3/19/09 | FORMER RACINE WATER AND GRAND MGP SITE |
| APPROVED BY: JAZ 5/22/09 | WE ENERGIES |
| DRAWING NO: 1696-9-B06C | CITY OF RACINE, WISCONSIN |
| REFERENCE: . | FIGURE 1 |

# Maintenance and Soils Management Plan
**June 2009**

**Property:**

| **621 Water Street** | **513 Grand Avenue** |
|---|---|
| **Parcel ID 00028001** | **Parcel ID 00028002** |
| **Commercial/Business Zoning (B4)** | **Industrial Zoning (I2)** |

City of Racine, Wisconsin
Racine County
SW ¼, Section 9, T3N, R23E
(Refer to attached figures)

Legal Description:
Lots 10 and 11 excepting the east fifty-eight and five tenths (58.5) feet thereof, and all of Lot 9, Block 4, Harbor Addition to Racine, being a subdivision of a part of the Southwest 1/4 of Sections 9, Township 3 North, Range 23 East, City of Racine, Racine County, Wisconsin.

Property Owner (as of June 2009):
We Energies
c/o Property Management
231 W Michigan Street, Rm. A252
Milwaukee, WI 53201

**WDNR Case:** Former Racine Water Street and Grand Avenue Manufactured Gas Plant (MGP)
BRRTS# 02-52-543766
FID #252243090

MGP Responsible Party:
We Energies
333 W. Everett St.
Milwaukee, WI 53203
Contact: Mr. Mark Collins
(414) 221-2162

Wisconsin Department of Natural Resources (WDNR) Contact:
Mr. John Feeney
Hydrogeologist
Wisconsin Department of Natural Resources – Southeast Region
1155 Pilgrim Parkway
Plymouth WI 53073
920-892-8756 Ext.3023

## Introduction

This Maintenance and Soils Management Plan ("Plan") has been prepared for the above-referenced property ("Property") to be implemented as part of the case closure for the Property as shown on the attached map (Figure 1). A copy of this Plan is to be kept on file: (1) by the Wisconsin Department of Natural Resources (WDNR), Southeast Region; (2) by the Property Owner, including future Property owners; (3) by the Property Manager, if any; and (4) by We Energies. The Plan shall be made available by the Property Owner to prospective purchasers, contractors, utilities and maintenance personnel, and any other public or private persons or entities authorized to perform work at the Property. Summary reports are on file with the WDNR and are available upon request (WDNR file reference: Former Racine Gas Light, BRRTS # 02-52-543766).

## Plan Purpose and Site Information

The purpose of this Plan is to document the responsibilities associated with the land use controls applicable to the Property and to identify how to properly manage residual MGP-impacted soil, in-situ stabilized/solidified (ISS) soil, and historic fill material (in the subsurface) at the Property (*see* Appendix A - Definitions).

Residual soil and groundwater impacts and the ISS treated soil extent are shown on Figures 2, 3 and 4. Table 1 provides a summary of the remaining soil analytical results.

## Responsibilities

1) Maintain direct contact barrier. Based on the Commercial/Business zoning for the 621 Water Street portion of the Property, a direct contact barrier was placed over the historic fill and ISS treated soil to serve as a barrier to prevent direct human contact with residual soil contamination within the top 4 feet of ground surface. The direct contact barrier should function as intended unless disturbed. The direct contact barrier consists of vegetated 3 inches of topsoil above 12 inches of rooting zone material (silty sand with gravel). The location of the direct contact barrier is depicted in Figure 1.

A) *Inspections and Repairs*: The cap should be inspected periodically by the Property Owner to ensure that its integrity is maintained and that no significant deterioration, ruts, animal burrows, erosional features, or other potential problems develop that would compromise the cap integrity and increase the risk of direct contact with the contaminated materials. *See* Inspection Log Form sample at Appendix B (which must be submitted to the WDNR upon request). Any problems noted at any time should be scheduled for repair as soon as practical. Repair activities conducted at the Property may include patching and filling topsoil and/or rooting zone material, and seeding of disturbed areas. Repair measures are to be documented (e.g., date, description, contractor). In the event that necessary maintenance or construction activities expose the underlying soil, the Property Owner must inform maintenance or construction workers of the direct contact exposure hazard

and ensure they have appropriate personal protection equipment. Any exposed area shall be restored in a manner consistent with the original earthen cap condition.

B) *Restrictions:* WDNR written approval is required to modify the earthen cap, including without limitation replacing the existing cap with another barrier; excavating, grading or plowing the surface; filling on capped areas; and constructing or placing a building or other structure on the capped area. Any area of cap disturbance shall be restored in a manner consistent with the original earthen cap condition.

2) Avoid disturbing residual MGP- impacted and ISS treated soil: The Property Owner shall avoid disturbing the residual MGP-impacted and ISS treated soil. The approximate known locations of these areas are shown on Figures 2, 3 and 4.

3) Properly manage soils if disturbance cannot be avoided. If disturbance cannot be avoided, soil disturbing activities shall not be conducted until approval is obtained from WDNR. Proper material management includes, but is not limited to:

A) Segregation of the material removed as historic fill, residual MGP-impacted soil, or ISS treated soil in order to properly characterize and manage the material. All excavated materials must be managed in accordance with NR 718, WAC.

B) ISS treated soil or residual MGP-impacted soil may be excavated, but must be properly characterized, managed, and disposed as Special Waste. We Energies will coordinate the waste profiling, manifesting and disposal of residual MGP-impacted soil at a designated disposal facility.

C) If removal of ISS treated soil is required, it shall be conducted by the Property Owner in a manner that does not have an adverse impact to the environment. For any work that disturbs the ISS treated soil adjacent to residual MGP-impacted soil (i.e. installation of a new utility service), a vertical cutoff collar shall be installed at the interface of the ISS treated soil and the residual MGP-impacted soil that consists of flowable fill, concrete, or bentonite.

D) All MGP-impacted groundwater or storm water/surface water that is removed during construction requires special handling and disposal. Such water must be managed in accordance with an approved local or state discharge permit.

4) Retain zoning. The 513 Grand Avenue portion of the Property shall remain subject to industrial zoning and land use, and the 621 Water Street portion of the Property shall remain subject to commercial/business zoning (or industrial zoning) and land use, unless WDNR approval is granted to change the land use condition. Any additional investigation and remedial action activities that may be necessary due to such a change would be the Property Owner's responsibility.

5) Site improvements. Prior to implementing any site improvements, the Property Owner shall determine whether planned site improvements require WDNR approval. Site improvements include, but are not limited to, constructing or placing a building or other structure or landscaping which could be disruptive to the cap.

A) If a building is proposed to be constructed on the property, the Property Owner is responsible for reviewing the potential impact of subsurface conditions on building construction methods.

B) Site improvements shall be designed to avoid disturbance to the residual MGP-impacted and ISS treated soils. Historic fill materials shall be managed in accordance with WDNR regulations and guidance.

C) See also 1.B. above.

6) Inform construction workers of the known contaminated materials. Inform contractors or other construction or maintenance workers of the known residual MGP-impacted soils and other subsurface materials such that the contractor can prepare a site-specific health and safety plan, appropriate for the work being performed. All workers shall take precautions to protect themselves from exposures to the contaminated materials. All contractor personnel conducting or participating in work in areas that may have contaminated materials must be HAZWOPER-trained as required by 29 CFR 1910.120.

7) Documentation. Following completion of any work disturbing MGP-impacted or ISS treated soil performed at the Property, a brief report shall be prepared. The report shall describe the work performed, identify the person(s) whom performed the work and the date of the work, and confirmation that this Plan was adhered to in completing the work. A copy of the report shall be kept on file by the Property Owner and the Property Manager, if any, and a copy shall be filed with the WDNR.

**Amendment or Withdrawal of Plan**

This Plan can be amended or withdrawn by the Property Owner or We Energies with the written approval of the WDNR.

Attachments: Appendix A – Definitions
Figure 1 – Land Use Controls
Figure 2 – Post-Remedial Residuals Site Map
Figure 3 – Post-Remedial Saturated Soil Residual Impacts Contour Map
Figure 4 – Post-Remedial Unsaturated Soil Residual Impacts Contour Map
Table 1 – Summary of Soil Remaining Analytical Results
Appendix B – Inspection Log Form

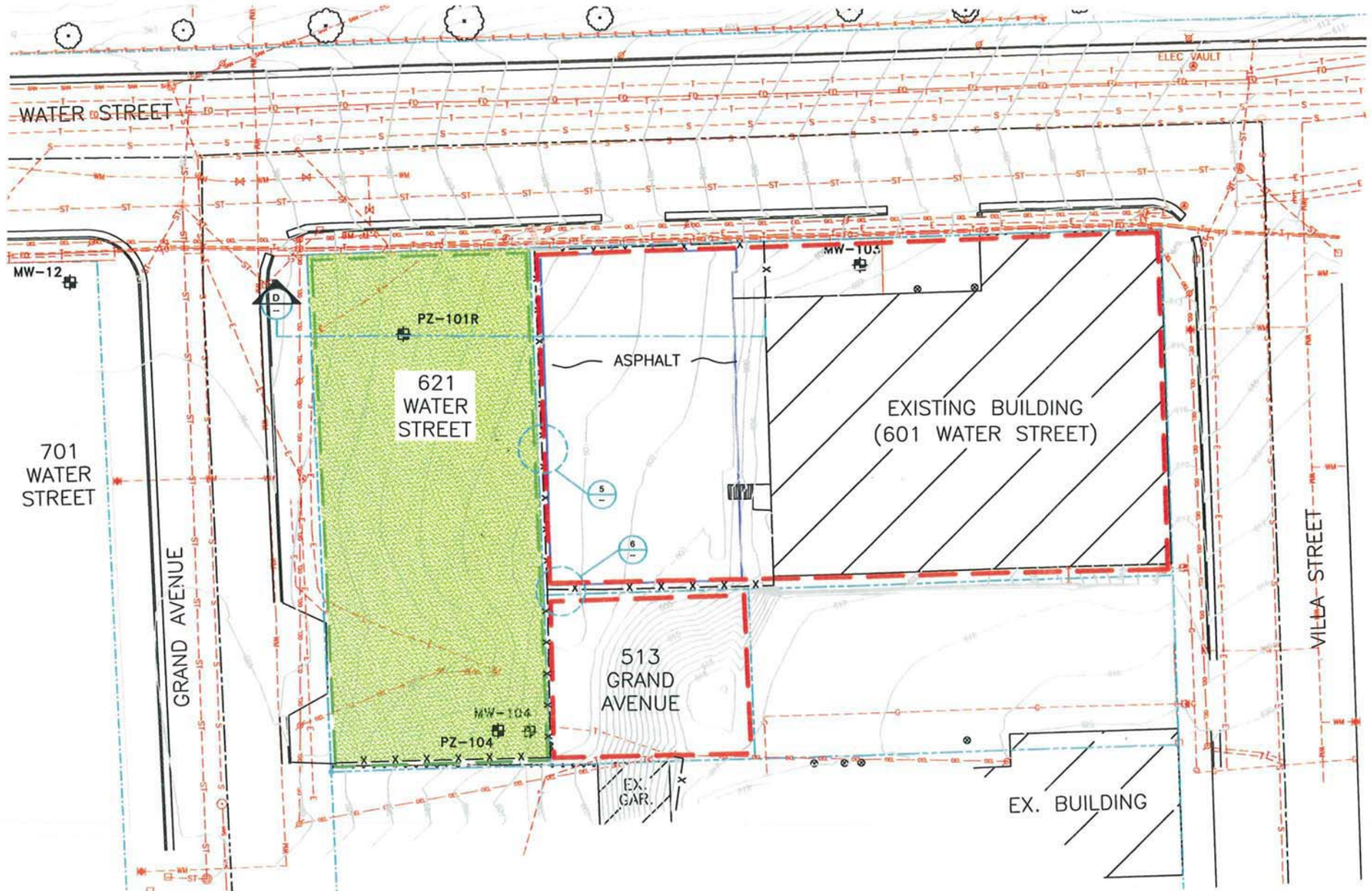
## APPENDIX A

### Definitions

"**Residual MGP-impacted soil**" is defined as: soils containing evidence of coal tar including odor and/or visual tar or staining. Contaminants of concern (COCs) include benzene, toluene, ethylbenzene, and xylenes (BTEX), and polynuclear aromatic hydrocarbons (PAHs).

"**ISS treated soil**" is defined as: MGP-contaminated soil that was mixed with cement-based stabilizing reagents during remedial action activities conducted by We Energies. The ISS treated soil is located within the ISS Treatment Area on the Property, as shown in the attached map (Figure 2). The top elevation of the ISS soil is at 593.5 feet (NGVD29 datum), or approximately 1.5 to 6 feet below ground surface (bgs), on the Property (Figure 1). Bottom elevation ranges between 569 and 563 feet, or approximately 30 to 37 feet bgs, within the ISS Treatment Area on the Property.

"**Historic fill material**" is defined as: fill materials (not impacted by MGP tar residual) that are present in the shallow subsurface such as foundry sand, coal fines and/or any fill material containing residual contaminants. The fill material was placed on the property to raise the elevation sometime after decommissioning the MGP. Within the ISS treatment area, the historic fill is present below the earthen cap to depths of approximately 3 to 6 feet bgs and is underlain by ISS material. In areas outside the ISS treatment area, the historic fill is present below the earthen cap to depths of 15 to 20 feet bgs. Refer to Table 1 for historic fill soil quality data. Fill material of this nature is common in urban industrial areas. Fill materials may contain residual concentrations of BTEX, PAHs, lead, and arsenic.




GENERAL NOTES:
1. BEARING BASIS: GRID NORTH, WISCONSIN COORDINATE SYSTEM, SOUTH ZONE.
2. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.
3. THE EXACT LOCATION OF UNDERGROUND STRUCTURES OR FACILITIES SHOWN ON THE PLANS ARE BASED ON AVAILABLE RECORDS AT THE TIME OF PREPARATION AND ARE NOT GUARANTEED TO BE COMPLETE OR CORRECT.
4. BENCHMARK 1: HYDRANT LOCATED AT SOUTHEAST CORNER OF WATER STREET AND GRAND AVENUE, ELEVATION = 597.45.

SOURCE NOTES:
1. THIS DRAWING WAS DEVELOPED FROM A DRAWING BY MIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, JOB 2004.133, DRAWING NAME 2004133.DWG, DATED 05-04-04, REVISED JANUARY 2005.
2. MONITORING WELLS SURVEYED BY MIELSEN MADSEN & BARBER S.C., RACINE, WISCONSIN, SEPTEMBER 2004.
3. PORTIONS OF THIS DRAWING PROVIDED BY MIDWEST ENGINEERING SERVICES, INC., PROJECT NO. 7-11017, FIGURE NO. 2, DATED 3/27/01, DIGITAL FILE SITE.DWG.
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10. FINAL GRADE FROM A DRAWING BY MIELSEN MADSEN AND BARBER S.C. CONSULTING CIVIL ENGINEERS AND LAND SURVEYERS, RACINE WISCONSIN. JOB 2006.206 DRAWING NAME 2006206.

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SCALE IN FEET

LEGEND
- DIRECT CONTACT BARRIER
- EXISTING CONTOURS
- PROPERTY BOUNDARY
- INDUSTRIAL ZONED PROPERTY
- COMMERCIAL/BUSINESS ZONED PROPERTY
- STREET RIGHT-OF-WAY
- MW-103 MONITORING WELL
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- WATER SHUT OFF
- GAS METER
- GAS SHUT OFF
- ELEC MANHOLE
- POWER POLE
- SIGN
- GUARD POST
- GUARD RAIL
- CONIFEROUS TREE
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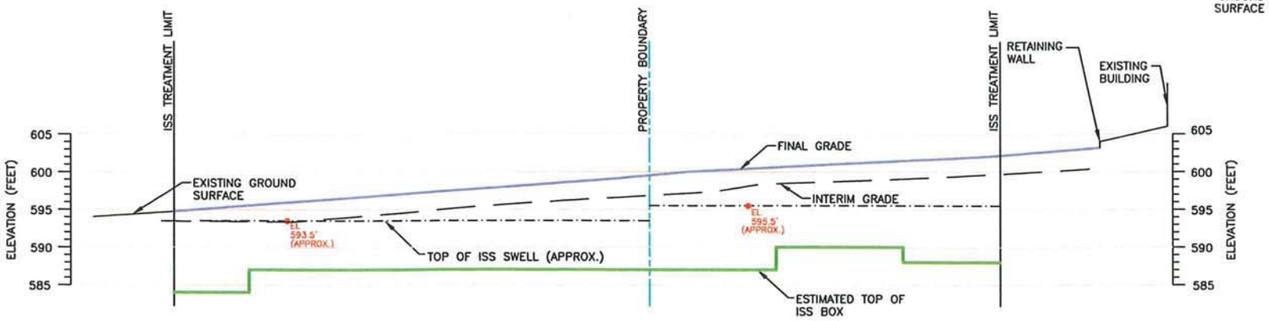
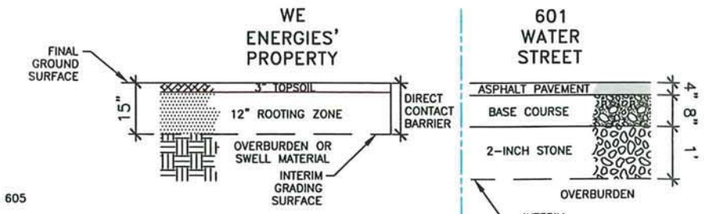
- ASPHALT




D SITE RESTORATION SECTION
-- HORIZONTAL SCALE: 1"=10'
VERTICAL SCALE: 1"=10'
VERTICAL EXAGGERATION=1

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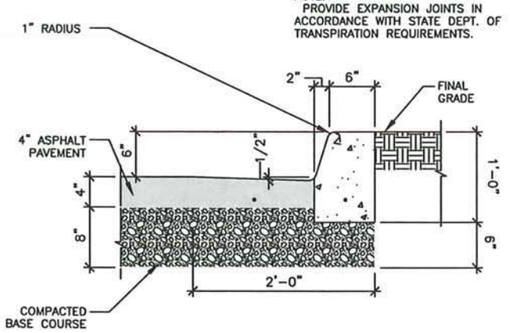


6 CONCRETE CURB AND GUTTER DETAIL
-- NOT TO SCALE

NATURAL RESOURCE TECHNOLOGY

| | |
|---|---|
| PROJECT NO. 1696/9.0 | LAND USE CONTROLS |
| DRAWN BY: KNW 3/19/09 | SITE CLOSURE REQUEST |
| CHECKED BY: HMS 3/19/09 | FORMER RACINE WATER AND GRAND MGP SITE |
| APPROVED BY: JAZ 5/22/09 | WE ENERGIES |
| DRAWING NO: 1696-9-B06C | CITY OF RACINE, WISCONSIN |
| REFERENCE: . | FIGURE 1 |

## APPENDIX B

### Form of Inspection Log

*This Inspection Log shall be maintained by the Property Owner and must be submitted to the Wisconsin Department of Natural Resources upon their request*

| Date of Inspection | Inspection By | Visual Inspection/General Comments | Type of Defect (eroded areas, vegetation disturbed, pavement cracks and fissures, etc.) and Location of Defect Noted | Necessary Maintenance Actions and Date Performed | Photographs taken Before & After (Y/N) |
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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

Plymouth Service Center
1155 Pilgrim Rd.
P.O. Box 408
Plymouth, Wisconsin 53073-0408
Telephone 920-892-8756
FAX 920-892-6638

January 8, 2010

Mark Collins
WE Energies
231 West Michigan Street
Milwaukee, WI 53203

Dear Mr. Collins:

SUBJECT: Conditional case closure, Racine Gas Light, Water and Grand, Racine, file reference BRRTS #0252543766, FID #252243090.

Thank you for submitting a closure request for your case. The department reviewed your submittal and has only the following requirements left: have your consultant properly abandon the monitoring wells and submit the forms to me.

If you have any questions about this letter, please call me at 920-892-8756 x 3023.

Sincerely,

John Feeney
Wisconsin Department of Natural Resources

Cc: NRT
SER File

1828873

Document Number

STATE BAR OF WISCONSIN FORM 1 - 1999

# WARRANTY DEED

REGISTER'S OFFICE
RACINE COUNTY, WI

RECORDED _____

2002 APR 30 AM 11:01

MARK A. LADD
REGISTER OF DEEDS

3419 759-760

**This Deed,** made between William P. VanDerZee and Anna M. VanDerZee, Husband and Wife

Grantor, and Mark T. Ulinski

Grantee.

Grantor, for a valuable consideration, conveys and warrants to Grantee the following described real estate in Racine County, State of Wisconsin (if more space is needed, please attach addendum):

Lots 1 and 2, and the East 58.5 feet of Lots 10 and 11, Block 4, Harbor Addition, according to the recorded plat thereof. Said land being in the City of Racine, Racine County, Wisconsin, and is more particularly as described per survey on Exhibit "A" attached hereto.

13

Recording Area

Name and Return Address
Robert G. Riegelman
Box #110

P.29891

WI REAL ESTATE
TRANSFER FEE
$ 435.00

22
Parcel Identification Number (PIN)

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

Together with all appurtenant rights, title and interests.

Grantor warrants that the title to the Property 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 general real estate taxes for 2002.

Dated this 26th day of April, 2002.

[signature]
* William P. VanDerZee

[signature]
* Anna M. VanDerZee

## AUTHENTICATION

Signature(s) _____

authenticated this ____ day of _____, _____

*

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

THIS INSTRUMENT WAS DRAFTED BY
Robert G. Riegelman
State Bar No. 01007895

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

## ACKNOWLEDGMENT

STATE OF FLORIDA )
) ss.
Palm Beach County )

Personally came before me this 26 day of April, 2002 the above named William P. VanDerZee and Anna M. VanDerZee, Husband and Wife

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

[signature]
Notary Public, State of Florida
My Commission is permanent. (If not, state expiration date: _____, _____.)

* Names of persons signing in any capacity shown above or printed below their signature.

WARRANTY DEED

STATE BAR OF WISCONSIN
FORM No. 1 - 1999

Notary Public - State of Florida
My Commission Expires Feb 19, 2005
Commission # [illegible]

Notary Public - State of Florida
My Commission Expires
Commission #

Company Fond du Lac, WI
800-655-2021

# EXHIBIT "A"

## LEGAL DESCRIPTION

Commence at the Northeast corner of Lot 1, Block 4, Harbor Addition; run thence Southerly along the Easterly line of Lots 1 and 2, Block 4, Harbor Addition 99.75 feet to the Southerly line of said Lot 2; thence Westerly along the Southerly line of said Lot 2 121.68 feet; thence continue Westerly along the Southerly line of Lot 10, Block 4, 58.50 feet; thence Northerly 99.60 feet to a point in the Northerly line of Lot 11, Block 4 that is located 58.50 feet Westerly of the Northeasterly corner of said Lot 11; run thence Easterly on the Northerly line of Lots 11 and 1 180.81 feet more or less to the point of beginning. Said land being in the City of Racine, Racine County, Wisconsin.

Street Address: 601 Water Street

Tax Parcel No.: 22

**ACKNOWLEDGEMENT OF NOTIFICATION LETTER AND LEGAL DESCRIPTION CERTIFICATION**

**601 Water Street Property**

Legal Description on the Warranty Deed and Provided as Part of a WDNR GIS Registry Packet for:

WE ENERGIES
FORMER WATER STREET AND GRAND AVENUE MGP SITE
BRRTS #02-52-543766
RACINE, WISCONSIN

Lots 1 and 2 and the East fifty-eight and five tenths (58.5) feet of Lots 10 and 11, Block 4, Harbor Addition

Commence at the Northeast corner of Lot 1, Block 4, Harbor Addition; run thence Southerly along the Easterly line of Lots 1 and 2, Block 4, Harbor Addition 99.75 feet to the Southerly line of said Lot 2; thence Westerly along the Southerly line of said Lot 2 121.68 feet; thence continue Westerly along the Southerly line of Lot 10, Block 4, 58.50 feet; thence Northerly 99.60 feet to a point in the Northerly line of Lot 11, Block 4 that is located 58.50 feet Westerly of the Northeasterly corner of said Lot 11; run thence Easterly on the Northerly line of Lots 11 and 1 180.81 feet more or less to the point of beginning. Said land being in the City of Racine, Racine County, Wisconsin.

***"I certify that the attached legal description is, to the best of my knowledge, complete and accurate. I further acknowledge that I have received and reviewed the notification letter dated June 17, 2009 from We Energies regarding their intent to request case closure of the Former Water Street and Grand Avenue Manufactured Gas Plant (MGP) site on my property located at 601 Water Street, Racine, Wisconsin."***

Mr. Mark Ulinski
Owner

8-7-09
Date

1588A
ENCL

112543

No.

James Cape & Sons Company

TO

Wisconsin Electric Power Company

# Warranty Deed

This Instrument should be immediately placed on file to avoid trouble and litigation.

This space reserved for
Register of Deeds

Return to

Return to O. F. KOSME
Room 450, 231 W. Michigan St.
MILWAUKEE 1, WIS.

2.00

WISCONSIN LEGAL BLANK COMPANY
MILWAUKEE, WISCONSIN

DOCUMENT NO.

784255

VOL 854 PAGE 198 37d

WARRANTY DEED
FORM 888

THIS SPACE RESERVED FOR RECORDING DATA

Register's Office } ss.
Racine County, Wis. }
Received for Record 8th day of March A.D., 1965 at 11:30 o'clock A M. and recorded in Volume 854 of Records on page 198

Stanley F. Bialecki
Register of Deeds

2.00

RETURN TO
O.F.Koske, Room 450
Wisconsin Electric Power Co.
231 West Michigan Street
Milwaukee, Wisconsin 53201

THIS INDENTURE, Made this 18th day of February, A. D., 1965 between JAMES CAPE & SONS COMPANY

a Corporation duly organized and existing under and by virtue of the laws of the State of Wisconsin, located at Racine Wisconsin, party of the first part, and WISCONSIN ELECTRIC POWER COMPANY

a Corporation duly organized and existing under and by virtue of the laws of the State of Wisconsin, located at Milwaukee, Wisconsin, party of the second part.

Witnesseth, That the said party of the first part, for and in consideration of the sum of One Dollar ($1.00) and other good and valuable consideration

to it paid by the said party of the second part, the receipt whereof is hereby confessed and acknowledged, has given, granted, bargained, sold, remised, released, aliened, conveyed and confirmed, and by these presents does give, grant, bargain, sell, remise, release, alien, convey and confirm unto the said party of the second part, its successors and assigns forever, the following described real estate situated in the County of Racine and State of Wisconsin, to-wit:

Lots Ten (10) and Eleven (11), excepting the east fifty-eight and five tenths (58.5) feet thereof, and all of Lot Nine (9), Block Four (4), HARBOR ADDITION TO RACINE, being a subdivision of a part of the Southwest one-quarter (SW¼) of Section Nine (9), Township Three (3) North, Range Twenty-three (23) East, City of Racine.

(IF NECESSARY, CONTINUE DESCRIPTION ON REVERSE SIDE)

Together with all and singular the hereditaments and appurtenances thereunto belonging or in any wise appertaining; and all the estate, right, title, interest, claim or demand whatsoever, of the said party of the first part, either in law or equity, either in possession or expectancy of, in and to the above bargained premises, and their hereditaments and appurtenances.

To Have and to Hold the said premises as above described with the hereditaments and appurtenances, unto the said party of the second part, and to its successors and assigns FOREVER.

And the said JAMES CAPE & SONS COMPANY party of the first part, for itself and its successors, does covenant, grant, bargain and agree to and with the said party of the second part, its successors and assigns, that at the time of the ensealing and delivery of these presents it is well seized of the premises above described, as of a good, sure, perfect, absolute and indefeasible estate of inheritance in the law, in fee simple, and that the same are free and clear from all incumbrances whatever, except municipal and zoning ordinances

and that the above bargained premises in the quiet and peaceable possession of the said party of the second part, its successors and assigns, against all and every person or persons lawfully claiming the whole or any part thereof, it will forever WARRANT and DEFEND.

In Witness Whereof, the said JAMES CAPE & SONS COMPANY party of the first part, has caused these presents to be signed by B. M. Cape its President, and countersigned by W. R. Cape its Secretary, at Racine Wisconsin, and its corporate seal to be hereunto affixed, this 18th day of February A. D., 1965

JAMES CAPE & SONS COMPANY
Corporate Name

SIGNED AND SEALED IN PRESENCE OF

Thomas R. Hamilton
Thomas R. Hamilton

B. M. Cape
President

COUNTERSIGNED:

Lorn Gunderson
Lorn Gunderson

W. R. Cape
Secretary

State of Wisconsin, } ss.
Racine County. }

Personally came before me, this 18th day of February A. D., 1965 B. M. Cape, President, and W. R. Cape, Secretary of the above named Corporation, to me known to be the persons who executed the foregoing instrument, and to me known to be such President and Secretary of said Corporation, and acknowledged that they executed the foregoing instrument as such officers as the deed of said Corporation by its authority.

Thomas R. Hamilton
Notary Public, Waukesha County, Wis.
My commission (expires) (is) November 12, 1965

THIS INSTRUMENT WAS DRAFTED BY
Thomas R. Hamilton on behalf of Wisconsin Electric Power Company

NOTARY SEAL

(Section 39.31 (1) of the Wisconsin Statutes provides that any instrument to be recorded shall have plainly printed or typewritten thereon the names of the grantors, grantees, witnesses and notary. Section 39.31 similarly requires that the name of the person who, or governmental agency which, drafted such instrument, shall be printed, typewritten, stamped or written thereon in a legible manner.)

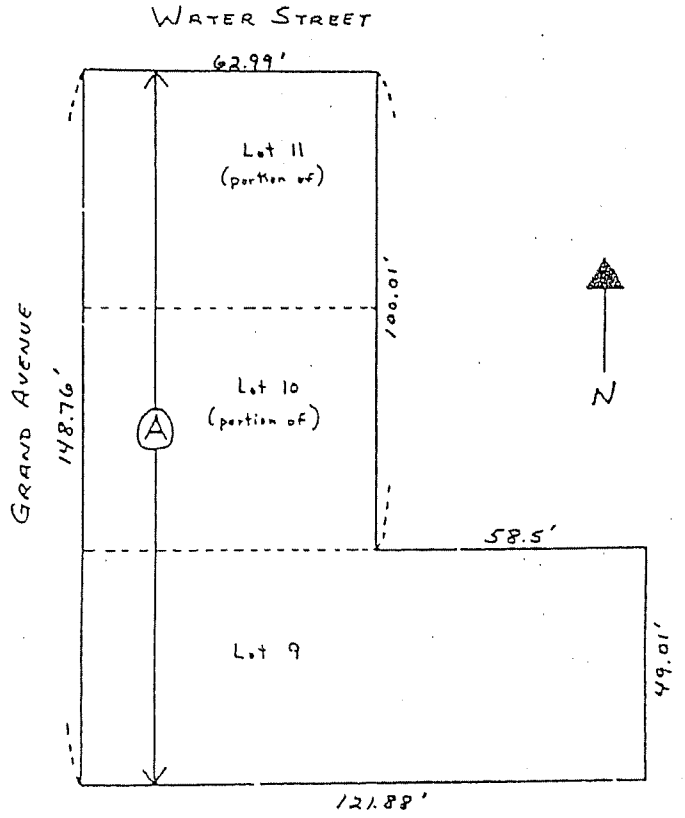
Wisconsin Legal Blank Company, Milwaukee, Wisconsin 54971

WARRANTY DEED Corporation to Corporation FORM No. 888

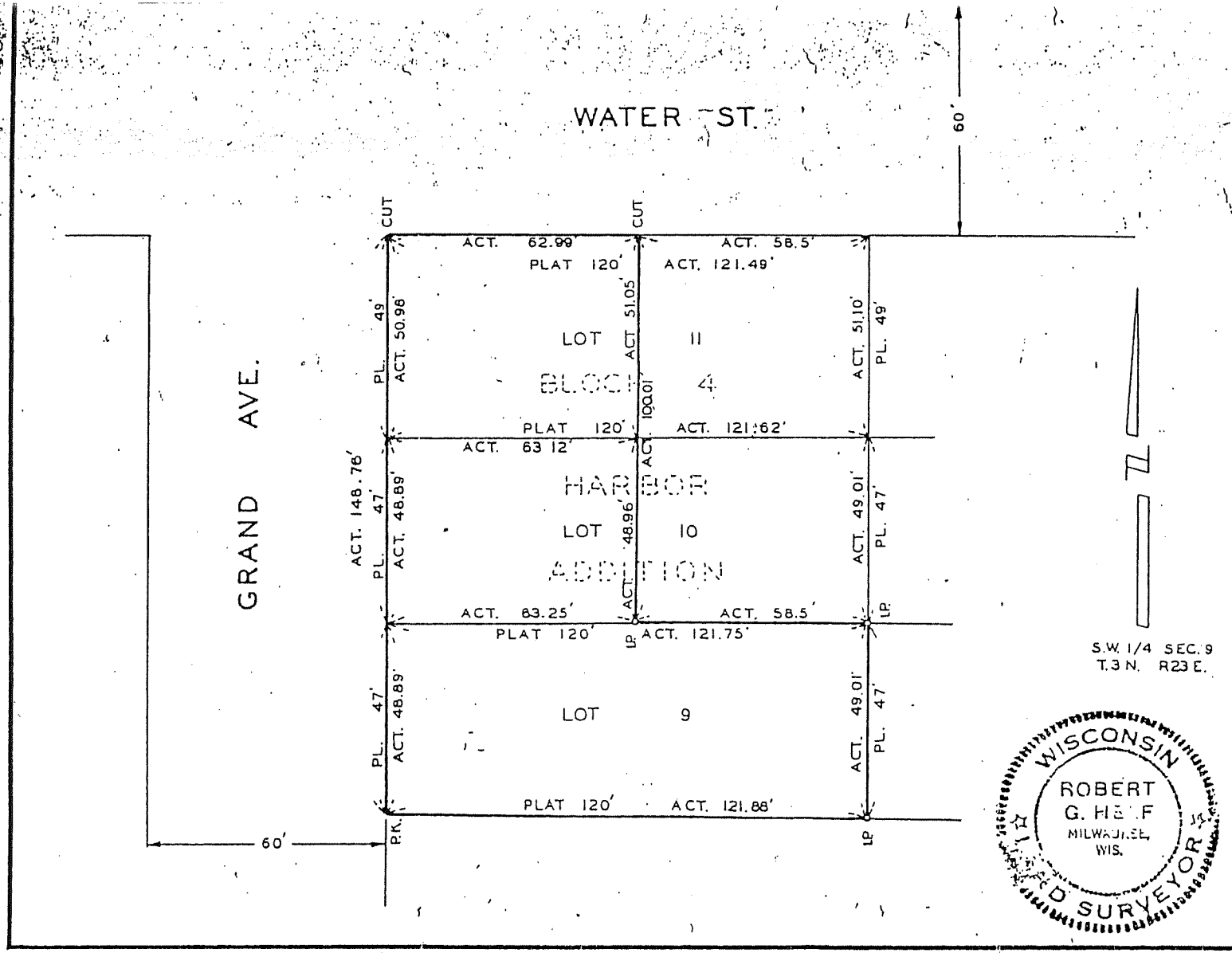
Racine County SW¼ 9-3-23

## Grand Distribution Center

Ⓐ #112543 W.D. dated 2/18/65 from James Cape + Sons Co. to WEPCo.




14F




| | |
|---|---|
| COMPANY NAME | W.E.P. CO. EXT. SYS. |
| UTILITY USE | ELECTRIC |
| LOCATION | CITY OF RACINE, RACINE CO., WISCONSIN |
| POLITICAL DISTRICT | 71 |
| WORK ORDER NO | 2600-2 |
| FORMER OWNER | J. CAPE & SONS |
| MAP AREA | D-6408C |
| SCALE | 1:30' |
| SURVEYED BY | J. HESSENTHALER |
| DATE | 21 JAN 1965 |
| APPROVED BY | [signature] |

GRAND

SUBSTATION

TD 58-2706-

M-1809

TRACT

## LEGAL DESCRIPTION CERTIFICATION

**621 Water Street and 513 Grand Avenue**

Legal Description on the Warranty Deed and Provided as Part of a WDNR GIS Registry Packet for:

WISCONSIN ELECTRIC POWER COMPANY, D/B/A WE ENERGIES
FORMER RACINE WATER AND GRAND MGP SITE
BRRTS #02-52-543766
RACINE, WISCONSIN

Lots 10 and 11 excepting the east fifty-eight and five tenths (58.5) feet thereof, and all of Lot 9, Block 4, Harbor Addition to Racine, Southeast ¼ of Southwest ¼ of Section 9 of T3N, R23E, City of Racine, Racine County, Wisconsin.

***"I certify that the attached legal description is, to the best of my knowledge, complete and accurate."***

James T Raabe

Mr. James T. Raabe
Manager of Property Management
Wisconsin Electric Power Company

6/17/09

Date

**ACKNOWLEDGEMENT OF NOTIFICATION LETTER AND LEGAL DESCRIPTION CERTIFICATION**

**601 Water Street Property**

Legal Description on the Warranty Deed and Provided as Part of a WDNR GIS Registry Packet for:

WE ENERGIES
FORMER WATER STREET AND GRAND AVENUE MGP SITE
BRRTS #02-52-543766
RACINE, WISCONSIN

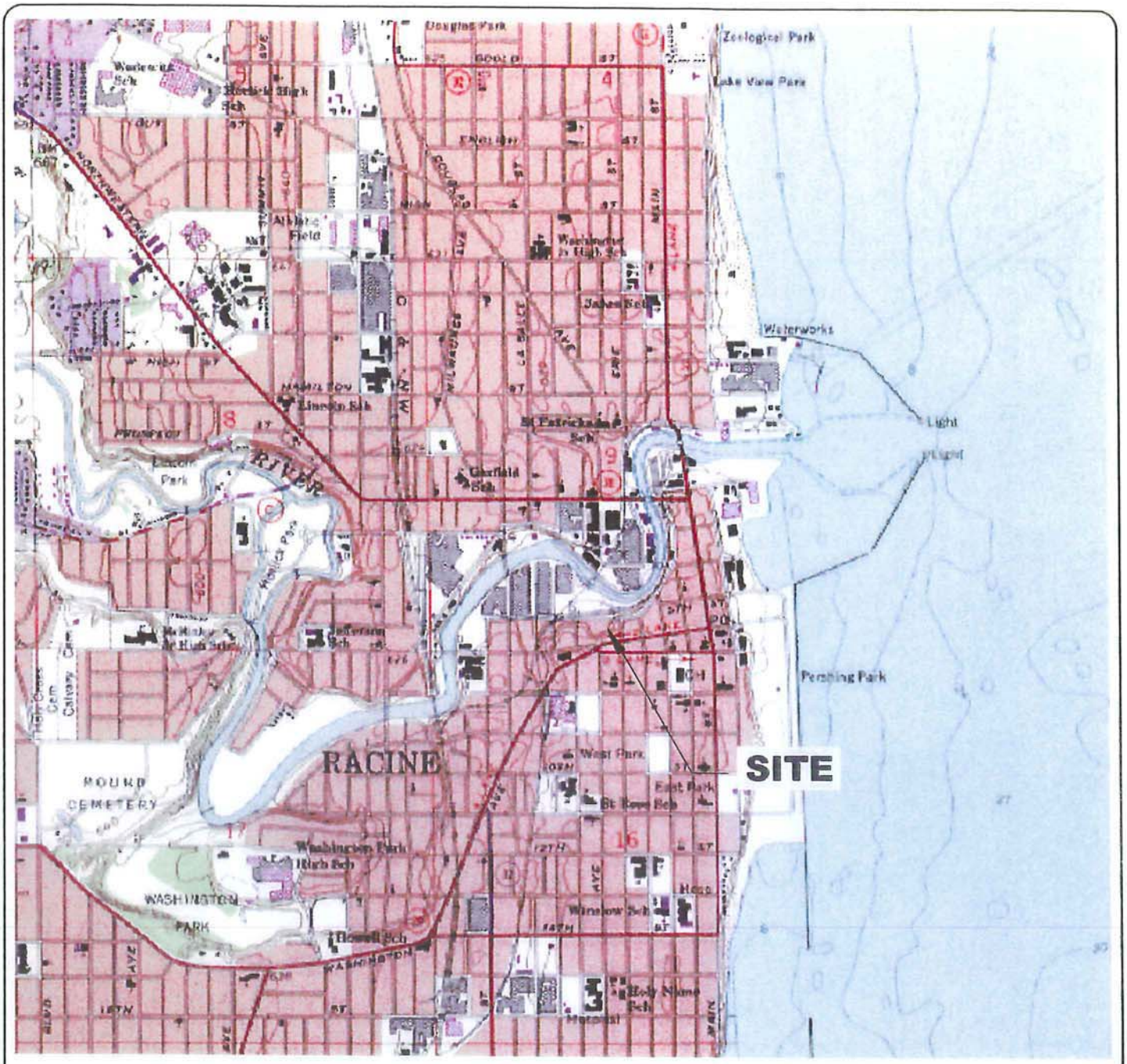
Lots 1 and 2 and the East fifty-eight and five tenths (58.5) feet of Lots 10 and 11, Block 4, Harbor Addition

Commence at the Northeast corner of Lot 1, Block 4, Harbor Addition; run thence Southerly along the Easterly line of Lots 1 and 2, Block 4, Harbor Addition 99.75 feet to the Southerly line of said Lot 2; thence Westerly along the Southerly line of said Lot 2 121.68 feet; thence continue Westerly along the Southerly line of Lot 10, Block 4, 58.50 feet; thence Northerly 99.60 feet to a point in the Northerly line of Lot 11, Block 4 that is located 58.50 feet Westerly of the Northeasterly corner of said Lot 11; run thence Easterly on the Northerly line of Lots 11 and 1 180.81 feet more or less to the point of beginning. Said land being in the City of Racine, Racine County, Wisconsin.

***"I certify that the attached legal description is, to the best of my knowledge, complete and accurate. I further acknowledge that I have received and reviewed the notification letter dated June 17, 2009 from We Energies regarding their intent to request case closure of the Former Water Street and Grand Avenue Manufactured Gas Plant (MGP) site on my property located at 601 Water Street, Racine, Wisconsin."***

Mr. Mark Ulinski
Owner

8-7-09
Date



SOURCE: EARTHVISIONS U.S. TERRAIN SERIES,
© EARTHVISIONS, INC. 603-433-8500.
USGS 7.5 MINUTE QUADRANGLE,
RACINE SOUTH. DATED 1958.
PHOTOREVISED 1971 AND 1976.

N

0 2000 4000

SCALE IN FEET

CONTOUR INTERVAL 10 FEET

Natural Resource Technology

N R T

# SITE LOCATION MAP

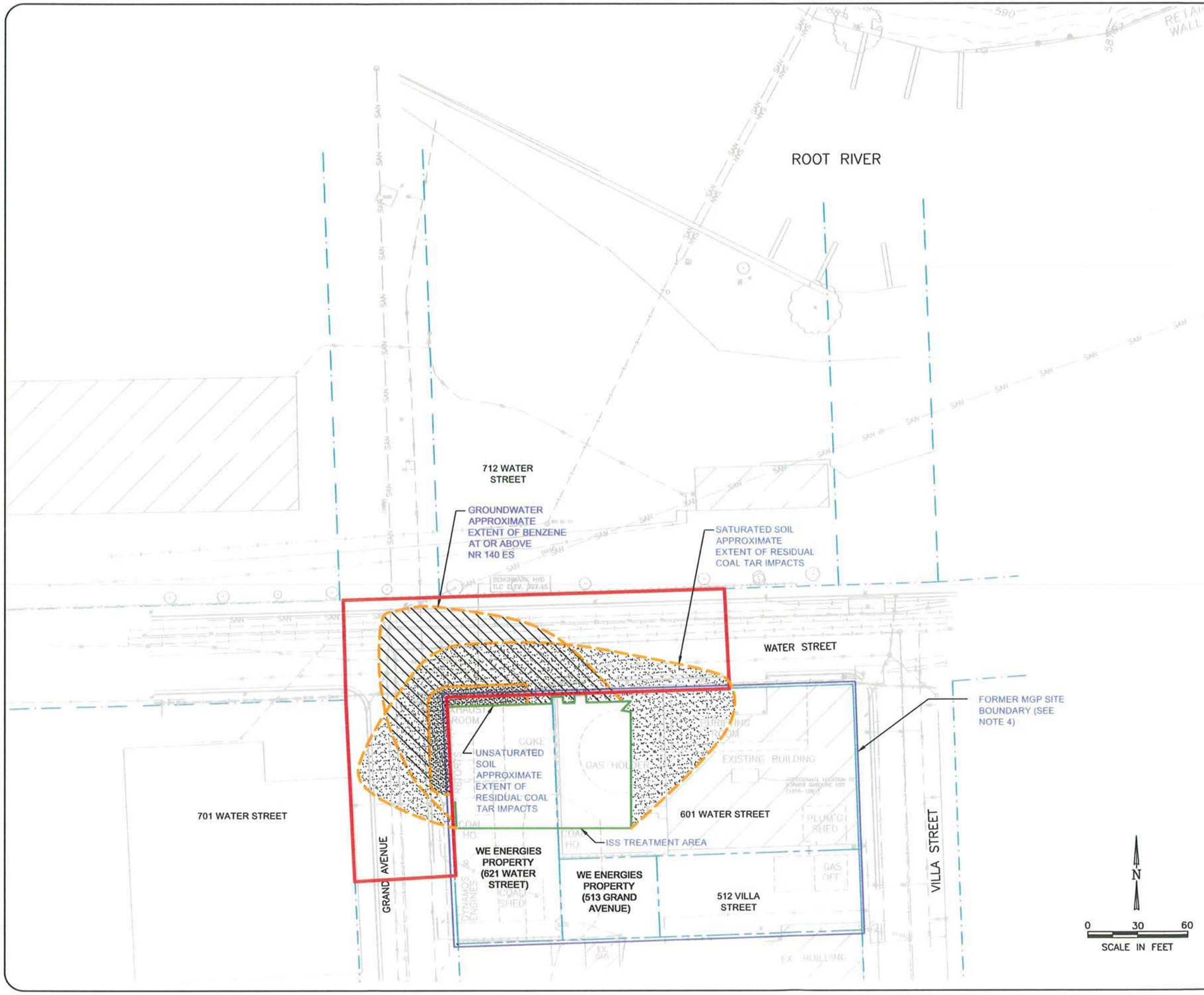
FORMER RACINE WATER AND GRAND MGP SISTE
WE ENERGIES
CITY OF RACINE, WISCONSIN

DRAWN BY: RLH APPROVED BY: JAZ DATE: 07/27/05

PROJECT NO. 1696/2

DRAWING NO. 1696-A03C

FIGURE NO. 1




**LEGEND**

- ESTIMATED EXTENT OF POTENTIALLY AFFECTED RIGHT-OF-WAY
- GROUNDWATER APPROXIMATE EXTENT OF BENZENE AT OR ABOVE NR140 ES (5µg/L) BASED ON LOG SCALE INTERPOLATION
- SATURATED SOIL APPROXIMATE EXTENT OF RESIDUAL COAL TAR IMPACTS
- UNSATURATED SOIL APPROXIMATE EXTENT OF RESIDUAL COAL TAR IMPACTS
- FORMER MGP SITE BOUNDARY
- PROPERTY BOUNDARY
- STREET RIGHT-OF-WAY
- STORM SEWER
- SANITARY SEWER
- FENCE
- GAS MAIN
- ELECTRIC LINE
- FIBER OPTIC
- TELEPHONE LINE
- WATERMAIN
- GUARD RAIL
- SANITARY MANHOLE
- STORM MANHOLE
- CATCH BASIN
- HYDRANT
- VALVE BOX
- WATER SHUT OFF
- GAS METER
- GAS SHUT OFF
- ELEC MANHOLE
- POWER POLE
- SIGN
- GUARD POST
- SANITARY (CITY RACINE WITH YEAR)
- CONIFEROUS TREE
- DECIDUOUS TREE
- MANUFACTURED GAS PLANT

GENERAL NOTES:
1. BEARING BASE: GRID NORTH, WISCONSIN COORDINATE SYSTEM, SOUTH ZONE.
2. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.
3. THE EXACT LOCATION OF UNDERGROUND STRUCTURES OR FACILITIES SHOWN ON THE PLANS ARE BASED ON AVAILABLE RECORDS AT THE TIME OF PREPARATION AND ARE NOT GUARANTEED TO BE COMPLETE OR CORRECT.
4. FORMER MGP SITE BOUNDARY SHOWN OUTSIDE OF PROPERTY LINES, FOR CLARITY. ACTUAL BOUNDARY LIMITS ARE THE PROPERTY LINES.

SOURCE NOTE:
1. THIS DRAWING WAS DEVELOPED FROM A DRAWING BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, JOB 2004.135, DRAWING NAME 20041135.DWG, DATED 05-04-04, REVISED JANUARY 2005.
2. PORTIONS OF THIS DRAWING PROVIDED BY MIDWEST ENGINEERING SERVICES, INC., PROJECT NO: 7-11017, FIGURE NO: 2, DATED 3/27/01, DIGITAL FILE SITE.DWG.
3. PORTIONS OF SANITARY AND STORM SEWER FROM MAP PROVIDED BY CITY OF RACINE.
4. ESTIMATED LOCATION OF FORMER GAS HOLDER REVISED OCTOBER 2005 BY NRT FOLLOWING TEST PIT EXCAVATION.
5. APPROXIMATE LOCATION OF BUILDINGS AT 701 WATER ST. FROM A DRAWING BY EDER ASSOCIATES.

DRAWN BY: KNW DATE: 7/15/09
CHECKED BY: HMS DATE: 7/15/09
APPROVED BY: JAZ DATE: 07/15/09
DRAWING NO: 1696-9-B04C-A
REFERENCE: .

# POST-REMEDIAL RESIDUALS SITE MAP
## SITE CLOSURE REQUEST
## FORMER RACINE WATER AND GRAND MGP SITE
## WE ENERGIES
## CITY OF RACINE, WISCONSIN

NATURAL RESOURCE TECHNOLOGY

PROJECT NO. 1696/9.0

FIGURE NO. 14

| PZ-106 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 11/17/2004 | 6-8 | <25 | nd | <10 Q | 10 |

| SB-107 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 11/17/2004 | 6.5-8 | <25 | nd | 20 | 832 |

| MW-105 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 11/15/2004 | 8-12 | *7,600* | 110,000 | ***2,100,000*** | 5,883,000 |
| 11/15/2004 | 14-16 | *13,000* | 197,000 | ***920,000*** | 2,281,100 |

| SB-118 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/5/2005 | 13-15 | <25 | nd | <2.9 | 104 |

| MW-103 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 9/7/2004 | 0-2 | 36 | 1,476 | 210 | 2,721 |
| 9/7/2004 | 4-6 | 44 | 1,014 | 170 | 5,685 |
| 9/7/2004 | 16-18 | <25 | nd | 5.2 | 124 |

| SB-117 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/4/2005 | 10-12 | <25 | nd | 22 | 293 |

| MW-104 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 9/9/2004 | 1-3 | <25 | 283 | 160 | 38,080 |
| 9/9/2004 | 9-11 | <25 | nd | 130 | 19,105 |

PZ-101R
REFER TO TABLE 8 FOR HISTORICAL FILL SOIL QUALITY DATA THAT WAS REUSED ABOVE ISS MATERIAL

EXISTING BUILDING (601 WATER STREET)

EX. BUILDING

701 WATER STREET

WATER STREET

GRAND AVENUE

DRAINAGE OUTLET

## LEGEND

| SAMPLE LOCATION | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| SAMPLE DATE | DEPTH IN FEET | BENZENE (µg/kg) | BENZENE, TOLUENE, ETHYLBENZENE, AND XYLENES (µg/kg) | NAPHTHALENE (µg/kg) | TOTAL POLYNUCLEAR AROMATIC HYDROCARBONS (µg/kg) |
| Soil Site Specific Residual Contaminant Levels (SSRCLs) (RR-682) | | | | | |
| GROUNDWATER PROTECTION | | 300 | nc | 77,000 | nc |
| Suggested Generic Soil Residual Contaminant Levels (RR-519-97, April 1997) | | | | | |
| NON-INDUSTRIAL | | ns | ns | 20,000 | ns |
| INDUSTRIAL | | ns | ns | 110,000 | ns |

DATA QUALIFIERS:

| | |
|---|---|
| *300* | CONCENTRATION EXCEEDS SSRCL FOR GROUNDWATER PROTECTION |
| *110,000* | CONCENTRATION EXCEEDS THE DIRECT CONTACT INDUSTRIAL RCL AND GROUNDWATER PROTECTION SSRCL |
| <25 | NOT DETECTED ABOVE DETECTION LIMIT SHOWN |
| nc | NOT CALCULATED |
| nd | NOT DETECTED |
| ns | STANDARD HAS NOT BEEN ESTABLISHED |
| (µg/kg) | MICROGRAMS PER KILOGRAM |

## LEGEND

- UNSATURATED SOIL APPROXIMATE EXTENT OF RESIDUAL COAL TAR IMPACTS
- SB-122 — SOIL BORING, SCREENED IF TREATED
- MW-103 — ABANDONED MONITORING WELL
- MW-103 — MONITORING WELL
- PZ-106 — PIEZOMETER
- TP-101 — TEST PIT, SCREENED IF TREATED
- FORMER MGP STRUCTURE
- ISS TREATMENT AREA (OCT./NOV. 2006)
- FENCE REPLACEMENT
- PROPERTY BOUNDARY
- STREET RIGHT-OF-WAY
- EXISTING FENCE
- OVERHEAD ELECTRIC LINE
- SANITARY MANHOLE
- STORM MANHOLE
- CATCH BASIN
- HYDRANT
- VALVE BOX
- WATER SHUT OFF
- GAS METER
- GAS SHUT OFF
- ELEC MANHOLE
- POWER POLE
- SIGN
- GUARD POST
- GUARD RAIL
- CONIFEROUS TREE
- DECIDUOUS TREE
- MGP — MANUFACTURED GAS PLANT
- ST — STORM SEWER LINE
- S — SANITARY SEWER LINE
- G — GAS MAIN
- E — ELECTRIC LINE
- FO — FIBER OPTIC LINE
- T — TELEPHONE LINE
- WM — WATERMAIN
- SAN — SANITARY SEWER LINE (CITY RACINE WITH YEAR)

GENERAL NOTES:
1. BEARING BASE: GRID NORTH, WISCONSIN COORDINATE SYSTEM, SOUTH ZONE.
2. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.
3. THE EXACT LOCATION OF UNDERGROUND STRUCTURES OR FACILITIES SHOWN ON THE PLANS ARE BASED ON AVAILABLE RECORDS AT THE TIME OF PREPARATION AND ARE NOT GUARANTEED TO BE COMPLETE OR CORRECT.
4. BENCHMARK 1: HYDRANT LOCATED AT SOUTHEAST CORNER OF WATER STREET AND GRAND AVENUE, ELEVATION = 597.45.

SOURCE NOTES:
1. THIS DRAWING WAS DEVELOPED FROM A DRAWING BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, JOB 2004.135, DRAWING NAME 2004135.DWG, DATED 05-04-04, REVISED JANUARY 2005.
2. MONITORING WELLS SURVEYED BY NIELSEN MADSEN & BARBER S.C., RACINE, WISCONSIN, SEPTEMBER 2004.
3. PORTIONS OF THIS DRAWING PROVIDED BY MIDWEST ENGINEERING SERVICES, INC., PROJECT NO: 7-11017, FIGURE NO: 2, DATED 3/27/01, DIGITAL FILE SITE.DWG.
4. PORTIONS OF SANITARY AND STORM SEWER FROM MAP PROVIDED BY CITY OF RACINE.
5. SB-104-106, SB-108, AND SB-110-121 SURVEYED BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, APRIL 2005.
6. MW-12 FIELD MEASURED BY NATURAL RESOURCE TECHNOLOGY, INC., APRIL 2005.
7. MW-10 TAKEN FROM DRAWING "BOREHOLE AND MONITORING WELL LOCATIONS", FIGURE 3, BY EDER ASSOCIATES, MADISON, WISCONSIN.
8. ESTIMATED LOCATION OF FORMER GAS HOLDER REVISED OCTOBER 2005 BY NRT FOLLOWING TEST PIT EXCAVATION.
9. APPROXIMATE LOCATION OF MW-1 AND BUILDINGS AT 701 WATER ST. FROM A DRAWING BY EDER ASSOCIATES.
10. FINAL GRADE FROM A DRAWING BY NIELSEN MADSEN AND BARBER S.C. CONSULTING CIVIL ENGINEERS AND LAND SURVEYERS, RACINE WISCONSIN, JOB 2006.206 DRAWING NAME 2006206.
11. MONITORING WELLS RE-SURVEYED BY NIELSEN MADSEN & BARBER S.C., ON JUNE 7, 2007.

N

0 15 30
SCALE IN FEET

DRAWN BY: KNW DATE: 7/15/09
CHECKED BY: HMS DATE: 7/15/09
APPROVED BY: JAZ DATE: 07/15/09
DRAWING NO: 1696-9-B03
REFERENCE: 1696 CAD ANALYTICAL 012809.xls

# POST-REMEDIAL UNSATURATED SOIL RESIDUAL IMPACTS CONTOUR MAP SITE CLOSURE REQUEST FORMER RACINE WATER AND GRAND MGP SITE WE ENERGIES CITY OF RACINE, WISCONSIN

NATURAL RESOURCE TECHNOLOGY

PROJECT NO. 1696/9.0

FIGURE NO. 10

| SAMPLE LOCATION | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| SAMPLE DATE | DEPTH IN FEET | BENZENE (µg/kg) | BENZENE, TOLUENE, ETHYLBENZENE, AND XYLENES (µg/kg) | NAPHTHALENE (µg/kg) | TOTAL POLYNUCLEAR AROMATIC HYDROCARBONS (µg/kg) |

DATA QUALIFIERS:

| | |
|---|---|
| <25 | NOT DETECTED ABOVE DETECTION LIMIT SHOWN |
| nd | NOT DETECTED |
| ** | SUSPECTED CROSS-CONTAMINATION. CONCENTRATIONS LIKELY DO NOT ACCURATELY REPRESENT SAMPLE INTERVAL. |
| * | PER SI/RAOR, PETROLEUM IMPACTS SUSPECTED, NOT RELATED TO MGP |
| (µg/kg) | MICROGRAMS PER KILOGRAM |

NOTE:
TP-103 AND TP-104 SOIL CONCENTRATIONS WERE COMPARED TO SITE SPECIFIC RESIDUAL CONTAMINATION LEVELS (SSRCLS), SOURCE OF SB-110 AND SB-111 SOIL CONCENTRATIONS TO BE MISCELLANEOUS FILL.

| PZ-106 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 11/17/2004 | 18-20 | <25 | nd | 20 | 28 |

| PZ-107 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 11/22/2004 | 18-20 | <25 | nd | 5 | 8 |

| SB-103 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 9/8/2004 | 38-40** | 330 | 1,373 | 140 | 321 |

| SB-114 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/5/2005 | 34-36 | <25 | nd | 65 | 191 |

| SB-116 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/5/2005 | 36-38 | 12,000 | 74,200 | 11,000 | 19,290 |
| 4/5/2005 | 38-40 | 82 | 129 | 15 | 15 |

| MW-103 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 9/7/2004 | 20-22 | <25 | 287 | 2,100 | 48,060 |

| SB-104 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/5/2005 | 33-35 | <25 | nd | 86 | 273 |

| SB-118 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/5/2005 | 29-31 | <25 | nd | 8 | 8.4 |

| SB-121 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/5/2005 | 17-19 | 620 | 6,700 | 41,000 | 111,700 |
| 4/5/2005 | 28-30 | <25 | 34 | 760 | 1,632 |
| 4/5/2005 | 32-34 | <25 | 80 | 100 | 192 |

| SB-119 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/5/2005 | 13-15 | <310 | 5,650 | 3,500 | 11,474 |
| 4/5/2005 | 29-30 | 2,000 | 152,000 | 480,000 | 1,028,400 |

| PZ-101 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 12/27/2004 | 50-52 (2) | <25 | nd | 21 | 60 |

| SB-120 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/4/2005 | 15-17* | <50 | 1,850 | 25,000 | 328,900 |
| 4/4/2005 | 20-22 | <25 | 170 | 360 | 4,486 |

| TP-104 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 10/11/2005 | 12 | 100 | 378 | 2,500 | 154,260 |

| SB-113 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/4/2005 | 10-12 | <25 | nd | 630 | 55,300 |
| 4/4/2005 | 23-25 | <25 | nd | 4.6 | 4.6 |

| SB-117 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/4/2005 | 23-25 | <25 | nd | 5 | 5 |

| TP-103 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 10/11/2005 | 11 | 250 | 1,045 | 1,700 | 57,520 |

| SB-112 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 4/4/2005 | 18-20 | 130 | 3,470 | 350 | 1,646 |
| 4/4/2005 | 23-25 | <25 | nd | 26 | 885 |

| MW-104 | DEPTH | BEN | BTEX | NAPH | PAH |
|---|---|---|---|---|---|
| 9/9/2004 | 21-23 | <25 | 46 | <2.8 | 19 |

LEGEND

- TP-101 — ISS TREATMENT AREA (OCT./NOV. 2006)
- TEST PIT, SCREENED IF TREATED
- MW-101 — MONITORING WELL
- PZ-106 — PIEZOMETER
- SB-101 — SOIL BORING, SCREENED IF TREATED
- MW-10 — ABANDONED MONITORING WELL
- PROPERTY BOUNDARY
- SATURATED SOIL APPROXIMATE EXTENT OF RESIDUAL COAL TAR IMPACTS
- ST — STORM SEWER
- S — SANITARY SEWER
- X — FENCE
- G — GAS MAIN
- E — ELECTRIC LINE
- FO — FIBER OPTIC
- T — TELEPHONE LINE
- STREET RIGHT-OF-WAY
- W — WATERMAIN
- G — GUARD RAIL
- PIER
- SANITARY MANHOLE
- STORM MANHOLE
- CATCH BASIN
- HYDRANT
- VALVE BOX
- WATER SHUT OFF
- GAS METER
- GAS SHUT OFF
- ELEC MANHOLE
- POWER POLE
- SIGN
- GUARD POST
- SAN — SANITARY (CITY RACINE WITH YEAR)
- CONIFEROUS TREE
- DECIDUOUS TREE
- MGP — MANUFACTURED GAS PLANT

GENERAL NOTES:
1. BEARING BASE: GRID NORTH, WISCONSIN COORDINATE SYSTEM, SOUTH ZONE.
2. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.
3. THE EXACT LOCATION OF UNDERGROUND STRUCTURES OR FACILITIES SHOWN ON THE PLANS ARE BASED ON AVAILABLE RECORDS AT THE TIME OF PREPARATION AND ARE NOT GUARANTEED TO BE COMPLETE OR CORRECT.
4. BENCHMARK 1: HYDARNT LOCATED AT SOUTHEAST CORNER OF WATER STREET AND GRAND AVENUE, ELEVATION = 597.45.

SOURCE NOTE:
1. THIS DRAWING WAS DEVELOPED FROM A DRAWING BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, JOB 2004.135, DRAWING NAME 2004135.DWG, DATED 05-04-04, REVISED JANUARY 2005.
2. MONITORING WELLS SURVEYED BY NIELSEN MADSEN & BARBER S.C., RACINE, WISCONSIN, SEPTEMBER 2004.
3. PORTIONS OF THIS DRAWING PROVIDED BY MIDWEST ENGINEERING SERVICES, INC., PROJECT NO: 7-11017, FIGURE NO: 2, DATED 3/27/01, DIGITAL FILE SITE.DWG.
4. PORTIONS OF SANITARY AND STORM SEWER FROM MAP PROVIDED BY CITY OF RACINE.
5. SB-104-106, SB-108, AND SB-110-121 SURVEYED BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, APRIL 2005.
6. MW-12 LOCATION FIELD MEASURED BY NATURAL RESOURCE TECHNOLOGY, INC. (NRT), APRIL 2005. TOP OF CASING FIELD SURVEYED BY NRT, DECEMBER 2005.
7. MW-10 TAKEN FROM DRAWING "BOREHOLE AND MONITORING WELL LOCATIONS", FIGURE 3, BY EDER ASSOCIATES, MADISON, WISCONSIN.
8. ESTIMATED LOCATION OF FORMER GAS HOLDER REVISED OCTOBER 2005 BY NRT FOLLOWING TEST PIT EXCAVATION.
9. APPROXIMATE LOCATION OF MW-1 AND BUILDINGS AT 701 WATER ST. FROM A DRAWING BY EDER ASSOCIATES.
10. MONITORING WELLS RESURVEYED BY NIELSEN MADEN AND BARBER S.C., ON JUNE 7, 2007.

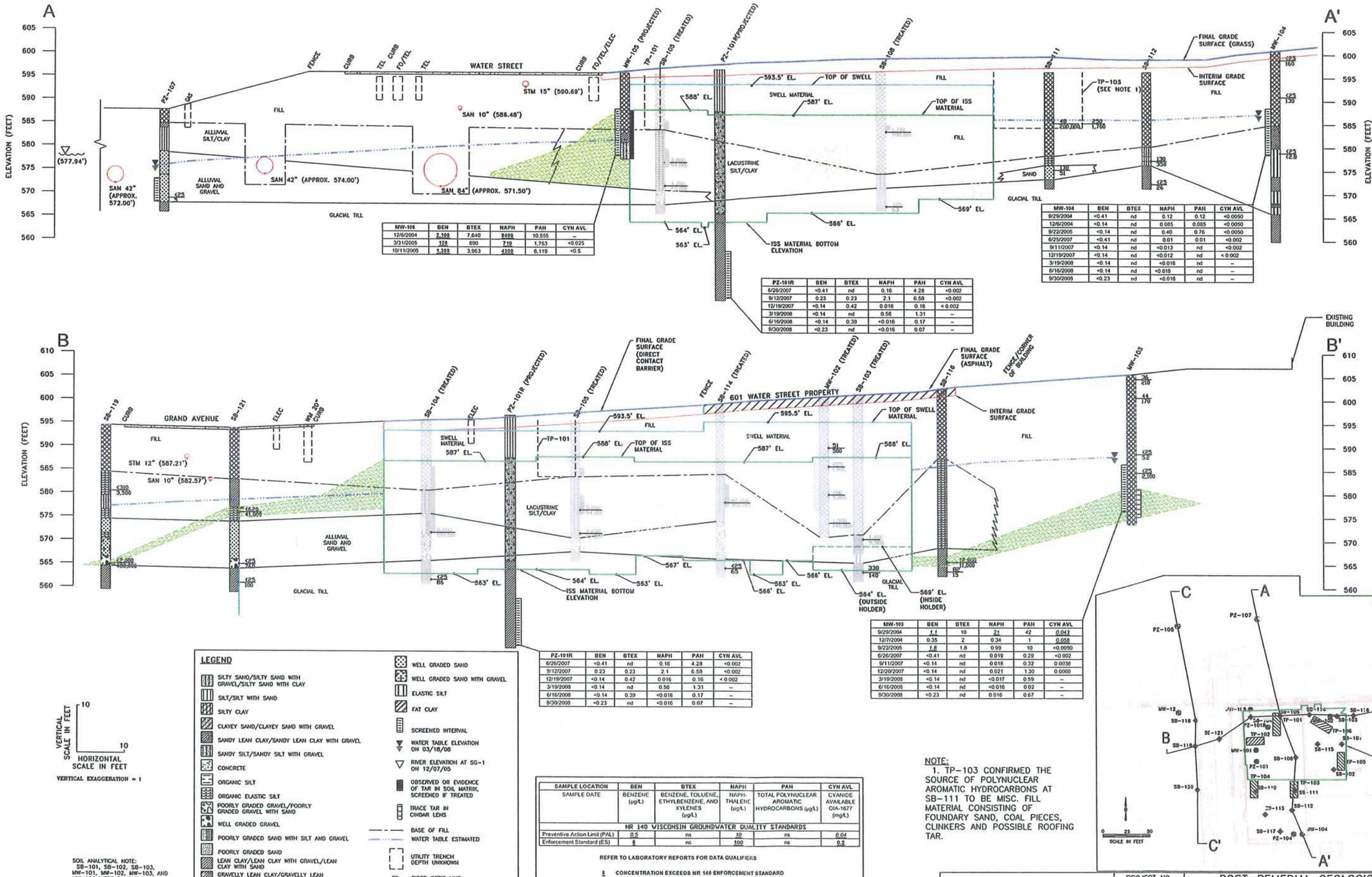
DRAWN BY: KNW DATE: 7/15/09
CHECKED BY: HMS DATE: 7/15/09
APPROVED BY: JAZ DATE: 7/15/09
DRAWING NO: 1696-9-B05-A
REFERENCE: 1696 CAD ANALYTICAL 012809.XLS

# POST-REMEDIAL SATURATED SOIL RESIDUAL IMPACTS CONTOUR MAP
## SITE CLOSURE REQUEST
## FORMER RACINE WATER AND GRAND MGP SITE
## WE ENERGIES
## CITY OF RACINE, WISCONSIN

NATURAL RESOURCE TECHNOLOGY

PROJECT NO. 1696/9

FIGURE NO. 11




| MW-105 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 12/6/2004 | 2,100 | 7,640 | 8400 | 10,555 | – |
| 3/31/2005 | 120 | 890 | 710 | 1,753 | <0.025 |
| 10/11/2005 | 1,300 | 3,963 | 4300 | 6,119 | <0.5 |

| MW-104 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 9/29/2004 | <0.41 | nd | 0.12 | 0.12 | <0.0050 |
| 12/6/2004 | <0.14 | nd | 0.095 | 0.095 | <0.0050 |
| 9/22/2005 | <0.14 | nd | 0.40 | 0.76 | <0.0050 |
| 6/25/2007 | <0.41 | nd | 0.01 | 0.01 | <0.002 |
| 9/11/2007 | <0.14 | nd | <0.013 | nd | <0.002 |
| 12/19/2007 | <0.14 | nd | <0.012 | nd | < 0.002 |
| 3/19/2008 | <0.14 | nd | <0.016 | nd | – |
| 6/16/2008 | <0.14 | nd | <0.016 | nd | – |
| 9/30/2008 | <0.23 | nd | <0.016 | nd | – |

| PZ-101R | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 6/26/2007 | <0.41 | nd | 0.16 | 4.28 | <0.002 |
| 9/12/2007 | 0.23 | 0.23 | 2.1 | 6.58 | <0.002 |
| 12/19/2007 | <0.14 | 0.42 | 0.016 | 0.16 | < 0.002 |
| 3/19/2008 | <0.14 | nd | 0.56 | 1.31 | – |
| 6/16/2008 | <0.14 | 0.39 | <0.016 | 0.17 | – |
| 9/30/2008 | <0.23 | nd | <0.016 | 0.07 | – |

| MW-103 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 9/29/2004 | 1.1 | 10 | 21 | 42 | 0.043 |
| 12/7/2004 | 0.35 | 2 | 0.34 | 1 | 0.058 |
| 9/22/2005 | 1.8 | 1.8 | 0.99 | 10 | <0.0050 |
| 6/26/2007 | <0.41 | nd | 0.019 | 0.29 | <0.002 |
| 9/11/2007 | <0.14 | nd | 0.018 | 0.32 | 0.0038 |
| 12/20/2007 | <0.14 | nd | 0.021 | 1.30 | 0.0069 |
| 3/19/2008 | <0.14 | nd | <0.017 | 0.59 | – |
| 6/16/2008 | <0.14 | nd | <0.016 | 0.02 | – |
| 9/30/2008 | <0.23 | nd | 0.016 | 0.67 | – |

| SAMPLE LOCATION | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| SAMPLE DATE | BENZENE (µg/L) | BENZENE, TOLUENE, ETHYLBENZENE, AND XYLENES (µg/L) | NAPHTHALENE (µg/L) | TOTAL POLYNUCLEAR AROMATIC HYDROCARBONS (µg/L) | CYANIDE AVAILABLE OIA-1677 (mg/L) |
| NR 140 WISCONSIN GROUNDWATER QUALITY STANDARDS | | | | | |
| Preventive Action Limit (PAL) | 0.5 | ns | 10 | ns | 0.04 |
| Enforcement Standard (ES) | 5 | ns | 100 | ns | 0.2 |

REFER TO LABORATORY REPORTS FOR DATA QUALIFIERS

| | |
|---|---|
| 5 | CONCENTRATION EXCEEDS NR 140 ENFORCEMENT STANDARD |
| 21 | CONCENTRATION EXCEEDS NR 140 PREVENTIVE ACTION LIMIT |
| < | NOT DETECTED ABOVE DETECTION LIMIT SHOWN |
| nd | NOT DETECTED |
| ns | STANDARD HAS NOT BEEN ESTABLISHED |
| (µg/L) | MICROGRAMS PER LITER |
| (mg/L) | MILLIGRAMS PER LITER |

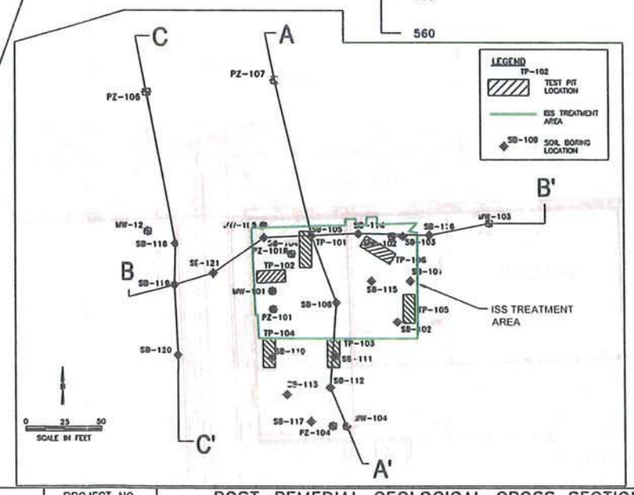
LEGEND

- SILTY SAND/SILTY SAND WITH GRAVEL/SILTY SAND WITH CLAY
- SILT/SILT WITH SAND
- SILTY CLAY
- CLAYEY SAND/CLAYEY SAND WITH GRAVEL
- SANDY LEAN CLAY/SANDY LEAN CLAY WITH GRAVEL
- SANDY SILT/SANDY SILT WITH GRAVEL
- CONCRETE
- ORGANIC SILT
- ORGANIC ELASTIC SILT
- POORLY GRADED GRAVEL/POORLY GRADED GRAVEL WITH SAND
- WELL GRADED GRAVEL
- POORLY GRADED SAND WITH SILT AND GRAVEL
- POORLY GRADED SAND
- LEAN CLAY/LEAN CLAY WITH GRAVEL/LEAN CLAY WITH SAND
- GRAVELLY LEAN CLAY/GRAVELLY LEAN CLAY WITH SAND
- POORLY GRADED SAND WITH GRAVEL
- FILL
- NO RECOVERY
- IN-SITU STABILIZATION/SOLIDIFICATION MATERIAL
- SOIL APPROXIMATE EXTENT OF RESIDUAL COAL TAR IMPACTS
- WELL GRADED SAND
- WELL GRADED SAND WITH GRAVEL
- ELASTIC SILT
- FAT CLAY
- SCREENED INTERVAL
- WATER TABLE ELEVATION ON 03/18/08
- RIVER ELEVATION AT SG-1 ON 12/07/05
- OBSERVED OR EVIDENCE OF TAR IN SOIL MATRIX, SCREENED IF TREATED
- TRACE TAR IN CINDAR LENS
- BASE OF FILL
- WATER TABLE ESTIMATED
- UTILITY TRENCH DEPTH UNKNOWN
- FO FIBER OPTIC LINE
- TEL TELEPHONE LINE
- ELEC ELECTRIC LINE
- WM WATER MAIN
- <25 / 220 BENZENE (µg/kg), SCREENED IF TREATED / NAPHTHALENE (µg/kg), SCREENED IF TREATED
- (µg/kg) MICROGRAMS PER KILOGRAM

VERTICAL SCALE IN FEET: 10
HORIZONTAL SCALE IN FEET: 10
VERTICAL EXAGGERATION = 1

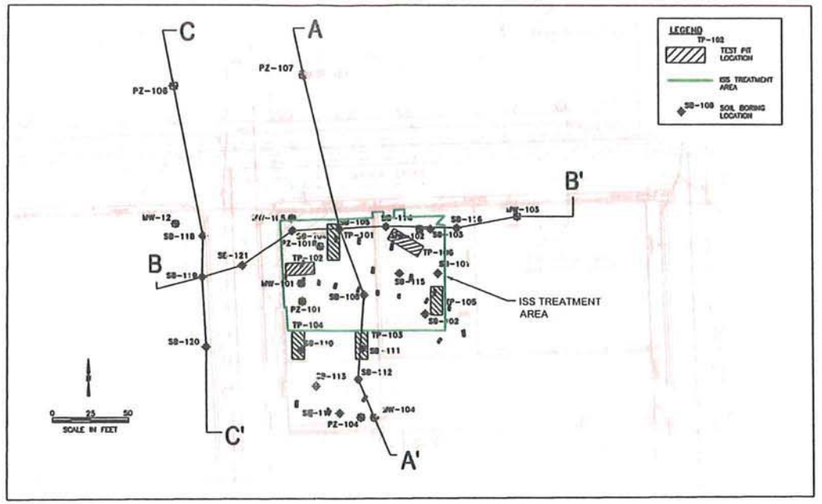
SOIL ANALYTICAL NOTE:
SB-101, SB-102, SB-103, MW-101, MW-102, MW-103, AND MW-104 WERE SAMPLED IN SEPTEMBER 2004. MW-105, PZ-106, AND PZ-107 WERE SAMPLED IN NOVEMBER 2004. PZ-101 WAS SAMPLED IN DECEMBER 2004. SB-104, SB-105, SB-106, AND SB-110, THROUGH SB-121 WERE SAMPLED APRIL 2005.

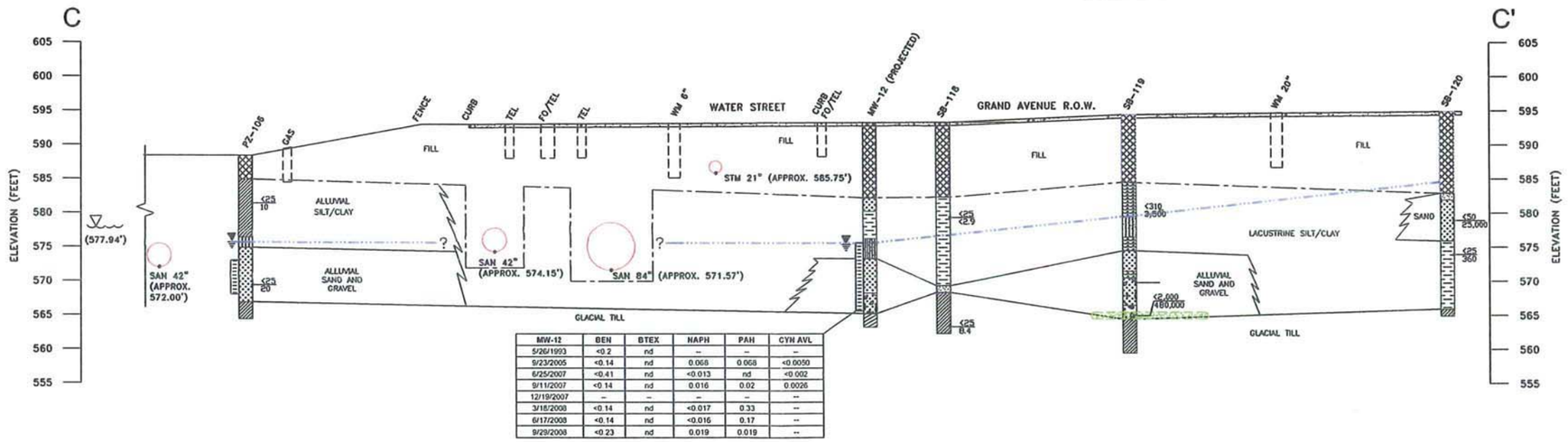
NOTE:
1. TP-103 CONFIRMED THE SOURCE OF POLYNUCLEAR AROMATIC HYDROCARBONS AT SB-111 TO BE MISC. FILL MATERIAL CONSISTING OF FOUNDARY SAND, COAL PIECES, CLINKERS AND POSSIBLE ROOFING TAR.




NATURAL RESOURCE TECHNOLOGY

| | |
|---|---|
| PROJECT NO. 1696/9.0 | POST-REMEDIAL GEOLOGICAL CROSS SECTIONS A-A' AND B-B' |
| DRAWN BY: KNW 7/15/09 | SITE CLOSURE REQUEST |
| CHECKED BY: HMS 7/15/09 | FORMER RACINE WATER AND GRAND MGP SITE |
| APPROVED BY: JAZ 7/15/09 | WE ENERGIES RACINE, WISCONSIN |
| DRAWING NO: 1696-9-D01C LAYOUT 1 | SHEET NO. 4 |
| REFERENCE: - | |




| MW-12 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 5/26/1993 | <0.2 | nd | -- | -- | -- |
| 9/23/2005 | <0.14 | nd | 0.068 | 0.068 | <0.0050 |
| 6/25/2007 | <0.41 | nd | <0.013 | nd | <0.002 |
| 9/11/2007 | <0.14 | nd | 0.016 | 0.02 | 0.0026 |
| 12/19/2007 | -- | -- | -- | -- | -- |
| 3/18/2008 | <0.14 | nd | <0.017 | 0.33 | -- |
| 6/17/2008 | <0.14 | nd | <0.016 | 0.17 | -- |
| 9/29/2008 | <0.23 | nd | 0.019 | 0.019 | -- |

VERTICAL SCALE IN FEET 10
HORIZONTAL SCALE IN FEET 10
VERTICAL EXAGGERATION = 1

LEGEND

- SILTY SAND/SILTY SAND WITH GRAVEL/SILTY SAND WITH CLAY
- SILT/SILT WITH SAND
- SILTY CLAY
- CLAYEY SAND/CLAYEY SAND WITH GRAVEL
- SANDY LEAN CLAY/SANDY LEAN CLAY WITH GRAVEL
- SANDY SILT/SANDY SILT WITH GRAVEL
- CONCRETE
- ORGANIC SILT
- ORGANIC ELASTIC SILT
- POORLY GRADED GRAVEL/POORLY GRADED GRAVEL WITH SAND
- WELL GRADED GRAVEL
- POORLY GRADED SAND WITH SILT AND GRAVEL
- POORLY GRADED SAND
- LEAN CLAY/LEAN CLAY WITH GRAVEL/LEAN CLAY WITH SAND
- GRAVELLY LEAN CLAY/GRAVELLY LEAN CLAY WITH SAND
- POORLY GRADED SAND WITH GRAVEL
- FILL
- NO RECOVERY
- IN-SITU STABILIZATION/SOLIDIFICATION MATERIAL
- SOIL APPROXIMATE EXTENT OF RESIDUAL COAL TAR IMPACTS
- WELL GRADED SAND
- WELL GRADED SAND WITH GRAVEL
- ELASTIC SILT
- FAT CLAY
- SCREENED INTERVAL
- WATER TABLE ELEVATION ON 03/18/08
- RIVER ELEVATION AT SG-1 ON 12/07/05
- OBSERVED OR EVIDENCE OF TAR IN SOIL MATRIX, SCREENED IF TREATED
- TRACE TAR IN CINDAR LENS
- BASE OF FILL
- WATER TABLE ESTIMATED
- UTILITY TRENCH DEPTH UNKNOWN
- FO FIBER OPTIC LINE
- TEL TELEPHONE LINE
- ELEC ELECTRIC LINE
- WM WATER MAIN
- <25 / 220 BENZENE (µg/kg), SCREENED IF TREATED / NAPHTHALENE (µg/kg), SCREENED IF TREATED
- (µg/kg) MICROGRAMS PER KILOGRAM

| SAMPLE LOCATION / SAMPLE DATE | BEN BENZENE (µg/L) | BTEX BENZENE, TOLUENE, ETHYLBENZENE, AND XYLENES (µg/L) | NAPH NAPHTHALENE (µg/L) | PAH TOTAL POLYNUCLEAR AROMATIC HYDROCARBONS (µg/L) | CYN AVL CYANIDE AVAILABLE OIA-1677 (mg/L) |
|---|---|---|---|---|---|
| NR 140 WISCONSIN GROUNDWATER QUALITY STANDARDS | | | | | |
| Preventive Action Limit (PAL) | 0.5 | ns | 10 | ns | 0.04 |
| Enforcement Standard (ES) | 5 | ns | 100 | ns | 0.2 |

REFER TO LABORATORY REPORTS FOR DATA QUALIFIERS

- 5 CONCENTRATION EXCEEDS NR 140 ENFORCEMENT STANDARD
- 21 CONCENTRATION EXCEEDS NR 140 PREVENTIVE ACTION LIMIT
- < NOT DETECTED ABOVE DETECTION LIMIT SHOWN
- nd NOT DETECTED
- ns STANDARD HAS NOT BEEN ESTABLISHED
- (µg/L) MICROGRAMS PER LITER
- (mg/L) MILLIGRAMS PER LITER

SOIL ANALYTICAL NOTE:
SB-101, SB-102, SB-103, MW-101, MW-102, MW-103, AND MW-104 WERE SAMPLED IN SEPTEMBER 2004. MW-105, PZ-106, AND PZ-107 WERE SAMPLED IN NOVEMBER 2004. PZ-101 WAS SAMPLED IN DECEMBER 2004. SB-104, SB-105, SB-108, AND SB-110, THROUGH SB-121 WERE SAMPLED APRIL 2005.

NATURAL RESOURCE TECHNOLOGY

| | |
|---|---|
| PROJECT NO. 1696/9.0 | POST-REMEDIAL GEOLOGICAL CROSS SECTIONS C-C' |
| DRAWN BY: KNW 07/15/09 | SITE CLOSURE REQUEST<br>FORMER RACINE WATER AND GRAND MGP SITE<br>WE ENERGIES<br>RACINE, WISCONSIN |
| CHECKED BY: HMS 07/15/09 | |
| APPROVED BY: JAZ 07/15/09 | DRAWING NO: 1696-9-D01C LAYOUT 2 |
| | REFERENCE: . |
| | SHEET NO. 5 |

| PZ-106 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 12/6/2004 | 0.36 | 0.36 | 2.5 | 3 | <0.0050 |
| 3/31/2005 | <0.14 | nd | <0.023 | nd | <0.0050 |
| 9/23/2005 | <0.14 | nd | 1.4 | 1.6 | <0.0050 |
| 6/26/2007 | <0.41 | nd | <0.12 | nd | <0.002 |
| 9/12/2007 | <0.14 | nd | <0.012 | 0.0093 | 0.0037 |
| 12/19/2007 | <0.14 | nd | <0.012 | nd | 0.0047 |
| 3/18/2008 | <0.14 | nd | <0.016 | nd | -- |
| 6/17/2008 | <0.14 | nd | 0.017 | 0.017 | -- |
| 9/30/2008 | <0.23 | nd | 0.049 | 0.063 | -- |

ASPHALT

PZ-106

| MW-105 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 12/6/2004 | 2,100 | 7,640 | 9400 | 10,555 | -- |
| 3/31/2005 | 120 | 890 | 710 | 1,753 | <0.025 |
| 10/11/2005 | 1,300 | 3,963 | 4300 | 6,119 | <0.5 |

PZ-107

| PZ-107 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 12/6/2004 | 0.24 | 0.24 | 0.29 | 0.4 | <0.0050 |
| 3/31/2005 | <0.14 | nd | 0.046 | 0.05 | <0.0050 |
| 9/23/2005 | <0.14 | nd | 0.036 | 0.036 | <0.0050 |
| 6/26/2007 | <0.41 | nd | 0.014 | 0.014 | <0.002 |
| 9/12/2007 | <0.14 | nd | <0.012 | nd | 0.004 |
| 12/20/2007 | <0.14 | nd | <0.013 | nd | 0.0046 |
| 3/18/2008 | <0.14 | nd | <0.017 | nd | -- |
| 6/17/2008 | <0.14 | nd | <0.016 | nd | -- |
| 9/29/2008 | <0.23 | nd | <0.016 | nd | -- |

| SAMPLE LOCATION / SAMPLE DATE | BEN (µg/L) | BTEX (µg/L) | NAPH (µg/L) | PAH (µg/L) | CYN AVL (mg/L) |
|---|---|---|---|---|---|
| NR 140 WISCONSIN GROUNDWATER QUALITY STANDARDS | | | | | |
| Preventive Action Limit (PAL) | 0.5 | ns | 10 | ns | 0.04 |
| Enforcement Standard (ES) | 5 | ns | 100 | ns | 0.2 |

REFER TO LABORATORY REPORTS FOR DATA QUALIFIERS

| | |
|---|---|
| 5 | CONCENTRATION EXCEEDS NR 140 ENFORCEMENT STANDARD |
| 21 | CONCENTRATION EXCEEDS NR 140 PREVENTIVE ACTION LIMIT |
| < | NOT DETECTED ABOVE DETECTION LIMIT SHOWN |
| nd | NOT DETECTED |
| ns | STANDARD HAS NOT BEEN ESTABLISHED |
| (µg/L) | MICROGRAMS PER LITER |
| (mg/L) | MILLIGRAMS PER LITER |

| MW-103 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 9/29/2004 | 1.1 | 10 | 21 | 42 | 0.043 |
| 12/7/2004 | 0.35 | 2 | 0.34 | 1 | 0.058 |
| 9/22/2005 | 1.8 | 1.8 | 0.99 | 10 | <0.0050 |
| 6/26/2007 | <0.41 | nd | 0.019 | 0.29 | <0.002 |
| 9/11/2007 | <0.14 | nd | 0.018 | 0.32 | 0.0038 |
| 12/20/2007 | <0.14 | nd | 0.021 | 1.30 | 0.0069 |
| 3/19/2008 | <0.14 | nd | <0.017 | 0.59 | -- |
| 6/16/2008 | <0.14 | nd | <0.016 | 0.02 | -- |
| 9/30/2008 | <0.23 | nd | 0.016 | 0.67 | -- |

N

0 15 30

SCALE IN FEET

MW-12

MW-105

MW-103

PZ-101R

PZ-104

MW-104

| MW-102 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 9/29/2004 | 5.2 | 56 | 34 | 70 | <0.0050 |
| 12/7/2004 | 14 | 76 | 58 | 37 | <0.0050 |
| 9/21/2005 | 66 | 92 | 13 | 10 | <0.0050 |

| PZ-101R | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 6/26/2007 | <0.41 | nd | 0.16 | 4.28 | <0.002 |
| 9/12/2007 | 0.23 | 0.23 | 2.1 | 6.58 | <0.002 |
| 12/19/2007 | <0.14 | 0.42 | 0.016 | 0.16 | < 0.002 |
| 3/19/2008 | <0.14 | nd | 0.56 | 1.31 | -- |
| 6/16/2008 | <0.14 | 0.39 | <0.016 | 0.17 | -- |
| 9/30/2008 | <0.23 | nd | <0.016 | 0.07 | -- |

| MW-12 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 5/26/1993 | <0.2 | nd | -- | -- | -- |
| 9/23/2005 | <0.14 | nd | 0.068 | 0.068 | <0.0050 |
| 6/25/2007 | <0.41 | nd | <0.013 | nd | <0.002 |
| 9/11/2007 | <0.14 | nd | 0.016 | 0.02 | 0.0026 |
| 12/19/2007 | -- | -- | -- | -- | -- |
| 3/18/2008 | <0.14 | nd | <0.017 | 0.33 | -- |
| 6/17/2008 | <0.14 | nd | <0.016 | 0.17 | -- |
| 9/29/2008 | <0.23 | nd | 0.019 | 0.019 | -- |

| MW-101 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 9/29/2004 | 629 | 5,190 | 3,900 | 5,076 | 0.052 |
| 12/6/2004 | 990 | 8,070 | 3,660 | 3,537 | <0.01 |
| 9/22/2005 | 358 | 1642 | 1,500 | 2,287 | <0.0050 |

| PZ-101 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 12/6/2004 | <0.41 | nd | 0.28 | 1 | <0.025 |
| 3/31/2005 | <0.14 | nd | 0.047 | 0.1 | <0.0050 |
| 9/22/2005 | <0.14 | nd | 0.9 | 0.92 | <0.0050 |

| PZ-104 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 6/25/2007 | <0.41 | nd | 0.046 | 0.06 | <0.002 |
| 9/11/2007 | <0.14 | nd | <0.012 | nd | <0.002 |
| 12/19/2007 | <0.14 | nd | <0.012 | nd | <0.002 |
| 3/19/2008 | <0.14 | nd | <0.017 | 0.006 | -- |
| 6/16/2008 | <0.14 | 0.5 | 0.02 | 0.024 | -- |
| 9/29/2008 | <0.23 | nd | <0.016 | nd | -- |

| MW-104 | BEN | BTEX | NAPH | PAH | CYN AVL |
|---|---|---|---|---|---|
| 9/29/2004 | <0.41 | nd | 0.12 | 0.12 | <0.0050 |
| 12/6/2004 | <0.14 | nd | 0.085 | 0.085 | <0.0050 |
| 9/22/2005 | <0.14 | nd | 0.40 | 0.76 | <0.0050 |
| 6/25/2007 | <0.41 | nd | 0.01 | 0.01 | <0.002 |
| 9/11/2007 | <0.14 | nd | <0.013 | nd | <0.002 |
| 12/19/2007 | <0.14 | nd | <0.012 | nd | < 0.002 |
| 3/19/2008 | <0.14 | nd | <0.016 | nd | -- |
| 6/16/2008 | <0.14 | nd | <0.016 | nd | -- |
| 9/30/2008 | <0.23 | nd | <0.016 | nd | -- |

LEGEND

- GROUNDWATER APPROXIMATE EXTENT OF BENZENE AT OR ABOVE ES(5 µg/L) BASED ON LOG SCALE INTERPOLATION
- GROUNDWATER APPROXIMATE EXTENT OF NAPHTHALENE AT OR ABOVE ES (100 µg/L) BASED ON LOG SCALE
- MW-103 MONITORING WELL
- PZ-106 PIEZOMETER
- ABANDONED MONITORING WELL
- GROUNDWATER FLOW DIRECTION
- FORMER MGP STRUCTURE
- ISS TREATMENT AREA (OCT./NOV. 2006)
- FENCE REPLACEMENT
- PROPERTY BOUNDARY
- STREET RIGHT-OF-WAY
- EXISTING FENCE
- OVERHEAD ELECTRIC LINE
- SANITARY MANHOLE
- STORM MANHOLE
- CATCH BASIN
- HYDRANT
- VALVE BOX
- WATER SHUT OFF
- GAS METER
- GAS SHUT OFF
- ELEC MANHOLE
- POWER POLE
- SIGN
- GUARD POST
- GUARD RAIL
- CONIFEROUS TREE
- DECIDUOUS TREE
- MGP MANUFACTURED GAS PLANT
- STORM SEWER LINE
- SANITARY SEWER LINE
- GAS MAIN
- ELECTRIC LINE
- FIBER OPTIC LINE
- TELEPHONE LINE
- WATERMAIN
- SANITARY SEWER LINE (CITY RACINE WITH YEAR)

GENERAL NOTES:
1. BEARING BASE: GRID NORTH, WISCONSIN COORDINATE SYSTEM, SOUTH ZONE.
2. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.
3. THE EXACT LOCATION OF UNDERGROUND STRUCTURES OR FACILITIES SHOWN ON THE PLANS ARE BASED ON AVAILABLE RECORDS AT THE TIME OF PREPARATION AND ARE NOT GUARANTEED TO BE COMPLETE OR CORRECT.
4. BENCHMARK 1: HYDRANT LOCATED AT SOUTHEAST CORNER OF WATER STREET AND GRAND AVENUE, ELEVATION = 597.45.

SOURCE NOTES:
1. THIS DRAWING WAS DEVELOPED FROM A DRAWING BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, JOB 2004.135, DRAWING NAME 2004135.DWG, DATED 05-04-04, REVISED JANUARY 2005.
2. MONITORING WELLS SURVEYED BY NIELSEN MADSEN & BARBER S.C., RACINE, WISCONSIN, SEPTEMBER 2004.
3. PORTIONS OF THIS DRAWING PROVIDED BY MIDWEST ENGINEERING SERVICES, INC., PROJECT NO: 7-11017, FIGURE NO: 2, DATED 3/27/01, DIGITAL FILE SITE.DWG.
4. PORTIONS OF SANITARY AND STORM SEWER FROM MAP PROVIDED BY CITY OF RACINE.
5. SB-104-106, SB-108, AND SB-110-121 SURVEYED BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, APRIL 2005.
6. MW-12 FIELD MEASURED BY NATURAL RESOURCE TECHNOLOGY, INC., APRIL 2005.
7. MW-10 TAKEN FROM DRAWING "BOREHOLE AND MONITORING WELL LOCATIONS", FIGURE 3, BY EDER ASSOCIATES, MADISON, WISCONSIN.
8. ESTIMATED LOCATION OF FORMER GAS HOLDER REVISED OCTOBER 2005 BY NRT FOLLOWING TEST PIT EXCAVATION.
9. APPROXIMATE LOCATION OF MW-1 AND BUILDINGS AT 701 WATER ST. FROM A DRAWING BY EDER ASSOCIATES.
10. FINAL GRADE FROM A DRAWING BY NIELSEN MADSEN AND BARBER S.C. CONSULTING CIVIL ENGINEERS AND LAND SURVEYERS, RACINE WISCONSIN. JOB 2006.206 DRAWING NAME 2006206.
11. MONITORING WELLS RE-SURVEYED BY NIELSEN MADSEN & BARBER S.C., ON JUNE 7, 2007.

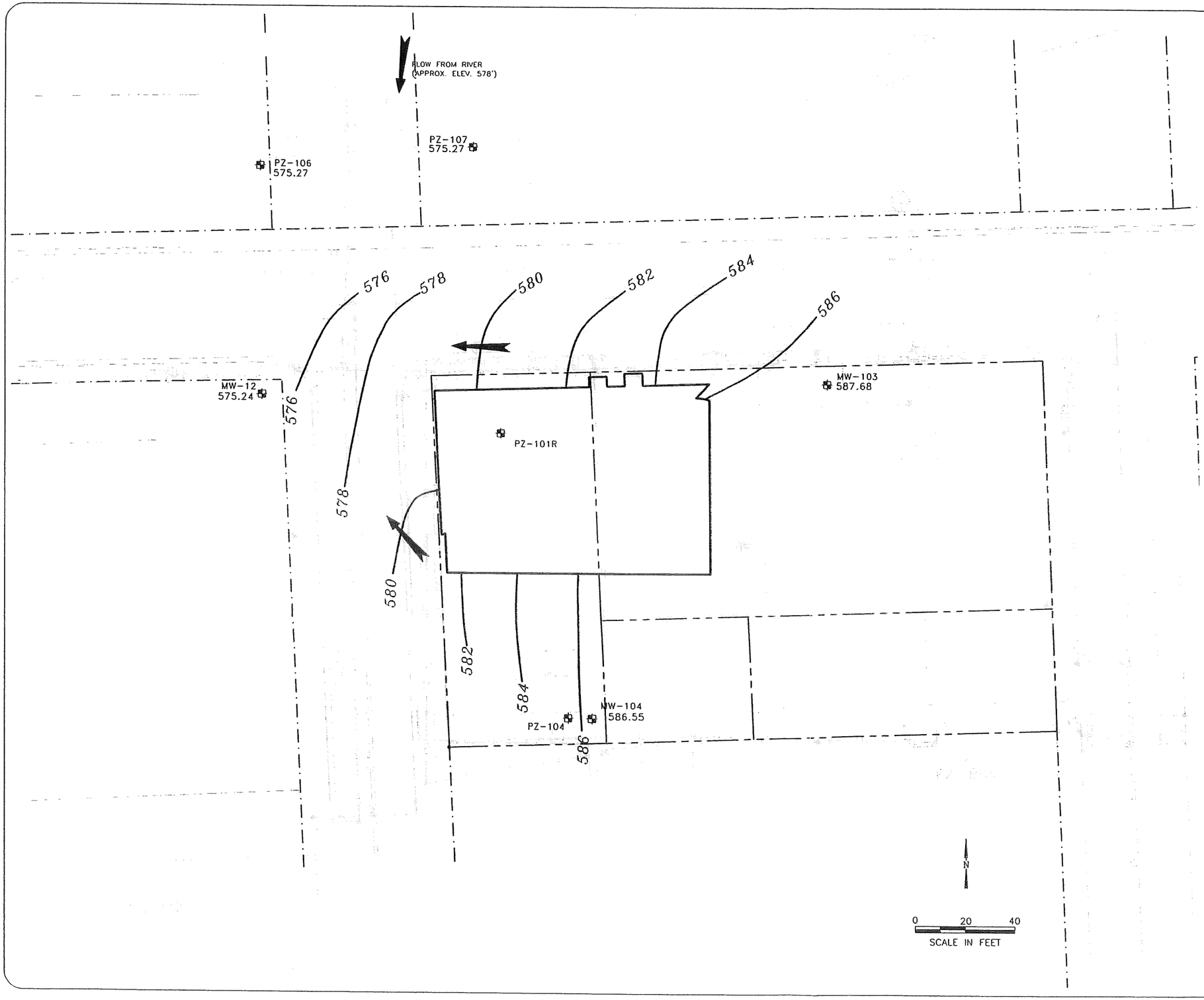
DRAWN BY: KNW DATE: 7/15/09
CHECKED BY: HMS DATE: 7/15/09
APPROVED BY: JAZ DATE: 7/15/09
DRAWING NO: 1696-9-B02
REFERENCE: 1696/CAD-1696/CAD WATER ANAL TABLES

# RESIDUAL GROUNDWATER CONTAMINATION EXTENT SITE CLOSURE REQUEST
## FORMER RACINE WATER AND GRAND MGP SITE
## WE ENERGIES
## CITY OF RACINE, WISCONSIN

NATURAL RESOURCE TECHNOLOGY

PROJECT NO. 1696/9.0

FIGURE NO. 13




LEGEND

- 578 — GROUNDWATER ELEVATION CONTOUR, FT.
- GROUNDWATER FLOW DIRECTION
- MW-103 587.65 — MONITORING WELL AND GROUNDWATER ELEVATION, FT.
- PZ-106 575.37 — PIEZOMETER AND GROUNDWATER ELEVATION, FT.
- FORMER MGP STRUCTURE
- ISS TREATMENT AREA (OCT./NOV. 2006)
- FENCE REPLACEMENT
- PROPERTY BOUNDARY
- EXISTING FENCE
- STREET RIGHT-OF-WAY
- OVERHEAD ELECTRIC LINE
- SANITARY MANHOLE
- STORM MANHOLE
- CATCH BASIN
- HYDRANT
- VALVE BOX
- WATER SHUT OFF
- GAS METER
- GAS SHUT OFF
- ELEC MANHOLE
- POWER POLE
- SIGN
- GUARD POST
- GUARD RAIL
- CONIFEROUS TREE
- DECIDUOUS TREE
- MGP — MANUFACTURED GAS PLANT
- STORM SEWER LINE
- SANITARY SEWER LINE
- GAS MAIN
- ELECTRIC LINE
- FIBER OPTIC LINE
- TELEPHONE LINE
- WATERMAIN
- SANITARY SEWER LINE (CITY RACINE WITH YEAR)

GENERAL NOTES:
1. BEARING BASE: GRID NORTH, WISCONSIN COORDINATE SYSTEM, SOUTH ZONE.
2. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.
3. THE EXACT LOCATION OF UNDERGROUND STRUCTURES OR FACILITIES SHOWN ON THE PLANS ARE BASED ON AVAILABLE RECORDS AT THE TIME OF PREPARATION AND ARE NOT GUARANTEED TO BE COMPLETE OR CORRECT.
4. BENCHMARK 1: HYDRANT LOCATED AT SOUTHEAST CORNER OF WATER STREET AND GRAND AVENUE, ELEVATION = 597.45.

SOURCE NOTES:
1. THIS DRAWING WAS DEVELOPED FROM A DRAWING BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, JOB 2004.135, DRAWING NAME 2004135.DWG, DATED 05-04-04, REVISED JANUARY 2005.
2. MONITORING WELLS SURVEYED BY NIELSEN MADSEN & BARBER S.C., RACINE, WISCONSIN, SEPTEMBER 2004.
3. PORTIONS OF THIS DRAWING PROVIDED BY MIDWEST ENGINEERING SERVICES, INC., PROJECT NO: 7-11017, FIGURE NO: 2, DATED 3/27/01, DIGITAL FILE SITE.DWG.
4. PORTIONS OF SANITARY AND STORM SEWER FROM MAP PROVIDED BY CITY OF RACINE.
5. SB-104-106, SB-108, AND SB-110-121 SURVEYED BY NIELSEN MADSEN & BARBER S.C., CONSULTING CIVIL ENGINEERS AND LAND SURVEYORS, RACINE, WISCONSIN, APRIL 2005.
6. MW-12 FIELD MEASURED BY NATURAL RESOURCE TECHNOLOGY, INC., APRIL 2005.
7. ESTIMATED LOCATION OF FORMER GAS HOLDER REVISED OCTOBER 2005 BY NRT FOLLOWING TEST PIT EXCAVATION.
8. APPROXIMATE LOCATION OF MW-1 AND BUILDINGS AT 701 WATER ST. FROM A DRAWING BY EDER ASSOCIATES.
9. FINAL GRADE FROM A DRAWING BY NIELSEN MADSEN AND BARBER S.C. CONSULTING CIVIL ENGINEERS AND LAND SURVEYERS, RACINE WISCONSIN, JOB 2006.206 DRAWING NAME 2006206.
10. MONITORING WELLS RE-SURVEYED BY NIELSEN MADSEN & BARBER S.C., ON JUNE 7, 2007.

DRAWN BY: KNW DATE: 7/15/09
CHECKED BY: HMS DATE: 7/15/09
APPROVED BY: JAZ DATE: 7/15/09
DRAWING NO: 1696-9-B01
REFERENCE: .

# GROUNDWATER ELEVATION CONTOURS
## SEPTEMBER 29-30, 2008
## SITE CLOSURE REQUEST
## FORMER RACINE WATER AND GRAND MGP SITE
## WE ENERGIES
## CITY OF RACINE, WISCONSIN

NATURAL RESOURCE TECHNOLOGY

PROJECT NO. 1696/9.0

FIGURE NO. 12

**Table 8. Summary of Soil Remaining Analytical Results**
**We Energies**
**Former MGP Water Street and Grand Avenue, Racine, WI**

| Sample Location | Sample Date | Sample Depth (feet) | MGP Residuals | Depth to Water Table (feet) | Arsenic | Lead | Benzene | Toluene | Ethylbenzene | Xylenes, Total | BTEX, Total | Acenaphthene | Acenaphthylene | Anthracene | Benz[a]anthracene | Benzo[a]pyrene | Benzo[b]fluoranthene | Benzo[g,h,i]perylene | Benzo[k]fluoranthene | Chrysene | Dibenz[a,h]anthracene | Fluoranthene | Fluorene | Indeno(1,2,3-cd)pyrene | Naphthalene | 2-Methylnaphthalene | 1-Methylnaphthalene | Phenanthrene | Pyrene | Total PAHs |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | Metals (mg/kg) | | BTEX (µg/kg) | | | | | Polynuclear Aromatic Hydrocarbons (µg/kg) | | | | | | | | | | | | | | | | | | | |
| | | | | | Site Specific Residual Contaminant Level (SSRCL) based on Groundwater Enforcement Standard (RR-682, January 2002) | | | | | | | | | | | | | | | | | | | | | | | | | |
| SSRCL - Protection of Groundwater | | | | | nc | nc | ***300*** | nc | nc | nc | nc | nc | nc | nc | nc | nc | nc | nc | nc | nc | nc | nc | nc | ***77,000*** | nc | nc | nc | nc | nc |
| | | | | | Wisconsin Soil Residual Contaminant Levels (RCLs) (NR 720, January 2001) | | | | | | | Wisconsin Suggested Generic Soil Residual Contaminant Levels (RCLs) (RR-519-97, April 1997) | | | | | | | | | | | | | | | | | | | | |
| Non-Industrial Direct Contact RCL | | | | | 0.039 | 50 | ns | ns | ns | ns | ns | 900,000 | 18000 | 5.0E+06 | 88 | 8.8 | 88 | 1800 | 880 | 8,800 | 8.8 | 600,000 | 600,000 | 88 | 20,000 | 600000 | 1100000 | 18,000 | 500,000 | ns |
| Industrial Direct Contact RCL | | | | | 1.6 | 500 | ns | ns | ns | ns | ns | 6.0E+07 | 360000 | 3.0E+08 | 3,900 | 390 | 3,900 | 39,000 | 3,900 | 390,000 | 390 | 4.0E+07 | 4.0E+07 | 3,900 | 110,000 | 4.0E+07 | 7.0E+07 | 390,000 | 3.0E+07 | ns |
| **Grand Avenue Right of Way** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SB-118 | 4/5/2005 | 13-15 | | 15.0 | -- | -- | <25 | <25 | <25 | <50 | nd | 87 | 14 Q | <2.6 | <15 | <12 | <9.8 | <6.6 | <13 | <14 | <4.0 | <11 | 2.5 Q | <6.3 | <2.9 | <3.9 | <2.7 | <6.7 | <15 | 104 |
| | 4/5/2005 | 29-31 | | | -- | -- | <25 | <25 | <25 | <50 | nd | <1.8 | <6.4 | <2.5 | <14 | <12 | <9.4 | <6.4 | <13 | <13 | <3.8 | <11 | <1.5 | <6.0 | 8.4 Q | <3.7 | <2.6 | <6.4 | <14 | 8.4 |
| SB-119 | 4/5/2005 | 13-15 | 29.7-30 ft. liquid tar | 13.1 | -- | -- | <310 Q | 450 Q | 1,300 Q | 3,900 Q | 5,650 | 270 | 120 Q | 430 | 360 | 260 Q | 180 | 110 Q | 300 | 320 | 44 Q | 900 | 460 | 130 | 3,500 | 1,300 | 900 | 1,300 | 590 | 11,474 |
| | 4/5/2005 | 29-30 | | | -- | -- | <2000 Q | 15,000 Q | 22,000 Q | 115,000 Q | 152,000 | 8,000 | 43,000 Q | 38,000 | 21,000 Q | 16,000 Q | 9,800 Q | 6,100 Q | 15,000 Q | 19,000 Q | 2,000 Q | 50,000 | 33,000 | 6,500 Q | 480,000 | 110,000 | 53,000 | 82,000 | 36,000 | 1,028,400 |
| SB-120 | 4/4/2005 | 15-17* | | 10.4 | -- | -- | <50 Q | 180 Q | 480 Q | 1,190 Q | 1,850 | 10,000 | 7,000 | 21,000 | 18,000 | 16,000 | 12,000 | 3,800 | 14,000 | 14,000 | 1,900 | 38,000 | 22,000 | 5,200 | 25,000 | 20,000 | 13,000 | 64,000 | 24,000 | 328,900 |
| | 4/4/2005 | 20-22 | | | -- | -- | <25 | <25 | <25 | 170 | 170 | 160 | 47 | 340 | 230 | 190 | 140 | 45 | 180 | 200 | 19 | 560 | 260 | 55 | 360 | 260 | 160 | 890 | 390 | 4,486 |
| SB-121 | 4/5/2005 | 17-19 | 17-17.3 ft. liquid tar | 12.3 | -- | -- | <620 Q | <620 Q | 1,600 Q | 5,100 Q | 6,700 | 4,600 | 2,800 Q | 4,100 | 2,700 | 2,200 Q | 1,600 Q | 580 Q | 2,000 Q | 2,300 Q | 210 Q | 7,700 | 5,200 | 710 Q | 41,000 | 9,700 | 5,300 | 14,000 | 5,000 | 111,700 |
| | 4/5/2005 | 28-30 | | | -- | -- | <25 Q | <25 Q | 34 Q | <50 Q | 34 | 66 | 80 Q | 36 | 33 Q | 28 Q | 21 Q | 15 Q | 24 Q | 29 Q | 4.4 Q | 71 | 45 | 13 Q | 760 | 120 | 120 | 120 | 47 | 1,632 |
| | 4/5/2005 | 32-34 | | | -- | -- | <25 | <25 | 51 Q | 29 Q | 80 | 8.4 | <6.2 Q | 6.0 Q | <14 | <11 | <9.1 | <6.2 | <12 | <13 | <3.7 | 17 Q | 5.9 | <5.9 | 100 | 18 | 16 | 21 | <14 | 192 |
| **621 Water Street Property** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PZ-101 | 12/27/2004 | 50-52 | | 11.0 | -- | -- | <25 | <25 | <25 | <50 | nd | <1.9 | <6.5 | 3.5 Q | <15 | <12 | <9.6 | <6.5 | <13 | <13 | <3.9 | <11 | 2.8 Q | <6.2 | 21 | 6.9 Q | 5.0 Q | 21 Q | <15 | 60 |
| MW-104 | 9/9/2004 | 1-3 | | 13.6 | *11* | *230* | <25 | 66 Q | 32 Q | 185 Q | 283 | 230 | <37 | 750 | *3,500* | *3,900* | *4,700* | 1,700 | *3,800* | 4,000 | *660* | 5,500 | 200 | *1,700* | 160 | 150 | 130 | 2,800 | 4,200 | 38,080 |
| | 9/9/2004 | 9-11 | | | 8.0 | 34 | <25 | <25 | <25 | <50 | nd | 61 | 45 Q | 410 | 1,700 | 2,100 | 2,500 | 1,300 | 1,900 | 1,900 | 500 | 2,200 | 92 | 1,200 | 130 | 91 | 76 | 1,100 | 1,800 | 19,105 |
| | 9/9/2004 | 21-23 | | | 4.2 | 7.0 | <25 | 46 Q | <25 | <50 | 46 | <1.8 | <6.3 | <2.4 | <14 | <11 | <9.2 | <6.3 | <12 | <13 | <3.7 | <11 | <1.5 | <6.0 | <2.8 | 6.7 Q | 4.7 Q | 7.8 Q | <14 | 19 |
| MW-105 | 11/15/2004 | 8-12 | 8-18.5 ft. viscous and liquid tar | 15.3 | -- | -- | ***7,600*** | 25,000 | 4,400 | 73,000 | 110,000 | 47,000 | 290,000 | 370,000 | 160,000 | 140,000 | 77,000 | 53,000 | 140,000 | 200,000 | 14,000 Q | 440,000 | 200,000 | 72,000 | ***2,100,000*** | 330,000 | 220,000 | 650,000 | 380,000 | 5,883,000 |
| | 11/15/2004 | 14-16 | | | -- | -- | ***13,000*** | 47,000 | 11,000 | 126,000 | 197,000 | 16,000 | 89,000 | 120,000 | 59,000 | 48,000 | 27,000 | 19,000 | 46,000 | 59,000 | 6,100 Q | 140,000 | 75,000 | 27,000 | ***920,000*** | 170,000 | 110,000 | 230,000 | 120,000 | 2,281,100 |
| SB-104 | 4/5/2005 | 33-35 | | 14.4 | -- | -- | <25 | <25 | <25 | <50 | nd | 6.1 | 9.0 Q | 14 | <14 | <11 | <9.4 | <6.3 | <13 | 14 Q | <3.8 | 28 Q | 9.9 | <6.0 | 86 | 27 | 14 | 45 | 20 Q | 273 |
| SB-112 | 4/4/2005 | 18-20 | | 9.7 | -- | -- | 130 Q | 340 | 300 | 2700 | 3,470 | 15 | 28 | 120 | 70 | 50 Q | 32 Q | 16 Q | 46 Q | 61 | 6.9 Q | 160 | 98 | 18 Q | 350 | 130 | 65 | 270 | 110 | 1,646 |
| | 4/4/2005 | 23-25 | | | -- | -- | <25 | <25 | <25 | <50 | nd | 6.7 | 19 Q | 88 | 65 | 50 | 33 | 22 | 45 | 59 | 8.0 Q | 120 | 38 | 21 | 26 | 30 | 16 | 150 | 88 | 885 |
| SB-113 | 4/4/2005 | 10-12 | | 9.3 | -- | -- | <25 | <25 | <25 | <50 | nd | 250 | 340 Q | 890 | 7,100 | 5,800 | 4,300 | 2,400 | 4,700 | 5,800 | 980 | 8,900 | 370 | 2,700 | 630 | 160 Q | 180 | 1,700 | 8,100 | 55,300 |
| | 4/4/2005 | 23-25 | | | -- | -- | <25 | <25 | <25 | <50 | nd | <1.9 | <6.6 | <2.5 | <15 | <12 | <9.7 | <6.6 | <13 | <14 | <3.9 | <11 | <1.6 | <6.3 | 4.6 Q | <3.8 | <2.7 | <6.7 | <15 | 4.6 |
| SB-117 | 4/4/2005 | 10-12 | | 11.8 | -- | -- | **<25** | **<25** | **<25** | **<50** | nd | **<1.9** | **<6.5** | **2.8 Q** | **19 Q** | **21 Q** | **39** | **22** | **27 Q** | **34 Q** | **7.2 Q** | **28 Q** | **<1.6** | **17 Q** | **22** | **7.6 Q** | **5.4 Q** | **19 Q** | **22 Q** | **293** |
| | 4/4/2005 | 23-25 | | | -- | -- | <25 | <25 | <25 | <50 | nd | <1.8 | <6.4 | <2.5 | <14 | <12 | <9.5 | <6.4 | <13 | <13 | <3.8 | <11 | <1.5 | <6.1 | 5.0 Q | <3.7 | <2.6 | <6.5 | <14 | 5.0 |
| TP-103[6] | 10/11/2005 | 11 | | 10.0 | -- | -- | 250 | 320 | 35 Q | 440 | 1,045 | 440 | 370 | 1,300 | 4,500 | 5,200 | 5,000 | 2,600 | 4,000 | 4,700 | 1,000 | 8,300 | 600 | 2,700 | 1,700 | 590 | 420 | 5,600 | 8,500 | 57,520 |
| TP-104[6] | 10/11/2005 | 12 | | 10.0 | -- | -- | 100 | 80 Q | <25 | 198 Q | 378 | 630 | 1,700 | 5,500 | 15,000 | 15,000 | 14,000 | 5,000 | 13,000 | 13,000 | 2,600 | 23,000 | 2,500 | 6,400 | 2,500 | 750 | 680 | 12,000 | 21,000 | 154,260 |
| **601 Water Street Property** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MW-103 | 9/7/2004 | 0-2 | 24-30 ft. trace liquid tar in cinder lenses | 19.2 | -- | -- | **36 Q** | **280** | **150** | **1,010** | **1,476** | **20** | **13 Q** | **37** | **210** | **250** | **270** | **120** | **220** | **240** | **47** | **320** | **16** | **120** | **210** | **110** | **78** | **170** | **270** | **2,721** |
| | 9/7/2004 | 4-6 | | | -- | -- | **44 Q** | **250** | **110** | **610** | **1,014** | **50** | **12 Q** | **120** | **470** | **510** | **570** | **240** | **480** | **530** | **97** | **790** | **54** | **240** | **170** | **64** | **48** | **600** | **640** | **5,685** |
| | 9/7/2004 | 16-18 | | | -- | -- | **<25** | **<25** | **<25** | **<50** | nd | **<2.0** | **<6.9** | **3.0 Q** | **<15** | **19 Q** | **17 Q** | **12 Q** | **17 Q** | **14 Q** | **<4.1** | **13 Q** | **<1.6** | **12 Q** | **5.2 Q** | **<4.0** | **<2.8** | **12 Q** | **<15** | **124** |
| | 9/7/2004 | 20-22 | | | -- | -- | <25 | 52 Q | 35 Q | 200 Q | 287 | 420 Q | 1,200 Q | 5,000 Q | 2,800 Q | 2,400 Q | 1,900 Q | 640 Q | 2,200 Q | 2,300 Q | 280 Q | 6,300 Q | 2,900 Q | 820 Q | 2,100 Q | 2,000 Q | 1,300 Q | 9,200 Q | 4,300 Q | 48,060 |
| SB-103 | 9/8/2004 | 38-40 ** | | 16.7 | -- | -- | 330 | 300 | 73 | 670 | 1,373 | 7.5 | 9.2 Q | 15 | <15 | <12 | <9.7 | <6.6 | <13 | <14 | <3.9 | 19 Q | 12 | <6.2 | 140 | 43 | 25 | 32 | 18 Q | 321 |
| SB-114 | 4/5/2005 | 34-36 | | 16.1 | -- | -- | <25 | <25 | <25 | <50 | nd | 3.4 Q | 6.9 Q | 13 | <14 | <11 | <9.3 | <6.3 | <12 | <13 | <3.7 | 20 Q | 7.7 | <6.0 | 65 | 26 | 14 | 35 | <14 | 191 |
| SB-116 | 4/5/2005 | 36-38 | | 17.1 | -- | -- | 12,000 | 14,000 | 4,200 | 44,000 | 74,200 | 600 | 260 Q | 480 | <180 | <140 | <120 | <79 | <160 | <160 | <47 | 370 Q | 700 | <75 | 11,000 | 2,900 | 1,600 | 1,100 | 280 Q | 19,290 |
| | 4/5/2005 | 38-40 | | | -- | -- | 82 | 47 Q | <25 | <50 | 129 | <1.8 | <6.4 | <2.5 | <14 | <12 | <9.4 | <6.4 | <13 | <13 | <3.8 | <11 | <1.5 | <6.1 | 15 | <3.7 | <2.6 | <6.5 | <14 | 15 |
| **Nearby Properties** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PZ-106 | 11/17/2004 | 6-8 | | 13.0 | -- | -- | **<25** | **<25** | **<25** | **<50** | nd | **<2.6** | **<9.2** | **<3.5** | **<20** | **<17** | **<14** | **<9.1** | **<18** | **<19** | **<5.5** | **<16** | **<2.2** | **<8.7** | **10 Q** | **<5.3** | **<3.8** | **<9.3** | **<20** | **10** |
| | 11/17/2004 | 18-20 | | | -- | -- | <25 | <25 | <25 | <50 | nd | <1.9 | <6.5 | <2.5 | <15 | <12 | <9.6 | <6.5 | <13 | <13 | <3.9 | <11 | <1.6 | <6.2 | 20 | <3.8 | <2.7 | 7.6 Q | <15 | 28 |
| PZ-107 | 11/22/2004 | 18-20 | | 12.0 | -- | -- | <25 | <25 | <25 | <50 | nd | <1.9 | <6.7 | <2.6 | <15 | <12 | <9.9 | <6.7 | <13 | <14 | <4.0 | <11 | <1.6 | <6.4 | 5.0 Q | <3.9 | 3.4 Q | <6.8 | <15 | 8 |
| SB-107 | 11/17/2004 | 6.5-8 | | 12.0 | -- | -- | **<25** | **<25** | **<25** | **<50** | nd | **160** | **51** | **140** | **17 Q** | **<12** | **<9.9** | **6.9 Q** | **<13** | **18** | **<4.0** | **30 Q** | **200** | **8.5 Q** | **20** | **16** | **30** | **65** | **70** | **832** |
| **Historical Fill Above ISS Material on 601 and 621 Water Street Properties (See Note 3)** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MW-101 | 9/8/2004 | 0-2 | | | 7.9 | 61 | 160 | 300 | 130 | 720 | 1,310 | 7.4 | 20 Q | 81 | 460 | 540 | 760 | 310 | 480 | 560 | 120 | 710 | 8.6 | 310 | 580 | 44 | 23 | 270 | 600 | 5,884 |
| | 9/8/2004 | 8-10 | | | 2.8 | 38 | <25 | <25 | <25 | <50 | nd | 320 | 1,100 | 3,600 | 6,600 | 7,200 | 4,800 | 3,800 | 5,500 | 5,800 | 980 | 15,000 | 770 | 3,500 | 530 | 150 Q | 130 Q | 10,000 | 13,000 | 82,780 |
| MW-102 | 9/7/2004 | 10-12 | | | -- | -- | 51 Q | 340 | 210 | 1,550 | 2,151 | 77 | 81 | 240 | 930 | 1,100 | 910 | 530 | 880 | 850 | 200 | 1,600 | 72 | 540 | 500 | 180 | 120 | 1,000 | 1,300 | 11,110 |
| SB-101 | 9/7/2004 | 0-2 | | | -- | -- | 100 | 830 | 420 | 3,010 | 4,360 | 2.3 Q | <6.4 | 14 | 83 | 95 | 96 | 53 | 100 | 96 | 18 | 120 | 2.0 Q | 51 | 13 | 9.4 Q | 9.1 | 53 | 110 | 925 |
| | 9/7/2004 | 12-14 | | | -- | -- | 110 | 660 | 560 | 3,770 | 5,100 | 61 | 17 Q | 160 | 340 | 360 | 260 | 150 | 250 | 360 | 64 | 530 | 80 | 140 | 120 | 40 | 29 | 500 | 560 | 4,021 |
| SB-102 | 9/7/2004 | 6-8 | | | -- | -- | <25 | 56 Q | 57 Q | 470 | 583 | 10 | 24 | 47 | 170 | 210 | 170 | 120 | 190 | 170 | 31 | 310 | 14 | 120 | 220 | 72 | 42 | 160 | 280 | 2,360 |
| TP-102 | 10/11/2005 | 3.5 | | | 3.2 | 11.6 | <25 | 31 Q | <25 | <50 | 31 | 4.8 Q | 28 | 7.9 Q | 35 | 32 | 31 | <5.3 | 35 | 45 | <5.6 | 53 | 17 | 25 | 610 | 75 | 35 | 39 | 68 | 1,141 |
| | 10/11/2005 | 8 | | | -- | -- | 160 | 92 | 570 | 1,310 | 2,132 | 240 | 420 | 210 Q | 400 Q | 290 | 200 Q | 100 Q | 270 | 320 Q | <65 | 750 | 300 | 110 Q | 12,000 | 720 | 1,700 | 720 | 550 | 19,300 |

[O-HMS C-RMW 02/09; U-HMS 4/09]

**Notes:**

1) Parameters that attain or exceed the groundwater protection SSRCL (0 feet bgs to water table) are identified in ***bold and italics***.
2) Parameters that attain or exceed the direct contact Non-industrial RCL (0 to 4 feet bgs) are identified in *italics and underlined*.
3) Analytical identified in gray represents the historical fill that was re-used above the ISS material. Locations and depths are not representative of current conditions.
4) Depth to Water Table was interpreted from water table contours from 2005.
5) Soil below the water table are identified in blue.
6) SB-110 and SB-111 analytical results are not included on this table because they were not representative of the actual soil conditions based on TP-103 and TP-104 sample analytical results and field observations.

-- : Analysis was not performed.
nc: not calculated
ns : A standard has not been established
Q: Data qualified. See original lab reports.
**: Based on field observations, soil sample was suspected to be cross-contaminated (dragdown) during sample collection and likely does not accurately represent the sample interval.
*: Per SI/RAOR, petroleum impacts suspected, not related to MGP.

*Table 5. Groundwater Laboratory Analytical Results - Volatile Organic Compounds (VOCs), Cyanide, Metals, and Phenolics*

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| Sample ID | Collection Date | VOCs (µg/L) | | | | | | | Cyanide (mg/L) | | Metals (µg/L) | | | | | | | | Phenolics (µg/L) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Benzene | Ethyl-benzene | Toluene | Xylenes, Total | Styrene | 1,2,4-Trimethly-benzene | 1,3,5-Trimethly-benzene | Available (no Lead carbonate) | Available (with Lead carbonate) | Arsenic | Barium | Cadmium | Chromium | Lead | Mercury | Selenium | Silver | Phenolics |
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | | | | | | | | | |
| **Preventive Action Limit (PAL)** | | 0.5 | 140 | 200 | 1000 | 10 | 96 | 96 | 0.04 | 0.04 | 1 | 400 | 0.5 | 10 | 1.5 | 0.2 | 10 | 10 | 1200 |
| **Enforcement Standard (ES)** | | 5 | 700 | 1000 | 10000 | 100 | 480 | 480 | 0.2 | 0.2 | 10 | 2000 | 5 | 100 | 15 | 2 | 50 | 50 | 6000 |
| MW101 | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | **820** | *140* | *900* | *930* | *76 Q* | *180* | *69 Q* | 0.032 | -- | *1.6* | 250 | < 2 | 4.2 | < 21 | < 0.17 | < 1.1 | 7.8 | 470 |
| | 12/6/2004 | **590** | *140* | *530* | *810* | -- | -- | -- | < 0.01 Q | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/22/2005 | **350** | 100 | 72 | 320 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| MW102 | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | **5.9** | 2.4 | 2.3 | 45 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/7/2004 | **14** | 4.2 | 2.2 | 66 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 10/11/2005 | **66** | 8.1 | 1.3 | 57 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| MW103 | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | *1.1 Q* | 1.3 Q | 0.83 Q | 6.8 Q | -- | -- | -- | *0.043* | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/7/2004 | 0.35 Q | < 0.4 | 0.36 Q | 0.93 Q | -- | -- | -- | *0.058* | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/22/2005 | *1.8* | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/26/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/11/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.0038 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/20/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.0069 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/19/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/16/2008 | < 0.14 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/30/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| MW104 | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | < 0.86 | < 0.97 | < 0.83 | < 0.005 | -- | 0.75 | 270 | < 2 | < 1.3 | < 21 | < 0.17 | 1.9 | 7.2 | < 5.9 |
| | 12/6/2004 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/22/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/25/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/11/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/19/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/19/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/16/2008 | < 0.14 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/30/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| MW105 | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | **2100** | *240* | **2100** | *3200* | -- | -- | -- | < 0.025 Q | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/31/2005 | **120 Q** | < 10 Q | 120 Q | *650 Q* | -- | -- | -- | < 0.5 Q | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 10/11/2005 | **1300** | 73 Q | **1100** | *1490* | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| *Sample ID* | *Collection Date* | *VOCs (µg/L)* | | | | | | | *Cyanide (mg/L)* | | *Metals (µg/L)* | | | | | | | *Phenolics (µg/L)* |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | *Benzene* | *Ethyl-benzene* | *Toluene* | *Xylenes, Total* | *Styrene* | *1,2,4-Trimethly-benzene* | *1,3,5-Trimethly-benzene* | *Available (no Lead carbonate)* | *Available (with Lead carbonate)* | *Arsenic* | *Barium* | *Cadmium* | *Chromium* | *Lead* | *Mercury* | *Selenium* | *Silver* | *Phenolics* |
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | | | | | | | | | |
| **Preventive Action Limit (PAL** | | 0.5 | 140 | 200 | 1000 | 10 | 96 | 96 | 0.04 | 0.04 | 1 | 400 | 0.5 | 10 | 1.5 | 0.2 | 10 | 10 | 1200 |
| **Enforcement Standard (ES)** | | 5 | 700 | 1000 | 10000 | 100 | 480 | 480 | 0.2 | 0.2 | 10 | 2000 | 5 | 100 | 15 | 2 | 50 | 50 | 6000 |
| MW12 | | | | | | | | | | | | | | | | | | | |
| | 9/23/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/25/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/11/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.0026 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/18/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/17/2008 | < 0.14 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/29/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| PWCOMPOS | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | **36** | 6.4 Q | 37 | 66 | < 4.3 | 21 | 14 Q | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| PZ101 | | | | | | | | | | | | | | | | | | | |
| | 1/13/2005 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | < 0.86 | < 0.97 | < 0.83 | < 0.025 Q | -- | *9.4* | 48 | < 2 | < 0.22 | < 21 | < 0.17 | 2.3 | 3.8 | 53 Q |
| | 3/31/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/22/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| PZ101R | | | | | | | | | | | | | | | | | | | |
| | 6/26/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/12/2007 | 0.23 Q | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/19/2007 | < 0.14 | < 0.4 | 0.42 Q | < 0.74 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/19/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/16/2008 | < 0.14 | < 0.4 | 0.39 Q | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/30/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| PZ104 | | | | | | | | | | | | | | | | | | | |
| | 6/25/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/11/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/19/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/19/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/16/2008 | < 0.14 | < 0.4 | 0.5 Q | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/30/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| PZ106 | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | 0.36 Q | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/31/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/23/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/26/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/12/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.0037 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/19/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.0047 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/18/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/17/2008 | < 0.14 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/29/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| Sample ID | Collection Date | VOCs (µg/L) | | | | | | | Cyanide (mg/L) | | Metals (µg/L) | | | | | | | | Phenolics (µg/L) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Benzene | Ethyl-benzene | Toluene | Xylenes, Total | Styrene | 1,2,4-Trimethly-benzene | 1,3,5-Trimethly-benzene | Available (no Lead carbonate) | Available (with Lead carbonate) | Arsenic | Barium | Cadmium | Chromium | Lead | Mercury | Selenium | Silver | Phenolics |
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | | | | | | | | | |
| **Preventive Action Limit (PAL)** | | 0.5 | 140 | 200 | 1000 | 10 | 96 | 96 | 0.04 | 0.04 | 1 | 400 | 0.5 | 10 | 1.5 | 0.2 | 10 | 10 | 1200 |
| **Enforcement Standard (ES)** | | 5 | 700 | 1000 | 10000 | 100 | 480 | 480 | 0.2 | 0.2 | 10 | 2000 | 5 | 100 | 15 | 2 | 50 | 50 | 6000 |
| PZ107 | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | 0.24 Q | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/31/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/23/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/26/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/12/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.004 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 12/20/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.0046 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/18/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 6/17/2008 | < 0.14 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 9/29/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| QC01 | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | **460** | 120 | *410* | *640* | -- | -- | -- | 0.0089 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| | 3/31/2005 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | < 0.005 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| (MW101) | 9/22/2005 | **330 Q** | 97 Q | 61 Q | 310 Q | -- | -- | -- | -- | < 0.005 Q | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| (MW12) | 6/25/2007 | < 0.41 | < 0.54 | < 0.67 | < 1.8 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| (PZ106) | 9/12/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | 0.004 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| (MW104) | 12/19/2007 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | -- | -- | -- | < 0.002 | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| (MW12) | 3/19/2008 | < 0.14 | < 0.4 | < 0.36 | < 0.74 | -- | < 0.39 | < 0.4 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| (MW103) | 6/16/2008 | < 0.14 | < 0.4 | < 0.36 | < 1.1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| (MW12) | 9/29/2008 | < 0.23 | < 0.4 | < 0.36 | < 1.1 Q | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |

Notes

1) Parameters that attain or exceed the NR 140 Wisconsin Groundwater Quality Preventive Action Limit (PAL) Standard are identified in italics and underlined.
2) Parameters that attain or exceed the NR 140 Wisconsin Groundwater Quality Enforcement Standard (ES) are identified in bold and underlined.
3) Only detected parameters are shown in report, reference the laboratory analytical report for full list of compounds analyzed.
4) 1,2,4 and 1,3,5- Trimethylbenzene analytical results combined for comparison against the NR 140 PAL and ES standards.
5) Xylene analytical results combined for comparison against the NR 140 PAL and ES standards.
<2.0 : Parameter not detected above the Limit of Detection indicated.
Q : Analyte result has been qualified, see laboratory analytical report for additional information.
--: Analysis not performed.
QC: Quality Control duplicate sample.

*Table 6. Groundwater Laboratory Analytical Results - Polynuclear Aromatic Hydrocarbons (PAH)*

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| Sample ID | Collection Date | All PAH analytical results in µg/L. | 1-Methyl naphthalene | 2-Methyl naphthalene | Acenaphthene | Acenaph - thylene | Anthracene | Benzo (a ) anthracene | Benzo (a) pyrene | Benzo (b) fluoranthene | Benzo (ghi) perylene | Benzo (k) fluoranthene | Chrysene | Dibenz (a,h) anthracene | Fluoranthene | Fluorene | Indeno (1,2,3-cd) pyrene | Naphthalene | Phenanthrene | Pyrene |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | | | | | | | | | | |
| *Preventive Action Limit* | | | NS | NS | NS | NS | 600 | NS | 0.02 | 0.02 | NS | NS | 0.02 | NS | 80 | 80 | NS | 10 | NS | 50 |
| **Enforcement Standard** | | | NS | NS | NS | NS | 3000 | NS | 0.2 | 0.2 | NS | NS | 0.2 | NS | 400 | 400 | NS | 100 | NS | 250Closure |
| MW101 | | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | | < 500 Q | < 570 Q | 50 | < 480 Q | 18 | < 4.9 | < 4.5 | < 4.5 | < 5.2 | < 4.8 | < 4.1 | < 5.5 | 13 Q | *82* | < 4.3 | **4800 Q** | 99 | 8 Q |
| | 12/6/2004 | | < 200 Q | < 230 Q | 31 | 73 | 11 Q | < 3.9 | < 3.6 | < 3.6 | < 4.1 | < 3.9 | < 3.3 | < 4.4 | 8.3 Q | 48 | < 3.4 | **3600 Q** | 61 | 5 Q |
| | 9/22/2005 | | 150 Q | 32 Q | 44 Q | 69 Q | 26 Q | 0.49 Q | *0.078* | *0.071 Q* | 0.02 Q | 0.063 Q | **0.23** | < 0.019 | 12 Q | 56 Q | 0.023 Q | **1800 Q** | 83 Q | 7.8 Q |
| MW102 | | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | | 8.9 | 8 | 6.5 Q | < 2 | 2 Q | < 2 | < 1.8 | < 1.8 | < 2.1 | < 1.9 | < 1.7 | < 2.2 | < 1.7 | 4.1 Q | < 1.7 | *34* | 6.5 Q | < 1.6 |
| | 12/7/2004 | | 8.5 Q | 5.6 Q | 5.9 Q | 0.83 Q | 1.1 Q | 0.11 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | *0.056* | < 0.022 | 1.5 Q | 4.1 Q | < 0.017 | 3.8 Q | 4.5 Q | 0.98 Q |
| | 10/11/2005 | | 0.31 Q | 0.18 Q | 2.6 | 0.45 | 0.74 | < 0.16 | < 0.19 | < 0.16 | < 0.2 | < 0.2 Q | < 0.19 | < 0.19 | 1.1 | 2.3 | < 0.19 | 1.3 | < 0.12 | 0.75 |
| MW103 | | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | | 3.3 Q | 4.2 Q | 2.8 Q | 2.2 Q | < 1.4 | < 1.6 | < 1.4 | < 1.4 | < 1.7 | < 1.5 | < 1.3 | < 1.8 | 2.1 Q | 1.9 Q | < 1.4 | *21* | 3.2 Q | 1.4 Q |
| | 12/7/2004 | | 0.11 | 0.034 Q | 0.097 | 0.16 | 0.064 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.017 | < 0.022 | 0.092 | 0.14 | < 0.017 | 0.34 Q | < 0.021 | 0.037 Q |
| | 9/22/2005 | | 0.33 | 0.094 | 2.6 Q | 0.78 Q | 0.22 | 0.23 | *0.021 Q* | *0.029 Q* | < 0.019 | 0.025 Q | *0.14* | < 0.019 | 2.2 Q | 0.64 Q | < 0.019 | 0.99 Q | 0.14 | 1.4 Q |
| | 6/26/2007 | | 0.026 Q | < 0.011 | 0.024 Q | 0.054 | 0.036 Q | < 0.016 | < 0.019 | < 0.016 Q | < 0.02 | < 0.02 Q | < 0.019 | < 0.019 | 0.049 Q | 0.028 Q | < 0.019 | 0.019 Q | 0.021 Q | 0.03 Q |
| | 9/11/2007 | | 0.035 | < 0.011 | 0.014 Q | 0.067 | 0.033 Q | < 0.016 | < 0.018 | < 0.016 Q | < 0.019 | < 0.019 Q | < 0.019 | < 0.019 | 0.037 Q | 0.057 | < 0.019 | 0.018 Q | 0.027 Q | 0.027 Q |
| | 12/20/2007 | | 0.032 Q | < 0.011 Q | 0.38 Q | 0.18 Q | 0.1 Q | 0.025 Q | < 0.019 | < 0.016 | < 0.02 | < 0.02 | *0.022 Q* | < 0.019 | 0.27 Q | 0.097 Q | < 0.019 | 0.021 Q | 0.02 Q | 0.18 Q |
| | 3/19/2008 | | 0.02 Q | < 0.011 | 0.14 | 0.1 | 0.07 | 0.011 Q | 0.0084 Q | 0.0071 Q | < 0.0063 | 0.01 Q | 0.012 Q | < 0.0043 | 0.11 | 0.024 Q | < 0.0036 | < 0.017 | 0.014 Q | 0.066 |
| | 6/16/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | 0.0071 Q | < 0.0035 | < 0.0054 | < 0.0051 | < 0.0062 | < 0.0078 | < 0.007 | < 0.0043 | 0.01 Q | < 0.0063 | < 0.0036 | < 0.016 | < 0.0075 | < 0.0068 |
| | 9/30/2008 | | 0.025 Q | < 0.011 | 0.16 | 0.11 | 0.055 | 0.011 Q | 0.0058 Q | < 0.0051 | < 0.0062 Q | < 0.0078 | 0.008 Q | < 0.0043 | 0.15 | 0.029 Q | < 0.0036 Q | 0.016 Q | 0.015 Q | 0.088 |
| MW104 | | | | | | | | | | | | | | | | | | | | |
| | 9/29/2004 | | < 0.02 | < 0.023 | < 0.02 | < 0.02 | < 0.018 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.017 | < 0.022 | < 0.017 | < 0.022 | < 0.017 | 0.12 | < 0.021 | < 0.016 |
| | 12/6/2004 | | < 0.02 | < 0.023 | < 0.02 | < 0.02 | < 0.018 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.017 | < 0.022 | < 0.017 | < 0.022 | < 0.017 | 0.085 Q | < 0.021 | < 0.016 |
| | 9/22/2005 | | 0.11 Q | 0.016 | 0.031 | 0.12 | < 0.012 | < 0.016 | < 0.019 | < 0.016 Q | < 0.019 | < 0.02 Q | < 0.019 | < 0.019 | < 0.016 | 0.058 | < 0.019 | 0.4 | 0.024 Q | < 0.015 |
| | 6/25/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0081 | < 0.012 | < 0.016 | < 0.018 | < 0.016 | < 0.019 | < 0.019 | < 0.019 | < 0.019 | < 0.015 | < 0.0091 | < 0.019 | 0.013 Q | < 0.011 | < 0.015 |
| | 9/11/2007 | | < 0.011 | < 0.012 | < 0.0085 | < 0.0084 | < 0.012 | < 0.016 | < 0.019 | < 0.016 Q | < 0.02 | < 0.02 Q | < 0.02 | < 0.02 | < 0.016 | < 0.0094 | < 0.02 | < 0.013 | < 0.012 | < 0.015 |
| | 12/19/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0082 | < 0.012 | < 0.016 | < 0.019 | < 0.016 | < 0.019 | < 0.02 | < 0.019 | < 0.019 | < 0.016 | < 0.0091 | < 0.019 | < 0.012 | < 0.011 | < 0.015 |
| | 3/19/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | < 0.0065 | < 0.0035 | < 0.0054 | < 0.0051 | < 0.0062 | < 0.0078 | < 0.007 | < 0.0043 | < 0.0053 | < 0.0063 | < 0.0036 | < 0.016 | < 0.0075 | < 0.0068 |
| | 6/16/2008 | | < 0.0095 Q | < 0.011 | < 0.0078 Q | < 0.005 Q | < 0.0065 | < 0.0035 | < 0.0054 Q | < 0.0051 Q | < 0.0062 Q | < 0.0078 | < 0.007 | < 0.0043 | < 0.0053 | < 0.0063 Q | < 0.0036 | < 0.016 Q | < 0.0075 Q | < 0.0068 Q |
| | 9/30/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | < 0.0065 | < 0.0035 Q | < 0.0054 | < 0.0051 | < 0.0062 Q | < 0.0078 | < 0.007 | < 0.0043 | < 0.0053 | < 0.0063 | < 0.0036 Q | < 0.016 | < 0.0075 | < 0.0068 |
| MW105 | | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | | 530 Q | 540 Q | 25 | < 390 Q | 11 | < 2 | < 1.8 | < 1.8 | < 2.1 | < 1.9 | < 1.6 | < 2.2 | 2.7 Q | < 440 Q | < 1.7 | **9400 Q** | 46 | < 1.6 |
| | 3/31/2005 | | 280 Q | 210 Q | 33 | 320 Q | 21 | < 3.9 | < 3.6 | < 3.6 | < 4.1 | < 3.9 | < 3.3 | < 4.4 | 10 Q | *90* | < 3.4 | **710 Q** | 73 | 6.3 Q |
| | 10/11/2005 | | 440 Q | 540 Q | 37 Q | 410 Q | 30 Q | 4.9 | **2** | **1.6** | 0.43 Q | 1.6 Q | **2.6** | < 0.38 | 27 Q | *120 Q* | 0.52 Q | **4300 Q** | 180 Q | 21 Q |

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| *Sample ID* | *Collection Date* | *All PAH analytical results in µg/L.* | *1-Methyl naphthalene* | *2-Methyl naphthalene* | *Acenaphthene* | *Acenaph - thylene* | *Anthracene* | *Benzo (a ) anthracene* | *Benzo (a) pyrene* | *Benzo (b) fluoranthene* | *Benzo (ghi) perylene* | *Benzo (k) fluoranthene* | *Chrysene* | *Dibenz (a,h) anthracene* | *Fluoranthene* | *Fluorene* | *Indeno (1,2,3-cd) pyrene* | *Naphthalene* | *Phenanthrene* | *Pyrene* |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | | | | | | | | | | |
| *Preventive Action Limit* | | | NS | NS | NS | NS | 600 | NS | 0.02 | 0.02 | NS | NS | 0.02 | NS | 80 | 80 | NS | 10 | NS | 50 |
| **Enforcement Standard** | | | NS | NS | NS | NS | 3000 | NS | 0.2 | 0.2 | NS | NS | 0.2 | NS | 400 | 400 | NS | 100 | NS | 250 |
| MW12 | | | | | | | | | | | | | | | | | | | | |
| | 9/23/2005 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0081 | < 0.012 | < 0.016 | < 0.018 | < 0.016 | < 0.019 | < 0.019 | < 0.019 | < 0.019 | < 0.015 | < 0.0091 | < 0.019 | 0.068 | **< 0.011** | < 0.015 |
| | 6/25/2007 | | < 0.011 | < 0.012 | < 0.0086 | < 0.0085 | < 0.012 | < 0.016 | < 0.019 | < 0.016 | < 0.02 | < 0.02 | < 0.02 | < 0.02 | < 0.016 | < 0.0095 | < 0.02 | < 0.013 | **< 0.012** | < 0.015 |
| | 9/11/2007 | | < 0.01 Q | < 0.011 | < 0.0082 Q | < 0.0082 Q | < 0.012 Q | < 0.016 | < 0.019 | < 0.016 Q | < 0.019 | < 0.02 Q | < 0.019 | < 0.019 | < 0.016 | < 0.0091 Q | < 0.019 | 0.016 Q | **< 0.011** | < 0.015 Q |
| | 3/18/2008 | | < 0.0096 | < 0.011 | < 0.0079 | 0.006 Q | 0.026 Q | 0.041 Q | *0.02* | *0.025 Q* | 0.017 Q | 0.031 Q | *0.051* | 0.011 Q | 0.036 Q | < 0.0063 | 0.014 Q | < 0.017 | **0.015 Q** | 0.032 Q |
| | 6/17/2008 | | < 0.0095 | < 0.011 | < 0.0078 | 0.015 Q | 0.0085 Q | 0.016 Q | 0.017 Q | 0.0075 Q | 0.0082 Q | 0.01 Q | 0.017 Q | < 0.0043 | 0.022 Q | < 0.0063 | 0.0058 Q | < 0.016 | **0.0083 Q** | 0.041 Q |
| | 9/29/2008 | | < 0.0096 | < 0.011 | < 0.0079 | < 0.005 | < 0.0066 | < 0.0035 | < 0.0055 | < 0.0052 | < 0.0063 | < 0.0078 | < 0.0071 | < 0.0043 | < 0.0054 | < 0.0063 | < 0.0036 | 0.019 Q | **< 0.0075** | < 0.0068 Q |
| PZ101 | | | | | | | | | | | | | | | | | | | | |
| | 1/13/2005 | | 0.044 Q | 0.079 | 0.02 Q | 0.023 Q | 0.034 Q | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.016 | < 0.022 | 0.056 | 0.039 Q | < 0.017 | < 0.74 | **0.12** | 0.038 Q |
| | 3/31/2005 | | < 0.02 | < 0.023 | < 0.019 | < 0.019 | < 0.018 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.016 | < 0.022 | < 0.017 | < 0.022 | < 0.017 | 0.047 Q | **< 0.02** | < 0.016 |
| | 9/22/2005 | | 0.056 | 0.024 Q | 0.012 Q | 0.02 Q | < 0.012 | < 0.016 | < 0.018 | < 0.016 Q | < 0.019 | < 0.019 Q | < 0.019 | < 0.019 | < 0.015 Q | 0.0097 | < 0.019 | 0.8 Q | **< 0.011** | < 0.015 |
| PZ101R | | | | | | | | | | | | | | | | | | | | |
| | 6/26/2007 | | 0.62 | 0.13 Q | 0.78 | 0.4 | 0.24 | < 0.062 | < 0.073 | < 0.063 Q | < 0.077 | < 0.077 Q | < 0.076 | < 0.075 | 0.34 | 0.84 | < 0.075 | 0.16 Q | **0.58** | 0.19 |
| | 9/12/2007 | | 0.46 | 0.38 | 0.38 | 0.18 | 0.26 | 0.035 Q | 0.019 Q | < 0.016 Q | < 0.019 | < 0.02 Q | *0.032 Q* | < 0.019 | 0.38 | 0.76 Q | < 0.019 | 2.1 Q | **1.3 Q** | 0.29 |
| | 12/19/2007 | | < 0.01 | < 0.011 | < 0.0082 | 0.017 Q | 0.013 Q | < 0.016 | < 0.019 | < 0.016 | < 0.019 | < 0.02 | < 0.019 | < 0.019 | 0.048 Q | < 0.0091 | < 0.019 | 0.016 Q | **0.015 Q** | 0.055 |
| | 3/19/2008 | | 0.069 | 0.048 | 0.059 | 0.045 Q | 0.06 | 0.02 Q | 0.015 Q | 0.015 Q | 0.014 Q | 0.019 Q | *0.024 Q* | 0.0073 Q | 0.091 | 0.052 | 0.012 Q | 0.56 | **0.14** | 0.059 |
| | 6/16/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | 0.01 Q | 0.014 Q | 0.011 Q | 0.0085 Q | 0.0076 Q | 0.012 Q | 0.013 Q | < 0.0043 | 0.032 Q | < 0.0063 | 0.0059 Q | < 0.016 | **0.027 Q** | 0.034 Q |
| | 9/30/2008 | | < 0.0095 | < 0.011 | < 0.0078 | 0.0066 Q | < 0.0065 | < 0.0035 Q | 0.0059 Q | < 0.0051 | < 0.0062 Q | < 0.0078 | < 0.007 | < 0.0043 | 0.021 Q | < 0.0063 | < 0.0036 Q | < 0.016 | **0.012 Q** | 0.023 Q |
| PZ104 | | | | | | | | | | | | | | | | | | | | |
| | 6/25/2007 | | < 0.012 | < 0.013 | < 0.0095 | < 0.0094 | < 0.013 | < 0.018 | < 0.021 | < 0.018 | < 0.022 | < 0.023 | < 0.022 | < 0.022 | < 0.018 | < 0.011 | < 0.022 | 0.046 Q | **0.014 Q** | < 0.017 |
| | 9/11/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0081 | < 0.012 | < 0.016 | < 0.018 | < 0.016 Q | < 0.019 | < 0.019 Q | < 0.019 | < 0.019 | < 0.015 | < 0.0091 | < 0.019 | < 0.012 | **< 0.011** | < 0.015 |
| | 12/19/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0082 | < 0.012 | < 0.016 | < 0.019 | < 0.016 | < 0.019 | < 0.02 | < 0.019 | < 0.019 | < 0.016 | < 0.0091 | < 0.019 | < 0.012 | **< 0.011** | < 0.015 |
| | 3/19/2008 | | < 0.0096 | < 0.011 | < 0.0079 | < 0.005 | < 0.0066 | < 0.0035 | < 0.0055 | < 0.0052 | < 0.0063 | < 0.0078 | < 0.0071 | < 0.0043 | 0.0061 Q | < 0.0063 | < 0.0036 | < 0.017 | **< 0.0075** | < 0.0068 |
| | 6/16/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | < 0.0065 | 0.0039 Q | < 0.0054 | < 0.0051 | < 0.0062 | < 0.0078 | < 0.007 | < 0.0043 | < 0.0053 | < 0.0063 | < 0.0036 | 0.02 Q | **< 0.0075** | < 0.0068 |
| | 9/30/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | < 0.0065 | < 0.0035 Q | < 0.0054 | < 0.0051 | < 0.0062 Q | < 0.0078 | < 0.007 | < 0.0043 | < 0.0053 | < 0.0063 | < 0.0036 Q | < 0.016 | **< 0.0075** | < 0.0068 |
| PZ106 | | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | | 0.17 | 0.26 | 0.029 Q | 0.064 Q | < 0.018 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.016 | < 0.022 | < 0.016 | 0.023 Q | < 0.017 | 2.5 Q | **0.044 Q** | < 0.016 |
| | 3/31/2005 | | < 0.02 | < 0.023 | < 0.02 | < 0.02 | < 0.018 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.017 | < 0.022 | < 0.017 | < 0.022 | < 0.017 | < 0.023 | **< 0.021** | < 0.016 |
| | 9/23/2005 | | 0.1 | 0.032 Q | 0.028 | 0.04 | < 0.012 | < 0.016 | < 0.018 | < 0.016 Q | < 0.019 | < 0.019 Q | < 0.019 | < 0.019 | < 0.015 | 0.019 Q | < 0.019 | 1.4 Q | **< 0.011** | < 0.015 |
| | 6/26/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0082 | < 0.012 | < 0.016 | < 0.019 | < 0.016 Q | < 0.019 | < 0.02 Q | < 0.019 | < 0.019 | < 0.016 | < 0.0091 | < 0.019 | < 0.012 | **< 0.011** | < 0.015 |
| | 9/12/2007 | | < 0.01 | < 0.011 | 0.0093 Q | < 0.0081 | < 0.012 | < 0.016 | < 0.018 | < 0.016 | < 0.019 | < 0.019 | < 0.019 | < 0.019 | < 0.015 | < 0.0091 | < 0.019 | < 0.012 | **< 0.011** | < 0.015 |
| | 12/19/2007 | | < 0.011 | < 0.011 | < 0.0087 | < 0.0087 Q | < 0.012 | < 0.017 | < 0.02 | < 0.017 Q | < 0.021 | < 0.021 | < 0.019 | < 0.02 | < 0.015 | < 0.0097 Q | < 0.019 | < 0.012 | **< 0.011 Q** | < 0.015 |
| | 3/18/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | < 0.0065 | < 0.0035 | < 0.0054 | < 0.0051 | < 0.0062 | < 0.0078 | < 0.007 Q | < 0.0043 | < 0.0053 | < 0.0063 | < 0.0036 | < 0.016 | **< 0.0075** | < 0.0068 |
| | 6/17/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | < 0.0065 Q | < 0.0035 | < 0.0054 | < 0.0051 | < 0.0062 | < 0.0078 | < 0.007 | < 0.0043 | < 0.0053 | < 0.0063 | < 0.0036 | 0.017 Q | **< 0.0075** | < 0.0068 |
| | 9/29/2008 | | < 0.0096 | 0.014 Q | < 0.0079 | < 0.005 | < 0.0066 | < 0.0035 | < 0.0055 | < 0.0052 | < 0.0063 | < 0.0078 | < 0.0071 | < 0.0043 | < 0.0054 | < 0.0063 | < 0.0036 | 0.049 Q | **< 0.0075** | < 0.0068 Q |

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| *Sample ID* | *Collection Date* | *All PAH analytical results in µg/L.* | *1-Methyl naphthalene* | *2-Methyl naphthalene* | *Acenaphthene* | *Acenaph - thylene* | *Anthracene* | *Benzo (a ) anthracene* | *Benzo (a) pyrene* | *Benzo (b) fluoranthene* | *Benzo (ghi) perylene* | *Benzo (k) fluoranthene* | *Chrysene* | *Dibenz (a,h) anthracene* | *Fluoranthene* | *Fluorene* | *Indeno (1,2,3-cd) pyrene* | *Naphthalene* | *Phenanthrene* | *Pyrene* |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | | | | | | | | | | |
| *Preventive Action Limit* | | | NS | NS | NS | NS | 600 | NS | 0.02 | 0.02 | NS | NS | 0.02 | NS | 80 | 80 | NS | 10 | NS | 50 |
| **Enforcement Standard** | | | NS | NS | NS | NS | 3000 | NS | 0.2 | 0.2 | NS | NS | 0.2 | NS | 400 | 400 | NS | 100 | NS | 250 |
| PZ107 | | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | | 0.061 Q | 0.049 Q | < 0.019 | < 0.019 | < 0.018 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.016 | < 0.022 | < 0.016 | < 0.022 | < 0.017 | 0.29 Q | < 0.02 | < 0.016 |
| | 3/31/2005 | | < 0.02 | < 0.023 | < 0.019 | < 0.019 | < 0.018 | < 0.02 | < 0.018 | < 0.018 | < 0.021 | < 0.019 | < 0.016 | < 0.022 | < 0.017 | < 0.022 | < 0.017 | 0.046 Q | < 0.02 | < 0.016 |
| | 9/23/2005 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0081 | < 0.012 | < 0.016 | < 0.018 | < 0.016 | < 0.019 | < 0.019 | < 0.019 | < 0.019 | < 0.015 | < 0.0091 | < 0.019 | 0.036 | < 0.011 | < 0.015 |
| | 6/26/2007 | | < 0.01 | < 0.011 | < 0.0083 | < 0.0083 | < 0.012 | < 0.016 | < 0.019 | < 0.016 Q | < 0.02 | < 0.02 Q | < 0.019 | < 0.019 | < 0.016 | < 0.0092 | < 0.019 | 0.014 Q | < 0.012 | < 0.015 |
| | 9/12/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0081 | < 0.012 | < 0.016 | < 0.018 | < 0.016 | < 0.019 | < 0.019 | < 0.019 | < 0.019 | < 0.015 | < 0.0091 | < 0.019 | < 0.012 | < 0.011 | < 0.015 |
| | 12/20/2007 | | < 0.01 Q | < 0.011 Q | < 0.0083 Q | < 0.0083 Q | < 0.012 Q | < 0.016 | < 0.019 | < 0.016 | < 0.02 | < 0.02 | < 0.019 | < 0.019 | < 0.016 Q | < 0.0092 Q | < 0.019 | < 0.013 Q | < 0.012 Q | < 0.015 Q |
| | 3/18/2008 | | < 0.0096 | < 0.011 | < 0.0079 | < 0.005 | < 0.0066 | < 0.0035 | < 0.0055 | < 0.0052 | < 0.0063 | < 0.0078 | < 0.0071 | < 0.0043 | < 0.0054 | < 0.0063 | < 0.0036 | < 0.017 | < 0.0075 | < 0.0068 |
| | 6/17/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | < 0.0065 Q | < 0.0035 | < 0.0054 | < 0.0051 | < 0.0062 | < 0.0078 | < 0.007 | < 0.0043 | < 0.0053 | < 0.0063 | < 0.0036 | < 0.016 | < 0.0075 | < 0.0068 |
| | 9/29/2008 | | < 0.0095 Q | < 0.011 | < 0.0078 Q | < 0.005 Q | < 0.0065 Q | < 0.0035 | < 0.0054 Q | < 0.0051 Q | < 0.0062 Q | < 0.0078 Q | < 0.007 Q | < 0.0043 | < 0.0053 | < 0.0063 Q | < 0.0036 Q | < 0.016 Q | < 0.0075 Q | < 0.0068 Q |
| QC01 | | | | | | | | | | | | | | | | | | | | |
| | 12/6/2004 | | < 100 Q | < 110 Q | 13 | 32 | 4.9 Q | < 2 | < 1.8 | < 1.8 | < 2.1 | < 1.9 | < 1.7 | < 2.2 | 3.3 Q | 20 | < 1.7 | **1300 Q** | 24 | 1.9 Q |
| | 3/31/2005 | | 0.1 | 0.088 | 0.025 Q | 0.075 | < 0.018 | < 0.02 | < 0.019 | < 0.019 | < 0.021 | < 0.02 | < 0.017 | < 0.023 | < 0.017 | < 0.023 | < 0.018 | 0.35 | < 0.021 | < 0.017 |
| *(MW101)* | 9/22/2005 | | 130 | 26 Q | 34 | 53 | 25 Q | 0.49 | *0.063 Q* | *0.06* | < 0.019 | 0.052 | **0.22 Q** | < 0.019 Q | 13 | 46 Q | < 0.019 Q | **1500 Q** | 84 | 8 |
| *(MW12)* | 6/25/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0082 | < 0.012 | < 0.016 | < 0.019 | < 0.016 | < 0.019 | < 0.02 | < 0.019 | < 0.019 | < 0.016 | < 0.0091 | < 0.019 | 0.013 Q | < 0.011 | < 0.015 |
| *(PZ106)* | 9/12/2007 | | 0.014 Q | 0.023 Q | 0.0091 Q | < 0.0081 | < 0.012 | < 0.016 | < 0.018 | < 0.016 Q | < 0.019 | < 0.019 Q | < 0.019 | < 0.019 | < 0.015 | < 0.0091 | < 0.019 | 0.016 Q | < 0.011 | < 0.015 |
| *(MW104)* | 12/19/2007 | | < 0.01 | < 0.011 | < 0.0082 | < 0.0082 | < 0.012 | < 0.016 | < 0.019 | < 0.016 | < 0.019 | < 0.02 | < 0.019 | < 0.019 | < 0.016 | < 0.0091 | < 0.019 | < 0.012 | < 0.011 | < 0.015 |
| *(MW12)* | 3/19/2008 | | < 0.0095 | < 0.011 | < 0.0078 | < 0.005 | 0.0088 Q | < 0.0035 | < 0.0054 | < 0.0051 | < 0.0062 | < 0.0078 | < 0.007 | < 0.0043 | 0.0057 Q | < 0.0063 | < 0.0036 | < 0.016 | < 0.0075 | < 0.0068 |
| *(MW103)* | 6/16/2008 | | < 0.0096 | < 0.011 | 0.015 Q | 0.02 Q | 0.018 Q | 0.0048 Q | < 0.0055 | < 0.0052 | < 0.0063 | < 0.0078 | < 0.0071 | < 0.0043 | 0.019 Q | < 0.0063 | < 0.0036 | 0.017 Q | < 0.0075 | 0.0098 Q |
| *(MW12)* | 9/29/2008 | | < 0.0096 | < 0.011 | < 0.0079 | < 0.005 | < 0.0066 | < 0.0035 | < 0.0055 | < 0.0052 | < 0.0063 | < 0.0078 | < 0.0071 | < 0.0043 | < 0.0054 | < 0.0063 | < 0.0036 | < 0.017 Q | < 0.0075 | < 0.0068 Q |

Notes

1) Parameters that attain or exceed the NR 140 Wisconsin Groundwater Quality Preventive Action Limit (PAL) Standard are identified in italics and underlined.

2) Parameters that attain or exceed the NR 140 Wisconsin Groundwater Quality Enforcement Standard (ES) are identified in bold and underlined.

<2.0 : Parameter not detected above the Limit of Detection indicated.
NS : NR 140 Wisconsin Groundwater Quality Standard has not been established for this parameter.
TB : Trip Blank for QA/QC.
QC: Quality Control duplicate sample.
Q: Analyte result has been qualified, see laboratory analytical report for additional information.
--: Analysis not performed.

## *Table 7. Groundwater Analytical Results - Laboratory and Field Natural Attenuation Indicator Parameters*

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| | | *Laboratory Parameters* | | | | | *Field Parameters* | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| *Sample ID* | *Collection Date* | *Dissolved Iron (µg/L)* | *Dissolved Manganese (µg/L)* | *Methane (µg/L)* | *Nitrate as N (mg/L)* | *Sulfate (mg/L)* | *pH (SU)* | *Temperature (Degrees C)* | *Conductivity (mmhos/cm)* | *Dissolved Oxygen (mg/L)* | *Oxidation Reduction Potential (mV)* |
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | |
| *Preventive Action Limit* | | 150 | 25 | NS | 2 | 125 | NS | NS | NS | NS | NS |
| **Enforcement Standard** | | 300 | 50 | NS | 10 | 250 | NS | NS | NS | NS | NS |
| MW101 | | | | | | | | | | | |
| | 09/29/04 | -- | -- | -- | -- | -- | 7.7 | 15.9 | 1.255 | 0.37 | 152 |
| | 12/06/04 | -- | -- | -- | -- | -- | 7.5 | 13.4 | 1.223 | 0.39 | 73 |
| | 09/22/05 | -- | -- | -- | -- | -- | 7.4 | 15.2 | 1.415 | 0.29 | 44 |
| MW102 | | | | | | | | | | | |
| | 09/29/04 | -- | -- | -- | -- | -- | 7.2 | 15.9 | 1.083 | 0.42 | 109 |
| | 12/07/04 | -- | -- | -- | -- | -- | 7.1 | 13.1 | 0.657 | 0.61 | 126 |
| MW103 | | | | | | | | | | | |
| | 09/29/04 | -- | -- | -- | -- | -- | 7.3 | 15.8 | 1.4 | 0.6 | 129 |
| | 12/07/04 | -- | -- | -- | -- | -- | 7.1 | 13 | 0.935 | 0.56 | 256 |
| | 09/22/05 | -- | -- | -- | -- | -- | 6.8 | 15.4 | 2.04 | 0.4 | 65 |
| | 06/26/07 | < 50 | **65** | 11 | 1.1 | *170* | 7.2 | 16.8 | 1.9 | 0.51 | 257 |
| | 09/11/07 | *260 Q* | *48* | < 10 | *4.4* | *220* | 7.3 | 16.8 | 1.83 | 0.4 | 454 |
| | 12/20/07 | **370** | **130** | 75 | 0.55 | 110 | 6.9 | 14 | 1.75 | 0.62 | 252 |
| | 03/19/08 | -- | -- | -- | -- | -- | 7 | 12.5 | 2.69 | 0.82 | 233 |
| | 06/16/08 | -- | -- | -- | -- | -- | 7.3 | 15.9 | 1.69 | 1.8 | 416 |
| | 09/30/08 | -- | -- | -- | -- | -- | 7.2 | 14.1 | 1.88 | 0.98 | 183 |
| MW104 | | | | | | | | | | | |
| | 09/29/04 | -- | -- | -- | -- | -- | 7.2 | 13.9 | 0.875 | 4.44 | 320 |
| | 12/06/04 | -- | -- | -- | -- | -- | 7.1 | 12.9 | 0.9 | 0.74 | 331 |
| | 09/22/05 | -- | -- | -- | -- | -- | 6.9 | 14.4 | 0.825 | 0.47 | 228 |
| | 06/25/07 | < 50 | **83** | < 10 | 0.39 Q | **580** | 7.2 | 14.76 | 1.58 | 3.72 | 317 |
| | 09/11/07 | **320 Q** | 8.9 | < 10 | 0.72 | **620** | 7.3 | 14.8 | 1.67 | 1.19 | 523 |
| | 12/19/07 | < 6.9 | *31* | 17 | < 0.085 Q | **510** | 7.1 | 1.8 | 1.64 | 3.68 | 475 |
| | 03/19/08 | -- | -- | -- | -- | -- | 7.2 | 5.6 | 1.376 | 3.23 | 287 |
| | 06/16/08 | -- | -- | -- | -- | -- | 7.1 | 16.7 | 1.433 | 2.34 | 238 |
| | 09/30/08 | -- | -- | -- | -- | -- | 7.2 | 14.8 | 1.413 | 1.28 | 271 |
| MW105 | | | | | | | | | | | |
| | 12/06/04 | -- | -- | -- | -- | -- | 7.2 | 12.8 | 2.02 | -- | 251 |
| | 03/31/05 | -- | -- | -- | -- | -- | 6.9 | 11.1 | 1.202 | 0.68 | 389 |
| MW12 | | | | | | | | | | | |
| | 09/23/05 | -- | -- | -- | -- | -- | 7.1 | 14.9 | 1.83 | 0.46 | 96 |
| | 06/25/07 | **810** | **89** | 120 | < 0.085 | *140* | 7.6 | 15.4 | 2.4 | 0.4 | 100 |
| | 09/11/07 | **820** | **81** | 140 | < 0.085 | *150* | 7.7 | 15.5 | 2.22 | 0.33 | 125 |
| | 03/18/08 | -- | -- | -- | -- | -- | 7.3 | 11.3 | 2.01 | 0.58 | 110 |
| | 06/17/08 | -- | -- | -- | -- | -- | 7.5 | 13.8 | 2.26 | 0.45 | 86 |
| | 09/29/08 | -- | -- | -- | -- | -- | 7.7 | 14.5 | 2.25 | 0.5 | 74 |

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| | | *Laboratory Parameters* | | | | | *Field Parameters* | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| *Sample ID* | *Collection Date* | *Dissolved Iron (µg/L)* | *Dissolved Manganese (µg/L)* | *Methane (µg/L)* | *Nitrate as N (mg/L)* | *Sulfate (mg/L)* | *pH (SU)* | *Temperature (Degrees C)* | *Conductivity (mmhos/cm)* | *Dissolved Oxygen (mg/L)* | *Oxidation Reduction Potential (mV)* |
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | |
| *Preventive Action Limit* | | 150 | 25 | NS | 2 | 125 | NS | NS | NS | NS | NS |
| **Enforcement Standard** | | 300 | 50 | NS | 10 | 250 | NS | NS | NS | NS | NS |
| PZ101 | | | | | | | | | | | |
| | 01/03/05 | -- | -- | -- | -- | -- | 7.35 | 8.73 | 0.524 | 0.65 | 463 |
| | 03/31/05 | -- | -- | -- | -- | -- | 8.7 | 11.3 | 0.536 | 0.77 | 301 |
| | 09/23/05 | -- | -- | -- | -- | -- | 8.3 | 15.2 | 0.621 | 0.48 | 102 |
| PZ101R | | | | | | | | | | | |
| | 06/26/07 | < 50 | *26* | < 10 | < 0.085 Q | 70 | 8.2 | 19.9 | 0.395 | 0.38 | 96 |
| | 09/12/07 | 88 Q | *38* | < 10 | < 0.085 | 68 | 8.2 | 17.6 | 0.374 | 0.45 | 100 |
| | 12/19/07 | 35 | 18 | < 10 | 0.18 Q | 65 | 7.8 | 14 | 0.383 | 0.7 | 168 |
| | 03/19/08 | -- | -- | -- | -- | -- | 8 | 10.7 | 0.375 | 3.3 | 156 |
| | 06/16/08 | -- | -- | -- | -- | -- | 8.2 | 21.3 | 0.382 | 0.76 | 84 |
| | 09/30/08 | -- | -- | -- | -- | -- | 8.4 | 18.1 | 0.381 | 0.74 | 106 |
| PZ104 | | | | | | | | | | | |
| | 06/25/07 | < 50 | 15 | < 10 | < 0.085 | 20 | 8.3 | 17.4 | 0.283 | 2.26 | 271 |
| | 09/11/07 | 36 Q | *44* | < 10 | < 0.085 | 23 | 8.3 | 13.7 | 0.29 | 1.35 | 484 |
| | 12/19/07 | < 6.9 | 3.1 | < 10 | 0.19 Q | 20 | 7.9 | 2.8 | 0.288 | 0.98 | 438 |
| | 03/19/08 | -- | -- | -- | -- | -- | 8.2 | 5.3 | 0.275 | 2.67 | 257 |
| | 06/16/08 | -- | -- | -- | -- | -- | 8 | 21.6 | 0.274 | 3.28 | 244 |
| | 09/30/08 | -- | -- | -- | -- | -- | 8.3 | 14.6 | 0.279 | 0.5 | 216 |
| PZ106 | | | | | | | | | | | |
| | 12/06/04 | -- | -- | -- | -- | -- | 6.9 | 14.1 | 0.826 | 0.34 | 254 |
| | 03/31/05 | -- | -- | -- | -- | -- | 7 | 8.1 | 0.554 | 0.36 | 346 |
| | 09/23/05 | -- | -- | -- | -- | -- | 6.8 | 16.7 | 0.719 | 0.39 | 113 |
| | 06/26/07 | **1400** | **520** | 220 | < 0.085 | 100 | 7 | 16.7 | 1.277 | 0.4 | 189 |
| | 09/12/07 | **1200** | **550** | 290 | < 0.085 | 120 | 7 | 16.5 | 1.359 | 0.3 | 197 |
| | 12/19/07 | *240* | **530** | 320 Q | < 0.085 Q | 65 | 6.7 | 12.8 | 1.235 | 0.86 | 324 |
| | 03/18/08 | -- | -- | -- | -- | -- | 6.8 | 9.8 | 1.245 | 0.43 | 152 |
| | 06/17/08 | -- | -- | -- | -- | -- | 6.8 | 14 | 1.293 | 0.42 | 235 |
| | 09/29/08 | -- | -- | -- | -- | -- | 7 | 17.5 | 1.256 | 0.46 | 168 |
| PZ107 | | | | | | | | | | | |
| | 12/06/04 | -- | -- | -- | -- | -- | 7 | 14.4 | 0.775 | 0.41 | 235 |
| | 03/31/05 | -- | -- | -- | -- | -- | 7.3 | 9.2 | 0.576 | 0.8 | 336 |
| | 09/23/05 | -- | -- | -- | -- | -- | 6.9 | 18.3 | 0.939 | 0.45 | 130 |
| | 06/26/07 | *230* | **820** | 33 | < 0.085 | *160* | 7.4 | 20.2 | 1.5 | 0.42 | 250 |
| | 09/12/07 | **640** | **830** | 100 | < 0.085 | 88 | 7.4 | 16.7 | 1.41 | 0.37 | 161 |
| | 12/20/07 | **470** | **610** | 170 | < 0.085 | 61 | 7.5 | 12.4 | 1.5 | 0.58 | 132 |
| | 03/18/08 | -- | -- | -- | -- | -- | 7.2 | 12.2 | 1.434 | 0.48 | 132 |
| | 06/17/08 | -- | -- | -- | -- | -- | 7.5 | 25.4 | 1.53 | 0.42 | 139 |
| | 09/29/08 | -- | -- | -- | -- | -- | 7.8 | 18.7 | 1.51 | 0.43 | 86 |

**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Water Street & Grand Avenue, Racine, WI**
**BRRTS# : 02-52-543766**

| Sample ID | Collection Date | Laboratory Parameters: Dissolved Iron (µg/L) | Dissolved Manganese (µg/L) | Methane (µg/L) | Nitrate as N (mg/L) | Sulfate (mg/L) | Field Parameters: pH (SU) | Temperature (Degrees C) | Conductivity (mmhos/cm) | Dissolved Oxygen (mg/L) | Oxidation Reduction Potential (mV) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Wisconsin Groundwater Quality Standards (NR 140, January 2007)** | | | | | | | | | | | |
| *Preventive Action Limit* | | 150 | 25 | NS | 2 | 125 | NS | NS | NS | NS | NS |
| **Enforcement Standard** | | 300 | 50 | NS | 10 | 250 | NS | NS | NS | NS | NS |
| QC01 | | | | | | | | | | | |
| *(MW12)* | 06/25/07 | **820** | **87** | 150 | < 0.085 | *140* | -- | -- | -- | -- | -- |
| *(PZ106)* | 09/12/07 | **1200** | **550** | 340 | < 0.085 | 120 | -- | -- | -- | -- | -- |
| *(MW104)* | 12/19/07 | < 6.9 | *29* | < 10 | < 0.085 Q | **490** | -- | -- | -- | -- | -- |
| QCEB | | | | | | | | | | | |
| | 09/30/08 | -- | -- | -- | -- | -- | 7.8 | 19.9 | 1 | 7.4 | 199 |

Notes

1) Parameters that attain or exceed the NR 140 Wisconsin Groundwater Quality Preventive Action Limit (PAL) Standard are identified in italics and underlined.

2) Parameters that attain or exceed the NR 140 Wisconsin Groundwater Quality Enforcement Standard (ES) are identified in bold and underlined.

<2.0 : Parameter not detected above the Limit of Detection indicated.

ns : NR 140 standard not established

Q: Analyte result has been qualified, see laboratory analytical report for additional information.

QC: Quality Control duplicate sample.

--: Analysis not performed on laboratory parameter or value for field parameter not available, see historic data table for values.

**Table 4. Groundwater Elevations and Monitoring Well Construction Information**
**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Racine, Wisconsin**
**BRRTS #02-52-543766**

| Well Construction Data | MW-101 | | MW-102 | | MW-103 | | |
|---|---|---|---|---|---|---|---|
| Well Depth from TOC (feet) | 22.90 | | 23.70 | | 28.83 | | |
| Screen Length (feet) | 10 | | 10 | | 10 | | |
| Surface Elevation (NGVD) | 595.90 | | 601.02 | | 605.70 | 605.71 | # |
| Casing Top Elevation (NGVD) | 598.91 | | 600.40 | | 605.36 | 605.36 | # |
| Screen Top Elevation (NGVD) | 586.0 | | 586.7 | | 586.5 | | |
| Screen Bottom Elevation (NGVD) | 576.0 | | 576.7 | | 576.5 | | |
| Date | Depth to Water from TOC (feet) | Water Elevation (NGVD) | Depth to Water from TOC (feet) | Water Elevation (NGVD) | Depth to Water from TOC (feet) | Water Elevation (NGVD) | |
| 9/21/2004 | 14.38 | 584.53 | 12.30 | 588.10 * | 19.69 | 585.67 | |
| 9/29/2004 | 14.43 | 584.48 | 12.47 | 587.93 * | 19.88 | 585.48 | |
| 11/1/2004 | 14.51 | 584.40 | 12.88 | 587.52 * | 20.38 | 584.98 | |
| 11/23/2004 | 14.30 | 584.61 | 12.88 | 587.52 * | 19.71 | 585.65 | |
| 12/6-7/2004 | 14.20 | 584.71 | 12.78 | 587.62 * | 18.96 | 586.40 | |
| 1/5/2005 | 14.26 | 584.65 | 12.82 | 587.58 * | 19.07 | 586.29 | |
| 1/13/2005 | 14.03 | 584.88 | 13.01 | 587.39 * | 18.75 | 586.61 | * |
| 3/31/2005 | nm | nm | nm | nm | nm | nm | |
| 4/5/2005 | 14.10 | 584.81 | 13.75 | 586.65 | 18.83 | 586.53 | * |
| 9/22/2005 | 14.67 | 584.24 | nm | nm | 20.46 | 584.90 | |
| 10/11/2005 | nm | nm | 14.45 | 585.95 | nm | nm | |
| 12/7/2005 | nm | nm | nm | nm | nm | nm | |
| 6/25-26/2007 | Abandoned | | Abandoned | | 17.71 | 587.65 | *# |
| 9/11-12/2007 | | | | | 16.33 | 589.03 | *# |
| 12/19-20/2007 | | | | | 18.44 | 586.92 | *# |
| 3/18-19/2008 | | | | | 17.28 | 588.08 | *# |
| 6/16-17/2008 | | | | | 15.62 | 589.74 | *# |
| 9/29-30/2008 | | | | | 17.68 | 587.68 | *# |

| Well Construction Data | MW-104 | | | MW-105 | | PZ-101 | | |
|---|---|---|---|---|---|---|---|---|
| Well Depth from TOC (feet) | 24.80 | | | 20.37 | | 60.21 | | |
| Screen Length (feet) | 10 | | | 10 | | 10 | | *** |
| Surface Elevation (NGVD) | 600.89 | 601.29 | # | 595.06 | | 596.01 | | |
| Casing Top Elevation (NGVD) | 603.32 | 603.29 | # | 597.65 | | 598.24 | | |
| Screen Top Elevation (NGVD) | 588.5 | | | 587.3 | | 548.0 | | |
| Screen Bottom Elevation (NGVD) | 578.5 | | | 577.3 | | 538.0 | | |
| Date | Depth to Water from TOC (feet) | Water Elevation (NGVD) | | Depth to Water from TOC (feet) | Water Elevation (NGVD) | Depth to Water from TOC (feet) | Water Elevation (NGVD) | |
| 9/21/2004 | 16.89 | 586.43 | | nm | nm | nm | nm | |
| 9/29/2004 | 17.32 | 586.00 | | nm | nm | nm | nm | |
| 11/1/2004 | 16.99 | 586.33 | | nm | nm | nm | nm | |
| 11/23/2004 | 16.22 | 587.10 | | 19.57 | 578.08 | nm | nm | |
| 12/6-7/2004 | 15.14 | 588.18 | | 19.48 | 578.17 | nm | nm | |
| 1/5/2005 | 16.13 | 587.19 | | 19.24 | 578.41 | 26.27 | 571.97 | |
| 1/13/2005 | 16.05 | 587.27 | | 19.21 | 578.44 | 28.13 | 570.11 | |
| 3/31/2005 | nm | nm | | 17.94 | 579.71 | 30.28 | 567.96 | |
| 4/5/2005 | 16.04 | 587.28 | | 17.88 | 579.77 | 30.39 | 567.85 | |
| 9/22/2005 | 17.14 | 586.18 | | 19.74 | 577.91 | 26.68 | 571.56 | |
| 10/11/2005 | nm | nm | | 19.38 | 578.27 | nm | nm | |
| 12/7/2005 | nm | nm | | 18.28 | 579.37 | nm | nm | |
| 6/25-26/2007 | 16.18 | 587.11 | # | Abandoned | | Abandoned | | |
| 9/11-12/2007 | 16.29 | 587.00 | # | | | | | |
| 12/19-20/2007 | 16.46 | 586.83 | # | | | | | |
| 3/18-19/2008 | 16.21 | 587.08 | # | | | | | |
| 6/16-17/2008 | 16.18 | 587.11 | # | | | | | |
| 9/29-30/2008 | 16.74 | 586.55 | # | | | | | |

**Table 4. Groundwater Elevations and Monitoring Well Construction Information**
**Closure Request**
**We Energies Former Racine Water and Grand MGP Site**
**Racine, Wisconsin**
**BRRTS #02-52-543766**

| Well Construction Data | PZ-101R | | | PZ-104 | | | MW-12 | | |
|---|---|---|---|---|---|---|---|---|---|
| Well Depth from TOC (feet) | 49.00 | | | 50.00 | | | 28.00 | | |
| Screen Length (feet) | 10 | | *** | 10 | | *** | 10 | | |
| Surface Elevation (NGVD) | 596.77 | | # | 599.99 | | # | 593.6**** | 593.21 | # |
| Casing Top Elevation (NGVD) | 599.28 | | # | 602.62 | | # | 592.85**** | 592.76 | # |
| Screen Top Elevation (NGVD) | 557.8 | | | 560.0 | | | 574.8 | | |
| Screen Bottom Elevation (NGVD) | 547.8 | | | 550.0 | | | 564.8 | | |
| Date | Depth to Water from TOC (feet) | Water Elevation (NGVD) | | Depth to Water from TOC (feet) | Water Elevation (NGVD) | | Depth to Water from TOC (feet) | Water Elevation (NGVD) | |
| 9/22/2005 | nm | nm | | nm | nm | | 17.33 | 575.52 | * |
| 12/7/2005 | nm | nm | | nm | nm | | 17.52 | 575.33 | * |
| 6/25-26/2007 | 19.47 | 579.81 | # | 19.33 | 583.29 | # | 17.43 | 575.33 | *# |
| 9/11-12/2007 | 17.94 | 581.34 | # | 18.01 | 584.61 | # | 17.98 | 574.78 | # |
| 12/19-20/2007 | 19.91 | 579.37 | # | 19.3 | 583.32 | # | nm | nm | |
| 3/18-19/2008 | 19.68 | 579.60 | # | 19.07 | 583.55 | # | 17.23 | 575.53 | *# |
| 6/16-17/2008 | 17.00 | 582.28 | # | 18.73 | 583.89 | # | 17.17 | 575.59 | *# |
| 9/29-30/2008 | 18.08 | 581.20 | # | 17.62 | 585.00 | # | 17.52 | 575.24 | *# |

| Well Construction Data | PZ-106 | | | PZ-107 | | | SG-1 | | |
|---|---|---|---|---|---|---|---|---|---|
| Well Depth from TOC (feet) | 24.30 | | | 23.10 | | | NA | | |
| Screen Length (feet) | 5 | | | 5 | | | NA | | |
| Surface Elevation (NGVD) | 588.38 | 588.54 | # | 587.83 | 588.16 | # | 581.52 | | |
| Casing Top Elevation (NGVD) | 591.66 | 591.55 | # | 591.15 | 591.06 | # | NA | | |
| Screen Top Elevation (NGVD) | 572.4 | | | 573.1 | | | NA | | |
| Screen Bottom Elevation (NGVD) | 567.4 | | | 568.1 | | | NA | | |
| Date | Depth to Water from TOC (feet) | Water Elevation (NGVD) | | Depth to Water from TOC (feet) | Water Elevation (NGVD) | | Depth to Water from TOC (feet) | Water Elevation (NGVD) | |
| 9/21/2004 | nm | nm | | nm | nm | | nm | nm | |
| 9/29/2004 | nm | nm | | nm | nm | | nm | nm | |
| 11/1/2004 | nm | nm | | nm | nm | | nm | nm | |
| 11/23/2004 | 16.15 | 575.51 | | 15.52 | 575.63 | | nm | 578.31 | ** |
| 12/6-7/2004 | 15.08 | 576.58 | | 15.45 | 575.70 | | nm | nm | |
| 1/5/2005 | 15.97 | 575.69 | | 15.31 | 575.84 | | frozen | frozen | |
| 1/13/2005 | 15.52 | 576.14 | | 14.87 | 576.28 | | frozen | frozen | |
| 3/31/2005 | 15.16 | 576.50 | | 14.57 | 576.58 | | nm | nm | |
| 4/5/2005 | 15.03 | 576.63 | | 14.42 | 576.73 | | nm | nm | |
| 9/22/2005 | 15.57 | 576.09 | | 15.38 | 575.77 | | nm | nm | |
| 12/7/2005 | 16.32 | 575.34 | | 15.73 | 575.42 | | 3.58 | 577.94 | |
| 6/25-26/2007 | 16.18 | 575.37 | # | 15.69 | 575.37 | # | nm | nm | |
| 9/11-12/2007 | 16.62 | 574.93 | # | 16.15 | 574.91 | # | nm | nm | |
| 12/19-20/2007 | 14.46 | 577.09 | #& | 16.02 | 575.04 | # | nm | nm | |
| 3/18-19/2008 | 15.89 | 575.66 | # | 15.41 | 575.65 | # | nm | nm | |
| 6/16-17/2008 | 15.89 | 575.66 | # | 15.40 | 575.66 | # | nm | nm | |
| 9/29-30/2008 | 16.28 | 575.27 | # | 15.79 | 575.27 | # | nm | nm | |

(O-PAR/C-BGH 10/04)(U-BGH/C-JAH 1/05)(U-BGH/C-JAH 4/05)(U-HMS/MJR 12/05)(U-RMW/JAZ 5/08)(U-RMW/KRM 1/09)

**Notes:**

**1)** Well depth from TOC was measured on 12/20/04 and 12/21/04; except PZ-101 measured on 1/5/05.
**2)** Casing Top and Surface elevations were surveyed by Nielsen Madsen & Barber S.C. except PZ-101 which was surveyed by NRT.
**TOC :** Top of PVC well casing
**nm :** not measured, either because the well or staff gauge had not been installed, or was not sampled.
**NGVD:** Elevations are referenced to National Geodetic Vertical Datum 29.
**MW :** Monitoring Well
**PZ :** Piezometer
**SG :** Staff Gauge, on Root River
*** :** Water level elevation above top of monitoring well screen elevation
****:** Water level elevation was surveyed by Nielsen Madsen & Barber S.C. during site survey.
*****:** 10 foot screen length for PZ-101, PZ-101R, and PZ-104 was installed to increase sample yield in the till.
******:** Elevation is approximate based on field survey on 12/7/05.
**frozen:** The Root River was frozen and therefore no measurement was collected.
**#:** Casing and ground elevations re-surveyed on 6/7/2007. Groundwater elevations based on 6/7/2007 survey data.
**&:** suspected depth to water field measurement error

SOURCE PROPERTY

We energies

231 W. Michigan Street
Milwaukee, WI 53203
www.we-energies.com

**Via Certified Mail**

Mr. Mark Ulinski
6820 Beechnut Drive
Racine, WI 53402

June 17, 2009

**Re: Notification of Case Closure Request**
We Energies Former Water Street and Grand Avenue Manufactured Gas Plant (MGP) Site
601 Water Street Property
Racine, Wisconsin
BRRTS# 02-52-543766

Dear Mr. Ulinski:

This letter is to inform you of We Energies' intent to request case closure of the former Manufactured Gas Plant (MGP) site, which was located at 601 Water Street (your property), and 621 Water Street/513 Grand Avenue (currently We Energies-owned property) in Racine, Wisconsin. Closure means that the Wisconsin Department of Natural Resources (WDNR) will not be requiring any further investigation or cleanup action to be taken, other than reliance on natural attenuation, as long as land use controls are followed.

**Background**

As you may recall, MGP residuals (such as coal tar) from the former plant operations were detected in the soil and groundwater. Remediation occurred in 2006 to address the accessible source of the MGP-impacted soil and groundwater. The remedial action approach that was approved by WDNR included in-situ stabilization/solidification (ISS) of source area contamination. Additional components of the final remedy include natural attenuation of groundwater and use of applicable site performance standards (i.e., land use controls) as a closure mechanism.

As indicated on the attached figures and table, residual MGP-impacts remain in the deep soils near the building on your property (MW-103 and SB-116 locations). These soils could not be treated by ISS due to their proximity to the building, which is a structural barrier to further investigation and remediation. ISS treated soil exists from approximately 4.5 to 35 feet below ground surface (area shown on figure). Disturbance of the residual untreated soils and the ISS treated soils should be avoided if possible.

Based on 2007-2008 groundwater sampling results, the remediation that occurred in 2006 addressed the majority of the groundwater impacts on your property. Any residual contamination in the groundwater will naturally degrade over time, allowing natural attenuation to complete the cleanup, which meets the requirements for case closure found in chapter NR 726, Wisconsin Administrative Code.

Final closure conditions will be determined by the WDNR and will likely include certain land use controls in accordance with sections 292.12, Wisconsin Statutes. Under this statute, the land use controls are generally the legal obligation of the property owner (and successors). Responsibilities include: 1) obtaining WDNR approval before changing certain physical or land use conditions, and 2) complying with a Maintenance and Soils Management Plan.

SOURCE PROPERTY



**Potential Land Use Controls**

It is anticipated that the WDNR would specify the following land use controls on your property:

- Zoning must remain industrial, unless WDNR approval is granted to change the land use condition. (Any additional investigation and remedial action activities that may be necessary due to a zoning change would be the property owner's responsibility).
- Maintain the existing building. If demolition and removal of the building is planned in the future, notification to We Energies and WDNR would be necessary. WDNR may require additional investigation and/or remediation in the area under and around the foundation in the event the building is removed.
- Proper handling and disposal of the ISS treated soil and/or other known or encountered MGP-impacted soils in accordance with state and federal requirements, if disturbance cannot be avoided. We Energies would need to be notified in advance so assistance can be provided in the proper handling and disposal of the materials.
- Special construction standards for any water supply well constructed on the property may be required along with WDNR approval.
- Assessment of the subsurface environmental conditions on building construction methods if a new building is contemplated.

**Maintenance and Soils Management Plan**

A maintenance plan for land use controls and a soils management plan (collectively, "Plan") is required to be provided to WDNR with the case closure request. This Plan is enclosed for your review. The Plan documents roles and responsibilities of you, as the property owner, and We Energies, as the MGP responsible party, in regard to land use controls and proper management of the residual MGP-contaminated soil, ISS treated soil, and historic fill material on the property.

**Closure Process**

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

Mr. John Feeney
WDNR
1155 Pilgrim Road
Plymouth, WI 53073-4294
Phone: (920) 892-8756 Ext.3023

SOURCE PROPERTY



If this case is closed, all properties within the site boundaries where groundwater contamination exceeds Chapter NR 140 groundwater enforcement standards, and where MGP residuals remain in the soil, will be listed on the WDNR geographic information system (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps showing the location of properties in Wisconsin where groundwater and soil contamination are above screening levels at the time the case is closed. This GIS Registry will be available to the general public on the WDNR internet web site. The legal description of your property to be used for the GIS Registry is on the attached page.

Once the WDNR makes a decision on the closure request, it will be documented in a letter. If the WDNR grants closure, you may obtain a copy of the letter by requesting a copy from me, by writing to the agency address given above or by accessing the WDNR GIS Registry of Closed Remediation Sites on the internet at http://www.dnr.wi.gov/org/aw/rr/gis/index.htm. A copy of the closure letter is included as part of the site file on the GIS Registry of Closed Remediation Sites.

Please sign and return the attached page to acknowledge in writing that you have received and reviewed this letter and believe that the legal description of your property is accurate to the best of your knowledge. You may contact me at (414) 221-2162 with questions or if you require additional information. On behalf of We Energies, I would like to thank you for your assistance and cooperation on this project.

Sincerely,

Mark J. Collins
Principal Hydrogeologist

Enclosures: Acknowledgement of Notification Letter and Legal Description Certification
Maintenance and Soils Management Plan

RIGHT-OF-WAY

we energies

231 W. Michigan Street
Milwaukee, WI 53203
www.we-energies.com

July 21, 2008

Mr. Richard Jones
Department of Public Works
City of Racine
730 Washington Avenue; Room 303
Racine, WI 53403

**RE: Notification of Potentially Affected Right-of-ways and Utilities and Request for Inclusion on City's Master Plan/GIS System**
We Energies
Former Water Street and Grand Avenue Manufactured Gas Plant Site
621 and 601 Water Street, 513 Grand Avenue, Racine, Wisconsin
**WDNR BRRTS# 02-52-543766, FID# 252243090**

Dear Mr. Jones:

We Energies is providing the City of Racine notification of affected or potentially affected right-of-ways and utilities associated with their former manufactured gas plant (MGP) site. The MGP operated in the mid to late 1800's at the corner of Grand Avenue and Water Street in Racine. As part of the site remediation and closure process, We Energies is notifying the City of potentially affected right-of-ways to be identified on the City's Master Plan. The estimated extent of potentially affected right-of-ways is shown on Figure 1.

The current status of the street right-of-ways and utilities in the area of the former MGP site is the following:

- Water Street owned by the City;
- Grand Avenue (not-a-through street) owned by the City;
- The storm sewers, water lines and sanitary sewers located in the street right-of-ways owned by the City; and
- Other utilities (telephone, fiber optic, etc.) owned by others.

**Background**

Soil and groundwater investigation and sampling of the site was conducted in 2004 and 2005. MGP contaminated soil and groundwater was found at the site. The MGP contamination resulted from the by-products and residuals of the coal gasification process including coal tar. Compounds found in coal tar are similar to typical petroleum compounds, including benzene, etc. and polynuclear aromatic hydrocarbons (PAHs). Other potential contaminants associated with MGP sites include phenols, cyanide and metals. Fill materials, including soils containing cinders, clinkers, coal pieces, or foundry sand, generally exist in the vicinity between 2 and 20 feet below ground surface (bgs) and also contain similar contaminants. Historical impacts are also known to have been associated with the 701 Water Street property near the Grand Avenue right-of-way.

RIGHT-OF-WAY



Remediation efforts of the MGP-impacted soil were conducted from September through November 2006 on We Energies and the adjacent east property (601 Water Street), as shown on Figure 2. Permits and approvals for the remediation were obtained from the City of Racine and the Wisconsin Department of Natural Resources (WDNR) in 2006. The remedial activities consisted of excavation of non-MGP-impacted overlying soil, in-situ stabilization and solidification (ISS) of MGP-impacted soil, backfilling with the non-MGP-impacted soil and placement of 15" of imported clean material to the current grade on We Energies property and asphalt on 601 Water Street. Figure 2 shows the area that was treated via ISS technology. The ISS technology process consisted of mixing the site soils with cement, a cement-like byproduct and water using a long stick back-hoe excavator. ISS in this area extended from approximately 8 feet to a maximum of 37 feet in depth.

**Soil and Groundwater Investigation Results**

During site investigation activities in 2004 and 2005, several soil borings were advanced in Grand Avenue and adjacent to Water Street. Borings were not able to be advanced in Water Street due to the dense amount of utilities present. Soil samples were collected for laboratory analyses and for visual observations. MGP tar impacts were observed in isolated, permeable zones in the Grand Avenue right-of-way at soil borings SB-121 and SB-119 below the water table. A thin layer of liquid-phase tar (approximately 4 inches) was noted in a sand seam at 17 feet bgs at SB-121 and at approximately 29.7 to 30 feet bgs at SB-119. Based on field observations and analytical results, the impacts indicated at SB-120 (15-17 ft bgs) are possibly unrelated to the former MGP, as the 701 Water Street property historically had releases of petroleum products and industrial-type wastes near the vicinity of the soil boring location. Odors at this boring were not distinctly MGP-type, but general petroleum odor. Generally non-detectable soil concentrations were found at SB-118.

Sample results from former well MW-105 and SB-104 located on We Energies property indicate it is likely that MGP soil impacts exist above the water table in the Water Street and Grand Avenue right-of-ways. The impacts above the water table are likely limited to the southeast corner of this intersection and are more than eight feet bgs. Soils containing MGP impacts in Grand Avenue and Water Street right-of-ways may generally range in depth from 8 ft to as deep as 30 ft bgs. Sample locations within and near the right-of-ways (within 15 feet) are shown on Figure 2. Soil analytical results are presented on Table 1.

Prior to remediation on the site, the groundwater concentration for benzene and naphthalene at MW-101 and MW-105, and for benzene at MW-102 were above their respective NR140 Enforcement Standard. The majority of the source of groundwater contamination has been solidified/stabilized since remediation; however, MGP impacts in the groundwater may be present beneath the Grand Avenue and Water Street right-of-ways. Groundwater is typically 15 to 17 feet bgs at the corner of Grand Avenue and Water Street and appears to be influenced by the large diameter sanitary sewers beneath Water Street, discussed further below. Groundwater elevations and analytical results from the monitoring wells within 15 feet of the right-of-ways are presented on Tables 2 and 3 with groundwater contours shown on Figure 3.

RIGHT-OF-WAY



**Utilities Known to be Present in the Potentially Affected Right-of-Ways**

Based on the City of Racine sewer maps, there are three sanitary sewers and one storm sewer with catch basin laterals located beneath Water Street including 10-inch, 84-inch and 42-inch sanitary sewers, and 15-inch storm sewer, as shown on Figure 1 and Appendix B. There is one 10-inch sanitary sewer and one 12-inch storm sewer located beneath Grand Avenue. The depth to the sanitary sewer inverts beneath Water Street ranges between 10 to 23 feet bgs, and beneath Grand Avenue is approximately 13 feet bgs. The possibility exists that one or both of the sanitary sewers in Water Street may be intercepting groundwater based on the lower groundwater levels measured in the monitoring wells than the Root River stage. The depth to the storm sewer invert beneath Water Street and Grand Avenue is at approximately 7 feet bgs, likely above MGP impacts and the groundwater level.

Telephone and fiber optic lines exist along Water Street. During remediation activities, the fiber optic line beneath Water Street sidewalk was found to exist at a depth of between 5 to 8 feet bgs. Water main and underground electric also exist along Water Street and Grand Avenue. The depths of these other (non-sewer) utilities are unknown.

**Notifications to City**

Based on the previous activities conducted, We Energies is notifying the City of the following conditions regarding the right-of-ways and request inclusion on the City's Master Plan:

- Samples collected within and within 15 feet of the right-of-ways indicate there is a potential for MGP-impacted soil and groundwater to be encountered in the Water Street and Grand Avenue right-of-ways due to past MGP activities in the areas shown on Figure 1. Potentially affected utilities also exist, as discussed previously.

- The City should notify We Energies and allow proper planning time (more than 3 months if possible) in the event any excavation activities are planned in the potentially affected right-of ways.

- Any work that the City plans to conduct in these right-of-ways may require proper health and safety training and protective equipment. Additional sampling prior to the work being conducted may be necessary to determine the level of training and protection needed;

- If soil is generated as part of any work within the right-of-ways and is confirmed to be MGP-impacted, the waste will need to be properly managed and disposed in accordance with applicable regulations. The waste generated is not expected to require hazardous waste disposal; however, sampling may be necessary for verification of this; and

- As part of the remedial action and future WDNR closure of the MGP site, the street right-of-ways will be considered an "engineered barrier" for limiting infiltration and leaching of the contaminants to groundwater. The engineered barrier is part of the "soil performance standard" approach for addressing the residual contamination.

RIGHT-OF-WAY



We Energies will notify the City if there are any changes to these conditions. Please contact me at (414) 221-2162 with questions or if further information is required. Please sign and return the attached page (Appendix A) or otherwise acknowledge in writing that the City has included the affected right-of-ways on the Master Plan. Thank you for your assistance in this matter.

Sincerely,

Mark J. Collins
Principal Hydrogeologist

Enclosures:
- Figure 1 – Estimated Extent of Potentially Affected Right-of-Way
- Figure 2 – Samples Locations Near Right-of-Way
- Figure 3 – Groundwater Elevation Contours – March 18-19, 2008
- Table 1 – Summary of Soil Analytical Results Near Right-of-Way
- Table 2 – Summary of Groundwater Elevations and Analytical Results Near Right-of-Ways – VOCs, Cyanide, Metals, Phenolics
- Table 3 – Summary of Groundwater Elevations and Analytical Results Near Right-of-Ways – Polynuclear Aromatic Hydrocarbons (PAHs)
- Appendix A – Acknowledgement of Affected ROW's on Master Plan
- Appendix B – City of Racine Sewer Map

cc: Mr. John Feeney, WDNR

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