

GIS REGISTRY INFORMATION

SITE NAME:	Pugh Oil Co Bulk Plant			FID #	
BRRTS #:	03-52-001961			(if appropriate):	
COMMERCE # (if appropriate):	53402-4900-00				
CLOSURE DATE:	January 5, 2005 - Conditional Closure Date: June 2, 2000				
STREET ADDRESS:	200 Dodge St				
CITY:	Racine				
SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection):	X =	701492	Y =	253724	
CONTAMINATED MEDIA:	Groundwater	<input checked="" type="checkbox"/>	Soil	<input type="checkbox"/>	Both <input type="checkbox"/>
OFF-SOURCE GW CONTAMINATION >ES:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
• IF YES, STREET ADDRESS:	1144 Michigan Blvd				
• GPS COORDINATES (meters in WTM91 projection):	X =	701506 per WDNR	Y =	253790 per WDNR	
OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL):	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	
• IF YES, STREET ADDRESS 1:					
• GPS COORDINATES (meters in WTM91 projection):	X =		Y =		
CONTAMINATION IN RIGHT OF WAY:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
<u>DOCUMENTS NEEDED</u>					
Closure Letter, and any conditional closure letter issued					<input checked="" type="checkbox"/>
Copy of most recent deed, including legal description, for all affected properties					<input type="checkbox"/>
Certified survey map or relevant portion of the recorded plat map (if referenced in the legal description) for all affected properties					<input type="checkbox"/>
County Parcel ID number, if used for county, for all affected properties					<input checked="" type="checkbox"/>
Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.					<input checked="" type="checkbox"/>
Detailed Site Map(s) for all affected properties , showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.					<input checked="" type="checkbox"/>
Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)					<input checked="" type="checkbox"/>
Tables of Latest Soil Analytical Results (no shading or cross-hatching)					<input type="checkbox"/>
Isoconcentration map(s), if required for site investigation (SI) (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. If not available, include the latest extent of contaminant plume map.					<input checked="" type="checkbox"/>
GW: Table of water level elevations, with sampling dates, and free product noted if present					<input checked="" type="checkbox"/>
GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)					<input checked="" type="checkbox"/>
SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour					<input type="checkbox"/>
Geologic cross-sections, if required for SI. (8.5x14" if paper copy)					<input checked="" type="checkbox"/>
RP certified statement that legal descriptions are complete and accurate.					<input type="checkbox"/>
Copies of off-source notification letters (if applicable)					<input type="checkbox"/>
Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW)					<input checked="" type="checkbox"/>
Copy of (soil or land use) deed restriction (s) or deed notice if any required as a condition of closure					<input checked="" type="checkbox"/>



ENVIRONMENTAL & REGULATORY SERVICES DIVISION
BUREAU OF PECFA
101 West Pleasant Street, Suite 100A
Milwaukee, Wisconsin 53212-3963
TDD #: (608) 264-8777
Fax #: (414) 220-5374
Jim Doyle, Governor
Cory L. Nettles, Secretary

January 5, 2005

Mr. William H. Pugh
W. H. Pugh Oil Company
200 Dodge Street
Racine, WI 53402

RE: **Final Closure**

Commerce # 53402-4900-00 **WDNR BRRTS # 03-52-001961**
Pugh Oil Company Bulk Plant, 200 Dodge Street, Racine

Dear Mr. Pugh:

The Wisconsin Department of Commerce (Commerce) has received all items required as conditions for closure of the site referenced above. This case is now listed as "closed" on the Commerce database. It is in your best interest to keep all documentation related to the environmental activities that were conducted.

If residual contamination is encountered in the future, it must be managed in accordance with all applicable state and federal regulations. If it is determined that any remaining contamination poses a threat, the case may be reopened and further investigation or remediation may be required.

Thank you for your efforts to bring this case to closure. If you have any questions, please contact me in writing at the letterhead address or by telephone at (414) 220-5376.

Sincerely,

A handwritten signature in blue ink that reads "L.M." followed by a stylized flourish.

Linda M. Michalets
Hydrogeologist
Site Review Section

cc: Mr. Mukesh Jain, K. Singh & Associates, Inc.
Case File



June 2, 2000

Mr. William Pugh
Pugh Oil Company
200 Dodge Street
Racine, WI 53402

RE: COMMERCE # 53402-4900-00
Pugh Oil Co. Bulk Plant, 200 Dodge Street, Racine, WI

Conditional Case Closure

Dear Mr. Pugh:

On March 31, 2000, the Wisconsin Department of Natural Resources (WDNR) transferred the referenced case to the Wisconsin Department of Commerce for regulatory oversight. The Department reviewed the case file to determine if closure is appropriate.

It is understood that residual soil and groundwater contamination remains at this site. Residual soil impacts remain in the former storage tank areas, extending into the Dodge Street right-of-way. Groundwater contamination is also present, with benzene and methyl tertiary butyl ether (MtBE) concentrations above enforcement standards (ESs) on site and MtBE above the ES off site. Using the standards established in NR 700, and the risk criteria of Comm 46, the Department has determined that this site does not pose a significant threat to the environment and human health and no further investigation or remedial action is necessary.

The following items are necessary to satisfy the conditions of closure:

- A groundwater use restriction and notification of residual soil contamination must be placed on the deed to the Pugh Oil property. The deed instrument must state that residual petroleum contamination exists on the site and that if a potable well is ever constructed, the Wisconsin Department Natural Resources water supply unit must be contacted to assist in proper design and placement. An example of the deed language is enclosed for your reference. Please submit a copy that has been signed, notarized, and filed with the County Register of Deeds. If you wish to modify the language, submit a copy to this office for review prior to filing.
- MtBE concentrations at off site well MW-9 have exceeded the ES since 1997, but show a decreasing trend. No other petroleum compounds were present above the preventive action limit in the last sample round collected in September 1999. If no other source for the contamination in this area can be identified, a groundwater use restriction must be placed on the deed to the property where monitoring well MW-9 is located as a condition of closure for this site. The deed instrument must state that if a potable well is ever constructed, the Wisconsin Department Natural Resources water supply unit must be contacted to assist in proper design and placement. An example of the deed language is enclosed for your reference. Please submit a copy that has been signed, notarized, and filed with the County Register of Deeds. If you wish to modify the language, submit a copy to this office for review prior to filing.

Mr. William Pugh

RE: Commerce # 53402-4900-00

Pugh Oil Co Bulk Plant
200 Dodge Street, Racine, WI

June 2, 2000

Page 2

- The municipal department that is responsible for maintaining Dodge Street must be notified in writing that petroleum contaminated soil remains within the right-of-way. Please provide the Department with a copy of the notification letter.
- Monitoring wells should be abandoned per chapter NR 141 requirements. Please submit copies of the well abandonment forms to this office.

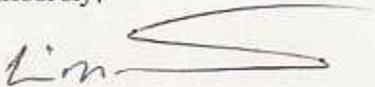
IMPORTANT: Before this case can be officially listed as "closed" on the Wisconsin Department of Commerce/Natural Resources computer database, you or your consultant must submit the requested information.

If, in the future, site conditions indicate that any contamination that remains poses a threat, the need for further remediation would be determined and required if necessary. If subsequent information indicates a need to reopen this case, any original claim under the PECFA fund would also reopen and you may apply for assistance to the extent of remaining eligibility.

If the land use conditions change in the future and the contaminated soil is disturbed, appropriate measures must be implemented to assure any residual contamination is managed following all applicable State of Wisconsin regulations and standards.

Upon receipt of all the requested documents, the case will be entered as "closed" on the database. If you have any questions, feel free to contact me at (414) 220-5376.

Sincerely,



Linda M. Michalets
Hydrogeologist
Site Review Section

Enclosures

cc: Mr. Dhruva N. Vangipuram, K. Singh & Associates, Inc.
Commerce electronic file

Declaration of Groundwater Use Restriction

Document Number

Document Title

Upon receipt of such a request, the Department shall determine whether or not the restrictions contained herein can be extinguished. Conditions under which a restriction may be extinguished will be determined in accordance with the site specific standards, rules and laws for this property. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this restriction, or portions of this restriction are no longer binding. Any restriction placed upon this property shall be extinguished without the Department's written determination.

Recording Area

Pugh Oil Company
200 Dodge Street
Milwaukee WI 53202

02489000

Parcel Identification Number (PIN)

By signing this document, he/she acknowledges that he/she is duly authorized to sign

this document on behalf of W.H. Pugh Oil Company,

this 9TH day of DECEMBER 2002

Signature: William Pugh

Printed Name: William Pugh

Subscribed and sworn to before me this 9TH day of DECEMBER 2002

Joseph M. Arvai III
Notary Public, Wisconsin

JOSEPH M. ARVAI III
(print name of Notary)

My Commission 5/23/2004

SOURCE: WDNR Close Out Guidance on the Use of Institutional Controls, September, 1998.

This instrument was drafted by K. Singh & Associates, Inc., 1135 Legion Drive, Elm Grove, WI 53122 based on comments from the Wisconsin Department of Commerce.

DATE: September 5, 2000

0001012

Declaration of Groundwater Use Restriction

DOC # 1998053

Recorded

OCT. 19, 2004 AT 04:42PM

Document Number

Document Title

PARCEL #4: The North one hundred (100) feet in width of Block Fifty-eight (58) of the Original Plat of Racine, as surveyed by Moses Vilas, excepting the North Seventy-five (75) feet in width of the West one hundred and fifteen (115) feet in width thereof.

PARCEL #5: The North Fifty (50) feet in width of the West one hundred and fifteen (115) feet in width of Block fifty-eight (58) in the original plat of Racine, as surveyed by Moses Vilas and recorded in the office of the Register of Deeds for Racine County.

Street Address: 1144 Michigan Blvd.



MARK LADD
RACINE COUNTY
REGISTER OF DEEDS

Fee Amount: \$21.00



21-
Pugh Oil Company
200 Dodge Street
Racine, WI 53402

02486000

Parcel Identification Number (PIN)

Declaration of Groundwater Use Restriction

State of Wisconsin)
 ss.
County of Waukesha)

Section 1. Pugh Oil Company is the owner of the property described above.

Section 2. One or more petroleum discharges have occurred at the property. Residual contaminated groundwater above NR 140 enforcement standards and soils above residual contaminant levels of the Wisconsin Administrative Code exist on this site within the property line south of Hamilton St. property line, west of 1144 Michigan Blvd. Storage building.

Section 3. The owner hereby declares that the property shall be held, conveyed or encumbered, leased, rented used, occupied and improved subject to the following limitations and /or restrictions:

Anyone who proposes to construct or reconstruct a well on this property is required to contact the Department of Natural Resources Bureau of Drinking Water and Groundwater, or its successor agency, to determine what specific requirements are applicable prior to constructing or reconstructing a well on this property. No well may be constructed or reconstructed on this property unless applicable requirements are met.

Residual petroleum contaminated soil with benzene levels as high as less than 2500 ppb remains on this side within the property along the property line south of Hamilton St. property line, west of 1144 Michigan Blvd. It has been shown that these levels are protective to health and the environment. If this soil is excavated in the future, it may be considered a solid waste and will need to be disposed in accordance with all applicable laws.

Any person who is or becomes owner of the property described herein may request that the Wisconsin Department of Commerce or its successor, issue a determination that the restrictions set forth in this covenant are no longer required. That property owner shall provide any and all necessary information to the Department in order for the Department to be able to make a determination.

0001013

Declaration of Ground water Use Restriction

Document Number

Document Title

Upon receipt of such a request, the Department shall determine whether or not the restrictions herein can be extinguished. Conditions under which a restriction may be extinguished will be determined in accordance with the site specific standards, rules and laws for this property. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this restriction, or portions of this restriction are no longer binding. Any restrictions placed upon this property shall be extinguished without the Department's written determination.

Pugh Oil Company
200 Dodge Street
Racine, WI 53402

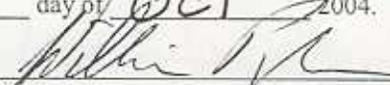
02486000

Parcel Identification Number (PIN)

By signing this document, he/she acknowledges that he/she is duly authorized to sign

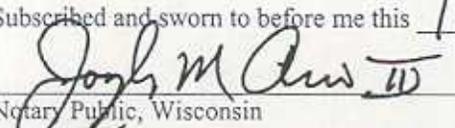
this document on behalf of W.H. Pugh Oil Company.

This 19 day of OCT 2004.

Signature: 

Printed Name: WILLIAM H. PUGH

Subscribed and sworn to before me this 19 day of OCT. 2004.


Notary Public, Wisconsin

JOSEPH M. ARVAT III
(print name of Notary)

My Commission 5-28-2008

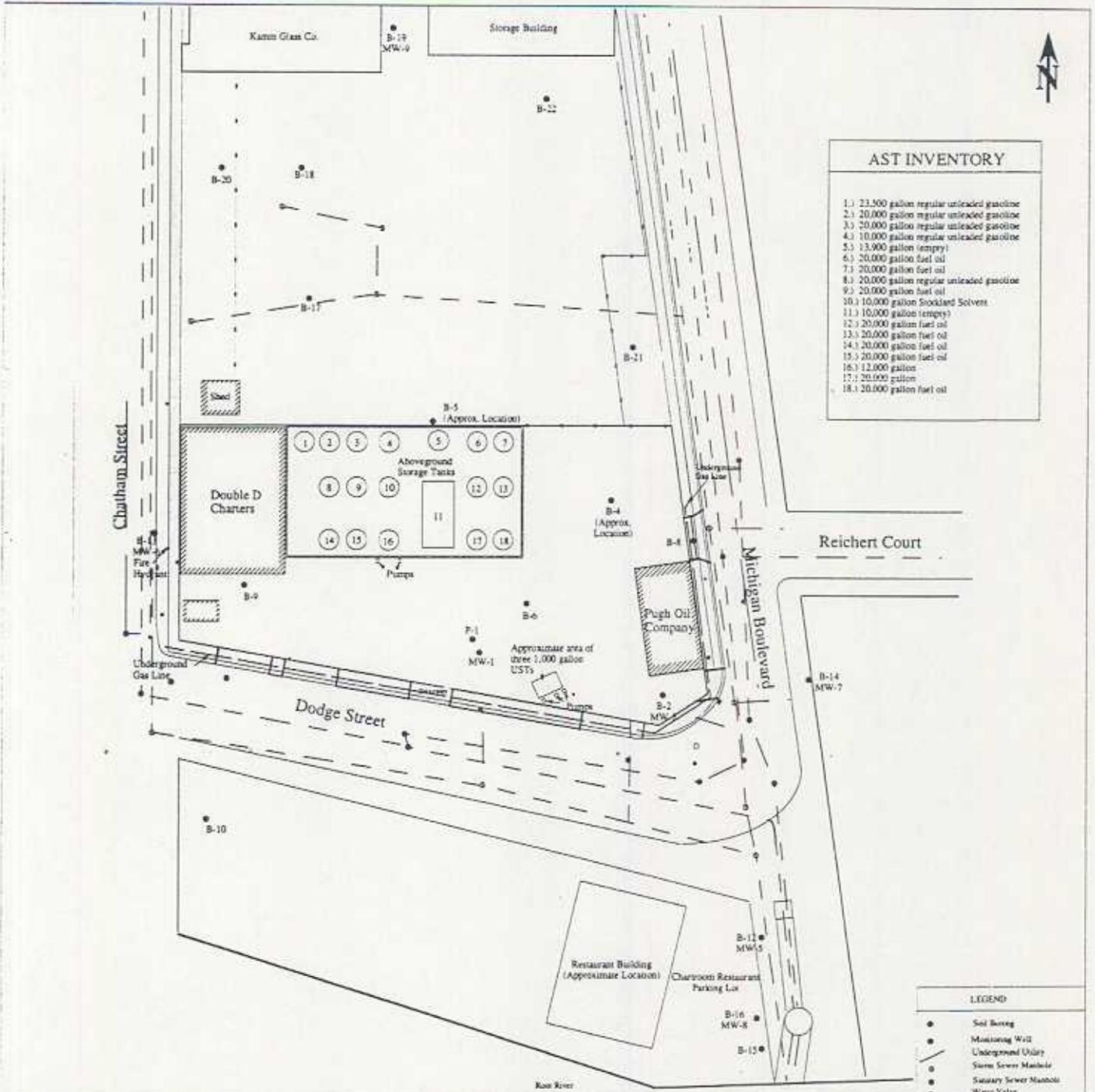
SOURCE: WDNR Close Out Guidance on the Use of Institutional Controls , September, 1998

This instrument was drafted by K. Singh & Associates, Inc., 1135 Legion Drive, Elm Grove, WI 53122 based on comments from the Wisconsin Department of Commerce.



Scale: 1" = 2,000 feet

Figure 2.1: Project Location Map



AST INVENTORY	
1.)	23,500 gallon regular unleaded gasoline
2.)	20,000 gallon regular unleaded gasoline
3.)	20,000 gallon regular unleaded gasoline
4.)	10,000 gallon regular unleaded gasoline
5.)	13,900 gallon (empty)
6.)	20,000 gallon fuel oil
7.)	20,000 gallon fuel oil
8.)	20,000 gallon regular unleaded gasoline
9.)	20,000 gallon fuel oil
10.)	10,000 gallon Shocklard Solvent
11.)	10,000 gallon (empty)
12.)	20,000 gallon fuel oil
13.)	20,000 gallon fuel oil
14.)	20,000 gallon fuel oil
15.)	20,000 gallon fuel oil
16.)	12,000 gallon
17.)	20,000 gallon
18.)	20,000 gallon fuel oil

LEGEND	
●	Soil Boring
○	Monitoring Well
—	Underground Utility
—	Storm Sewer Manhole
—	Sanitary Sewer Manhole
—	Water Valve

Figure 3.1 Soil Boring & Monitoring Well Locations			
DATE	Drawn By	Revisions By	Project Number
October 23, 1995	M.J.P.	Date	2071
SCALE	Checked By	Sheet Number	
0 50 100	P.N.S.	1 of 1	

Owner
W.H. PUGH OIL COMPANY
 Pugh Oil Bulk Plant
 200 Dodge Street
 Racine, WI 53402

Engineer
K. SINGH & ASSOCIATES, INC.,
 Engineers & Environmental Management Consultants
 1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171

Table 1

Summary of Groundwater Quality Test Results. Pugh Oil Bulk Plant, 200 Dodge St., Racine, WI

Location	Date	Benzene ppb	Ethylben- zene ppb	Toluene ppb	Xylenes ppb	1,2,4-TMB ppb	1,3,5-TMB ppb	MTBE ppb	Naphtha- lene ppb	GRO ppm	DRO ppm	Dis. Lead ppb
MW-1	9/26/95	NT*	NT*	NT*	NT*	NT*	NT*	NT*	NT*	NT*	NT*	NT*
MW-1	8/1/96	100	18	<10	<10	<20	<20	<100	NT	2.3	60	NT*
MW-1	Removed on 01/29/97, during interim soil remediation.											
P-1	9/26/95	<1.0	<1.0	1.7	1.5	<1.0	<1.0	<1.0	<3.0	1.0	1.5	<2.0
P-1	2/26/97	0.79	0.82	1.6	<0.5	<1.0	<1.0	6.6	NT	0.37	NT	NT
P-1	5/23/97	3.1	<0.5	1.2	0.62	<1.0	<1.0	28	NT	NT	NT	NT
P-1	8/22/97	6	<0.5	1.9	0.52	<1.0	<1.0	31	NT	NT	NT	NT
P-1	11/6/97	8.4	<0.68	2.8	<1.8	1.8	1.5	47	NT	0.3	2.6	NT
P-1	02/06/98	13	<0.68	2	<1.8	<1	<0.86	63	2.7	NT	NT	NT
P-1	5/21/98	13.6	0.82	<0.35	<0.98	<0.64	<0.98	65	1.51	NT	NT	NT
P-1	8/27/98	19	0.69	0.42	<0.98	0.75	<0.64	72	1.3	NT	NT	NT
P-1	11/19/98	25	0.79	3.3	<1	1.2	1.2	100	3.4	NT	NT	NT
P-1	2/16/99	19	0.34	0.53	<1.0	0.44	<0.36	270	1.6	NT	NT	NT
P-1	6/17/99	47	1.7	3.1	1.7	1.6	3.2	270	NT	NT	NT	NT
P-1	9/14/99	15	1.6	2.5	<4.72	3.2	1.5	240	NT	NT	NT	NT
MW-2	2/23/95	2.3	3.2	1.1	3.0	3.3	<1.0	78	<3.0	0.6	7.9	<2.0
MW-2	2/26/97	1.4	4.7	<0.5	7.4	5.5	2	52	NT	1.3	NT	NT
MW-2	5/23/97	<5.0	6.6	<5.0	7.5	<10	<10	59	NT	NT	NT	NT
MW-2	8/22/97	3.7	0.8	2	1.9	1.3	1.3	17	NT	NT	NT	NT
MW-2	11/6/97	4.4	0.8	5	3.9	1.3	4.1	28	NT	0.72	1.5	NT
MW-2	02/06/98	3.5	1	5.2	6.1	2.2	3.3	5.9	<1	NT	NT	NT
MW-2	5/21/98	19.8	2.12	<0.35	2.79	2.79	2.64	10.4	<0.88	NT	NT	NT
MW-2	8/27/98	9	0.69	<0.35	2.3	<0.35	1.7	16	<0.88	NT	NT	NT
MW-2	11/19/98	14	0.92	<0.35	2.8	0.64	1.5	8	0.88	NT	NT	NT
MW-2	2/16/99	0.46	<0.32	<0.38	<1.08	0.68	1	64	<0.73	NT	NT	NT
MW-2	6/17/99	1.7	4.8	6.9	9.3	1.9	3.1	13	NT	NT	NT	NT
MW-2	9/14/99	<0.32	<0.34	4.3	<2.12	0.81	1.1	9.1	NT	NT	NT	NT
MW-4	2/26/97	<50	67	<50	<50	<100	<100	<20	NT	16	NT	NT
MW-4	5/23/97	25	<25	<25	27	140	92	150	NT	NT	NT	NT
MW-4	8/22/97	25	<5	<5	6.1	<10	<10	410	NT	NT	NT	NT
MW-4	Removed during Phase II Remediation and placed back into recovery trench. Not constructed to NR 141 standards.											

Table 1

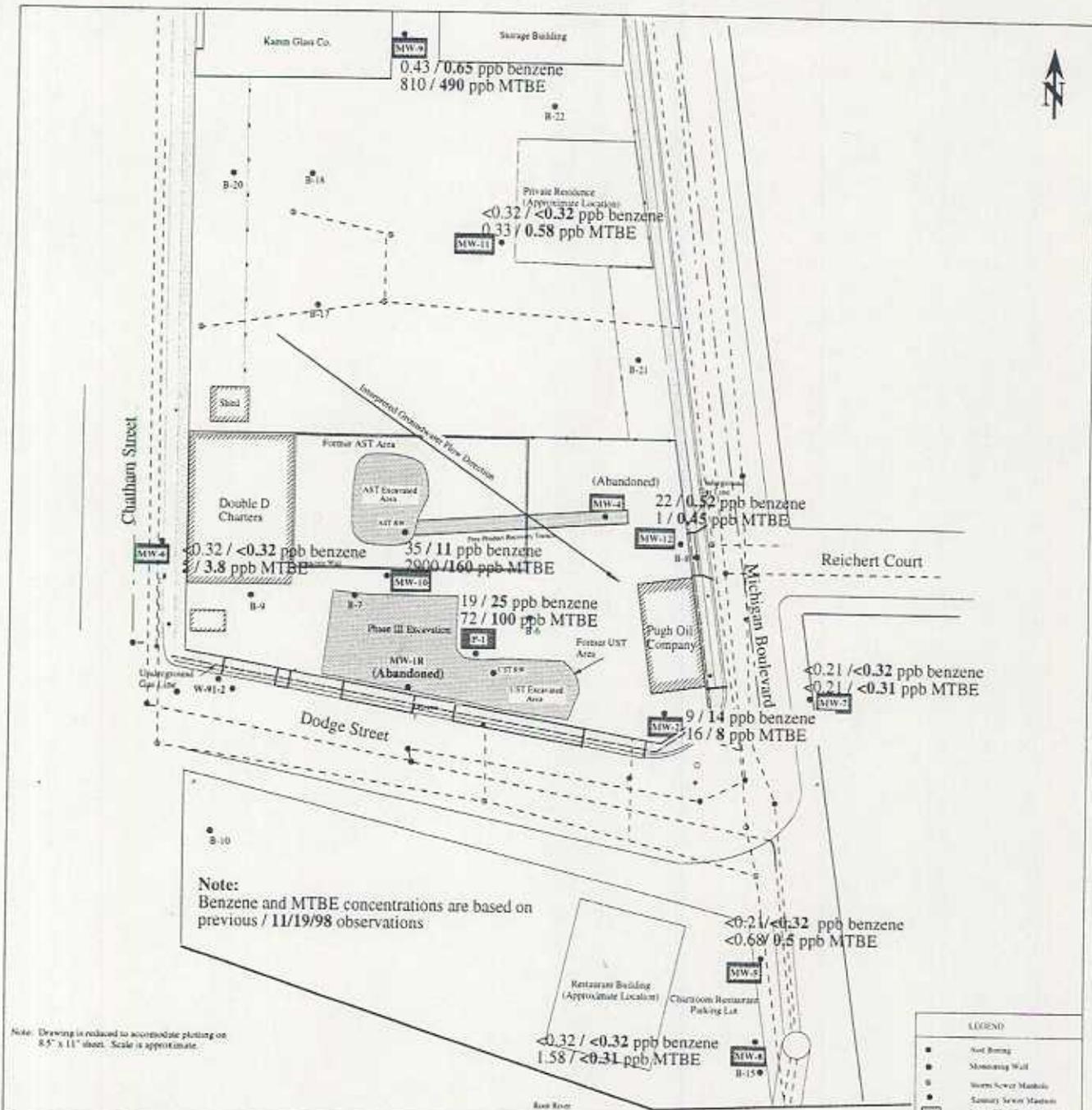
Summary of Groundwater Quality Test Results. Pugh Oil Bulk Plant, 200 Dodge St., Racine, WI

Location	Date	Benzene ppb	Ethylben- zene ppb	Toluene ppb	Xylenes ppb	1,2,4-TMB ppb	1,3,5-TMB ppb	MTBE ppb	Naphtha- lene ppb	GRO ppm	DRO ppm	Dis. Lead ppb
MW-5	2/23/95	14	<1.0	<1.0	1.0	<1.0	<1.0	8.2	<3.0	<0.1	2.3	<2.0
MW-5	2/26/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	<0.2	NT	<0.05	NT	NT
MW-5	5/23/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	<0.2	NT	NT	NT	NT
MW-5	8/22/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	<0.2	NT	NT	NT	NT
MW-5	11/6/97	<0.21	<0.68	<1.5	<1.8	<1	<1.0	0.68	NT	<0.1	<0.1	NT
MW-5	11/19/98	<0.32	<0.34	<0.35	<1	<0.35	<0.64	0.5	NT	NT	NT	NT
MW-6	9/26/95	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<1.0	<3.0	0.48	NT	<2.0
MW-6	2/26/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	310	NT	0.14	NT	NT
MW-6	5/23/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	80	NT	NT	NT	NT
MW-6	8/22/97	<0.5	<0.5	<0.5	1.2	<1.0	<1.0	42	NT	NT	NT	NT
MW-6	11/6/97	<0.21	<0.68	<1.5	<1.8	<1	<0.86	36	NT	<0.1	0.14	NT
MW-6	02/06/98	<0.21	<0.68	<1.5	<1.8	<1	<0.86	14	NT	NT	NT	NT
MW-6	5/21/98	<0.32	<0.34	<0.35	<0.98	<0.35	<0.64	5	NT	NT	NT	NT
MW-6	8/27/98	<0.32	<0.34	<0.35	<0.98	<0.35	<0.64	5	NT	NT	NT	NT
MW-6	11/19/98	<0.32	<0.34	<0.35	<1	<0.35	<0.64	3.8	NT	NT	NT	NT
MW-7	9/26/95	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<1.0	<3.0	<0.1	0.58	<2.0
MW-7	2/26/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	<0.2	NT	<0.05	NT	NT
MW-7	5/23/97	<0.5	0.73	0.73	0.98	<1.0	<1.0	<0.2	NT	NT	NT	NT
MW-7	8/22/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	<0.2	NT	NT	NT	NT
MW-7	11/6/97	<0.21	<0.68	<1.5	<1.8	<1	<0.86	<0.21	NT	<0.1	<0.1	NT
MW-7	11/19/98	<0.32	<0.34	<0.35	<1	<0.35	<0.64	<0.31	NT	NT	NT	NT
MW-8	9/26/95	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<1.0	<3.0	<0.1	4.8	<2.0
MW-8	2/26/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	1.2	NT	<0.05	NT	NT
MW-8	5/23/97	<0.5	<0.5	<0.5	<0.5	<1.0	<1.0	<0.2	NT	NT	NT	NT
MW-8	11/6/97	<0.21	<1.5	<1.5	<1.8	<1.0	<0.86	0.43	NT	<0.1	<0.1	NT
MW-8	5/21/98	<0.32	<0.34	<0.35	<0.95	<0.35	<0.34	1.58	NT	NT	NT	NT
MW-8	11/19/98	<0.32	<0.34	<0.35	<1	<0.35	<0.64	<0.31	NT	NT	NT	NT
MW-9	9/26/95	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<1.0	<3.0	<0.1	0.43	<2.0
MW-9	2/26/97	0.52	<0.5	<0.5	1.1	<1.0	<1.0	1600	NT	0.34	NT	NT
MW-9	5/23/97	1.2	0.62	<0.5	1.9	1.2	<1.0	1,000	NT	NT	NT	NT
MW-9	8/22/97	<5.0	<5.0	<5.0	<5.0	<10	<10	1,500	NT	NT	NT	NT
MW-9	11/5/97	0.52	<0.68	<1.5	<1.8	<1	<0.86	840	NT	0.45	<0.1	NT
MW-9	02/06/98	0.48	<0.68	<1.5	<1.8	<1	<0.86	2,800	22	NT	NT	NT

Table 1

Summary of Groundwater Quality Test Results. Pugh Oil Bulk Plant, 200 Dodge St., Racine, WI

Location	Date	Benzene ppb	Ethylben- zene ppb	Toluene ppb	Xylenes ppb	1,2,4-TMB ppb	1,3,5-TMB ppb	MTBE ppb	Naphtha- lene ppb	GRO ppm	DRO ppm	Dis. Lead ppb
MW-9	5/21/98	0.68	0.38	<0.35	<0.98	0.99	<0.64	1,200	NT	NT	NT	NT
MW-9	8/27/98	0.43	<0.34	<0.35	<0.98	0.69	<0.64	810	NT	NT	NT	NT
MW-9	11/19/98	0.65	0.49	<0.35	<1	0.82	<0.64	490	NT	NT	NT	NT
MW-9	2/16/99	0.67	<0.32	<0.38	<1.0	0.48	<0.36	510	NT	NT	NT	NT
MW-9	6/17/99	0.56	0.44	<0.35	<1	0.55	<0.64	290	NT	NT	NT	NT
MW-9	9/14/99	<0.32	<0.34	<0.35	<0.98	<0.35	<0.64	160	NT	NT	NT	NT
MW-1R	11/5/97	410	20	<15	<18	27	13	44	NT	1	4.6	2
MW-1R	02/06/98	740	52	<15	47	53	35	20	120	NT	NT	NT
MW-1R		Removed during soil remediation in October 1998										
MW-10	11/5/97	14	2.9	<1.5	<1.8	190	15	320	NT	1.2	1	<1
MW-10	02/06/98	35	<14	<30	45	150	63	2,900	100	NT	NT	NT
MW-10	5/21/98	Not sampled due to presence of free product										
MW-10	11/19/98	11	2.2	<0.35	1.4	62	9.1	160	25	NT	NT	NT
MW-10	2/16/99	37	8	8.4	<20.4	120	13	1,400	79	NT	NT	NT
MW-10	6/17/99	28	7	5	<10	140	17	1,400	110	NT	NT	NT
MW-10	9/14/99	11	<0.34	<0.35	<0.98	19	5.8	420	10	NT	NT	NT
MW-11	11/5/97	<0.21	<0.68	<1.5	<1.8	<1	<0.86	<0.21	NT	<0.1	<0.1	<1
MW-11	02/06/98	<0.21	<0.68	<1.5	<1.8	<1	<0.86	10	<1	NT	NT	NT
MW-11	5/21/98	<0.32	<0.34	<0.35	<0.98	<0.35	<0.64	<0.31	NT	NT	NT	NT
MW-11	8/27/98	<0.32	<0.34	<0.35	<0.98	<0.35	<0.64	0.33	NT	NT	NT	NT
MW-11	11/19/98	<0.32	<0.34	<0.35	<0.98	<0.35	<0.64	0.58	NT	NT	NT	NT
MW-11	2/16/99	<0.25	<0.32	<0.38	<1.0	<0.34	<0.36	0.92	NT	NT	NT	NT
MW-12	11/5/97	3.4	0.74	<1.5	<1.8	<1	2.3	0.87	NT	0.27	3.2	<1
MW-12	02/06/98	<0.21	<0.68	<1.5	<1.8	2.8	<0.86	0.55	1.3	NT	NT	NT
MW-12	5/21/98	33	0.97	<0.35	<0.98	<0.35	<0.64	1.22	5.1	NT	NT	NT
MW-12	8/27/98	22	0.86	<0.35	<0.98	<0.35	1.7	1	3	NT	NT	NT
MW-12	11/19/98	0.52	0.66	0.46	1.2	0.72	<0.64	0.45	1.2	NT	NT	NT
MW-12	2/16/98	0.38	<0.32	<0.38	<1.0	<0.34	<0.36	<0.21	2.3	NT	NT	NT
ES		5	700	343	620	480		60	40	---	---	15
PAL		0.5	140	68.6	124	96		12	8	---	---	1.5
lot tested												



Note:
Benzene and MTBE concentrations are based on
previous / 11/19/98 observations

Note: Drawing is reduced to accommodate plotting on
8.5" x 11" sheet. Scale is approximate.

LEGEND	
●	Test Boring
○	Monitoring Well
○	Storm Sewer Manhole
○	Sanitary Sewer Manhole
■	Area of Soil Remediation (Planned)

Owner
W.H. PUGH OIL COMPANY
Pugh Oil Bulk Plant
200 Dodge Street
Racine, WI 53402

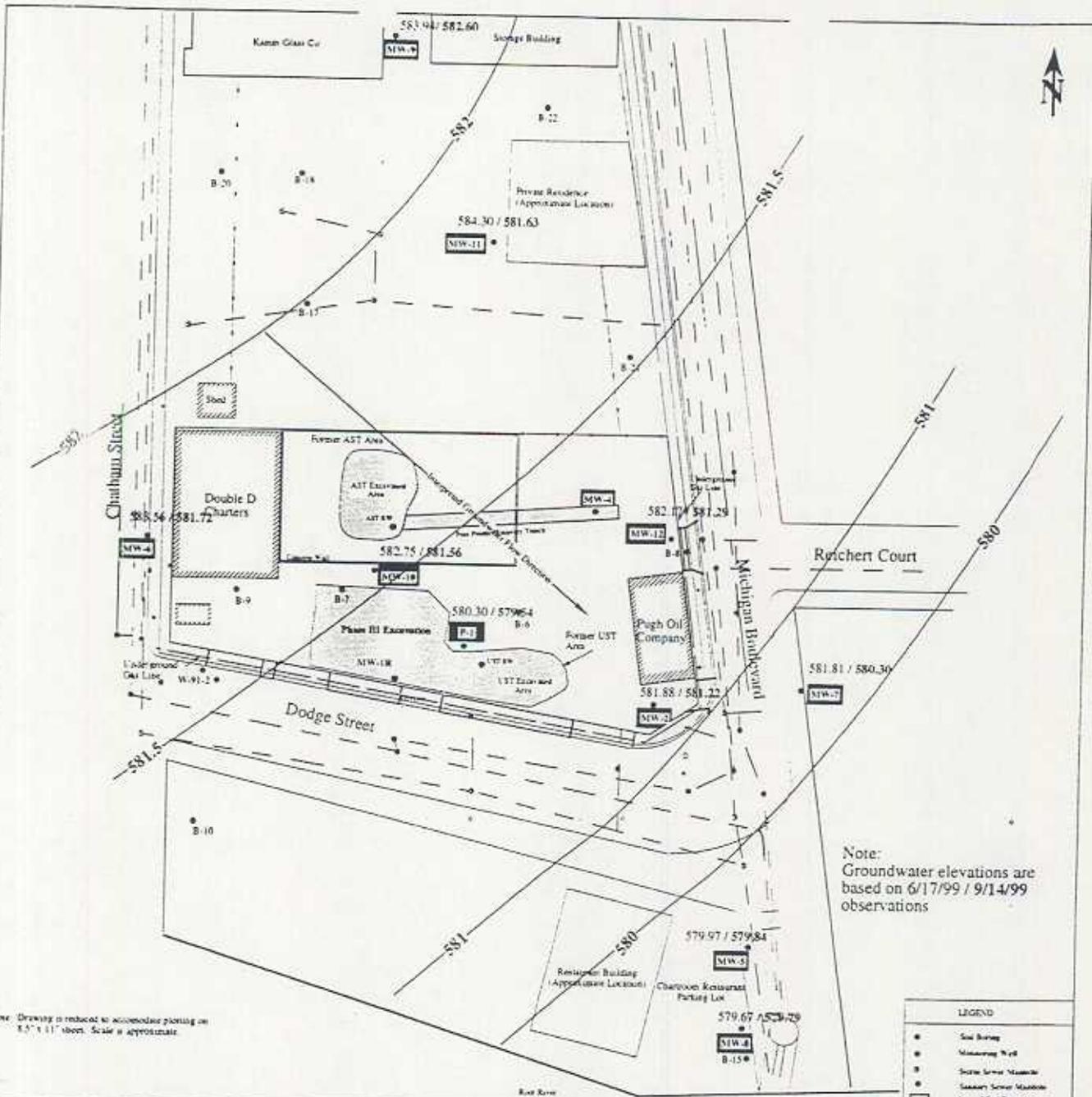
Engineer
K. SINGH & ASSOCIATES, INC.,
Engineers & Environmental Management Consultants
1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171

Figure 4.2 Benzene and MTBE Concentrations in Groundwater

DATE	Drawn By	Revisions By	Project Number
October 23, 1995	M.J.P.	S.D.M.	2071
SCALE		Checked By: S.D.M.	Sheet Number
		P.N.S.	1 of 1

Table 2
Summary of Groundwater Elevation Data
Pugh Oil Bulk Plant, 200 Dodge Street, Racine, WI

Well Id.	P-1	MW-2	MW-5	MW-6	MW-7	MW-8	MW-9	MW-10	MW-11	MW-12	MW-1R
PVC Elevn.	587.95	587.24	586.24	587.15	587.34	585.62	590.69	588.14	589.22	587.03	587.88
Date											
2/26/97	581.07	581.88	581.13	--	582.13	580.87	584.17	--	--	--	--
5/23/97	581.66	581.79	581.44	583.32	582.22	581.28	583.59	--	--	--	--
8/22/97	582.20	581.95	581.96	583.15	582.28	581.88	583.20	--	--	--	--
11/5/97	581.56	581.51	581.41	582.39	581.67	581.21	582.66	--	--	--	--
2/6/98	581.37	581.97	--	583.31	--	--	583.55	582.10	582.50	581.84	581.45
5/21/98	581.08	581.99	581.40	583.54	582.14	581.25	583.50	582.54	583.82	582.36	581.29
8/27/98	581.25	581.89	580.99	582.69	581.78	580.62	583.19	582.53	583.58	582.33	581.45
11/19/98	580.24	581.61	580.10	582.66	581.66	579.79	583.19	582.08	582.38	581.50	581.27
2/16/99	580.06	581.68	579.63	583.63	577.72	579.36	583.47	581.42	583.38	582.03	NS
6/17/99	580.30	581.88	579.97	583.56	581.81	579.67	583.93	582.75	584.71	582.28	NS
9/14/99	579.54	581.22	579.84	581.72	580.30	578.79	583.94	582.75	584.30	582.17	NS
							582.60	581.56	581.63	581.29	NS



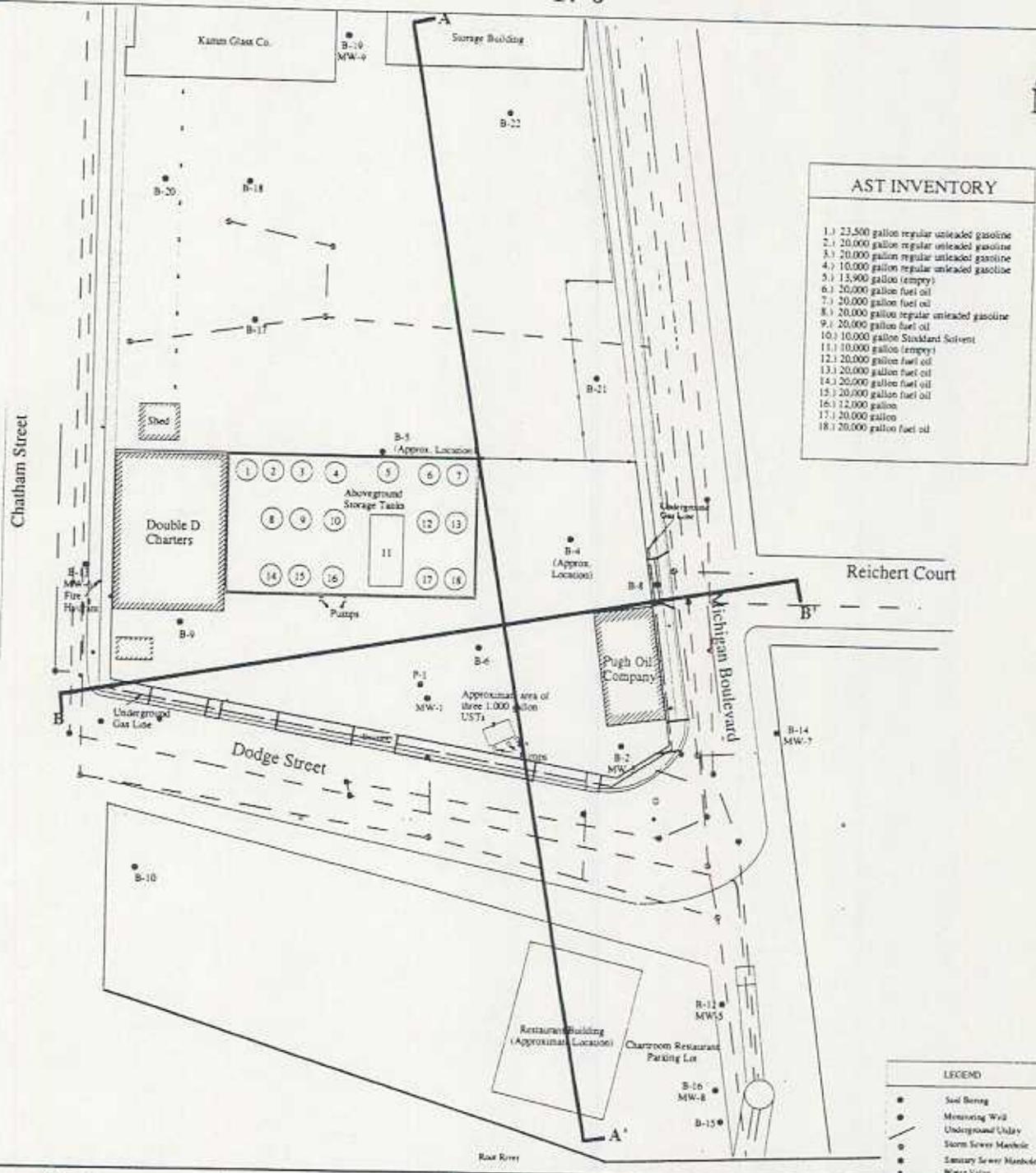
Note: Drawing is reduced to accommodate plotting on 8.5" x 11" sheet. Scale is approximate.

Owner
W.H. PUGH OIL COMPANY
 Pugh Oil Bulk Plant
 200 Dodge Street
 Racine, WI 53402

Engineer
K. SINGH & ASSOCIATES, INC.,
 Engineers & Environmental Management Consultants
 1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171

Figure 2. Current Site Layout and Groundwater Elevation Contours

DATE	Drawn By	Revisions By	Project Number
October 23, 1995	M.J.P.	S.D.M. 10/24/97	217.1
SCALE	Checked By: S.D.M. 10/24/97		Sheet Number
	P.N.S.	S.D.M. 10/24/97	1 of 1

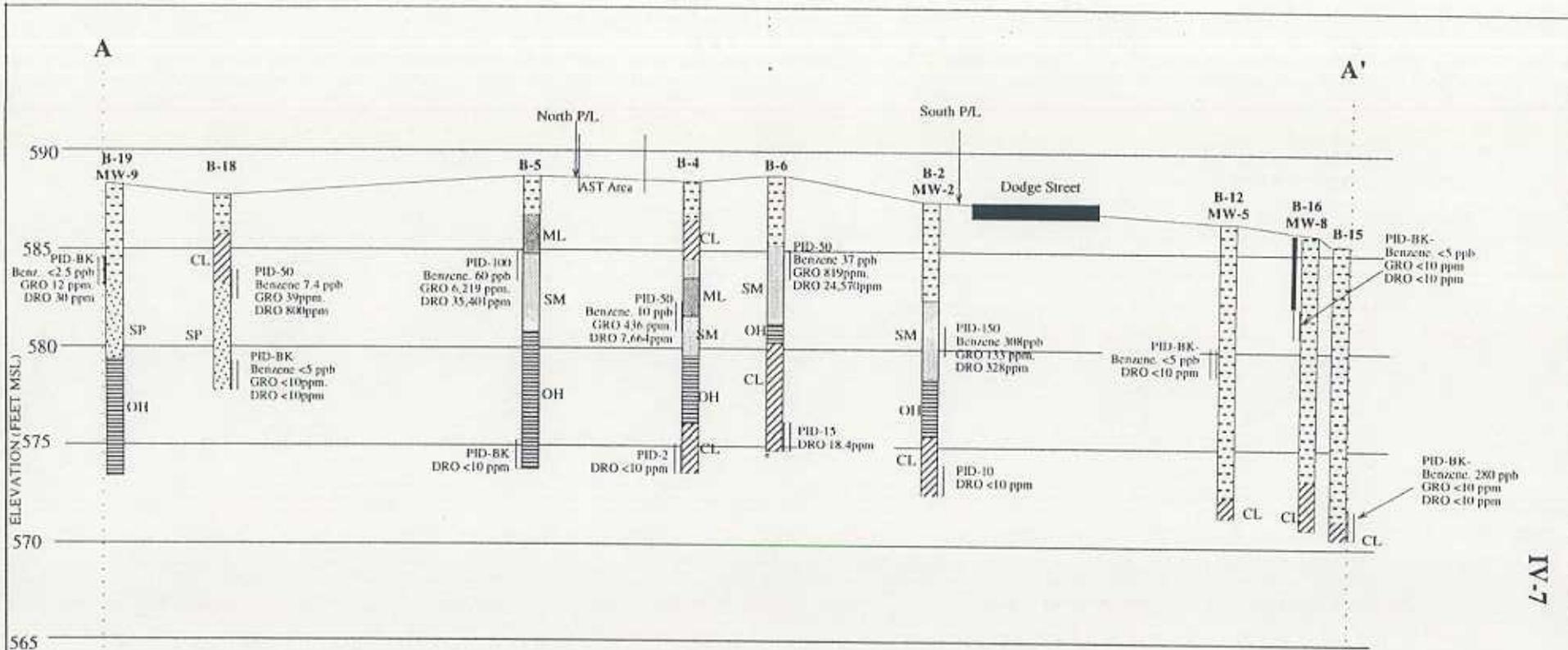


Owner
W.H. PUGH OIL COMPANY
 Pugh Oil Bulk Plant
 200 Dodge Street
 Racine, WI 53402

Engineer
K. SINGH & ASSOCIATES, INC.,
 Engineers & Environmental Management Consultants
 1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171

Figure 4.1 Map of Geologic Cross-Sections

DATE October 23, 1995	Drawn By M.J.P.	Revisions By Date	Project Number 2071
SCALE 0 30 60	Checked By P.N.S.	Sheet Number 1 of 1	

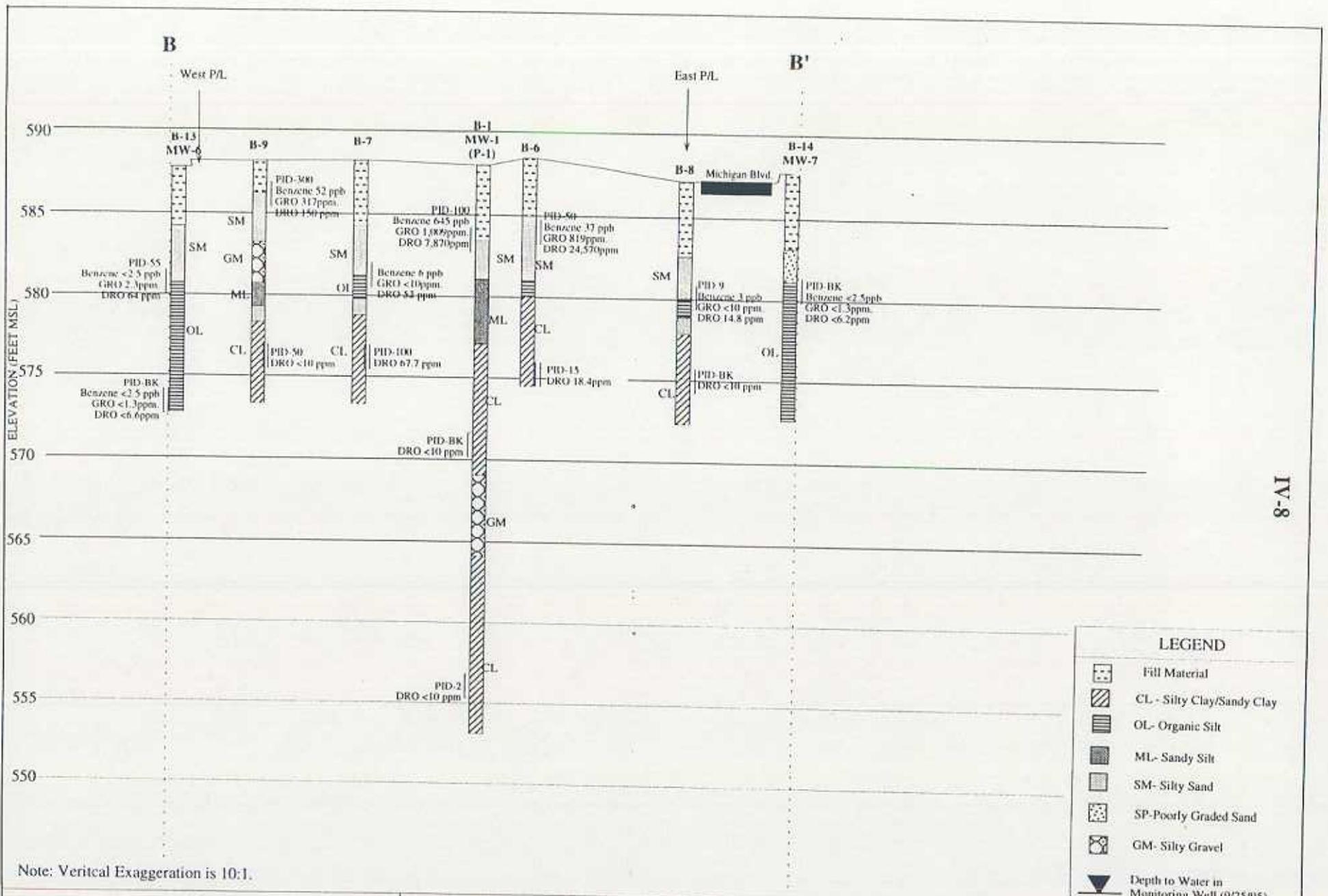


IV-7

Note: Vertical Exaggeration is 10:1.

- CL - Silty Clay/Sandy Clay
- SW-Well Graded Sand
- SW-Gravelly Well Graded Sand
- GW-Sandy Gravel
- Depth to Water While Drilling
- Depth to Water in Monitoring Well (9/25/95)

Owner PUGH OIL COMPANY	Engineer K. SINGH & ASSOCIATES, INC., Engineers & Environmental Management Consultants 1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171	Figure 4.2 - Geologic Section A-A'	
Pugh Oil Bulk Plant 200 Dodge Street Racine, WI		Date November 29, 1995	Drawn by MJP
		SCALE 	Project no. 4073
			Checked by P.N.S.
			Date



8-AI

Note: Vertical Exaggeration is 10:1.

Owner PUGH OIL COMPANY Pugh Oil Bulk Plant 200 Dodge Street Racine, WI		Engineer K. SINGH & ASSOCIATES, INC., Engineers & Environmental Management Consultants 1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171		Figure 4.3 - Geologic Section B-B'	
Date February 12, 1996		Drawn by M.J.P.	Project no. 4073	Date	
SCALE 		Checked by P.N.S.			



K. SINGH & ASSOCIATES, INC.

Engineers, Scientists and Environmental Management Consultants

RECEIVED

July 7, 2000

JUL 11 2000

Mr. Rick Jones
Director
Department of Public Works
City of Racine
730 Washington Avenue
Racine, WI 53403

ERS DIVISION

Project # 2071

Subject: Notification of Residual Soil Contamination in the Right-of-Way of Dodge Street for Pugh Oil Company Bulk Plant, 200 Dodge Street, Racine, WI (COMMERCE # 53402-4900-00)

Dear Mr. Jones:

On behalf of Pugh Oil Company and in accordance with the letter of Department of Commerce of June 2, 2000, we are notifying the residual soil contamination in the right-of-way of 200 Dodge Street. The area of residual soil contamination is shown in the attached Figure. Soil quality test results are summarized in the attached Table.

Based on the soil quality test results, residual soil contamination exists in the right-of-way of Dodge Street. Further excavation towards the ROW was not possible due to potential damage of utilities. An alternative method of remediation (natural attenuation) was considered more appropriate. It is our understanding that natural attenuation will help remediate residual soil contamination.

We recommend that contaminated residual soil, if generated during construction activities in the ROW, be managed in an environmentally acceptable manner.

Please call us, if you have any questions regarding this submittal.

Sincerely,

K. SINGH & ASSOCIATES, INC.

Raghu B. Singh, Ph.D.
Project Scientist

Pratap N. Singh, Ph. D., P. E.
Project Manager

CC: Linda M. Michalets / Department of Commerce, 101 West Pleasant St. Suite 205, Milwaukee, WI 53212
William / Pugh Oil Company
Kamala Singh / PECFA Claim File