

Source Property Information

CLOSURE DATE: 07/24/2013

BRRTS #: 02-68-183136

FID #: 268137870

ACTIVITY NAME: BENZ OIL INC

DATCP #:

PROPERTY ADDRESS: 12733 W ARDEN PL

PECFA#: 53007200533B

MUNICIPALITY: Butler

PARCEL ID #: 1009269001

*WTM COORDINATES:

WTM COORDINATES REPRESENT:

X: 676973 Y: 293625

Approximate Center Of Contaminant Source

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

Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

CONTINUING OBLIGATIONS

Contaminated Media for Residual Contamination:

Groundwater Contamination > ES (236)

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

Contamination in ROW

Contamination in ROW

Off-Source Contamination

Off-Source Contamination

*(note: for list of off-source properties
see "Impacted Off-Source Property Information,
Form 4400-246")*

*(note: for list of off-source properties
see "Impacted Off-Source Property Information,
Form 4400-246")*

Site Specific Obligations:

Soil: maintain industrial zoning (220)

Cover or Barrier (222)

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

Direct Contact

Structural Impediment (224)

Soil to GW Pathway

Site Specific Condition (228)

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*



July 24, 2013

Benz Oil Inc.
Lee Konkel
2724 W. Hampton Ave.
Milwaukee, WI 53209

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Benz Oil Inc., 12733 W. Arden Place, Butler, WI
WDNR BRRTS Activity #: 02-68-183136
FID #: 268137870

Dear Mr. Konkel:

The Department of Natural Resources (DNR) considers the Benz Oil site in Butler closed, with continuing obligations. No further investigation or remediation is required at this time. However, you and future property owners must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attached maintenance plan to anyone who purchases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under ch. NR 726, Wisconsin Administrative Code. The Project Manager reviewed the request for compliance with state laws and standards to maintain consistency in the closure of these cases. A conditional closure letter was issued by the DNR on June 26, 2013, and documentation that the conditions in that letter were met was received on July 22, 2013.

This waste oil recycling facility has residual soil contamination. Remediation included soil excavation on-site. The conditions of closure and continuing obligations required were based on the property being used for industrial purposes.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- If a structural impediment that obstructed a complete site investigation or cleanup is removed or modified, additional environmental work must be completed.
- Before the land use may be changed from industrial to non-industrial, additional environmental work must be completed.

- Waste oil is still in use at the site. If changes in property use or land use to a residential exposure setting are planned, an assessment of the vapor pathway will be necessary.
- Site-specific exposure assumptions were used. Current land or property use must be maintained to be protective. If changes to the current property use or land use are planned, an assessment must be made of whether the closure is still protective.
- Remaining soil contamination could result in vapor intrusion if future construction activities occur. If new building construction is planned, vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that conditions are protective of the new use.

GIS Registry

This site will be listed on the Remediation and Redevelopment Program's internet accessible Geographic Information System (GIS) Registry, to provide notice of residual contamination and of any continuing obligations. DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf> or at the web address listed below for the GIS Registry.

All site information is also on file at the Waukesha Regional DNR office listed on the letterhead. This letter and information that was submitted with your closure request application, including the maintenance plan, will be included on the GIS Registry in a PDF attachment. To review the site on the GIS Registry web page, visit the RR Sites Map page at <http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2>.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. If these requirements are not followed, the DNR 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.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)

Soil contamination remains on the west end of the property as indicated on the **attached map**. 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 contamination remains. If sampling confirms that contamination is present, the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Structural Impediments (s. 292.12 (2) (b), Wis. Stats.)

The remaining building as shown on the **attached map**, made complete investigation and/or remediation of the soil contamination on this property impracticable. If the structural impediment is to be removed, the property owner shall notify the DNR before removal and conduct an investigation of the degree and extent of petroleum contamination below the structural impediment. If contamination is found at that time, the contamination shall be properly remediated in accordance with applicable statutes and rules.

Industrial Soil Standards (s. NR 726.05 (8) (b) 1., Wis. Adm. Code)

Soil contamination remains at the west portion of the property, as shown on the **attached map**. Samples contained polycyclic aromatic hydrocarbons (PAH) in concentrations that met the site-specific industrial soil standards for this site.

This property may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless prior written approval has been obtained from the DNR. An investigation and remedial action to meet applicable soil cleanup standards may be required at that time.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats.)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

The current use of the property is recycling of waste oil, which uses PAH compounds. The operation introduces these compounds into the indoor air space. Case closure is possible based on site-specific conditions, including continued recycling of waste oil. Property use is restricted to non-residential settings (i.e. commercial or industrial uses).

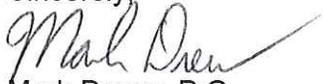
Therefore, if changes in property use or occupancy to a residential exposure setting are planned, the property owner must notify the DNR and evaluate the concentrations of contaminants that remain in the soil vapor beneath the building. Additional response actions may be necessary.

In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

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

The DNR 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 Mark Drews at 262-574-2146.

Sincerely,



Mark Drews, P.G.

Hydrogeologist

Remediation & Redevelopment Program

Attachments:

- remaining soil contamination map

cc: Endpoint Solutions, David Buser, 12065 W. Janesville Rd., Suite 300, Hales
Corners, WI 53130
SER File

PRODUCTION TOOL CORPORATION
12726 ARDEN PLACE

CLASSIC TOOL &
MACHINE CO.
4535 N. 128th ST.

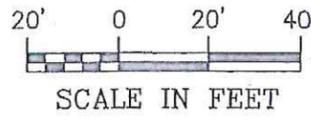
EXPLANATION

- MANHOLE
- STORM SEWER INLET
- BOREHOLE LOCATION AND IDENTIFICATION
- MONITORING WELL LOCATION AND IDENTIFICATION
- UNDERGROUND TELEPHONE LINE
- WATER LINE
- UNDERGROUND GAS LINE
- STORM SEWER LINE
- PROPERTY LINE
- SANITARY SEWER LINE

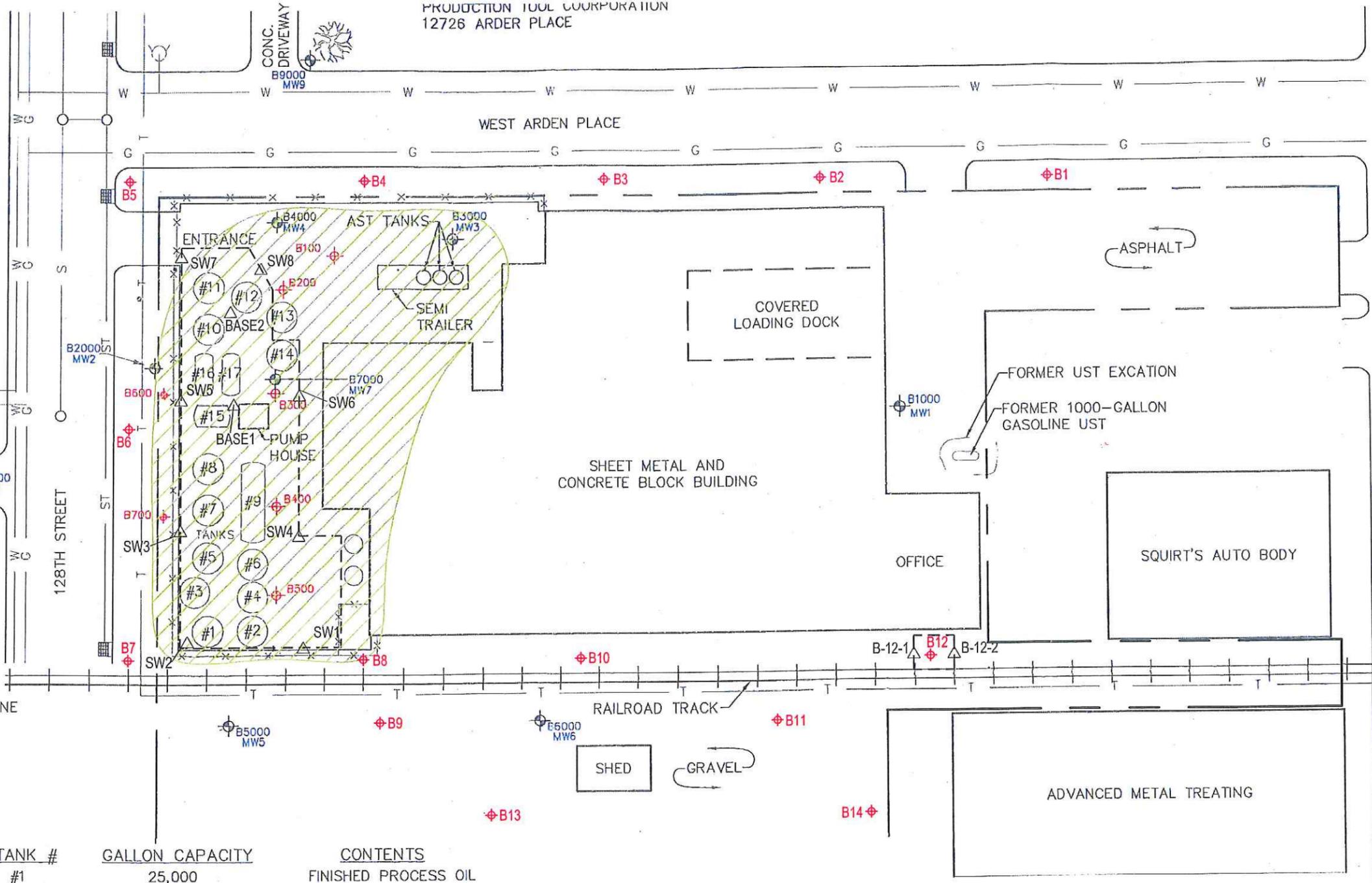
ESTIMATED EXTENT OF SOIL WITH PETROLEUM CONCENTRATIONS EXCEEDING THE NR720 GENERIC RCLs AND NR746 SCREENING CRITERIA AND SUGGESTED RCLs FOR PAHs BASED ON INDUSTRIAL DIRECT CONTACT

ESTIMATED EXTENT OF EXCAVATION

CONFIRMATION SOIL SAMPLE LOCATION



TANK #	GALLON CAPACITY	CONTENTS
#1	25,000	FINISHED PROCESS OIL
#2	25,000	FINISHED PROCESS OIL
#3	25,000	USED PROCESS OIL
#4	11,000	FINISHED PROCESS OIL
#5	11,000	LUBE BASE OIL
#6	11,000	LUBE BASE OIL
#7	10,000	USED PROCESS OIL
#8	10,000	USED PROCESS OIL
#9	3,000	WASTE WATER
#10	13,000	WASTE WATER
#11	8,000	EMPTY
#12	13,000	WASTE OIL
#13	17,000	LUBE BASE OIL
#14	8,000	EMPTY
#15	2-3,000	USED LUBRICANTS
#16	2-4,000	USED LUBRICANTS
#17	2-4,000	USED LUBRICANTS



POST-REMEDIATION SOIL CONTAMINATION

BENZ OIL - ARDEN PLACE
12733 West Arden Place
Butler, Wisconsin

Endpoint Solutions
12065 West Janesville Road
Hales Corners, WI 53130

Phone: (414) 427-1200 Fax: (414) 427-1259

DRAWN BY: MMV DATE: 05/16/2013
REVIEWED BY: DMB PROJECT NO: 072-002-005

Figure B.2.b

P:\Benz Oil\Arden Place\CADD\Closure Soil Figures.dwg



June 26, 2013

Benz Oil Inc.
Lee Konkel
2724 W. Hampton Ave.
Milwaukee, WI 53209

FID # 268137870

Subject: Conditional Closure Decision,
With Requirements to Achieve Final Closure
Benz Oil Inc., 12733 W. Arden Place, Butler, Wisconsin
WDNR BRRTS Activity # 02-68-183136

Dear Mr. Konkel:

The Department of Natural Resources (Department) reviewed your request for closure of the case described above. The Department reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the Department has determined that the petroleum contamination on the site from the former above ground storage tanks appears to have been investigated and remediated to the extent practicable under site conditions. Your case meets the screening criteria of s. NR 746.07 or s. NR 746.08, Wis. Adm. Code, and the requirements of ch. NR 726, Wis. Adm. Code and will be closed if the following conditions are satisfied:

MONITORING WELL ABANDONMENT

The monitoring wells at the site must be properly abandoned in accordance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to Mark Drows on Form 3300-005, found at <http://dnr.wi.gov/topic/DrinkingWater/documents/forms/3300005.pdf> or provided by the Department of Natural Resources.

PURGE WATER, WASTE AND SOIL PILE REMOVAL

Any remaining purge water, waste and/or soil piles generated as part of site investigation or remediation activities must be removed from the site and disposed of or treated in accordance with Department of Natural Resources' rules. Once that work is completed, please send appropriate documentation regarding the treatment or disposal of the remaining purge water, waste and/or soil piles.

When the conditions above have been satisfied, please submit the appropriate documentation (for example, well abandonment forms, disposal receipts, copies of correspondence, etc.) to verify that applicable conditions have been met, and your case will be closed. Your site will be listed on the DNR's Remediation and Redevelopment GIS Registry. Information that was submitted with your closure request application will be included on the GIS Registry. To review the site on the GIS Registry web page, visit the RR Sites Map page at: <http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2>.

CONTINUING OBLIGATIONS AND RESPONSIBILITIES

As part of the approval of the closure of this case, you will be responsible for maintaining certain

continuing obligations. If the property use changes from its current industrial use or the existing building is modified, additional site investigation (including vapor intrusion) and/or remediation may be necessary.

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

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 262-574-2146.

Sincerely,



Mark Drews, P.G.

Hydrogeologist

Remediation & Redevelopment Program

cc: Endpoint Solutions, David Buser, 12065 W. Janesville Rd., Suite 300, Hales Corners, WI 53130
SER File

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided. Any section of the form not relevant to the case closure request must be fully filled out or explained on a separate page and attached to the relevant section of this form. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Site Information

BRRTS No. 02-68-183136		Parcel ID No. 10-09-269001	
BRRTS Activity (Site) Name Benz Oil, Inc.		WTM Coordinates X 676973 Y 293625	
Street Address 12733 West Arden Place		City Butler	State ZIP Code WI 53007
Responsible Party (RP) Name Mr. Lee Konkel c/o Benz Oil, Inc.			
Company Name Benz Oil, Inc.			
Street Address 2724 West Hampton Avenue		City Milwaukee	State ZIP Code WI 53209
Phone Number (414) 442-2900		Email lkonkel@benz.com	

Check here if the RP is the owner of the source property.

Environmental Consultant Name Kirk Kapfhammer			
Consulting Firm Endpoint Solutions Corp.			
Street Address 12065 West Janesville Road, Suite 300		City Hales Corners	State ZIP Code WI 53130
Phone Number (414) 427-1200		Email kirk@endpointcorporation.com	
Acres Ready For Use 2.07		Voluntary Party Liability Exemption Site? <input type="radio"/> Yes <input checked="" type="radio"/> No	

Fees and Mailing of Closure Request

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

1. **Send a copy of page one** of this form and the applicable ch. NR 749, Wis. Adm. Code, fee(s) to the DNR regional Environmental Program Associate at <http://dnr.wi.gov/topic/Brownfields/Contact.html>. Check all fees that apply:

\$750 Closure Fee

\$200 GIS Registry Fee for Soil

\$250 GIS Registry Fee for Groundwater Lost Well(s)

Total Amount of Payment \$ 950.00

2. **Send one paper copy and one e-copy on compact disk of the entire closure package** to the Regional Project Manager assigned to your site. Submit as *unbound, separate documents* in the order and with the titles prescribed by this form. For electronic document submittal requirements, see <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

Site Summary

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

1. General Site Information and Site History

- A. **Site Location:** Describe the physical location of the site, both generally and specific to its immediate surroundings.
The subject property is an irregularly shaped parcel (Tax Key: BV 1009269001) located in the Village of Butler. The site is roughly bound by North 128th Street (to the west); by West Arden Place (to the north); adjoining industrial properties and North 127th Street (to the east); and, Ruby Avenue (to the south). Specifically, the "site" itself occupies roughly the northwest quadrant of the subject property. The site location is shown in Attachment B.1.a. (Location Map) and the site layout is depicted in Attachment B.1.b. (Detailed Site Map).
- B. **Prior and current site usage:** Specifically describe the current and historic occupancy and types of use.
The site has operated as a used oil processing facility since the 1970s. Prior to 1987, the site was occupied by Filmite Oil Corporation. Since 1987, Benz Oil has continued operating the site as a used oil processing facility.
- C. Describe how and when site contamination was discovered.
On January 9, 1998, the WDNR issued a Notice of Noncompliance to Benz Oil regarding its management of used oil, and further recommended that Benz Oil conduct a site investigation to identify potential contamination at the site before making improvements to the tank farm area. Benz Oil retained Northern Environmental to conduct a preliminary site investigation at the site, which was completed on March 5, 1998. Based on the results of soil and groundwater samples collected during the investigation, a petroleum release was reported to the WDNR.
- D. Describe the type(s) and source(s) or suspected source(s) of contamination.
On-site soils have been impacted by diesel-range organics (DRO), petroleum volatile organic compounds (PVOCs), and polycyclic aromatic hydrocarbons (PAHs); and groundwater at the site has been impacted by PVOCs and PAHs. Both the soil and groundwater contamination are attributed to operations associated with bulk petroleum storage in the tank farm formerly located in the northwest portion of the subject property.
- E. Other relevant site description information (or enter Not Applicable).
Not Applicable
- F. List BRRTS activity site name and number for all other BRRTS activities at this property, including closed cases.
Benz Oil Inc, BRRTS #02-68-183136 (current activity); Benz Oil Property, BRRTS #03-68-000770 (closed); Benz Oil, BRRTS #03-68-004588 (closed)
- G. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to this site, and those impacted by contamination from this site.
Production Tool Corp, BRRTS #02-68-000477 (closed); Advanced Metal Treating Inc, BRRTS #03-68-526427 (closed); Western States Envelope Co, BRRTS #03-68-002355 (closed); Western States Envelope Co - Adhesive Tank, BRRTS #04-68-552513 (closed)
- H. **Current zoning** (e.g. industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
The subject property is zoned for industrial use (M-1 Industrial District, Village of Butler). Adjoining properties to the north and east are similarly zoned as part of the M-1 Industrial District. The adjoining property to the west is zoned for heavy industry (M-3 Heavy Industrial District, Village of Butler). The adjoining property to the south is zoned for industrial use ("I" Industrial District, City of Brookfield). Zoning maps for the Village of Butler and the Northeastern Quarter of the City of Brookfield are provided in Attachment G.3. (Verification of Zoning).

2. General Site Conditions

- A. **Soil/Geology**
- i. Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.
The uppermost soils at the site consist largely of brown, well-graded, silty sand with some gravel. This uppermost unit extends to approximately 3 feet in depth and is interpreted to be anthropogenic fill. Underlying the heterogeneous fill materials is a gray, laterally extensive silt and clay unit with low to medium plasticity. This silt/clay unit extends to the maximum depth explored and is interpreted to be native glacial deposits as part of the Oak Creek Formation. A geologic cross-section is provided in Attachment B.3.a. (Geologic Cross-Section).
- ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
The predominant fill unit at the site is described above. In places, the fill unit also appears to have a significant silt/clay component which is interpreted to be reworked native deposits. No obvious waste material or debris was encountered in this unit. In general, the thickness of the fill unit appears to increase to the north and west of the site, where it extends up to 5 feet below ground surface (bgs) (refer to Attachment B.3.a., Geologic Cross-Section).

- iii. Depth to bedrock, bedrock type, and whether or not it was encountered during the investigation.
Based on information from the USGS, the depth to bedrock is estimated to be approximately 100 feet. The predominant bedrock type in the area is Silurian dolomite.
- iv. Describe the nature and locations of current surface cover(s) across the site (e.g. natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).
The subject property is improved with a slab-on-grade, sheet metal and concrete block building. The vast majority of the surrounding exterior is covered with concrete, asphalt and/or compacted gravel.

B. Groundwater

- i. **Discuss depth to groundwater and piezometric elevations.** Describe and explain depth variations, and whether free product affects measurement or water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.
In general, the depth to groundwater across the site ranges from approximately 2 to 5 feet bgs; however, the depth to groundwater west and north of the site (at MW-8 and MW-9, respectively) has been measured up to 12 feet bgs during historical monitoring events. The water table typically intersects the upper portion of the native silt/clay unit. The occasional historical presence of free product generally occurs as a film; therefore, it has minimal effect on the calculated water table elevations. Historical depth-to-water measurements are provided in Attachment A.7. (Water Level Elevations).
- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.
Shallow groundwater at the site exhibits radial flow to the north, northwest and northeast (refer to Attachment B.3.c., Groundwater Flow Direction). This observed flow pattern has been relatively consistent during the groundwater monitoring activities at the site.
- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.
This information was not obtained since groundwater concentrations are relatively low and do not exceed the applicable Wisconsin Administrative Code (WAC) Chapter NR 140 Enforcement Standards (ESs). Moreover, the predominant geology at the site (silt/clay) is characterized by very low hydraulic conductivities, and the type of contamination at the site is relatively immobile and does not readily dissolve in groundwater.
- iv. Identify and describe locations/distance of potable and/or municipal Wells within 1200 feet of the site.
Residents and businesses in the area obtain potable water from the City of Milwaukee, which receives its municipal water supply from Lake Michigan. No active water-supply wells are operated by a public utility within 1,000 feet of the site. No private potable wells are located within 100 feet of the site.

3. Site Investigation Summary

A. General

- i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.
Northern Environmental conducted a preliminary site investigation in 1998, during which they advanced seven (7) soil borings (B100 through B700). In 2000, Northern Environmental performed additional site investigation activities, including the advancement of nine (9) soil borings (B1000 through B9000) and subsequent installation of nine (9) monitoring wells (MW1 through MW9). Between 2000 and 2008, Northern Environmental performed five (5) groundwater monitoring events. Endpoint assumed oversight of the site investigation in 2010, and performed three (3) additional rounds of groundwater sampling between September 2010 and July 2011. In July 2011, Endpoint also advanced fourteen (14) soil borings (B1 through B14) concentrated along the perimeter of the source area and along the street and railroad rights-of-way. In January 2012, Endpoint oversaw two (2) remedial excavations during which approximately 232.37 tons of soil were removed. Following the remedial excavations, Endpoint performed two (2) additional rounds of groundwater monitoring in May 2012 and August 2012. A list of previous submittals detailing the site investigation history is provided in Attachment C.1. (Site Investigation Documentation).
- ii. Identify whether contamination extends beyond the source property boundary, describe the off-site media (e.g., soil, groundwater, etc.) impacted, and the vertical and horizontal extent of off-site impacts.
The extent of soil contamination is generally limited to the source property. Portions of the adjoining rights-of-way along West Arden Place and North 128th Street as well as within the railroad right-of-way have residual PAH concentrations above the suggested non-industrial Residual Contaminant Levels (RCLs) based on direct contact; however, the neighborhood is zoned for industrial use. The most recent groundwater monitoring indicates that contaminant concentrations in groundwater do not exceed the applicable NR 140 ESs, and Preventive Action Limit (PAL) exceedances are limited to the site and its immediate vicinity.

- iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.

The site investigation and remedial excavation activities were limited by the active on-site building adjacent to the source area (refer to Attachment C.6., Photos).

B. Soil

- i. Describe degree and extent of **soil contamination** at and from this site. Relate this to known or suspected sources and known or potential receptors/migration pathways.

The soil at the site is impacted with DRO, PVOCs, and PAHs. These contaminants are consistent with the suspected sources (petroleum storage tanks) being assessed. The highest concentrations in soil are limited to the source property (refer to Attachment B.2.b., Post-Remedial Soil Contamination; and Attachment B.3.a., Geologic Cross-Section). The limited extent of soil contamination is consistent with the primary contaminants, which have a high affinity for soil surfaces. Portions of the adjoining rights-of-way have benzene above the generic WAC Chapter NR 720 RCL and PAH concentrations above the suggested RCLs based on direct contact at non-industrial sites. There is no evidence to indicate the soil contamination has a significant extent beyond the upper 5 to 8 feet. Based on the nature of the released contaminant (e.g., minimal tendency to volatilize), its limited extent, the absence of ES exceedances in groundwater, and the lack of subsurface utilities in the area of contamination, no potential receptors or migration pathways have been identified for the residual soil contamination at the site.

- ii. Describe the level and types of **soil contaminants** found in the upper four feet of the soil column.

The upper four (4) feet of soil is impacted with DRO, PVOCs, and PAHs. Much of the contaminated soil in the upper two (2) feet has been removed from the source area and replaced with clean imported backfill.

- iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site: for example, a Residual Contaminant Level (RCL), a Site-Specific Residual Contaminant Level (SSRCL), or a Performance Standard as determined under ss NR 720.09, 720.11 and 720.19, Wis. Adm. Code. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.

Concentrations were compared to generic NR 720 RCLs, NR 746 risk-screening criteria, and suggested RCLs for PAHs based on protection of groundwater and direct contact. Since the subject property and surrounding neighborhood are zoned for industrial use, suggested RCLs for PAHs based on direct contact at industrial properties were considered as appropriate cleanup standards.

C. Groundwater

- i. Describe degree and extent of groundwater contamination at or from this site. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.

Benzene and several PAHs exceed applicable PALs in the source area and are generally limited to the subject property (refer to Attachment B.3.b., Groundwater Isoconcentration). These contaminants are consistent with the suspected sources (petroleum storage tanks) being assessed. Based on the most recent monitoring data, none of the concentrations in groundwater exceed their applicable ESSs. The relative absence of groundwater impacts is consistent with the primary contaminants, which are only slightly soluble. There is no basement on the subject property; therefore, there is no building foundation drain system. Residents and businesses in the area obtain potable water from the City of Milwaukee municipal system, which receives its water supply from Lake Michigan.

- ii. Describe the presence of free product at the site, including the thickness, depth, and locations.

Two (2) of the monitoring wells at the site have been documented to have measurable thicknesses of free product. Monitoring well MW-2 had a free product thickness of 0.53 foot in September 2010; however, the replacement well (MW-2R) has had no measurable thickness of free product. Monitoring well MW-3 had 0.01 foot of free product in July 2011. No measurable thickness of free product has been documented at the site since that time (refer to Attachment A.7., Water Level Elevations).

D. Vapor

- i. Describe how the vapor migration pathway was assessed, including locations where vapor or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.

The contaminant type (lube oil, process oil, and/or used oil) is characterized by its low volatility and does not readily dissolve in groundwater. There is little potential for migration via utility corridors since only one storm sewer is present near the area of contamination. The on-site building adjacent to the source area has a competent slab-on-grade foundation. Moreover, this building continues to be used for petroleum storage and handling. The greatest exposure potential to on-site personnel is from routine occupational exposure to similar chemicals (but at much higher concentrations) on a daily basis. Based on the results of the VI assessment, no soil vapor or indoor air samples were collected as part of the investigation.

- ii. Identify the applicable DNR action levels and the land use classification used to establish them. Describe where the DNR action levels were reached or exceeded (e.g., sub slab, indoor air or both).
Not Applicable

E. Surface Water and Sediment

- i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.
The extent of contamination is isolated to the subject property and does not extend to the nearest surface water body (the Menomonee River) located approximately two-thirds (2/3) mile east. For these reasons, surface water and/or sediment were not sampled as part of this investigation.
- ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.
Not Applicable

4. Remedial Actions Implemented and Residual Levels at Closure

- A. General: Provide a brief summary of the remedial action history. List previous remedial action report submittals by name and date. Identify remedial actions undertaken since the last submittal for this project and provide the appropriate documentation in Attachment C.

Between January 9-11, 2012, Endpoint oversaw two (2) remedial excavations during which approximately 232 tons of contaminated soil were removed. The vast majority of this soil was removed from the west portion of the subject property where numerous ASTs existed. It is important to note the intent of the excavation activities was to remove the visually impacted soils and reduce the direct contact threat and overall contaminant source mass, which was successfully completed. In addition, a second "hot spot" remedial excavation was performed near soil boring B12. Both excavations extended to the depth of the water table at that time. The extent of the remedial excavations are depicted in Attachment B.2.b. (Post-Remedial Soil Contamination). Details regarding the remedial action performed at the site were provided in a previous submittal referenced in Attachment C.1. (Site Investigation Documentation).

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.
Not Applicable

- C. Describe the *active* remedial actions taken at the site, including: type of remedial system(s) used for each media impacted; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.

Between January 9-11, 2012, Endpoint oversaw two (2) remedial excavations during which approximately 232 tons of contaminated soil were removed. The vast majority of this soil was removed from the west portion of the subject property where numerous ASTs existed. It is important to note the intent of the excavation activities was to remove the visually impacted soils and reduce the direct contact threat and overall contaminant source mass, which was successfully completed. In addition, a second "hot spot" remedial excavation was performed near soil boring B12. Both excavations extended to the depth of the water table at that time. The extent of the remedial excavations are depicted in Attachment B.2.b. (Post-Remedial Soil Contamination). Details regarding the remedial action performed at the site were provided in a previous submittal referenced in Attachment C.1. (Site Investigation Documentation).

- D. Provide a discussion of the nature, degree and extent of residual contamination that will remain at the site or on off-site affected properties after case closure.

Soils with DRO, PVOC and PAH concentrations exceeding NR 720 generic RCLs, NR 746 risk-screening criteria, and/or suggested RCLs will remain on the northwest portion of the subject property (refer to Attachment B.2.b., Post-Remedial Soil Contamination).

- E. Describe the remaining soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds the ch. NR720, Wis. Adm. Code, standard(s) for direct contact.

Since the release at the site has been attributed to petroleum tanks containing lube oil, process oil, and/or used oil, metals are not believed to be constituents of concern. Accordingly, comparison to NR 720 Table 2 values based on direct contact is not applicable. The remaining contamination within four feet of ground surface was compared to NR 746 Table 2 values for direct contact and suggested RCLs for PAHs based on direct contact at industrial properties. None of the soil samples collected from the upper four (4) feet had concentrations exceeding these standards. Portions of the adjacent street rights-of-way have PAH concentrations above the suggested RCLs based on direct contact for non-industrial properties, although the site is located in an industrial zoned area.

- F. Describe the remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway.

Residual concentrations above NR 720 generic RCLs and NR 746 risk-screening criteria, as well as suggested RCLS (for PAHs) exist at the site for DRO, PVOCs, and PAHs. However, empirical data from extensive groundwater monitoring indicate that the plume is stable or receding; and moreover, the most recent sampling event shows that no ESs are exceeded. Based on these observations, the residual soil contamination does not pose a significant threat to groundwater quality.

- G. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.

None of the concentrations in soil exceed the appropriate RCLs based on direct contact at industrial properties. The groundwater plume is stable or receding, and the most recent sampling event shows that no ESs are exceeded. Due to the nature of the contaminants and the site's continued operation as an active used oil processing and bulk petroleum storage facility, vapor mitigation is not needed.

- H. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration, (e.g. stable or receding groundwater plume).

Extensive groundwater monitoring has been performed beginning in 2000 and as recently as 2012. Although ES exceedances were documented during historical monitoring events, none of the concentrations in groundwater exceed their applicable ESs during the most recent monitoring event. Prior to the remedial excavation, historical concentrations already indicated the contaminant plume was stable (if not receding). The post-excavation monitoring data indicate the remedial action was effective in removing source material that had contributed to ES (and most recently, only PAL) exceedances in groundwater.

- I. Identify how all exposure pathways were removed and/or adequately addressed by immediate and/or remedial action(s) described above in paragraphs, B, C, D, E and F.

Contaminated soils in the source area were excavated to the extent practicable, including to the depth of the water table at that time. The site and surrounding area are zoned for industrial use, and none of the concentrations in soil exceed the NR 746 Table 2 risk-screening criteria or the suggested RCLs for PAHs based on direct contact for industrial properties. The most recent groundwater sampling event resulted in no ES exceedances, and extensive groundwater monitoring at the site has shown that the contaminant plume is stable (if not receding); thus, the empirical evidence demonstrates that the residual soil contamination does not pose a significant threat to groundwater quality.

- J. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
Not Applicable

- K. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.

Based on the most recent groundwater monitoring data, there are no ES exceedances at the site. PAL exceedances affect the following monitoring points: MW-2R (benzene, chrysene); MW-4 (benzene); MW-5 [benzo(b)fluoranthene]; and MW-7R [benzene, benzo(a)pyrene, benzo(b)fluoranthene and chrysene].

- L. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.

Not Applicable

- M. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.

Not Applicable

5. Continuing Obligations: Situations where a maintenance plan(s) and inclusion on DNR's GIS Registry are required.

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: Maintenance Plans and GIS Registry	Maintenance Plan (s) Required in Attachment D	GIS Registry Listing
	A. On-Site	B. Off-Site			
i.	<input type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Direct Contact	✓	✓
ii.	<input type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Groundwater Infiltration	✓	✓
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure passive system	✓	✓
iv.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure active system	✓	✓
v.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	None of the above scenarios apply to this case closure	NA	NA

6. Continuing Obligations: Situations where inclusion on DNR's GIS Registry is required.

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: GIS Registry Only	GIS Registry Listing
	A. On-Site	B. Off-Site		
i.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination exceeds ch. NR 720 generic or site-specific RCLs	✓
ii.	<input type="checkbox"/>	<input type="checkbox"/>	Sites with groundwater contamination equal to or greater than the ch. NR 140, enforcement standards (ES)	✓
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Monitoring wells: lost, transferred or remaining in use	✓
iv.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Structural Impediment (not as a performance standard)	✓
v.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination remaining at ch. NR 720 Industrial Use levels	✓
vi.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vapor intrusion may be future, post-closure issue if building use or land use changes	✓
vii.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None of the above scenarios apply to this case closure	NA

7. Underground Storage Tanks

A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action? Yes No

B. Do any upgraded tanks meeting the requirements of ch. SPS 310, Wis. Adm. Code, exist on the property? Yes No

C. If the answer to question 7b is yes, is the leak detection system currently being monitored? Yes No

Data Tables (Attachment A)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General directions for Data Tables:

- Use bold and italics font on information of importance on tables and figures. Use bold font for ch. NR 140, Wis. Adm. Code, groundwater enforcement standard (ES) attainments or exceedances, and italicized font for ch. NR 140, Wis. Adm. Code, groundwater preventive action limit (PAL) standard attainments or exceedances.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e. do not just list as no detect (ND)).
- Include the units on data tables.

- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15(2)(g)3, Wis. Adm. Code, in the format required in s. NR 716.15(2)(h)3, Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Pre-remedial Soil Analytical Table, etc).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate PDF.

A. Data Tables

- A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates, for all groundwater sampling points e.g. monitoring wells, temporary wells, sumps, extraction wells, any potable wells and any other wells, extraction wells and any potable wells for which samples have been collected.
- A.2. **Pre-remedial Soil Analytical Table(s):** Table(s) showing the soil analytical results and collection dates - prior to conducting the interim and/or remedial action. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.3. **Post-remedial Soil Analytical Table(s):** Table(s) showing the post-remedial action soil analytical results and collection dates. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.4. **Pre and Post Remaining Soil Contamination Soil Analytical Table(s):** Table(s) showing only the pre and post remedial action soil analytical results that exceed a Residual Contaminate Level (RCL) or a Site-Specific Residual Level (SSRCL).
- A.5. **Vapor Analytical Table:** Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.
- A.6. **Other Media of Concern (e.g., sediment or surface water):** Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, time period for sample collection, method and results sampling.
- A.7. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.
- A.8. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

Maps and Figures (Attachment B)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions for all Maps and Figures:

- If any map or figure is not relevant to the case closure request, you must fully explain the reason(s) why and attach that explanation (properly labeled with the map/ figure title) in Attachment B.
- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11x17 inches, in a portable document format (pdf) readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(2)(h)1 and 726.05(3)(a)4.d, Wis Adm. Code.
- Do not use shading or highlights on any of the analytical tables.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.) should be a separate PDF.

B.1. Location Maps

- B.1.a. **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 impacted and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.
- B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for on-site and applicable off-site properties, 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 ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

- B.1.c. **RR Site Map:** From RR Sites Map (<http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2>) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

B.2. Soil Figures

- B.2.a. **Pre-remedial Soil Contamination:** Figure(s) showing the sample location of all pre-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeded a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.
- B.2.b. **Post-remedial Soil Contamination :** Figure(s) showing the sample location of all post-remedial, unsaturated 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 ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.
- B.2.c. **Pre/Post Remaining Soil Contamination:** Figure(s) showing the only location of all pre and post remedial residual soil sample location(s) where unsaturated contaminated soil remains after remediation 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 Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Admin. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

B.3. Groundwater Figures

- B.3.a. **Geologic Cross-Section Figure(s):** One or more cross-section diagrams showing soil types and correlations across the site, water table and piezometric elevations, and locations and elevations of geologic rock units, if encountered. Display on one or more figures all of the following:
- Source location(s) and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
 - Source location(s) and lateral and vertical extent if groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES)
 - Surface features, including buildings and basements, and show surface elevation changes.
 - Any areas of active remediation within the cross section path, such as excavations or treatment zones.
 - Include a map displaying the cross-section location(s), if they are not displayed on the Detailed Site Map (Map B.1b)
- B.3.b. **Groundwater Isoconcentration:** Figure(s) showing the horizontal extent of the post-remedial groundwater contamination exceeding a ch. NR 140, Wis. Adm. Code, Preventive Action Limit (PAL) and/or an Enforcement Standard (ES). Indicate the date and direction of groundwater flow based on the most recent sampling data.
- B.3.c. **Groundwater Flow Direction:** Figure(s) representing groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit two groundwater flow maps showing the maximum variation in flow direction.
- B.3.d. **Monitoring Wells:** Figure(s) showing all monitoring wells, with well identification number. Clearly designate any wells that: (1) are proposed to be abandoned; (2) cannot be located; (3) are being transferred; (4) will be retained for further sampling, or (5) have been previously abandoned.

B.4. Vapor Maps and Other Media

- B.4.a. **Vapor Intrusion Map:** Map(s) showing all locations and results for samples taken to investigate the vapor intrusion pathway, in relation to remaining soil and groundwater contamination, including sub-slab, indoor air, soil vapor, ambient air, and communication testing. Show locations and footprints of affected structures and utility corridors, and/or where residual contamination poses a future risk of vapor intrusion.
- B.4.b. **Other media of concern (e.g., sediment or surface water):** Map(s) showing all sampling locations and results for other media investigation. Include the date of sample collection and identify where any standards are exceeded.
- B.4.c. **Other:** Include any other relevant maps and figures not otherwise noted above. (This section may remain blank)

Documentation of Remedial Action (Attachment C)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc).
- If the documentation requested below is "not applicable" to the site-specific circumstances, include a brief explanation to support that conclusion.
- If the documentation requested below has already been submitted to the Department, please note the title and date of the report for

that particular document requested.

- C.1. **Site investigation documentation**, that has not otherwise been previously submitted.
- C.2. **Investigative waste disposal documentation**.
- C.3. **NR 720.19 analysis**, assumptions and calculations for site specific RCLs (SSRCLs) , with justification, including EPA Soil Screening Level Model Calculations and results.
- C.4. **Construction documentation** or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
- C.5. **Decommissioning of Remedial Systems**. Include plans to properly abandon any systems or equipment upon receiving conditional closure.
- C.6. **Photos**. For sites or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system. Include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features should be visible and discernible. Photographs must be labeled with the site name, the features shown, location and the date on which the photograph was taken.
- C.7. **Other**. Include any other relevant documentation not otherwise noted above. (This section may remain blank)

Maintenance Plan(s) (Attachment D)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

When one or more "maintenance plans" are required for a site closure, include in each maintenance plan all required information in sections D.1. through D.5. below, and attach the plan(s) in Attachment D. The following "model" maintenance plans can be located at: (1) Maintenance plan for an engineering control or cover: <http://dnr.wi.gov/topic/Brownfields/documents/maintenance-plan.pdf>; and (2) Maintenance plan for vapor intrusion: http://dnr.wi.gov/topic/Brownfields/documents/appendix5_606.pdf.

- D.1. **Location map(s)** which show(s): (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance - on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) all property boundaries.
- D.2. **Brief descriptions** of the type, depth and location of residual contamination.
- D.3. **Description of maintenance action(s)** required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter.
- D.5. **Contact information**, including the name, address and phone number of the individual or facility who will be conducting the maintenance.

Monitoring Well Information (Attachment E)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

Attach monitoring well construction and development forms (DNR FORM 4400-113 A and B: http://dnr.wi.gov/org/water/dwg/gw/forms/4400_113_1_2.pdf) for all wells that will remain in-use, be transferred to another party or that could not be located. A figure of these wells should be included in Attachment B.3.d.

Select One:

- No monitoring wells were required as part of this response action.
- All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site
- Select One or More:**
- Not all monitoring wells can be located, despite good faith efforts. Attachment E must include description of efforts made to locate the "lost" wells.
 - One or more wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s).
 - One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason(s) the well(s) will remain in use.

Notifications to Owners of Impacted Properties (Attachment F)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

- State law requires that the responsible party provide a 30-day, written advance notice (i.e., a letter) to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned.
- A model "template letter" for these mandatory notifications can be downloaded at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR919.pdf>.

Check all that apply to the site-specific circumstances of this case closure:

	A. Impacted Source Property and Owner is not Conducting Cleanup	B. Impacted Right of Way	C. Impacted Off-Site Property Owner	Impacted Property Notification Situations: Ch. NR 726 Appendix A Letter
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual groundwater contamination exceeds Ch. NR 140 Wis. Administrative Code enforcement standards.
2.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination that attains or exceeds standards is present after the remedial action is complete, and must be properly managed should it be excavated or removed.
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	An engineered cover or a soil barrier (e.g. pavement) must be maintained over contaminated soil for direct contact or groundwater infiltration concerns.
4.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Industrial land use soil standards were used for the clean-up standard.
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A vapor mitigation system (or other specific vapor protection) must be operated and maintained.
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vapor assessment needed if use changes.
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Structural impediment.
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lost, transferred or open monitoring wells.
9.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable.

If any of the previous boxes in rows 1 thru 8 were checked, include the following as part of Attachment F:

- FORM 4400-246;
- Copy of each letter sent, 30 days or more prior to requesting closure; and
- Proof of receipt for each letter.
- For this site closure, 1 (number) property (ies) has/have been impacted, the owners have been notified, and copies of the letters and receipts are included in Attachment F.

Source Legal Documents (Attachment G)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Include all of the following documents, in this order, in Attachment G:

- G.1. Deeds - Source Property and Other Impacted Properties:** The most recent deed with legal descriptions clearly labeled for (1) the **Source Property** (where the contamination originated) and (2) all **off-source** (off-site) properties where letters were required to be sent per the ch. NR 700, Wis. Adm. Code, rule series (e.g., off-site cover maintenance required, lost monitoring well, off-site cover property impacts to groundwater exceeding the ch. NR 140, Wis. Adm. Code).
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.
- G.2. 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)).
- G.3. Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- G.4. Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

Signatures and Findings for Closure Determination

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Check the correct signature block below for this case closure request, and have the proper environmental professional(s) sign this document, in accordance with the ch. NR 700 Wis. Adm. Code rule series. Both boxes may be checked if applicable to this case closure.

- A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies). In this situation, the closure request must be prepared by, or under the supervision of, a professional engineer and a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code. Include both signatures provided below with the submittal.
- The response action(s) for this site addresses media other than groundwater. In this situation, the case closure request must be prepared by, or under the supervision of, a professional engineer, as defined in ch. NR 712, Wis. Adm. Code. The "engineering certification" language below, at a minimum, must be signed.

Engineering Certification

I Joseph Mentzer hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this case closure request has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. All phases of work necessary to obtain data, develop conclusions, recommendations and prepare submittals for this case closure request have been prepared by me, or their preparation has been supervised by me. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Joseph E. Mentzer
Printed Name

Senior Engineer
Title

[Signature]
Signature

5-17-13
Date



Hydrogeologist Certification

I Kirk Kopfhammer hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. All phases of work necessary to address groundwater contamination including obtaining data, developing conclusions, recommendations and preparing submittals for this case closure request have been prepared by me, or their preparation has been supervised by me. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Kirk Kopfhammer
Printed Name

Principal
Title

[Signature]
Signature

5-16-13
Date

Table A.1.a.
Groundwater Monitoring Results
MW-2 / MW-2R

Benz Oil
12733 West Arden Place
Butler, Wisconsin

All units expressed in µg/l	ES	PAL	MW-2			MW-2R			
			9/5/2007	1/28/2008	9/1/2010	1/11/2011	7/20/2011	5/1/2012	8/21/2012
PVOCs									
Benzene	5	<i>0.5</i>	<i>0.64 J</i>	<i>0.59 J</i>	<i>0.57 J</i>	1.63	<i>1.08 J</i>	1.78	1.67
Ethylbenzene	700	140	<0.44	2.41	<0.55	1.32 J	6.0	2.3	<0.78
Methyl-tert-butyl-ether	60	12	<0.53	<0.62	<0.25	<25	<0.47	<0.57	<0.8
Toluene	800	160	2.7	1.47 J	<0.72	<0.72	12.9	5.1	<0.53
Trimethylbenzenes	480*	96*	4.62	3.98 J	1.33 J	9.4	5.91 J	5.99	3.69
Xylenes	2000**	400**	295	118	41	718	31.09 J	248.4 J	52.8
PAHs									
Acenaphthene	--	--	1.4	0.67	0.162 J	0.14	0.027 J	0.229	0.046 J
Acenaphthylene	--	--	1.69	1.23	0.245 J	0.123	0.016 J	0.33	0.095
Anthracene	3,000	600	1.42	0.79	0.173 J	<0.018	<0.009	0.34	0.028 J
Benzo (a) anthracene	--	--	1.65	1.69	0.37	0.069	<0.014	0.201	0.035 J
Benzo (a) pyrene	0.2	<i>0.02</i>	2.44	1.71	0.37	<i>.038 J</i>	<0.011	<i>0.151</i>	<0.018
Benzo (b) fluoranthene	0.2	<i>0.02</i>	3.2	1.55	0.35	<i>.019 J</i>	<0.013	<i>0.124</i>	<0.02
Benzo (g,h,i) perylene	--	--	0.5	0.7	0.208 J	<.017	<0.015	0.048 J	<0.019
Benzo (k) fluoranthene	--	--	0.64 J	0.44 J	<0.145	<.029	<0.015	0.08	<0.022
Chrysene	0.2	<i>0.02</i>	7.8	5.1	1.08	<i>0.085</i>	<i>0.036 J</i>	0.74	<i>0.098</i>
Dibenzo(a,h)anthracene	--	--	NA	NA	NA	<0.016	<0.016	0.019 J	<0.019
Fluoranthene	400	80	0.45 J	2.37	0.5	0.079	0.013 J	0.34	0.04 J
Fluorene	400	80	3.3	1.63	0.34	0.167	0.063	0.75	0.245
Indeno (1,2,3-cd)pyrene	--	--	0.43 J	0.47	0.104 J	<0.016	<0.015	0.039 J	<0.018
1-Methylnaphthalene	--	--	1.39	0.92	0.175 J	0.37	<0.009	0.5	0.255
2-Methylnaphthalene	--	--	1.32	0.89	0.13 J	0.193	0.027 J	0.309	0.145
Naphthalene	100	10	2.09	1.95	0.23	1.05	<0.015	0.98	0.49
Phenanthrene	--	--	4.7	2.63	0.36	0.073	0.011 J	1.6	0.279
Pyrene	250	50	7.8	6	1.54	0.228	0.039 J	0.45	0.072

MW-2 was abandoned and replaced with MW-2R in December 2010

PVOCs = Petroleum Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

µg/l - micrograms per liter

ES - WAC Chapter NR140 Enforcement Standard

PAL - WAC Chapter NR140 Preventive Action Limit

WAC - Wisconsin Administrative Code

* - Total Trimethylbenzenes (1,2,4- and 1,3,5-trimethylbenzene combined)

** - Total Xylenes (meta-, ortho-, and para-xylene combined)

" - " - No Established Standard

J - Analyte detected between the limit of detection (LOD) and the Limit of Quantification (LOQ). Result is an estimate.

NA : Not Analyzed

Bold value indicates exceedance of WAC Chapter NR 140 ES

Italicized value indicates exceedance of WAC Chapter NR 140 PAL

**Table A.1.a. (cont.)
Groundwater Monitoring Results
MW-3**

Benz Oil
12733 West Arden Place
Butler, Wisconsin

	ES	PAL	9/5/2007	1/28/2008	9/1/2010	1/11/2011	7/20/2011	5/1/2012	8/21/2012
All units expressed in µg/l									
PVOCs									
Benzene	5	<i>0.5</i>	<i>0.81</i>	<i>1.34 J</i>	<i>0.59 J</i>	<i>0.59 J</i>	<0.49	<0.46	<0.5
Ethylbenzene	700	<i>140</i>	<0.44	9.3	<0.55	<0.55	3.9	<0.46	<0.8
Methyl-tert-butyl-ether	60	<i>12</i>	<0.53	<0.62	<0.25	<0.25	<0.47	<0.57	<0.8
Toluene	800	<i>160</i>	<0.26	<0.46	<0.72	<0.72	<0.89	<0.48	<0.53
Trimethylbenzenes	480*	<i>96*</i>	<0.67	<1.42	<1.2	<1.2	<2.7	<1.57	<1.54
Xylenes	2000**	<i>400**</i>	<0.68	<1.43	<1.1	<1.1	<3.2	<1.45	<1.9
PAHs									
Acenaphthene	--	--	<0.015	<0.015	<0.017	<0.017	<0.01	<0.025	<0.025
Acenaphthylene	--	--	<0.016	0.065	<0.016	<0.016	<0.014	<0.019	<0.019
Anthracene	3,000	<i>600</i>	<0.013	<0.013	<0.018	<0.018	<0.009	<0.018	<0.018
Benzo (a) anthracene	--	--	<0.015	<0.015	<0.017	<0.017	<0.014	0.036 J	<0.024
Benzo (a) pyrene	0.2	<i>0.02</i>	<0.015	<0.015	<0.016	<0.016	<0.011	<i>0.034 J</i>	<0.018
Benzo (b) fluoranthene	0.2	<i>0.02</i>	<0.014	<0.014	<0.017	<0.017	<0.013	<i>0.064 J</i>	<0.02
Benzo (g,h,i) perylene	--	--	<0.015	<0.015	<0.017	<0.017	<0.015	0.043 J	<0.019
Benzo (k) fluoranthene	--	--	<0.023	<0.023	<0.029	<0.029	<0.015	0.024 J	<0.022
Chrysene	0.2	<i>0.02</i>	<0.016	<0.016	<0.017	<0.017	<0.013	<i>0.051 J</i>	<0.019
Dibenzo(a,h)anthracene	--	--	NA	NA	NA	NA	<0.016	NA	<0.019
Fluoranthene	400	<i>80</i>	<0.015	<0.015	<0.019	<0.019	<0.012	<0.019	<0.022
Fluorene	400	<i>80</i>	<0.019	0.030 J	<0.018	<0.018	<0.008	<0.018	<0.02
Indeno (1,2,3-cd)pyrene	--	--	<0.014	<0.014	<0.016	<0.016	<0.015	<0.016	<0.018
1-Methylnaphthalene	--	--	<0.018	<0.018	<0.016	<0.016	<0.009	<0.016	<0.022
2-Methylnaphthalene	--	--	<0.021	<0.021	<0.017	<0.017	<0.013	<0.017	<0.024
Naphthalene	100	<i>10</i>	<0.018	0.028 J	<0.017	<0.017	<0.015	<0.017	0.029 J
Phenanthrene	--	--	<0.017	<0.017	<0.019	<0.019	<0.01	<0.019	<0.019
Pyrene	250	<i>50</i>	<0.015	<0.015	<0.02	<0.02	<0.013	<0.02	<0.02

PVOCs = Petroleum Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

µg/l - micrograms per liter

ES - Wisconsin Administrative Code (WAC) Chapter NR140 Enforcement Standard

PAL - WAC Chapter NR140 Preventive Action Limit

" - - " - No Established Standard

* - Total Trimethylbenzenes (1,2,4- and 1,3,5-trimethylbenzene combined)

** - Total Xylenes (meta-, ortho-, and para-xylene combined)

J - Analyte detected between the limit of detection (LOD) and the Limit of Quantification (LOQ). Result is an estimate.

NA : Not Analyzed

Bold value indicates exceedance of WAC Chapter NR 140 ES

Italicized value indicates exceedance of WAC Chapter NR 140 PAL

**Table A.1.a. (cont.)
Groundwater Monitoring Results
MW-4**

Benz Oil
12733 West Arden Place
Butler, Wisconsin

All units expressed in µg/l	ES	PAL	9/5/2007	1/28/2008	9/1/2010	1/11/2011	7/20/2011	5/1/2012	8/21/2012
PVOCs									
Benzene	5	<i>0.5</i>	<i>1.59 J</i>	<i>1.53 J</i>	<i>0.58 J</i>	<i>0.62 J</i>	<i>0.71 J</i>	<i>0.85 J</i>	<i>0.70 J</i>
Ethylbenzene	700	<i>140</i>	<0.44	9.5	<0.55	<0.55	4.5	0.48 J	<0.78
Methyl-tert-butyl-ether	60	<i>12</i>	<0.53	<0.62	<0.25	<0.25	<0.47	<0.57	<0.8
Toluene	800	<i>160</i>	<0.26	0.52 J	<0.72	<0.72	<0.89	<0.48	<0.53
Trimethylbenzenes	480*	<i>96*</i>	<0.67	<1.42	<1.2	<1.2	<2.7	<1.57	<1.54
Xylenes	2000**	<i>400**</i>	0.72 J	<1.43	<1.1	<1.62	<3.2	<1.45	<1.9
PAHs									
Acenaphthene	--	--	<0.015	0.109	0.32	0.084	0.025 J	0.191	0.062 J
Acenaphthylene	--	--	<0.016	0.34	0.187	0.188	0.018 J	<0.019	0.113
Anthracene	3,000	<i>600</i>	<0.013	<0.013	0.037 J	<0.018	<0.009	0.019 J	<0.018
Benzo (a) anthracene	--	--	<0.015	<0.015	<0.017	<0.02	<0.014	<0.024	<0.024
Benzo (a) pyrene	0.2	<i>0.02</i>	<0.015	<0.015	<0.016	<0.016	<0.011	<0.018	<0.018
Benzo (b) fluoranthene	0.2	<i>0.02</i>	<0.014	<0.014	<0.017	<0.017	<0.013	<0.02	<0.02
Benzo (g,h,i) perylene	--	--	<0.015	<0.015	<0.017	<0.017	<0.015	<0.019	<0.019
Benzo (k) fluoranthene	--	--	<0.023	<0.023	<0.029	<0.029	<0.015	<0.022	<0.022
Chrysene	0.2	<i>0.02</i>	<0.016	<0.016	<0.017	<0.017	<0.013	<0.019	<0.019
Dibenzo(a,h)anthracene	--	--	NA	NA	NA	<0.016	<0.016	<0.019	<0.019
Fluoranthene	400	<i>80</i>	<0.015	<0.015	0.021 J	0.025 J	0.037 J	0.078	0.026 J
Fluorene	400	<i>80</i>	0.026 J	0.096	0.267	0.08	0.027	0.281	0.069
Indeno (1,2,3-cd)pyrene	--	--	<0.014	<0.014	<0.016	<0.016	<0.015	<0.016	<0.018
1-Methylnaphthalene	--	--	<0.018	0.026 J	0.156	<0.016	0.011 J	0.027 J	<0.022
2-Methylnaphthalene	--	--	<0.021	0.027 J	0.020 J	0.024 J	<0.013	0.032 J	<0.024
Naphthalene	100	<i>10</i>	<0.018	0.041 J	0.049 J	<0.02	<0.015	<0.021	0.031 J
Phenanthrene	--	--	<0.017	<0.017	0.064	<0.019	<0.01	<0.019	<0.019
Pyrene	250	<i>50</i>	<0.015	0.019 J	0.023 J	0.027 J	0.037 J	0.088	0.039 J

PVOCs = Petroleum Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

µg/l - micrograms per liter

ES - Wisconsin Administrative Code (WAC) Chapter NR140 Enforcement Standard

PAL - WAC Chapter NR140 Preventive Action Limit

-- -- - No Established Standard

* - Total Trimethylbenzenes (1,2,4- and 1,3,5-trimethylbenzene combined)

** - Total Xylenes (meta-, ortho-, and para-xylene combined)

J - Analyte detected between the limit of detection (LOD) and the Limit of Quantification (LOQ). Result is an estimate.

NA : Not Analyzed

Bold value indicates exceedance of WAC Chapter NR 140 ES

Italicized value indicates exceedance of WAC Chapter NR 140 PAL

Table A.1.a. (cont.)
Groundwater Monitoring Results
MW-5
Benz Oil
12733 West Arden Place
Butler, Wisconsin

All units expressed in µg/l	ES	PAL	9/5/2007	1/28/2008	9/1/2010	1/11/2011	7/20/2011	5/1/2012	8/21/2012
PVOCs									
Benzene	5	<i>0.5</i>	<0.22	NA	<0.38	<0.38	<0.49	<0.46	<0.5
Ethylbenzene	700	<i>140</i>	<0.44	NA	<0.55	<0.55	<0.98	<0.46	<0.78
Methyl-tert-butyl-ether	60	<i>12</i>	<0.53	NA	<0.25	<0.25	<0.47	<0.57	<0.8
Toluene	800	<i>160</i>	<0.26	NA	<0.72	<0.72	<0.89	<0.48	<0.53
Trimethylbenzenes	480*	<i>96*</i>	<0.67	NA	<1.2	<1.2	<2.7	<1.57	<1.54
Xylenes	2000**	<i>400**</i>	<0.68	NA	<1.1	<1.1	<3.2	<1.45	<1.9
PAHs									
Acenaphthene	--	--	<0.015	NA	<0.017	<0.017	<0.01	<0.025	<0.025
Acenaphthylene	--	--	<0.016	NA	<0.016	<0.016	<0.014	0.024 J	<0.019
Anthracene	3,000	<i>600</i>	0.017 J	NA	<0.018	<0.018	0.011 J	0.03 J	<0.018
Benzo (a) anthracene	--	--	0.021 J	NA	<0.017	<0.017	0.025 J	0.038 J	0.024 J
Benzo (a) pyrene	0.2	<i>0.02</i>	<0.015	NA	<0.016	<0.016	0.013 J	<i>0.024 J</i>	<0.018
Benzo (b) fluoranthene	0.2	<i>0.02</i>	<i>0.025 J</i>	NA	<0.017	<0.017	<i>0.034 J</i>	<i>0.059 J</i>	<i>0.026 J</i>
Benzo (g,h,i) perylene	--	--	<0.015	NA	<0.017	<0.017	<0.015	0.028 J	<0.019
Benzo (k) fluoranthene	--	--	<0.023	NA	<0.029	<0.029	<0.015	0.023 J	<0.022
Chrysene	0.2	<i>0.02</i>	<0.016	NA	<0.017	<0.017	0.017 J	<i>0.04 J</i>	<0.019
Dibenzo(a,h)anthracene	--	--	NA	NA	NA	<0.016	<0.016	<0.019	<0.019
Fluoranthene	400	<i>80</i>	0.028 J	NA	<0.019	<0.019	0.029 J	0.06 J	0.025 J
Fluorene	400	<i>80</i>	<0.019	NA	<0.018	<0.018	<0.008	<0.02	<0.02
Indeno (1,2,3-cd)pyrene	--	--	<0.014	NA	<0.016	<0.016	<0.015	0.023 J	<0.018
1-Methylnaphthalene	--	--	<0.018	NA	<0.016	<0.016	<0.009	<0.022	<0.022
2-Methylnaphthalene	--	--	<0.021	NA	<0.017	<0.017	<0.013	<0.024	<0.024
Naphthalene	100	<i>10</i>	<0.018	NA	<0.017	<0.017	<0.015	<0.021	<0.021
Phenanthrene	--	--	<0.017	NA	<0.019	<0.019	0.010 J	0.025 J	<0.019
Pyrene	250	<i>50</i>	0.021 J	NA	<0.02	<0.02	0.024 J	0.048 J	0.021 J

PVOCs = Petroleum Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

µg/l - micrograms per liter

ES - Wisconsin Administrative Code (WAC) Chapter NR140 Enforcement Standard

PAL - WAC Chapter NR140 Preventive Action Limit

-- -- - No Established Standard

* - Total Trimethylbenzenes (1,2,4- and 1,3,5-trimethylbenzene combined)

** - Total Xylenes (meta-, ortho-, and para-xylene combined)

J - Analyte detected between the limit of detection (LOD) and the Limit of Quantification (LOQ). Result is an estimate.

NA : Not Analyzed

Bold value indicates exceedance of WAC Chapter NR 140 ES

Italicized value indicates exceedance of WAC Chapter NR 140 PAL

**Table A.1.a. (cont.)
Groundwater Monitoring Results
MW-7 / 7R**

Benz Oil
12733 West Arden Place
Butler, Wisconsin

All units expressed in µg/l	ES	PAL	MW-7					MW-7R	
			9/5/2007	1/28/2008	9/1/2010	1/11/2011	7/20/2011	5/1/2012	8/21/2012
PVOCs									
Benzene	5	0.5	2.01	3.12	2.24	2.8	1.89	1.34 J	1.2 J
Ethylbenzene	700	140	<0.44	3.6	<0.55	<0.55	2.08 J	1.12 J	<0.78
Methyl-tert-butyl-ether	60	12	<0.53	<0.62	<0.25	<0.25	<0.47	<0.57	<0.8
Toluene	800	160	0.64 J	1.35 J	<0.72	<0.72	<0.89	1.43 J	<0.53
Trimethylbenzens	480*	96*	<0.67	<1.42	<1.2	<1.2	<2.7	1.89 J	<1.54
Xylenes	2000**	400**	<0.68	1.71 J	<1.1	<1.1	<3.2	68.84 J	10.4
PAHs									
Acenaphthene	--	--	0.034 J	0.06	0.027 J	0.034 J	0.053	0.041 J	1.59
Acenaphthylene	--	--	<0.016	0.022 J	<0.016	0.042 J	<0.014	0.301	0.030 J
Anthracene	3,000	600	<0.013	0.047	<0.018	<0.018	<0.009	0.38	0.85
Benzo (a) anthracene	--	--	<0.015	0.067	<0.017	<.02	<0.014	0.285	0.123
Benzo (a) pyrene	0.2	0.02	<0.015	0.021 J	<0.016	<0.016	<0.011	0.302	0.062
Benzo (b) fluoranthene	0.2	0.02	<0.014	0.031 J	<0.017	<0.017	<0.013	0.44	0.09
Benzo (g,h,i) perylene	--	--	<0.015	<0.015	<0.017	<0.017	<0.015	0.146	0.037 J
Benzo (k) fluoranthene	--	--	<0.023	<0.023	<0.029	<0.029	<0.015	0.114	0.029 J
Chrysene	0.2	0.02	<0.016	0.276	<0.017	<0.017	<0.013	0.8	0.116
Dibenzo(a,h)anthracene	--	--	NA	NA	NA	<0.016	<0.016	0.044 J	<0.019
Fluoranthene	400	80	<0.015	0.102	<0.019	<0.019	<0.012	0.82	0.82
Fluorene	400	80	0.085	0.119	0.055 J	0.057	0.093	0.38	1.59
Indeno (1,2,3-cd)pyrene	--	--	<0.014	<0.014	<0.016	<0.016	<0.015	0.135	0.029 J
1-Methylnaphthalene	--	--	<0.018	0.066	0.037 J	0.029 J	<0.009	0.256	0.56
2-Methylnaphthalene	--	--	<0.021	<0.021	0.019 J	0.018 J	<0.013	0.299	0.51
Naphthalene	100	10	0.029 J	0.06	<0.017	0.024 J	<0.015	1.3	1.86
Phenanthrene	--	--	0.018 J	0.046 J	<0.019	0.038 J	<0.01	1.24	2.11
Pyrene	250	50	0.032 J	0.184	<0.02	<0.02	0.015 J	0.66	0.54

MW-7 was abandoned in January 2012 and replaced with MW-7R in April 2012

PVOCs = Petroleum Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

µg/l - micrograms per liter

ES - WAC Chapter NR140 Enforcement Standard

PAL - WAC Chapter NR140 Preventive Action Limit

WAC - Wisconsin Administrative Code

* - Total Trimethylbenzenes (1,4,4- and 1,3,5-trimethylbenze combined)

** - Total Xylenes (meta-, ortho-, and para-xylene combined)

" - " - No Established Standard

J - Analyte detected between the limit of detection (LOD) and the Limit of Quantification (LOQ). Result is an estimate.

NA : Not Analyzed

Bold value indicates exceedance of WAC Chapter NR 140 ES

Italicized value indicates exceedance of WAC Chapter NR 140 PAL

Table A.1.a. (cont.)
Groundwater Monitoring Results
MW-8
Benz Oil
12733 West Arden Place
Butler, Wisconsin

All units expressed in µg/l	ES	PAL	9/5/2007	1/28/2008	9/1/2010	1/11/2011	7/20/2011	5/1/2012	8/21/2012
PVOCs									
Benzene	5	<i>0.5</i>	<0.22	<0.49	<0.38	<0.38	<0.49	<0.46	<0.5
Ethylbenzene	700	<i>140</i>	<0.44	<0.68	<0.55	<0.55	<0.98	<0.46	<0.78
Methyl-tert-butyl-ether	60	<i>12</i>	<0.53	<0.62	<0.25	<0.25	<0.47	<0.57	<0.8
Toluene	800	<i>160</i>	<0.26	<0.46	<0.72	<0.72	<0.89	<0.48	<0.53
Trimethylbenzenes	480*	<i>96*</i>	<0.67	<1.42	<1.2	<1.2	<2.7	<1.57	<1.54
Xylenes	2000**	<i>400**</i>	<0.68	<1.43	<1.1	<1.1	<3.2	<1.45	<1.9
PAHs									
Acenaphthene	--	--	<0.015	NA	<0.017	<0.017	<0.01	<0.025	<0.025
Acenaphthylene	--	--	<0.016	NA	<0.016	<0.016	<0.014	<0.019	<0.019
Anthracene	3,000	<i>600</i>	<0.013	NA	<0.018	<0.018	<0.009	<0.018	<0.018
Benzo (a) anthracene	--	--	<0.015	NA	<0.017	<0.02	<0.014	<0.024	<0.024
Benzo (a) pyrene	0.2	<i>0.02</i>	<0.015	NA	<0.016	<0.016	<0.011	<0.018	<0.018
Benzo (b) fluoranthene	0.2	<i>0.02</i>	<0.014	NA	<0.017	<0.017	<0.013	<0.02	<0.02
Benzo (g,h,i) perylene	--	--	<0.015	NA	<0.017	<0.017	<0.015	<0.019	<0.019
Benzo (k) fluoranthene	--	--	<0.023	NA	<0.029	<0.029	<0.015	<0.022	<0.022
Chrysene	0.2	<i>0.02</i>	<0.016	NA	<0.017	<0.017	<0.013	<0.019	<0.019
Dibenzo(a,h)anthracene	--	--	NA	NA	NA	<0.016	<0.016	<0.019	<0.019
Fluoranthene	400	<i>80</i>	<0.015	NA	<0.019	<0.019	<0.012	<0.022	<0.022
Fluorene	400	<i>80</i>	<0.019	NA	<0.018	<0.018	<0.008	<0.02	<0.02
Indeno (1,2,3-cd)pyrene	--	--	<0.014	NA	<0.016	<0.016	<0.015	<0.018	<0.018
1-Methylnaphthalene	--	--	<0.018	NA	<0.016	<0.016	<0.009	<0.022	<0.022
2-Methylnaphthalene	--	--	<0.021	NA	<0.017	<0.017	<0.013	<0.024	<0.024
Naphthalene	100	<i>10</i>	<0.018	NA	<0.017	<.02	<0.015	<0.021	<0.021
Phenanthrene	--	--	<0.017	NA	<0.019	<0.019	<0.01	<0.019	<0.019
Pyrene	250	<i>50</i>	<0.015	NA	<0.02	<0.02	<0.013	<0.02	<0.02

PVOCs = Petroleum Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

µg/l - micrograms per liter

ES - Wisconsin Administrative Code (WAC) Chapter NR140 Enforcement Standard

PAL - WAC Chapter NR140 Preventive Action Limit

-- -- - No Established Standard

* - Total Trimethylbenzenes (1,2,4- and 1,3,5-trimethylbenzene combined)

** - Total Xylenes (meta-, ortho-, and para-xylene combined)

J - Analyte detected between the limit of detection (LOD) and the Limit of Quantification (LOQ). Result is an estimate.

NA : Not Analyzed

Bold value indicates exceedance of WAC Chapter NR 140 ES

Italicized value indicates exceedance of WAC Chapter NR 140 PAL

**Table A.1.a. (cont.)
Groundwater Monitoring Results
MW-9**

Benz Oil
12733 West Arden Place
Butler, Wisconsin

All units expressed in µg/l	ES	PAL	9/5/2007	1/28/2008	9/1/2010	1/11/2011	7/20/2011	5/1/2012	8/21/2012
VOCs									
Benzene	5	<i>0.5</i>	<0.22	<0.49	<0.38	<0.38	<0.49	<0.46	<0.5
Ethylbenzene	700	<i>140</i>	<0.44	<0.68	<0.55	<0.55	<0.98	<0.46	<0.78
Methyl-tert-butyl-ether	60	<i>12</i>	<0.53	<0.62	<0.25	<0.25	<0.47	<0.57	<0.8
Toluene	800	<i>160</i>	<0.26	<0.46	<0.72	<0.72	<0.89	<0.48	<0.53
Trimethylbenzenes	480*	<i>96*</i>	<0.67	<1.42	<1.2	<1.2	<2.7	<1.57	<1.54
Xylenes	2000**	<i>400**</i>	<0.68	<1.43	<1.1	<1.62	<3.2	<1.45	<1.9
PAHs									
Acenaphthene	--	--	<0.015	<0.015	<0.017	<0.017	<0.01	<0.025	<0.025
Acenaphthylene	--	--	<0.016	<0.016	<0.016	<0.016	<0.014	<0.019	<0.019
Anthracene	3,000	<i>600</i>	<0.013	<0.013	<0.018	<0.018	<0.009	<0.018	<0.018
Benzo (a) anthracene	--	--	0.016 J	<0.015	<0.017	<0.02	<0.014	<0.024	<0.024
Benzo (a) pyrene	0.2	<i>0.02</i>	<0.015	<0.015	<0.016	<0.016	<0.011	<0.018	<0.018
Benzo (b) fluoranthene	0.2	<i>0.02</i>	0.014 J	<0.014	<0.017	<0.017	<0.013	<0.02	<0.02
Benzo (g,h,i) perylene	--	--	<0.015	<0.015	<0.017	<0.017	<0.015	<0.019	<0.019
Benzo (k) fluoranthene	--	--	<0.023	<0.023	<0.029	<0.029	<0.015	<0.022	<0.022
Chrysene	0.2	<i>0.02</i>	<0.016	<0.016	<0.017	<0.017	<0.013	<0.019	<0.019
Dibenzo(a,h)anthracene	--	--	NA	NA	NA	<0.016	<0.016	<0.019	<0.019
Fluoranthene	400	<i>80</i>	0.019 J	<0.015	<0.019	<0.019	<0.012	<0.022	<0.022
Fluorene	400	<i>80</i>	<0.019	<0.019	<0.018	<0.018	<0.008	<0.02	<0.02
Indeno (1,2,3-cd)pyrene	--	--	<0.014	<0.014	<0.016	<0.016	<0.015	<0.018	<0.018
1-Methylnaphthalene	--	--	<0.018	<0.018	<0.016	<0.016	<0.009	<0.022	<0.022
2-Methylnaphthalene	--	--	<0.021	<0.021	<0.017	<0.017	<0.013	<0.024	<0.024
Naphthalene	100	<i>10</i>	<0.018	<0.018	<0.017	<0.02	<0.015	<0.021	<0.021
Phenanthrene	--	--	<0.017	<0.017	<0.019	<0.019	<0.01	<0.019	<0.019
Pyrene	250	<i>50</i>	0.015 J	<0.015	<0.02	<0.02	<0.013	<0.02	<0.02

PVOCs = Petroleum Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

µg/l - micrograms per liter

ES - Wisconsin Administrative Code (WAC) Chapter NR140 Enforcement Standard

PAL - WAC Chapter NR140 Preventive Action Limit

-- -- - No Established Standard

* - Total Trimethylbenzenes (1,2,4- and 1,3,5-trimethylbenzene combined)

** - Total Xylenes (meta-, ortho-, and para-xylene combined)

J - Analyte detected between the limit of detection (LOD) and the Limit of Quantification (LOQ). Result is an estimate.

NA : Not Analyzed

Bold value indicates exceedance of WAC Chapter NR 140 ES

Italicized value indicates exceedance of WAC Chapter NR 140 PAL

Table A.1.b. Groundwater Laboratory Volatile Organic Compound Analytical Results, Benz Oil Company, Butler, Wisconsin

Sample Number	Date Collected	Detected Volatile Organic Compounds Analytes (micrograms per liter)										
		1,1-Dichloro ethane	1,2-Dichloro benzene	Benzene	Chloro-benzene	Chloro ethane	Ethyl-benzene	Methyl tert-butyl ether	Naphthalene	Toluene	Trimethyl-benzenes	Total Xylenes
NR 140, Wis. Adm. Code PAL		85	60	0.5	CNR	80	140	12	8	200	96	1000
NR 140, Wis. Adm. Code ES		850	600	5	CNR	400	700	60	40	1000	480	10,000
MW8	10/02/00	<0.40	<0.30	<0.10	<0.30	<0.50	<0.10	-	<0.70	<0.10	-	<0.30
	05/31/01	-	-	<0.40	-	-	<0.40	<0.40	-	<0.40	<0.80	<1.10
	09/05/07	-	-	<0.22	-	-	<0.44	<0.53	-	<0.26	<0.67	<1.21
	01/28/08	-	-	<0.49	-	-	<0.68	<0.62	-	<0.46	<1.42	<1.85
MW9	05/31/01	<0.40	<0.30	<0.10	<0.30	<0.50	<0.10	<1.1	<0.70	<0.10	<0.50	<0.30
	09/05/07	-	-	<0.22	-	-	<0.44	<0.53	-	<0.26	<0.67	<1.21
	01/28/08	-	-	<0.49	-	-	<0.68	<0.62	-	<0.46	<1.42	<1.85
Trip	06/01/00	<0.40	<0.30	<0.10	<0.30	<0.50	<0.10	-	<0.70	<0.10	-	0.31
	10/02/00	<0.30	<0.30	<0.10	<0.30	<0.50	<0.10	-	<0.70	<0.10	-	<0.30
	05/31/01	-	-	<0.40	-	-	<0.40	<0.40	-	<0.40	<0.80	<1.10
	09/05/07	-	-	<0.22	-	-	<0.44	<0.53	-	<0.26	<0.67	<1.21

Note:
 CNR = currently not regulated
 <x = compound not detected to a detection limit of x
 - = not laboratory analyzed
 XXX = exceeds Chapter NR 140, Wisconsin Administrative Code (NR 140, Wis. Adm. Code) preventive action limit (PAL)
XXX = exceeds NR 140, Wis. Adm. Code enforcement standard (ES)

Table A.1.b
(cont.)

Groundwater Laboratory Volatile Organic Compound Analytical Results, Benz Oil Company, Butler, Wisconsin

Sample Number	Date Collected	Detected Volatile Organic Compounds Analytes (micrograms per liter)										
		1,1-Dichloro ethane	1,2-Dichloro benzene	Benzene	Chloro-benzene	Chloro ethane	Ethyl-benzene	Methyl tert-butyl ether	Naphthalene	Toluene	Trimethyl-benzenes	Total Xylenes
NR 140, Wis Adm Code PAL		85	60	0.5	CNR	80	140	12	8	200	96	1000
NR 140, Wis. Adm. Code ES		850	600	5	CNR	400	700	60	40	1000	480	10,000
MW1	06/01/00	<0.40	<0.30	<0.10	1.1	<0.50	<0.10	-	<0.70	<0.10	-	<0.30
	05/31/01	-	-	<0.40	-	-	<0.40	<0.40	-	<0.40	<0.80	<1.10
MW2 *	06/01/00	0.41	3.3	1.8	<0.30	2.8	<20	-	<140	5.1	-	1000
	06/01/00	0.47	3.3	1.7	<0.30	3.1	<20	-	<140	5.6	-	950
	05/31/01	-	-	4.2	-	-	18	<0.40	-	4.9	6.9	89.3
	09/05/07	-	-	0.64 "J"	-	-	<0.44	<0.53	-	2.7	4.62	294.76
	01/28/08	-	-	0.59 "J"	-	-	2.41	<0.62	-	1.47 "J"	3.98 "J"	118.16
MW3	06/01/00	<0.40	<0.30	<0.10	3.2	3.8	<0.10	-	0.88	<0.10	-	0.59
	05/31/01	-	-	1.3	-	-	0.40	<0.40	-	0.45	14.3	6.1
	09/05/07	-	-	0.81	-	-	<0.44	<0.53	-	<0.26	<0.67	<1.21
	01/28/08	-	-	1.34 "J"	-	-	9.3	<0.62	-	<0.46	<1.42	<1.85
MW4	06/01/00	<0.40	0.81	2.0	8.8	53	11	-	<0.70	34	-	1.3
	05/31/01	-	-	6.3	-	-	<0.40	<0.40	-	<0.40	1.0	37
	09/05/07	-	-	1.59	-	-	<0.44	<0.53	-	<0.26	<0.67	0.72 "J"
	09/05/07	-	-	1.37	-	-	6.8	<0.53	-	0.39 "J"	<0.67	0.74 "J"
	01/28/08	-	-	1.53 "J"	-	-	9.5	<0.62	-	0.52 "J"	<1.42	<1.85
MW5	06/01/00	<0.40	<0.30	<0.10	<0.30	<0.50	<0.10	-	<0.70	<0.10	-	0.21
	05/31/01	-	-	<0.40	-	-	<0.40	<0.40	-	<0.40	<0.80	<1.10
	09/05/07	-	-	<0.22	-	-	<0.44	<0.53	-	<0.26	<0.67	<1.21
MW6	06/01/00	<0.40	<0.30	<0.10	<0.30	<0.50	<0.10	-	<0.70	<0.10	-	<0.30
	05/31/01	-	-	<0.40	-	-	<0.40	<0.40	-	<0.40	<0.80	<1.10
MW7 *	10/02/00	<8.0	<6.0	<2.0	<6.0	<10	<2.0	-	<14	<2.0	-	750
	10/02/00	<8.0	<6.0	<2.0	<6.0	<10	<2.0	-	<14	<2.0	-	540
	05/31/01	-	-	1.1	-	-	<0.40	<0.40	-	0.51	<0.80	2.9
	05/31/01	-	-	1.2	-	-	0.43	0.40	-	0.60	<0.80	3.5
	09/05/07	-	-	2.01	-	-	<0.44	<0.53	-	0.64 "J"	<0.67	<1.21
	01/28/08	-	-	3.12	-	-	3.6	<0.62	-	1.35 "J"	<1.42	1.71 "J"

Table A.1.c: Groundwater Polynuclear Aromatic Hydrocarbon Laboratory Analytical Results, Benz Oil Company, Butler, Wisconsin

Borehole Number	Date Sampled	Relevant and Significant Polynuclear Aromatic Hydrocarbon Analytical Results (micrograms per kilogram)																
		Acenaphthalene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Phenanthrene	Pyrene
NR 140, Wis. Adm. Code PAL		NE	NE	600	NE	0.02	0.02	NE	NE	0.02	80	80	NE	NE	NE	10	NE	50
NR 140, Wis. Adm. Code ES		NE	NE	3000	NE	0.2	0.2	NE	NE	0.2	400	400	NE	NE	NE	100	NE	250
MW2	09/05/07	14	1.69	1.42	1.65	2.44	3.2	0.5	0.64 "J"	7.8	0.45 "J"	3.3	0.43 "J"	1.39	1.32	2.09	4.7	7.8
	01/28/08	0.67	1.23	0.79	1.69	1.71	1.55	0.7	0.44 "J"	5.1	2.37	1.63	0.47	0.92	0.89	1.95	2.63	6.0
MW3	09/05/07	<0.015	<0.016	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	<0.019	<0.014	<0.018	<0.021	<0.018	<0.017	<0.015
	01/28/08	<0.015	0.065	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	0.030 "J"	<0.014	<0.018	<0.021	0.028 "J"	<0.017	<0.015
MW4 *	09/05/07	<0.015	<0.016	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	0.026 "J"	<0.014	<0.018	<0.021	<0.018	<0.017	<0.015
	09/05/07	<0.015	<0.016	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	0.033 "J"	<0.014	<0.018	<0.021	0.028 "J"	0.024 "J"	<0.015
	01/28/08	0.109	0.34	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	0.096 "J"	<0.014	0.026 "J"	0.027 "J"	0.041 "J"	<0.017	0.019 "J"
MW5	09/05/07	<0.015	<0.016	0.017 "J"	0.021 "J"	<0.015	0.025 "J"	<0.015	<0.023	<0.016	0.028 "J"	<0.019	<0.014	<0.018	<0.021	<0.018	<0.017	0.021 "J"
MW7	09/05/07	0.034 "J"	<0.016	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	0.085	<0.014	<0.018	<0.021	0.029 "J"	0.018 "J"	0.032 "J"
	01/28/08	0.06	0.022 "J"	0.047	0.067	0.021 "J"	0.031 "J"	<0.015	<0.023	0.276	0.102	0.119	<0.014	0.066	<0.021	0.06	0.046 "J"	0.184
MW8	09/05/07	<0.015	<0.016	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	0.026 "J"	<0.014	<0.018	<0.021	<0.018	<0.017	<0.015
MW9	09/05/07	<0.015	<0.016	<0.013	0.016 "J"	<0.015	0.014 "J"	<0.015	<0.023	<0.016	0.019 "J"	<0.019	<0.014	<0.018	<0.021	<0.018	<0.017	0.015 "J"
	01/28/08	<0.015	<0.016	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	<0.019	<0.014	<0.018	<0.021	<0.018	<0.017	<0.015

Note: Suggested generic RCLS based on Wisconsin Department of Natural Resources Guidance Publication RR-519-97 (Corrected), April 1997

NE = not established

<x = compound not detected to a detection limit of x

J = analyte detected between the limit of detection and the limit of quantitation

XXX = exceeds Chapter NR 140, Wisconsin Administrative Code (NR 140, Wis. Adm. Code) prevention action limit (PAL)

XXX = exceeds NR 140, Wis. Adm. Code enforcement standard (ES)

Table A.2.a.
Pre-Remedial Soil Analytical Table
Benz Oil Property
12733 West Arden Place, Butler, WI

Boring Location				B1	B1	B2	B2	B3	B3	B4	B4	B5	B5	B6	B6	B7	B7	B8	B8	B9	B9	B10	B10	B11	B11	B12	B12	B13	B13	B14	B14	
Sample Depth (feet bgs)				0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	
Sample Date				7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	
Location Relative to the All-time Low Water Table				Above																												
PVOCs	NR 720 Table 1 ¹	NR 746 Table 1 ²	NR 746 Table 2 ³	units																												
Benzene	5.5	8,500	1,100	µg/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25			
Ethylbenzene	2,900	4,600	--	µg/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25			
Methyl-tert-butyl-ether	--	--	--	µg/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25			
Toluene	1,500	38,000	--	µg/kg	62	58	<25	66	62	43	41	<25	45	119	49	74	56	60	186	500	219	790	63	192	213	124	125	390	<25	44	<25	51
1,2,4-Trimethylbenzene	--	83,000	--	µg/kg	<25	<25	<25	<25	<25	<25	<25	41	<25	<25	<25	<25	<25	<25	206	830	600	1,120	<25	99	53	<25	199	1,620	<25	<25	<25	<25
1,3,5-Trimethylbenzene	--	11,000	--	µg/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	308	1,440	680	2,650	<25	<25	39	<25	66	690	<25	<25	<25	<25
m&p-Xylene	4,100	42,000	--	µg/kg	<75	<75	<75	<75	<75	<75	45	<75	<75	133	<75	<75	198	<75	406	1,060	1,410	2,860	123	210	157	141	352	2,390	<75	212	<75	<75
o-Xylene																																

Boring Location				B1	B1	B2	B2	B3	B3	B4	B4	B5	B5	B6	B6	B7	B7	B8	B8	B9	B9	B10	B10	B11	B11	B12	B12	B13	B13	B14	B14	
Sample Depth (feet bgs)				0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	0-2'	2-4'	
Sample Date				7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011	7/19/2011
Location Relative to the All-time Low Water Table				Above																												
PAHs	Groundwater Pathway ⁴	Industrial Direct Contact ⁴	NR 746 Table 1 ²	units																												
Acenaphthene	38,000	60,000,000		µg/kg	13.2 "J"	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	14 "J"	23.7 "J"	10.7 "J"	10.98 "J"	<9.7	<9.7	20.6 "J"	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	<9.7	
Acenaphthylene	700	360,000		µg/kg	<8.4	<8.4	<8.4	<8.4	<8.4	13.1 "J"	<8.4	<8.4	<8.4	<8.4	<8.4	<8.4	<8.4	<8.4	8.6 "J"	<8.4	<8.4	<8.4	18.3 "J"	<8.4	<8.4	<8.4	<8.4	<8.4	<8.4	<8.4		
Anthracene	3,000,000	300,000,000		µg/kg	50	<10.2	<10.2	<10.2	<10.2	<10.2	<10.2	<10.2	<10.2	18.4 "J"	<10.2	<10.2	<10.2	<10.2	17.2 "J"	41	18.7 "J"	12.6 "J"	<10.2	<10.2	51	<10.2	<10.2	<10.2	<10.2	<10.2	<10.2	
Benzo(a)anthracene	17,000	3,900		µg/kg	95	<14.6	17.2 "J"	<14.6	16.7 "J"	<14.6	25.6 "J"	23.3 "J"	<14.6	42 "J"	<14.6	<14.6	<14.6	<14.6	15.4 "J"	22.2 "J"	16.9 "J"	<14.6	<14.6	<14.6	<14.6	<14.6	<14.6	<14.6	<14.6	<14.6	<14.6	
Benzo(a)pyrene	48,000	390		µg/kg	83	<16.6	<16.6	<16.6	18.7 "J"	<16.6	26.4 "J"	<16.6	<16.6	131	<16.6	<16.6	<16.6	<16.6	<16.6	<16.6	<16.6	<16.6	<16.6	29 "J"	<16.6	<16.6	<16.6	<16.6	<16.6	<16.6		
Benzo(b)fluoranthene	360,000	3,900		µg/kg	113	<16.7	<16.7	<16.7	38 "J"	<16.7	38 "J"	<16.7	<16.7	82	<16.7	<16.7	<16.7	<16.7	<16.7	<16.7	<16.7	<16.7	<16.7	40 "J"	<16.7	<16.7	<16.7	<16.7	<16.7	<16.7		
Benzo(g,h,i)perylene	6,800,000	39,000		µg/kg	62	<8.2	<8.2	<8.2	57	<8.2	38	<8.2	<8.2	111	<8.2	20.8 "J"	<8.2	<8.2	<8.2	<8.2	<8.2	<8.2	15 "J"	<8.2	<8.2	<8.2	<8.2	<8.2	<8.2	<8.2		
Benzo(k)fluoranthene	870,000	39,000		µg/kg	44 "J"	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1	22.5 "J"	<16.1	<16.1	<16.1	<16.1	<16.1	<16.1		
Chrysene	37,000	390,000		µg/kg	74	<9.2	9.7 "J"	<9.2	31.4	<9.2	22.3 "J"	135	<9.2	151	<9.2	<9.2	<9.2	25.6 "J"	32	69	21.2 "J"	12.9 "J"	<9.2	<9.2	47	<9.2	<9.2	<9.2	<9.2	<9.2	<9.2	
Dibenzo(a,h)anthracene	38,000	390		µg/kg	11.4 "J"	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5	20.5 "J"	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5	18.6 "J"	<10.5	<10.5	<10.5	<10.5	<10.5	<10.5		
Fluoranthene	500,000	40,000,000		µg/kg	230	<9.8	21.4 "J"	<9.8	18.7 "J"	<9.8	21.1 "J"	21.6 "J"	<9.8	25.6 "J"	<9.8	<9.8	<9.8	<9.8	22.8 "J"	36	36	13 "J"	12.3 "J"	<9.8	131	<9.8	<9.8	<9.8	<9.8	<9.8	<9.8	
Fluorene	100,000	40,000,000		µg/kg	17.3 "J"	<10.7	<10.7	<10.7	<10.7	<10.7	<10.7	<10.7	<10.7	<10.7	<10.7	<10.7	<10.7	76	174	44	55	<10.7	<10.7	62	<10.7	<10.7	11.5 "J"	<10.7	<10.7	<10.7		
Indeno(1,2,3-cd)pyrene	680,000	3,800		µg/kg	51	<9.5	<9.5	<9.5	18.3 "J"	<9.5	20.4 "J"	<9.5	<9.5	52	<9.5	<9.5	<9.5	<9.5	<9.5	<9.5	<9.5	<9.5	<9.5	12.8 "J"	<9.5	<9.5	<9.5	<9.5	<9.5	<9.5		
1-Methylnaphthalene	23,000	70,000,000		µg/kg	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	57 "J"	110	24.8 "J"	30.3 "J"	<17.9	<17.9	62	<17.9	<17.9	<17.9	<17.9	<17.9	<17.9	
2-Methylnaphthalene	20,000	40,000,000		µg/kg	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	33	130	20.8 "J"	37	13.2 "J"	<9.6	51	<9.6	<9.6	<9.6	<9.6	<9.6	<9.6	
Naphthalene	400	110,000	2,700	µg/kg	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	103	241	49	116	44	<10.8	20.5 "J"	<10.8	<10.8	<10.8	<10.8	<10.8	<10.8	
Phenanthrene	1,800	390,000		µg/kg	193	<9.8	<9.8	<9.8	12.6 "J"	<9.8	10.6 "J"	<9.8	<9.8	13 "J"	<9.8	<9.8	<9.8	<9.8	272	590	144	193	15.1 "J"	<9.8	340	<9.8	<9.8	47	<9.8	<9.8	<9.8	
Pyrene	8,700,000	30,000,000		µg/kg	188	<9.5	18.9 "J"	<9.5	28.9 "J"	<9.5	23.2 "J"	70	<9.5	215	<9.5	<9.5	<9.5	<9.5	41	87	37	19.7 "J"	14.4 "J"	<9.5	193	<9.5	<9.5	<9.5	<9.5	<9.5	<9.5	

1. Wisconsin Administrative Code Chapter NR 720 Table 1 - Generic Residual Contaminant Levels Based on Protection of Groundwater
2. Wisconsin Administrative Code Chapter NR 746 Table 1 - Indicators of Residual Petroleum Product in Soil Pores
3. Wisconsin Administrative Code Chapter NR 746 Table 2 - Protection of Human Health from Direct Contact with Contaminated Soil
4. Published in Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance - WDNR Publication RR-519-97 (April 1997).
NR720 - Wisconsin Administrative Code Chapter NR 720
PVOCs - Petroleum Volatile Organic Compounds
PAHs - Polycyclic Aromatic Hydrocarbons
µg/kg - micrograms per kilogram
J - Indicates analyte detected between limit of detection and limit of quantitation.
Italicized value indicates exceedance of WAC Chapter NR 720 RCL or suggested RCL based on protection of groundwater.
Boxed value for PVOCs indicates exceedance of WAC Chapter NR 746 risk-screening criterion based on protection of groundwater.
Boxed value for PAHs indicates exceedance of suggested RCL based on direct contact at industrial properties.
Bold value for PVOCs indicates exceedance of WAC Chapter NR 746 risk-screening criterion based on direct contact
Bold value for PAHs indicates exceedance of WAC Chapter NR 746 risk-screening criterion based on protection of groundwater

Table A.3.
Post-remedial Soil Analytical Table
Benz Oil Property
12733 West Arden Place, Butler, WI

Boring Location				B-12-1	B-12-2	SW-1	SW-2	SW-3	SW-4	SW-5	SW-6	SW-7	SW-8	Base #1	Base #2	
Sample Depth (feet bgs)				2	2	1 to 2	1 to 2	1 to 2	1 to 2	0 to 4	1 to 2	1 to 2	1 to 2	2	2	
Sample Date				1/9/2012	1/9/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/11/2012	1/11/2012	
Location Relative to All-time Low Water Table				Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	
PVOCs	NR 720 Table 1 ¹	NR 746 Table 1 ²	NR 746 Table 2 ³	units												
Benzene	5.5	8,500	1,100	µg/kg	<25	<25	<25	<250	29	<25	<25	<25	<250	<250	30	<25
Ethylbenzene	2,900	4,600		µg/kg	<25	<25	590	9,200	3,800	265	238	560	1,070	910	189	<25
Methyl-tert-butyl-ether				µg/kg	<25	<25	<25	<250	<25	<25	<25	<25	<250	<250	<25	<25
Toluene	1,500	38,000		µg/kg	<25	<25	1,720	6,600	1,290	470	182	500	780	<250	244	51
1,2,4-Trimethylbenzene		83,000		µg/kg	<25	<25	750	5,900	370	96	277	2,100	850	5,800	2,320	<25
1,3,5-Trimethylbenzene		11,000		µg/kg	<25	<25	410	5,300	330	156	224	4,100	1,060	19,900	1,290	<25
m&p-Xylene	4,100	42,000		µg/kg	<75	<75	2,762	65,400	10,370	3,410	782	3,800	6,780	3,760	11,810	<75
o-Xylene																

Boring Location				B-12-1	B-12-2	SW-1	SW-2	SW-3	SW-4	SW-5	SW-6	SW-7	SW-8	Base #1	Base #2	
Sample Depth (feet bgs)				0-2'	0-2'	0-2'	0-2'	0-2'	0-4'	0-2'	0-2'	0-2'	0-2'	2'	2'	
Sample Date				1/9/2012	1/9/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/11/2012	1/11/2012	
Location Relative to All-time Low Water Table				Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	
PAHs	Groundwater Pathway ⁴	Industrial Direct Contact ⁴	NR 746 Table 1 ²	units												
Acenaphthene	38,000	60,000,000		µg/kg	<9.7	<9.7	<97	43	19.6 "J"	<97	283 "J"	21.5 "J"	186 "J"	45	156 "J"	<97
Acenaphthylene	700	360,000		µg/kg	<8.4	<8.4	<84	380	33	430	330	67	950	97	217 "J"	<84
Anthracene	3,000,000	300,000,000		µg/kg	14.5 "J"	<10.2	205 "J"	36	34	380	490	38	490	79	289 "J"	<102
Benzo(a)anthracene	17,000	3,900		µg/kg	54	<14.6	151 "J"	57	17.6 "J"	1,710	540	29.6 "J"	360 "J"	78	166 "J"	146 "J"
Benzo(a)pyrene	48,000	390		µg/kg	88	<16.6	<166	61	<16.6	232 "J"	390 "J"	<16.6	303 "J"	80	<166	<166
Benzo(b)fluoranthene	360,000	3,900		µg/kg	151	17.5 "J"	<167	<16.7	25.2 "J"	220 "J"	780	28.3 "J"	410 "J"	82	<167	<167
Benzo(g,h,i)perylene	6,800,000	39,000		µg/kg	93	9.7 "J"	<82	53	11.6 "J"	137 "J"	320	9.5 "J"	252 "J"	47	93 "J"	<82
Benzo(k)fluoranthene	870,000	39,000		µg/kg	57	<16.1	<161	<16.1	<16.1	<161	<16.1	<16.1	22.5 "J"	<161	<161	<161
Chrysene	37,000	390,000		µg/kg	84	9.4 "J"	187 "J"	209	64	1,500	610	40	480	86	360	167 "J"
Dibenzo(a,h)anthracene	38,000	390		µg/kg	11.8 "J"	<10.5	<105	<10.5	<10.5	<105	<10.5	<10.5	<105	<10.5	<105	<105
Fluoranthene	500,000	40,000,000		µg/kg	129	14.2 "J"	<98	26 "J"	29.6 "J"	173 "J"	1,200	34	760	142	350	117 "J"
Fluorene	100,000	40,000,000		µg/kg	<10.7	<10.7	245 "J"	92	147	215 "J"	1,290	160	780	400	530	450
Indeno(1,2,3-cd)pyrene	680,000	3,800		µg/kg	70	<9.5	<95	35	<9.5	<95	279 "J"	<9.5	158 "J"	30	<95	<95
1-Methylnaphthalene	23,000	70,000,000		µg/kg	<17.9	<17.9	<179	51 "J"	77	<179	550 "J"	237	490 "J"	560	840	229 "J"
2-Methylnaphthalene	20,000	40,000,000		µg/kg	<9.6	<9.6	<96	48	86	113 "J"	590	165	480	278	1,140	269 "J"
Naphthalene	400	110,000	2,700	µg/kg	<10.8	<10.8	<108	37	47	<108	500	87	690	30.9 "J"	660	114 "J"
Phenanthrene	1,800	390,000		µg/kg	54	<9.8	640	350	315	630	2,730	276	1,720	400	1,270	810
Pyrene	8,700,000	30,000,000		µg/kg	109	11.8 "J"	131 "J"	53	42	470	1,300	54	1,010	154	590	179 "J"

1. Wisconsin Administrative Code Chapter NR 720 Table 1 - Generic Residual Contaminant Levels Based on Protection of Groundwater
2. Wisconsin Administrative Code Chapter NR 746 Table 1 - Indicators of Residual Petroleum Product in Soil Pores
3. Wisconsin Administrative Code Chapter NR 746 Table 2 - Protection of Human Health from Direct Contact with Contaminated Soil
4. Published in Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance - WDNR Publication RR-519-97 (April 1997)
NR720 - Wisconsin Administrative Code Chapter NR 720
PVOCs - Petroleum Volatile Organic Compounds
PAHs - Polycyclic Aromatic Hydrocarbons
µg/kg - micrograms per kilogram
J - Indicates analyte detected between limit of detection and limit of quantitation.
Italicized value indicates exceedance of WAC Chapter NR 720 RCL or suggested RCL based on protection of groundwater.
Boxed value for PVOCs indicates exceedance of WAC Chapter NR 746 risk-screening criterion based on protection of groundwater.
Boxed value for PAHs indicates exceedance of suggested RCL based on direct contact at industrial properties.
Bold value for PVOCs indicates exceedance of WAC Chapter NR 746 risk-screening criterion based on direct contact.
Bold value for PAHs indicates exceedance of WAC Chapter NR 746 risk-screening criterion based on protection of groundwater.

Table A.4.a.
Pre and Post Remaining Soil Contamination Table

Benz Oil Property
 12733 West Arden Place, Butler, WI

DRO	NR 720	Soil Samples									
	Standard	B204	B302	B403	B502	B603	B703	B2003	B3001	B4001	B7002
Boring Location		B200	B300	B400	B500	B600	B700	B2000	B3000	B4000	B7000
Sample Depth (ft-bgs)		6 to 8	2 to 4	4 to 6	2 to 4	4 to 6	4 to 6	6 to 8	1 to 3	1 to 3	2.5 to 4.5
Sample Date		3/3/1998	3/3/1998	3/3/1998	3/3/1998	3/3/1998	3/3/1998	5/4/2000	5/4/2000	5/4 2000	9/6/2000
Location Relative to Water Table		Below	Above	Above	Above						
DRO	<i>100</i>	<i>9,600</i>	<i>1,500</i>	<i>1,400</i>	<i>3,600</i>	<i>3,400</i>	<i>2,700</i>	<i>1,600</i>	<i>10,000</i>	<i>450</i>	<i>2,100</i>

Notes:

All results shown in milligrams per kilogram (mg/kg)

ft bgs : feet below ground surface

DRO results in *italics* indicate values in exceedance of Wisconsin Administrative Code Chapter NR 720(4)(a) Generic Residual Contaminant DRO Soil Cleanup Standards for Permeable Soils.

Table A.4.b.
Pre and Post Remaining Soil Contamination Table
Benz Oil Property
12733 West Arden Place, Butler, WI

PVOCs	NR 720	NR 746	NR 746	Soil Samples															
	Table 1	Table 1	Table 2	B204	B302	B403	B502	B603	B703	B2003	B3001	B7002							
Boring Location				B200	B300	B400	B500	B600	B700	B2000	B3000	B7000	B12	SW-1	SW-2	SW-3	SW-7	SW-8	Base #1
Sample Depth (ft-bgs)				6 to 8	2 to 4	4 to 6	2 to 4	4 to 6	4 to 6	6 to 8	1 to 3	2.5 to 4.5	2 to 4	1 to 2	2				
Sample Date				3/3/1998	3/3/98	3/3/1998	3/3/1998	3/3/1998	3/3/1998	5/4/2000	5/4/2000	9/6/2000	7/19/2011	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/10/2012	1/11/2012
Location Relative to Water Table				Below	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above	Above
Benzene	5.5	8,500	1,100								25		222						30
Ethylbenzene	2,900	4,600	-		24,000		6,600			6,600				9,200	3,800				
Toluene	1,500	38,000	-									4,400		1,720	6,600				
1,3,5 Trimethylbenzene	-	11,000	-															19,900	
Xylenes (Total)	4,100*	42,000*	-	6,000	212,200	11,000	38,000	48,000	5,200	60,830		55,000			65,400	10,370	6,780		11,810

Notes:

PVOCs: Petroleum Volatile Organic Compounds

All results shown in micrograms per kilogram (ug/kg)

ft bgs : feet below ground surface

1. Results in *italics* indicate values in exceedance of Wisconsin Administrative Code (WAC) NR 720 Table 1 - Generic Residual Contaminant Levels Based on Protection of Groundwater values.

2. Results in double outline cells indicate values in exceedance of WAC NR 746 Table 1 - Indicators of Residual Petroleum Product in Soil Pores values.

3. Results in **bold** indicate values in exceedance of WAC NR 746 Table 2 - Protection of Human Health From Direct Contact with Contaminated Soil values for soil within 4-feet of ground surface.

4. * indicates Total Xylenes (meta-, ortho-, and para-xylene combined).

5. - indicates no standard established

Table A.4.c.
Pre and Post Remaining Soil Contamination Table

Benz Oil Property
 12733 West Arden Place, Butler, WI

PAHs	Groundwater Pathway	Industrial Direct Contact	Soil Samples		
Boring Location			SW-5	SW-7	Base #1
Sample Depth (ft-bgs)			1 to 2	1 to 2	2
Sample Date			1/10/2012	1/10/2012	1/11/2012
Location Relative to Water Table			Above	Above	Above
Acenaphthylene	<i>700</i>	<u>360,000</u>		<i>950</i>	
Naphthalene	<i>400</i>	<u>110,000</u>	<i>500</i>	<i>690</i>	<i>660</i>

Notes:

PAHs : Polycyclic Aromatic Hydrocarbons

ft-bgs : feet below ground surface

All results shown in micrograms per kilogram (ug/kg).

1. Results in *italics* indicate values in exceedance of Wisconsin Department of Natural Resources Interim Guidance (RR-519-97) Table 1 - Suggested Residual Contaminant Levels for Polycyclic Aromatic Hydrocarbons in soil for Protection of Groundwater Pathway.
2. Results in double line cell indicate values in exceedance of Wisconsin Department of Natural Resources Interim Guidance (RR-519-97) Table 1 - Suggested Residual Contaminant Levels for Polycyclic Aromatic Hydrocarbons in soil for Industrial Direct Contact.
3. Only detected constituents above cleanup standards are listed.

A.5. (Vapor Analytical Table) is not relevant to the case closure request.

Explanation: The type of contamination (lube oil, process oil, and/or used oil) is characterized by its low volatility and does not readily dissolve in groundwater. There are no subsurface utilities running through the source area. The on-site building does not contain a basement; therefore, there is no imminent threat of vapor migration into building foundation drain tiles, sumps, or other points of entry. Moreover, the on-site building continues to be used for petroleum handling and storage. Based on the results of the VI assessment, no soil vapor or indoor air samples were collected as part of the investigation.

A.6. (Other Media of Concern) is not relevant to the case closure request.

Explanation: The results of groundwater sampling indicate the extent of contamination is limited to the source area. The nearest surface water body (the Menomonee River) is located approximately 4,000 feet east of the site. For these reasons, surface water and/or sediment were not sampled as part of this investigation.

Table A.7.a.
Water Level Elevations
Benz Oil Property
12733 West Arden Place, Butler, WI

		TOC Elevation	Depth to Product	Depth to Water	Groundwater Elevation
Well	Date	(Feet)	(Feet below TOC)	(Feet below TOC)	(Feet)
MW-1	1/11/2011	96.86	--	4.07	92.79
	7/19/2011		--	4.07	92.79
	5/1/2012		--	3.38	93.48
	8/21/2012		--	3.91	92.95
MW-2	9/1/2010	101.28	0.53	8.91	92.86*
MW-2R	1/11/2011	98.02	--	4.97	93.05
	7/19/2011		--	5.22	92.80
	5/1/2012		film	4.85	93.17
	8/21/2012		film	5.13	92.89
MW-3	9/1/2010	97.04	--	2.43	94.61
	1/11/2011		--	2.43	94.61
	7/19/2011		3.87	3.88	93.17*
	5/1/2012		--	3.20	93.84
	8/21/2012		--	3.22	93.82
MW-4	9/1/2010	97.48	--	2.80	94.68
	1/11/2011		--	4.26	93.22
	7/19/2011		--	3.85	93.63
	5/1/2012		--	3.57	93.91
	8/21/2012		--	3.61	93.87
MW-5	9/1/2010	100.70	--	4.35	96.35
	1/11/2011		--	5.18	95.52
	7/19/2011		--	5.71	94.99
	5/1/2012		--	3.56	97.14
	8/21/2012		--	5.35	95.35
MW-6	1/11/2011	99.49	film	2.20	97.29
	7/19/2011		film	2.61	96.88
	5/1/2012		--	1.22	98.27
	8/21/2012		--	4.65	94.84
MW-7	9/1/2010	101.25	--	2.76	98.49
	1/11/2011		--	2.82	98.43
	7/19/2011		--	2.83	98.42
MW-7R	5/1/2012	97.43	--	2.43	95.00
	8/21/2012		film	2.86	94.57

Table A.7.a.
Water Level Elevations
Benz Oil Property
12733 West Arden Place, Butler, WI

		TOC Elevation	Depth to Product	Depth to Water	Groundwater Elevation
Well	Date	(Feet)	(Feet below TOC)	(Feet below TOC)	(Feet)
MW-8	9/1/2010	97.71	--	3.43	94.28
	1/11/2011		--	4.27	93.44
	7/19/2011		--	4.08	93.63
	5/1/2012		--	3.56	94.15
	8/21/2012		--	4.63	93.08
MW-9	9/1/2010	96.49	--	3.99	92.50
	1/11/2011		--	4.83	91.66
	7/19/2011		--	4.31	92.18
	5/1/2012		--	3.85	92.64
	8/21/2012		--	9.46	87.03

Notes:

TOC = Top of casing

TOC Elevation established in comparison to a local benchmark at 100.00 feet

* = Elevation adjusted to account for presence of light non-aqueous phase liquid (LNAPL); assumed LNAPL specific gravity of 0.85

Table 2 Groundwater Elevation Data, Benz Oil Company, Incorporated, Butler, Wisconsin

Well Number	Reference Point** Elevation (feet)*	Date	Depth to Water (feet below reference point)	Water Table Elevation (feet)*
MW1	96.86	06/01/00	2.32	94.54
		07/11/00	2.78	94.08
		08/18/00	3.11	93.75
		10/02/00	3.04	93.82
		05/29/01	2.82	94.04
		09/05/07	4.86	92.00
		01/28/08	3.96	92.90
MW2	101.28	06/01/00	6.31	94.97
		07/11/00	7.94	93.34
		08/18/00	8.01	93.27
		10/02/00	8.05	93.23
		05/29/01	8.00	93.28
		09/05/07	8.49	92.79
		01/28/08	9.25	92.03
MW3	97.04	06/01/00	1.26	95.78
		07/11/00	3.60	93.44
		08/18/00	3.17	93.87
		10/02/00	2.94	94.10
		05/29/01	2.60	94.44
		09/05/07	2.68	94.36
		01/28/08	2.80	94.24
MW4	97.48	06/01/00	2.47	95.01
		07/11/00	3.26	94.22
		08/18/00	3.05	94.43
		10/02/00	3.08	94.40
		05/29/01	3.52	93.96
		09/05/07	3.52	93.96
		01/28/08	4.23	93.25
MW5	100.70	06/01/00	3.00	97.70
		07/11/00	3.55	97.15
		08/18/00	3.85	96.85
		10/02/00	3.96	96.74
		05/29/01	3.90	96.80
		09/05/07	4.11	96.59
		01/28/08	4.39	96.31
MW6	99.49	06/01/00	3.25	96.24
		07/11/00	0.89	98.60
		08/18/00	1.75	97.74
		10/02/00	1.26	98.23
		05/29/01	2.40	97.09
		09/05/07	1.43	98.06
		01/28/08	2.00	97.49

Table 2 Groundwater Elevation Data, Benz Oil Company, Incorporated, Butler, Wisconsin

Well Number	Reference Point** Elevation (feet)*	Date	Depth to Water (feet below reference point)	Water Table Elevation (feet)*
MW7	101.25	10/02/00	2.31	98.94
		05/29/01	4.47	96.78
		09/05/07	1.73	99.52
		01/28/08	2.02	99.23
MW8	97.71	10/02/00	12.74	84.97
		05/29/01	4.15	93.56
		09/05/07	4.20	93.51
		01/28/08	4.31	93.40
MW9	96.49	10/02/00	-	-
		05/29/01	3.67	92.82
		09/05/07	11.39	85.10
		01/28/08	7.17	89.32

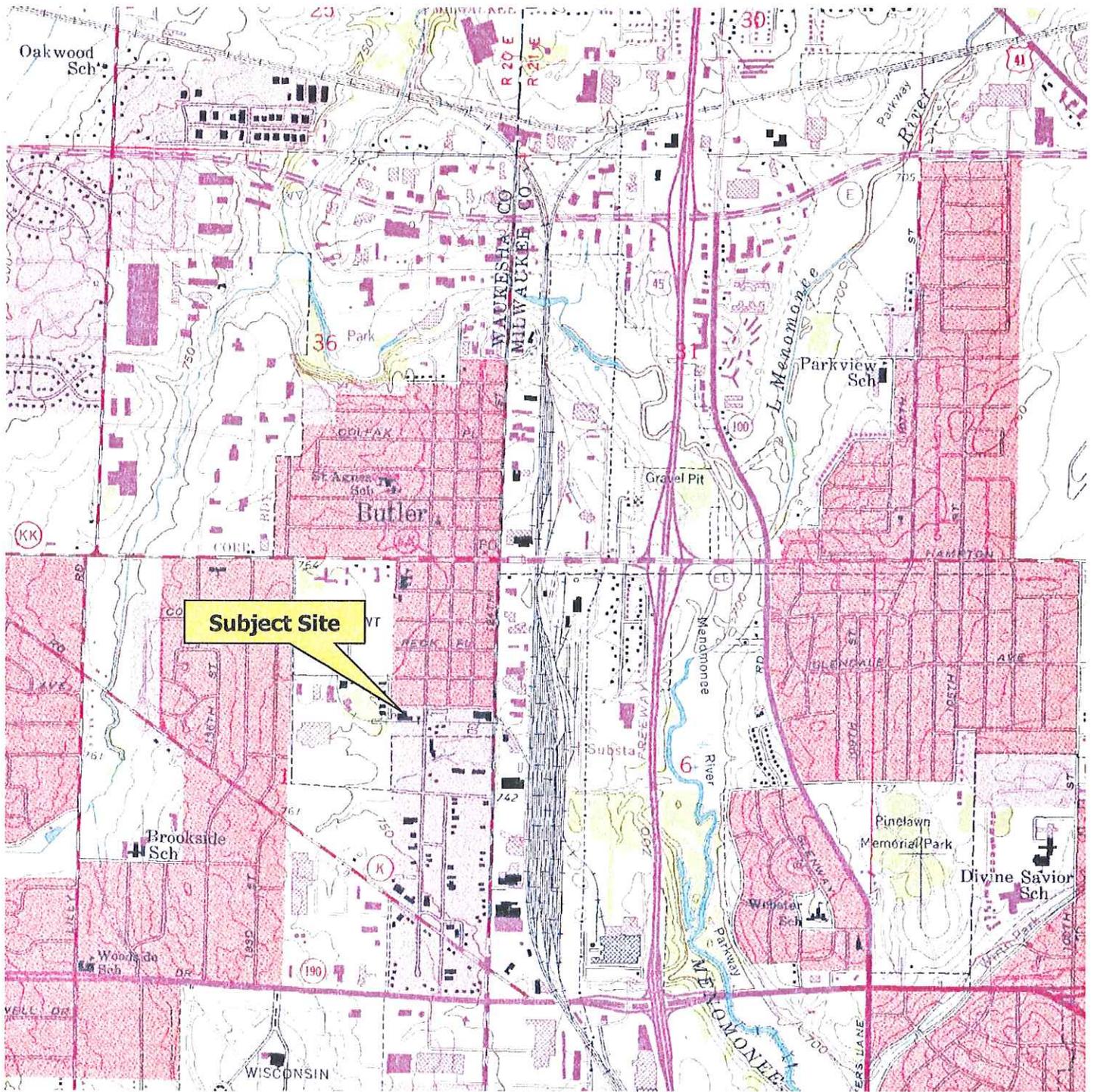
Notes:

* Elevations referenced to assign site datum of 100 feet (site datum is the top nut on the fire hydrant located on 128th Street.)

**Reference point is the north side of the PVC riser.

A.8. (Other) is not relevant to the case closure request.

Explanation: There are no relevant data available to tabulate beyond those already provided in the previous tables.



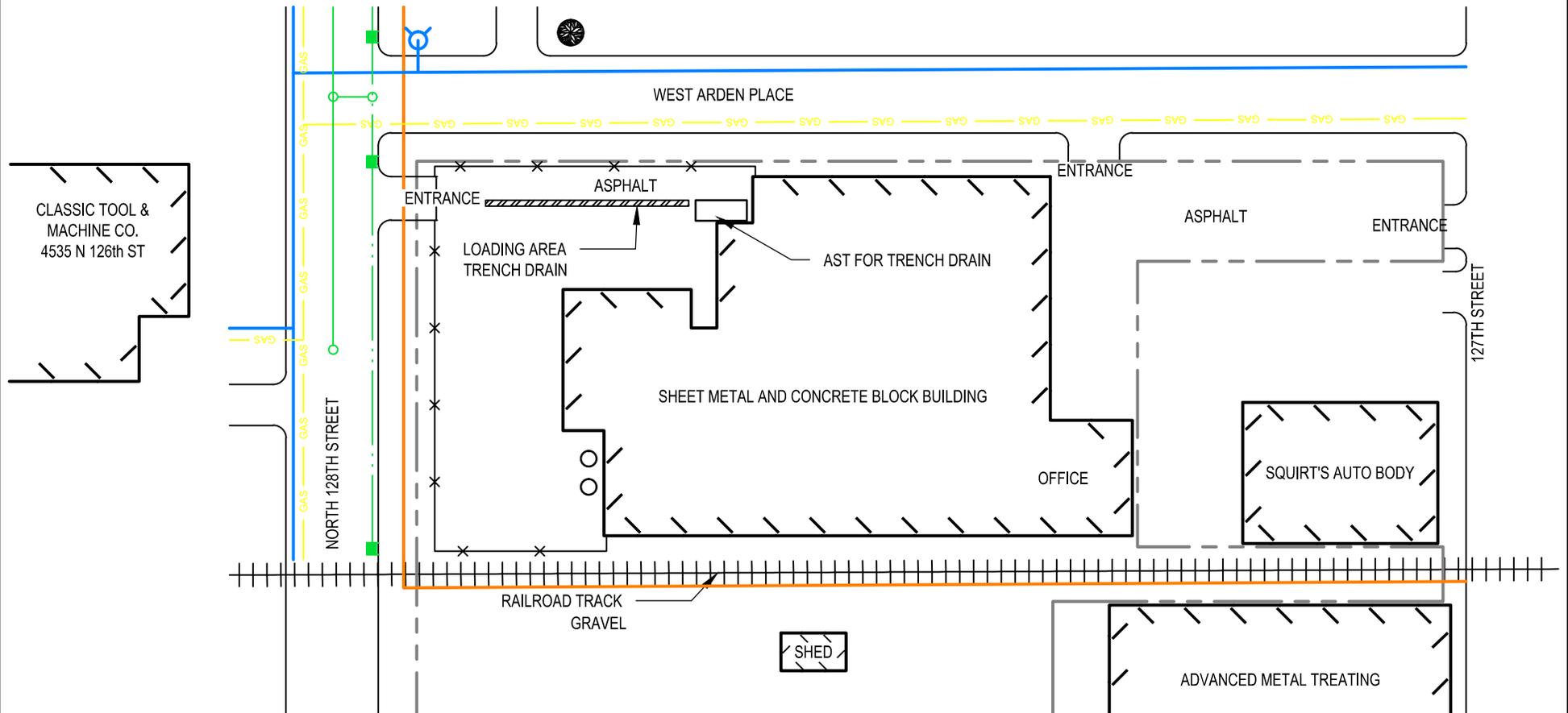
USGS TOPOGRAPHIC MAP
 WAUWATOSA, WISCONSIN
 QUADRANGLE

LOCATION MAP

12733 West Arden Place
 Butler, Wisconsin

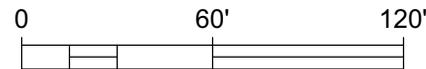
FIGURE B.1.a
 Project No:
 072-002-005

Endpoint



LEGEND

- UNDERGROUND TELEPHONE LINE
- WATER LINE
- UNDERGROUND GAS LINE
- STORM SEWER LINE
- SANITARY SEWER LINE
- PROPERTY LINE
- RAILROAD TRACKS



APPROXIMATE SCALE

DETAILED SITE MAP

BENZ OIL - ARDEN PLACE
 12733 West Arden Place
 Butler, Wisconsin

Endpoint Solutions

12065 West Janesville Road
 Hales Corners, WI 53130

Phone: (414) 427-1200

Fax: (414) 427-1259

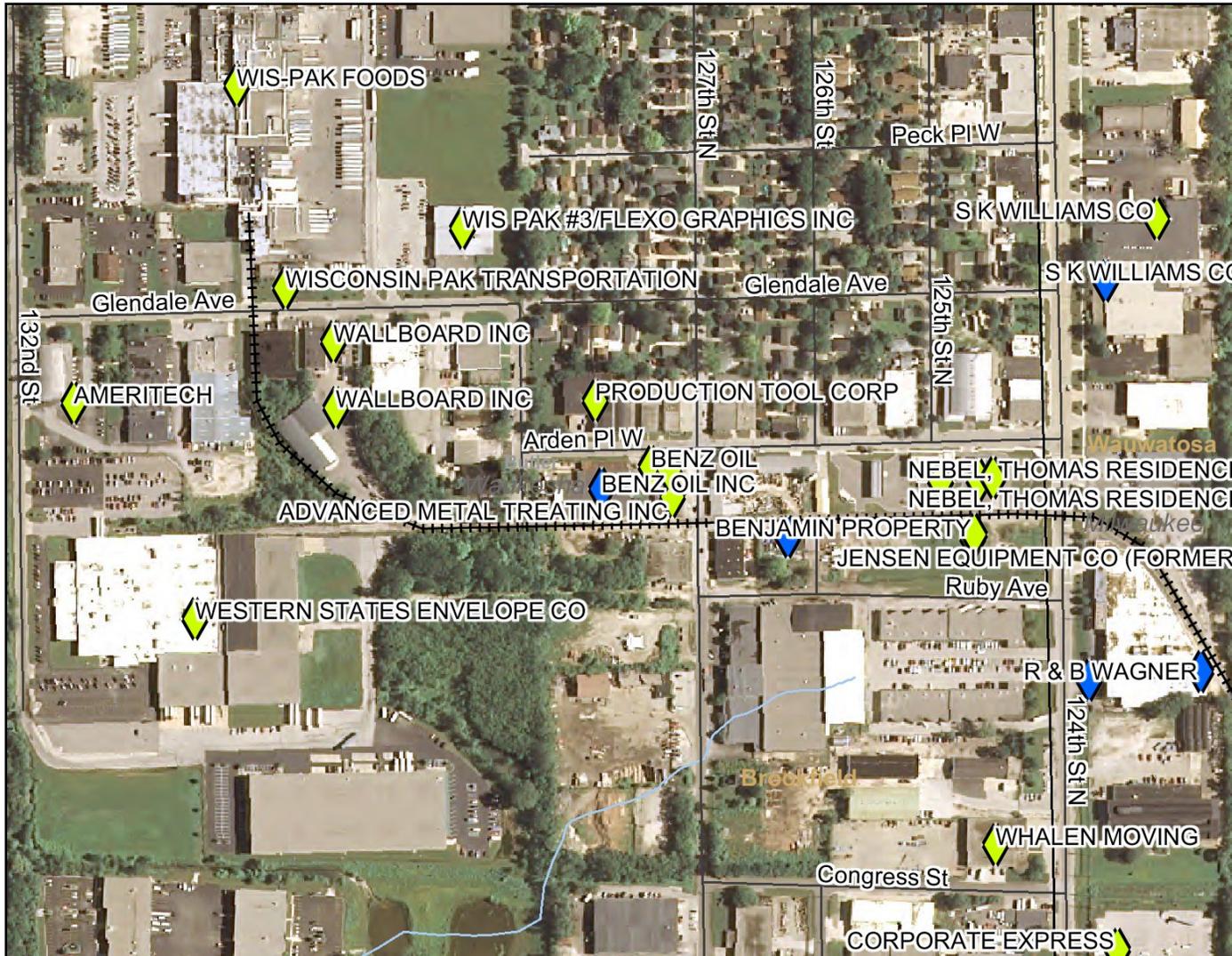
DRAWN BY: MMV

DATE: 05/16/2013

REVIEWED BY: DMB

PROJECT NO: 072-002-005

Figure B.1.b



Legend

- Open Sites (ongoing cleanups)
- Open Sites (ongoing cleanups) - site boundaries shown
- Closed Sites (completed cleanups)
- Closed Sites (completed cleanups) - site boundaries shown
- County Boundary
- Railroads
- County Roads (WDOT)
- County Trunk Highway
- State and U.S. Highways (WDOT)
- State Trunk Highway
- US Highway
- Interstate Highways (WDOT)
- Interstate Highway
- Local Roads (WDOT)
- Civil Towns
- Civil Town
- 24K Open Water
- 24K Rivers and Shorelines
- Municipalities

0 500 1000 1500 ft.

Map created on Apr 3, 2013

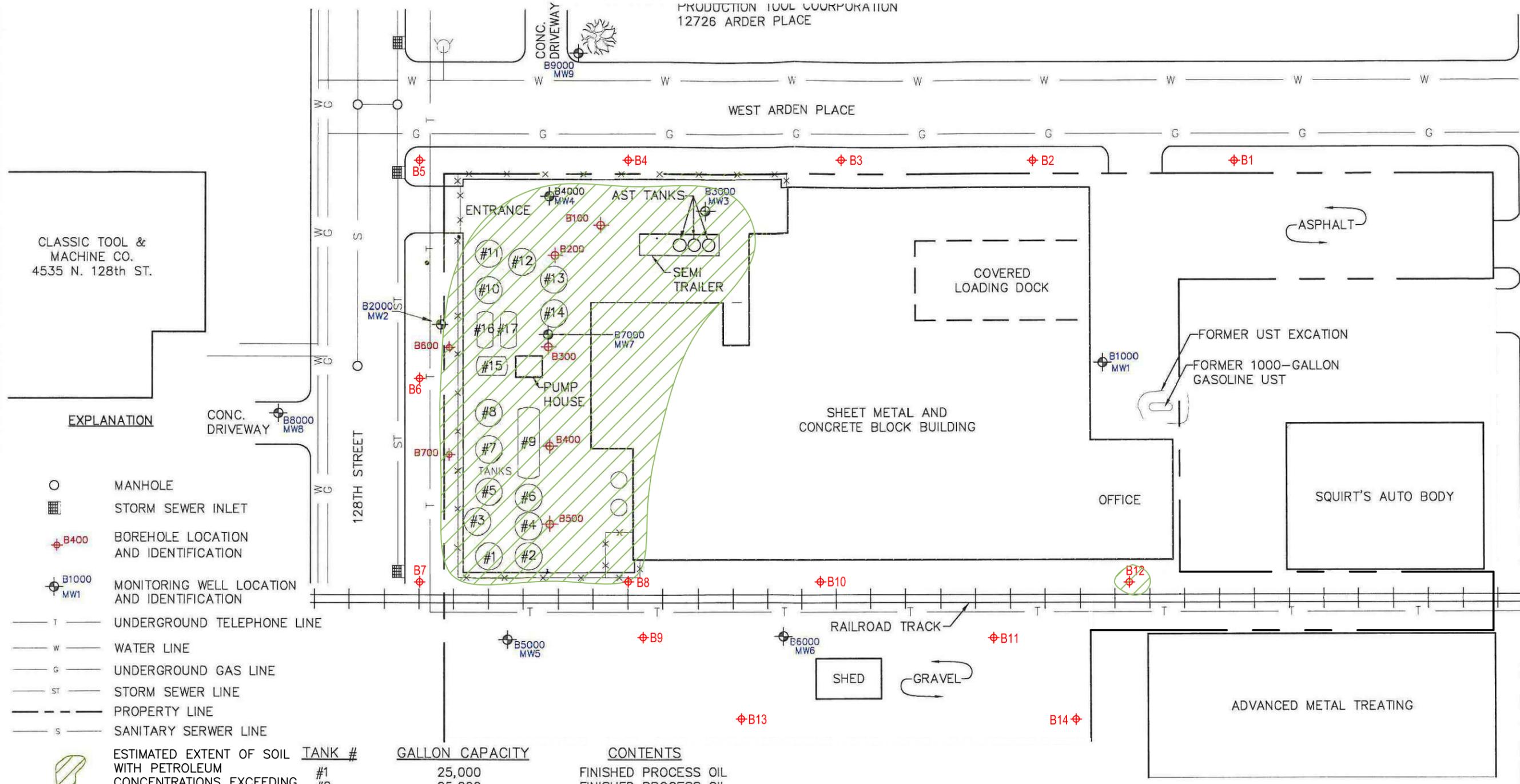
Note: Not all RR Sites have been geo-located yet.



Scale: 1:5,246

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

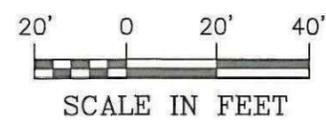
PRODUCTION TOOL CORPORATION
12726 ARDEN PLACE



EXPLANATION

- MANHOLE
- STORM SEWER INLET
- ⊕ B400 BOREHOLE LOCATION AND IDENTIFICATION
- ⊕ B1000 MW1 MONITORING WELL LOCATION AND IDENTIFICATION
- T — UNDERGROUND TELEPHONE LINE
- W — WATER LINE
- G — UNDERGROUND GAS LINE
- ST — STORM SEWER LINE
- — — PROPERTY LINE
- S — SANITARY SEWER LINE

ESTIMATED EXTENT OF SOIL WITH PETROLEUM CONCENTRATIONS EXCEEDING THE NR720 GENERIC RCLs AND NR746 SCREENING CRITERIA AND SUGGESTED RCLs FOR PAHs BASED ON INDUSTRIAL DIRECT CONTACT	TANK #	GALLON CAPACITY	CONTENTS
	#1	25,000	FINISHED PROCESS OIL
	#2	25,000	FINISHED PROCESS OIL
	#3	25,000	USED PROCESS OIL
	#4	11,000	FINISHED PROCESS OIL
	#5	11,000	LUBE BASE OIL
	#6	11,000	LUBE BASE OIL
	#7	10,000	USED PROCESS OIL
	#8	10,000	USED PROCESS OIL
	#9	3,000	WASTE WATER
	#10	13,000	WASTE WATER
	#11	8,000	EMPTY
	#12	13,000	WASTE OIL
	#13	17,000	LUBE BASE OIL
	#14	8,000	EMPTY
	#15	2-3,000	USED LUBRICANTS
	#16	2-4,000	USED LUBRICANTS
	#17	2-4,000	USED LUBRICANTS



PRE-REMEDIAL SOIL CONTAMINATION

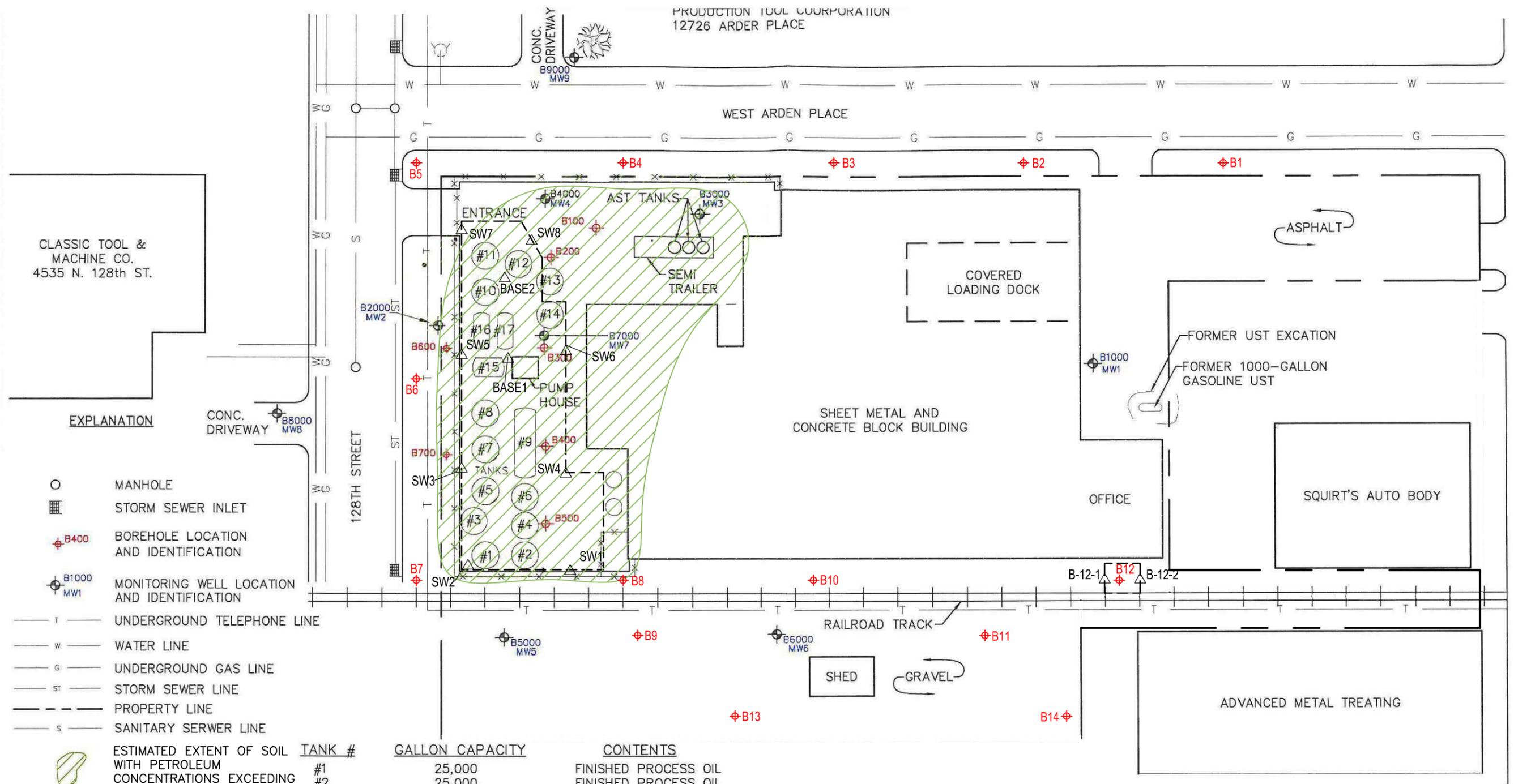
BENZ OIL - ARDEN PLACE
12733 West Arden Place
Butler, Wisconsin



12065 West Janesville Road
Hales Corners, WI 53130

Phone: (414) 427-1200 Fax: (414) 427-1259

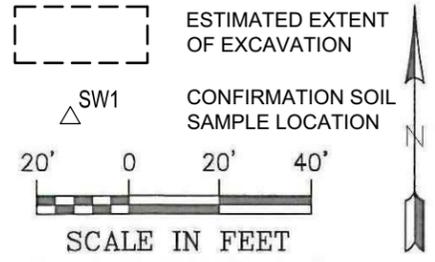
DRAWN BY: MMV	DATE: 05/16/2013	Figure B.2.a
REVIEWED BY: DMB	PROJECT NO: 072-002-005	



EXPLANATION

- MANHOLE
- STORM SEWER INLET
- ⊕ B400 BOREHOLE LOCATION AND IDENTIFICATION
- ⊕ B1000 MW1 MONITORING WELL LOCATION AND IDENTIFICATION
- T — UNDERGROUND TELEPHONE LINE
- W — WATER LINE
- G — UNDERGROUND GAS LINE
- ST — STORM SEWER LINE
- — PROPERTY LINE
- S — SANITARY SERWER LINE

ESTIMATED EXTENT OF SOIL WITH PETROLEUM CONCENTRATIONS EXCEEDING THE NR720 GENERIC RCLs AND NR746 SCREENING CRITERIA AND SUGGESTED RCLs FOR PAHs BASED ON INDUSTRIAL DIRECT CONTACT	TANK #	GALLON CAPACITY	CONTENTS
	#1	25,000	FINISHED PROCESS OIL
	#2	25,000	FINISHED PROCESS OIL
	#3	25,000	USED PROCESS OIL
	#4	11,000	FINISHED PROCESS OIL
	#5	11,000	LUBE BASE OIL
	#6	11,000	LUBE BASE OIL
	#7	10,000	USED PROCESS OIL
	#8	10,000	USED PROCESS OIL
	#9	3,000	WASTE WATER
	#10	13,000	WASTE WATER
	#11	8,000	EMPTY
	#12	13,000	WASTE OIL
	#13	17,000	LUBE BASE OIL
	#14	8,000	EMPTY
	#15	2-3,000	USED LUBRICANTS
#16	2-4,000	USED LUBRICANTS	
#17	2-4,000	USED LUBRICANTS	



POST-REMEDIAL SOIL CONTAMINATION

BENZ OIL - ARDEN PLACE
 12733 West Arden Place
 Butler, Wisconsin

Endpoint Solutions
 12065 West Janesville Road
 Hales Corners, WI 53130

Phone: (414) 427-1200 Fax: (414) 427-1259

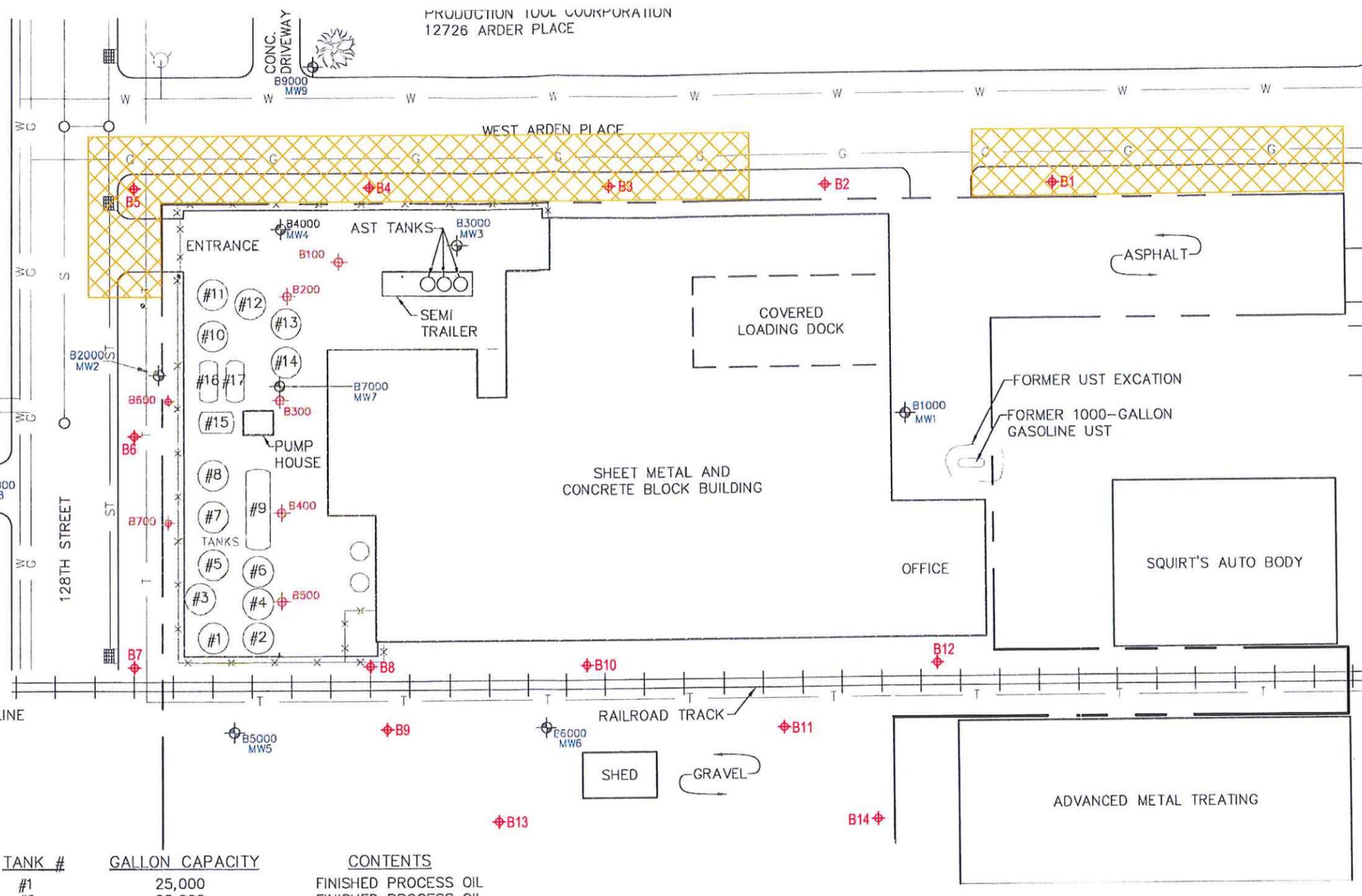
DRAWN BY: MMV DATE: 05/16/2013
 REVIEWED BY: DMB PROJECT NO: 072-002-005

Figure B.2.b

P:\Benz Oil\Arden Place\CADD\Closure Soil Figures.dwg

PRODUCTION TOOL CORPORATION
12726 ARDEN PLACE

CLASSIC TOOL &
MACHINE CO.
4535 N. 128th ST.

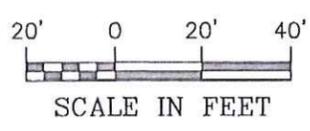


EXPLANATION

- MANHOLE
- STORM SEWER INLET
- ⊕ B400 BOREHOLE LOCATION AND IDENTIFICATION
- ⊕ B1000 MW1 MONITORING WELL LOCATION AND IDENTIFICATION
- T — UNDERGROUND TELEPHONE LINE
- W — WATER LINE
- G — UNDERGROUND GAS LINE
- ST — STORM SEWER LINE
- - - PROPERTY LINE
- S — SANITARY SERWER LINE

ESTIMATED EXTENT OF SOIL WITH POLYCYCLIC AROMATIC HYDROCARBON (PAH) CONCENTRATIONS EXCEEDING THE SUGGESTED GENERIC RESIDUAL CONTAMINANT LEVELS (RCLs) BASED ON NON-INDUSTRIAL DIRECT CONTACT

TANK #	GALLON CAPACITY	CONTENTS
#1	25,000	FINISHED PROCESS OIL
#2	25,000	FINISHED PROCESS OIL
#3	25,000	USED PROCESS OIL
#4	11,000	FINISHED PROCESS OIL
#5	11,000	LUBE BASE OIL
#6	11,000	LUBE BASE OIL
#7	10,000	USED PROCESS OIL
#8	10,000	USED PROCESS OIL
#9	3,000	WASTE WATER
#10	13,000	WASTE WATER
#11	8,000	EMPTY
#12	13,000	WASTE OIL
#13	17,000	LUBE BASE OIL
#14	8,000	EMPTY
#15	2-3,000	USED LUBRICANTS
#16	2-4,000	USED LUBRICANTS
#17	2-4,000	USED LUBRICANTS



RESIDUAL SOIL CONTAMINATION

BENZ OIL - ARDEN PLACE
12733 West Arden Place
Butler, Wisconsin

Endpoint Solutions

12065 West Janesville Road
Hales Corners, WI 53130

Phone: (414) 427-1200 Fax: (414) 427-1259

DRAWN BY: MMV	DATE: 05/16/2013
REVIEWED BY: DMB	PROJECT NO: 072-002-005

Attachment B

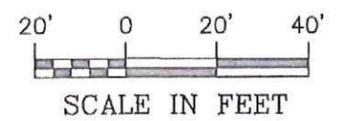
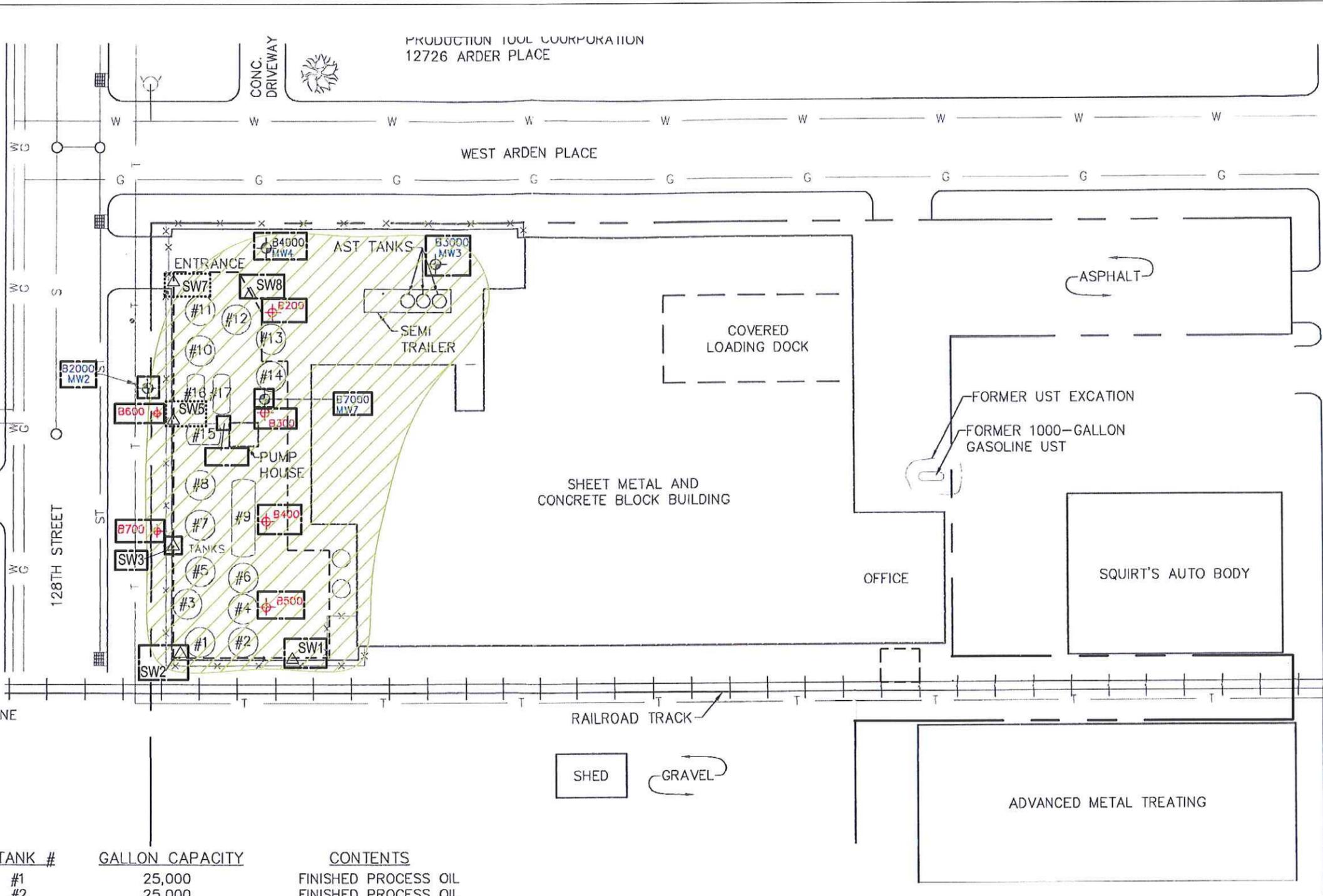
PRODUCTION TOOL CORPORATION
12726 ARDEN PLACE

CLASSIC TOOL &
MACHINE CO.
4535 N. 128th ST.

- EXPLANATION**
- MANHOLE
 - STORM SEWER INLET
 - ⊕ B400 BOREHOLE LOCATION AND IDENTIFICATION
 - ⊕ B1000 MW1 MONITORING WELL LOCATION AND IDENTIFICATION
 - T — UNDERGROUND TELEPHONE LINE
 - W — WATER LINE
 - G — UNDERGROUND GAS LINE
 - SI — STORM SEWER LINE
 - — — PROPERTY LINE
 - S — SANITARY SEWER LINE

ESTIMATED EXTENT OF SOIL WITH PETROLEUM CONCENTRATIONS EXCEEDING THE NR720 GENERIC RCLs AND NR746 SCREENING CRITERIA AND SUGGESTED RCLs FOR PAHs BASED ON INDUSTRIAL DIRECT CONTACT	TANK #	GALLON CAPACITY	CONTENTS
█	#1	25,000	FINISHED PROCESS OIL
█	#2	25,000	FINISHED PROCESS OIL
█	#3	25,000	USED PROCESS OIL
█	#4	11,000	FINISHED PROCESS OIL
█	#5	11,000	LUBE BASE OIL
█	#6	11,000	LUBE BASE OIL
█	#7	10,000	USED PROCESS OIL
█	#8	10,000	USED PROCESS OIL
█	#9	3,000	WASTE WATER
█	#10	13,000	WASTE WATER
█	#11	8,000	EMPTY
█	#12	13,000	WASTE OIL
█	#13	17,000	LUBE BASE OIL
█	#14	8,000	EMPTY
█	#15	2-3,000	USED LUBRICANTS
█	#16	2-4,000	USED LUBRICANTS
█	#17	2-4,000	USED LUBRICANTS

- ▭ ESTIMATED EXTENT OF EXCAVATION
- △ SW1 CONFIRMATION SOIL SAMPLE LOCATION
- ▭ EXCEEDS NR 720 GENERIC RCLs
- ▭ EXCEEDS SUGGESTED RCL BASED ON PROTECTION OF GW



PRE/POST REMAINING SOIL CONTAMINATION

BENZ OIL - ARDEN PLACE
12733 West Arden Place
Butler, Wisconsin

Endpoint Solutions

12065 West Janesville Road
Hales Corners, WI 53130

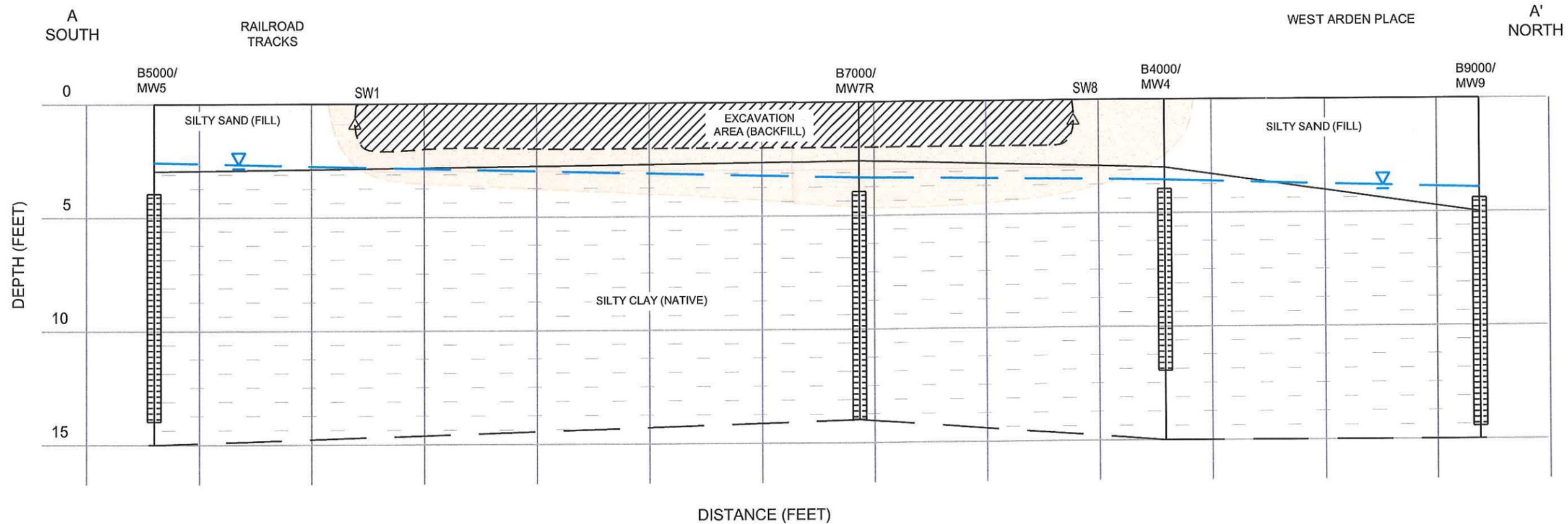
Phone: (414) 427-1200 Fax: (414) 427-1259

DRAWN BY: MMV DATE: 05/16/2013

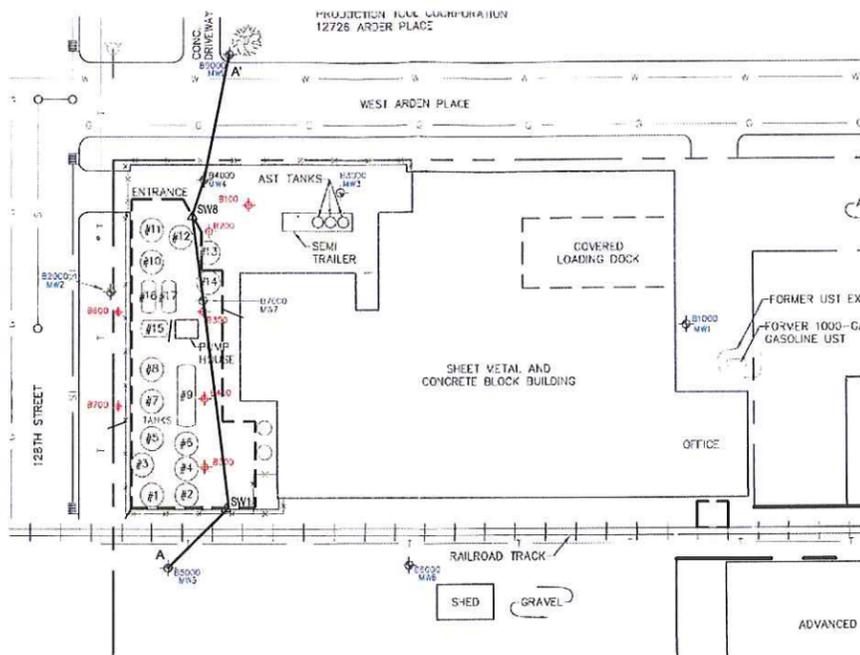
REVIEWED BY: DMB PROJECT NO: 072-002-005

Figure B.2.c

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CROSS SECTION KEY



LEGEND

-  GENERALIZED WATER TABLE
-  ESTIMATED EXTENT OF RESIDUAL SOIL CONTAMINATION >NR720 RCLs.

VERTICAL SCALE: 1" = 5'
HORIZONTAL SCALE: 1" = 20'

GEOLOGIC CROSS SECTION

BENZ OIL - ARDEN PLACE
12733 West Arden Place
Butler, Wisconsin

Endpoint Solutions

12065 West Janesville Road
Hales Corners, WI 53130

Phone: (414) 427-1200

Fax: (414) 427-1259

DRAWN BY: MMV

DATE: 05/16/2013

REVIEWED BY: DMB

PROJECT NO: 072-002-005

B.3.a

B.3.b Groundwater Isoconcentration Map is not relevant to this closure request.

Explanation: Based on the most recent groundwater monitoring data, there are no ES exceedances.

B.3.C Groundwater Flow Direction Map is not relevant to this closure request.

Explanation: Based on the most recent groundwater monitoring data, there are no ES exceedances.

B.3.D Monitoring Wells Map is not relevant to this closure request.

Explanation: Based on the most recent groundwater monitoring data, there are no ES exceedances.

Documentation of Remedial Action (Attachment C)

DISCLAIMER

Documents contained in Attachment C of the Case Closure – GIS Registry (Form 4400-202) are not included in the electronic version (GIS Registry Packet) available on RR Sites Map to limit file size.

For information on how to obtain a copy or to review the file, please contact the Remediation & Redevelopment (RR) Environmental Program Associate (EPA) at dnr.wi.gov/topic/Brownfields/Contact.html



Attachment D Maintenance Plan

Explanation: Maintenance plan not required. Soil sample PAH results below industrial direct contact standards.



RIGHT-OF-WAY

May 22, 2013

Mr. Jesse Thyes
Village Clerk
Village of Butler
12621 West Hampton Avenue
Butler, WI 53007

Subject: Notification of Residual Soil Contamination

Dear Mr. Thyes:

This letter is in regards to the investigation of a release of petroleum at 12733 West Arden Place that has shown that contamination has migrated onto the Village of Butler (Village) property. Benz Oil has conducted a cleanup, and will be requesting that the Wisconsin Department of Natural Resources (WDNR) grant case closure. Closure means that the WDNR will not be requiring any further investigation or cleanup action to be taken.

Residual soil contamination remains at 12733 West Arden Place. The remaining contaminants include diesel-range organics (DRO), petroleum volatile organic compounds (PVOCs), and polycyclic aromatic hydrocarbons (PAHs). The following steps have been taken to address any exposure to the remaining soil contamination. Contaminated soil on the source property has been excavated to the extent practicable. Residual concentrations in the upper 4 feet of soil both on the source property and in the adjacent rights-of-way have been investigated and were found to be below Wisconsin Administrative Code (WAC) ch. NR 720 residual contaminant levels (RCLs) and ch. NR 746 screening criteria based on direct contact. The concentrations were found to be below the suggested RCLs for PAHs based on direct contact in industrial settings specified in WDNR Publication RR-519-97, *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance*; however, they were found to exceed the suggested RCLs for PAHs based on direct contact at non-industrial properties. Finally, the most recent groundwater monitoring performed shows that contaminant concentrations in groundwater do not exceed WAC ch. NR 140 Enforcement Standards, and demonstrate that the residual soil contamination does not pose a significant threat to groundwater quality.

As part of the cleanup, Benz Oil is proposing that contaminated soil be left in place and allowed to naturally attenuate with time. This remedy would be used not only at 12733 West Arden Place, but also at the Village property located along the south side of West Arden Place and the east side of North 128th Street in those portions adjacent to the subject property. The source property and the adjacent rights-of-way owned by the Village are anticipated to remain in an area zoned for industrial use. Special precautions may be needed to prevent inhalation, ingestion or dermal contact with the residual contamination. If soil is excavated, the property owner at the time of

excavation must have the soil sampled and analyzed to determine if residual contamination remains. If sampling confirms that contamination is present, the property owner at the time of excavation must determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.

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

Mr. Mark Drews
Wisconsin Department of Natural Resources
141 NW Barstow Street, Room 180
Waukesha, WI 53188

Before Benz Oil requests closure, we need to inform the WDNR as to who will be responsible for continuing obligation on your property. Under s. 292.12, Wis. Stats., the responsibility for maintaining all necessary continuing obligations for your property will fall on the Village or any subsequent property owner, unless another person has a legally enforceable responsibility to comply with the requirements of the final closure letter. If the Village needs more time to finalize an agreement on the responsibility for maintaining industrial zoning in the area and managing the residual soil contamination in the public rights-of-way described above, it will need to request additional time for the WDNR contact identified in the last paragraph of this letter.

Under s. 292.12(5), Wis. Stats., occupants of this property are also responsible for complying with any continuing obligations. Please notify any current and future occupants that may be affected by a continuing obligation, by supplying them with a copy of this letter. The WDNR fact sheet, RR-819, *Continuing Obligations for Environmental Protection*, has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain copies at <http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf>.

CONTINUING OBLIGATIONS

Case closure is possible, based on site-specific conditions that include the continued use of the property and surrounding area for industrial purposes and its current zoning for industrial use. Prior to changing the use or occupancy of this property to a residential exposure setting, the property owner will need to notify the WDNR. Depending on exposure conditions, additional response actions may be necessary.

If soil in the specific locations owned by the Village and described above is excavated, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be 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.

Soil samples that are representative of currently remaining residual contamination on the property owned by the Village contained benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,23-cd)pyrene in concentrations that met suggested industrial standards but exceeded the suggested non-industrial soil standards. Under s. 292.12 (2) (c), Wis. Stats., the property may not be used or developed for a residential, commercial, agricultural, or other non-industrial uses, unless (at the time that the non-industrial use is proposed) an investigation is conducted, to determine the degree and extent of PAH contamination that remains on the property, and the remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. You will need to notify the WDNR prior to changing the use of this property, to determine what additional cleanup actions may be needed.

SUMMARY

Once the WDNR makes a decision on the closure request, it will be documented in a letter. If the WDNR grants closure, you will receive a copy of the closure letter. If the Village needs to, it may also obtain a copy of the closure letter by requesting a copy from Benz Oil, by writing to the agency address given above or by accessing the WDNR Geographic Information System (GIS) Registry (via RR Sites Map) on the Internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>. The final closure letter will contain a description of the continuing obligation, any prohibitions on activities and will include any applicable maintenance plan. The final closure letter, any required maintenance plan and a map of the properties affected will be included as part of the site file attached on the GIS Registry.

If this case is closed, all properties within the site boundaries where soil contamination attains or exceeds ch. NR 720 RCLs, NR 746 risk-screening criteria, or suggested RCLs for PAHs will be listed on the publicly accessible Bureau for Remediation and Redevelopment Tracking System on the Web (BOTW) to provide public notice of remaining contamination and of any continuing obligations. In addition, information will be displayed on the Remediation and Redevelopment Sites Map (RR Sites Map); a mapping application, under the GIS Registry theme. This GIS Registry is available to the general public on the WDNR Internet website. WDNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09(4) (w), Wis. Adm. Code.

Should the Village or any subsequent property owner wish to construct or reconstruct a well on your property, special well construction standards may be necessary to protect the well from the remaining contamination. Any well driller who proposes to construct a well on your property in the future will first need to obtain approval from a regional water supply specialist in WDNR Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the Internet at <http://www.dnr.state.wi.us/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

The following fact sheet (WDNR publication #RR-589, *Guidance for Dealing with Properties Affected by Off-Site Contamination*) has been included with this letter, to help explain the responsibilities you may have for maintenance of a certain remedy, the limits of any liability for investigation and cleanup of contamination, and how these differ. If the fact sheet is lost, you may obtain a copy at <http://dnr.wi.gov/org/aw/rr/archives/pubs/RR589.pdf>.

If you need more information about Benz Oil's proposed cleanup completion and request for closure, you may contact me at:

Benz Oil, Inc.
2724 West Hampton Avenue
Milwaukee, WI 53209
(414) 442-2900

If you need more information about cleanups and closure requirements, or to review the WDNR's file on this case, you may contact Mr. Mark Drews at:

Wisconsin Department of Natural Resources
141 NW Barstow Street, Room 180
Waukesha, WI 53188
(262) 574-2146

Sincerely,

Lee Konkel

Lee Konkel
Group Vice President
Benz Oil Co., Inc.

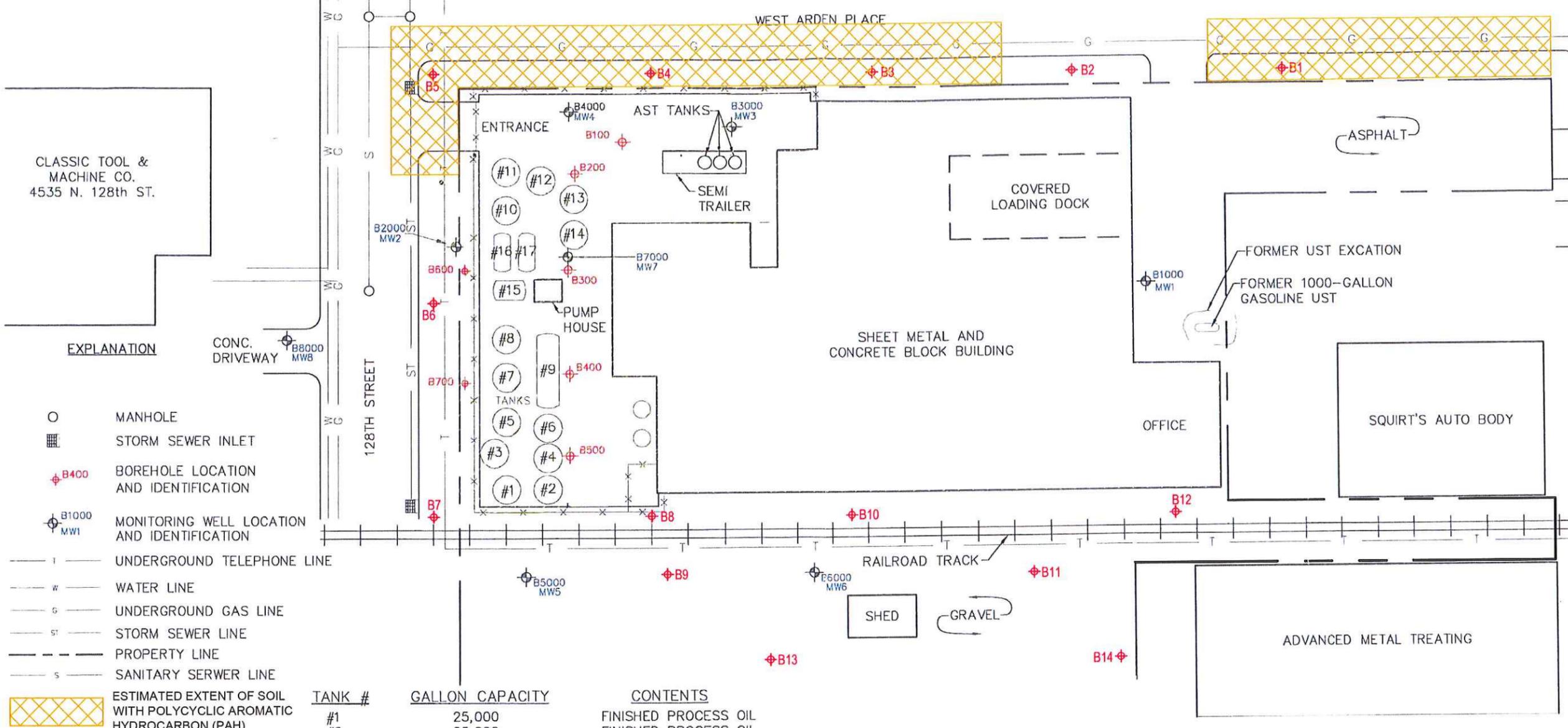
Cc: Mr. Joe Mentzer - Endpoint Solutions Corp.
Mr. Mark Drews - WDNR

Attachment A - Fact Sheets

- RR 819 - Continuing Obligations for Environmental Protection
- RR 671 - What Landowners Should Know: Information About Using Natural Attenuation to Clean Up Contaminated Groundwater
- RR 589 - Guidance for Dealing With Properties Affected by Off-Site Contamination

Attachment B - Residual Soil Contamination

PRODUCTION TOOL CORPORATION
12726 ARDEN PLACE

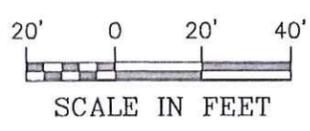


EXPLANATION

- MANHOLE
- STORM SEWER INLET
- ⊕ B400 BOREHOLE LOCATION AND IDENTIFICATION
- ⊕ B1000 MW1 MONITORING WELL LOCATION AND IDENTIFICATION
- T — UNDERGROUND TELEPHONE LINE
- W — WATER LINE
- G — UNDERGROUND GAS LINE
- ST — STORM SEWER LINE
- - - PROPERTY LINE
- S — SANITARY SERWER LINE

ESTIMATED EXTENT OF SOIL WITH POLYCYCLIC AROMATIC HYDROCARBON (PAH) CONCENTRATIONS EXCEEDING THE SUGGESTED GENERIC RESIDUAL CONTAMINANT LEVELS (RCLs) BASED ON NON-INDUSTRIAL DIRECT CONTACT

TANK #	GALLON CAPACITY	CONTENTS
#1	25,000	FINISHED PROCESS OIL
#2	25,000	FINISHED PROCESS OIL
#3	25,000	USED PROCESS OIL
#4	11,000	FINISHED PROCESS OIL
#5	11,000	LUBE BASE OIL
#6	11,000	LUBE BASE OIL
#7	10,000	USED PROCESS OIL
#8	10,000	USED PROCESS OIL
#9	3,000	WASTE WATER
#10	13,000	WASTE WATER
#11	8,000	EMPTY
#12	13,000	WASTE OIL
#13	17,000	LUBE BASE OIL
#14	8,000	EMPTY
#15	2-3,000	USED LUBRICANTS
#16	2-4,000	USED LUBRICANTS
#17	2-4,000	USED LUBRICANTS



RESIDUAL SOIL CONTAMINATION

BENZ OIL - ARDEN PLACE
12733 West Arden Place
Butler, Wisconsin

Endpoint Solutions

12065 West Janesville Road
Hales Corners, WI 53130

Phone: (414) 427-1200 Fax: (414) 427-1259

DRAWN BY: MMV	DATE: 05/16/2013
REVIEWED BY: DMB	PROJECT NO: 072-002-005

Attachment B

David Buser

From: Jesse Thyes [JThyes@butlerwi.gov]
Sent: Wednesday, May 29, 2013 3:20 PM
To: David Buser
Subject: RE: Benz Oil - West Arden Place

David,

As we discussed over the phone...On May 21st, I presented the Executive Summary of environmental report to our Village Board at their regular meeting and there was no further comments or action taken on the matter. That said, the Village of Butler has no further comment on this matter. Thank you.

Jesse Thyes

Village Administrator/Clerk
 Village of Butler

Phone: 262-783-2525

From: David Buser [mailto:david@endpointcorporation.com]
Sent: Wednesday, May 29, 2013 3:17 PM
To: Jesse Thyes
Subject: Benz Oil - West Arden Place

Jesse,

I'm happy to hear that the notification we provided regarding the residual contamination satisfies the needs of the Village and your trustees. As we discussed, if the Village waives its right to comment on our intended request for site closure, please respond to this email.

It's been a pleasure corresponding with you on this matter. Thanks again for your responsiveness and cooperation on this project!

Regards, David

David M. Buser, P.G.

Endpoint Solutions

12065 W. Janesville Road, Suite 300
 Hales Corners, WI 53130
 Direct (414) 858-2108
 Cell (414) 343-6500
 Office (414) 427-1200
 Fax (414) 427-1259

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <i>x Carolyn Jahnke</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
	B. Received by (<i>Printed Name</i>) <i>Carolyn Jahnke</i>	C. Date of Delivery <i>5/24/13</i>
1. Article Addressed to: <i>Village of Butler Attn: Jesse Thyes 12621 W. Hampton Ave. Butler, WI 53007</i>	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	
2. Article Number (Transfer from service label)	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (<i>Extra Fee</i>) <input type="checkbox"/> Yes	
	7011 0470 0001 1401 1794	

753177

THIS SPACE RESERVED FOR RECORDING DATA

THIS INDENTURE, Made this 17th day of December, A. D., 1969,
between Halt Realty Co.

a Corporation duly organized and existing under and by virtue of the laws of the
State of Wisconsin, located at Butler, Wisconsin,
~~Wisconsin~~ party of the first part, and Filmite Oil Corporation

a Corporation duly organized and existing under and by virtue of the laws of the
State of Wisconsin, located at 12733 W. Arden Place, Wisconsin, party
of the second part.

RETURN TO
Wis.

Witnesseth, That the said party of the first part, for and in consideration of the
sum of one dollar 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 fol-
lowing described real estate situated in the County of Waukesha and State of Wisconsin, to-wit:

Lot 1, Block 52, in the Plat of New Butler, being a part of the North-
east 1/4 of Section 1, Town 7 North, Range 20 East, Village of Butler,
Waukesha County, Wisconsin.

ALSO: Lots 16, 17, 18, 19, 20, 21 and 22, in Block 52, in the Plat of
the Second Continuation of New Butler, being a part of the Northeast
1/4 of Section 1, Town 7 North, Range 20 East, Village of Butler,
Waukesha County, Wisconsin.

TRANSFER
\$ 87.50
FEE

(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 Halt Realty Co.
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 sealing 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 ordinances, building
restrictions and easements if any, of record.

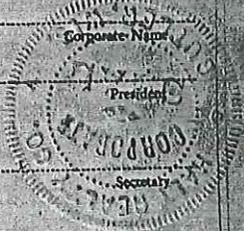
and that the above bargained premises in the quiet and peaceable possession of the said party of the second part, its
successors and assigns, against all and every person or persons lawfully claiming the whole or any part thereof, it will
forever WARRANT and DEFEND.

In Witness Whereof, the said Halt Realty Co.
party of the first part, has caused these presents to be signed by L. F. Paape, its
President, and countersigned by H. L. Kropp, its Secretary, at Milwaukee
Wisconsin, and its corporate seal to be hereunto affixed, this 17th day of December, A. D.,
1969.

SIGNED AND SEALED IN PRESENCE OF

D. L. Carlson
D. L. Carlson

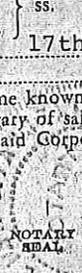
Halt Realty Co.
L. F. Paape
L. F. Paape
COUNTERSIGNED:
H. L. Kropp
H. L. Kropp



William J. Farrell
William J. Farrell
State of Wisconsin,

Personally came before me, this 17th day of December, A. D., 1969,
of the above named Corporation, to me known to be the persons who executed the foregoing instrument, and to be
known to be ~~such~~ President and Secretary of said Corporation, and acknowledged that they executed the foregoing instru-
ment as such officers as the deed of said Corporation, by its authority.

THIS INSTRUMENT WAS DRAFTED BY
William J. Farrell



My commission expires (is) permanent.

No. _____

Halt Realty Co.

TO

Filmite Oil Corporation

Warranty Deed

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

REGISTER'S OFFICE

Waukesha Co., Wis. } ss 753177
No. _____

RECEIVED FOR RECORD THE 24th DAY OF DECEMBER D. 1969 AT 9:38 O'CLOCK A.M. AND RECORDED IN VOL. 1180 DE 24 ON 11/24/69

By: Stanley H. Linstedt
Notary Public

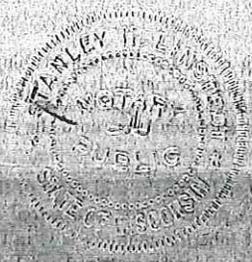
Return to
FRISCH, DUDEK, SLATTERY AND DENNY
Suite 1250, Marshall & Hsley
Bank Building,
780 North Water Street
Milwaukee, Wisconsin, 53202

WISCONSIN LEGAL BLANK COMPANY
MILWAUKEE, WISCONSIN

State of Wisconsin)
) ss
Milwaukee County

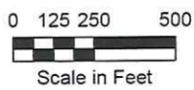
Personally came before me, this 17th day of December, A.D. 1969 L. F. Paape, President of the above named Corporation, to me known to be the person who executed the foregoing instrument, and to me known to be such President of said Corporation, and acknowledged that they executed the foregoing instrument as such officer as the deed of said Corporation, by its authority.

Stanley H. Linstedt
Stanley H. Linstedt
Notary Public, Milwaukee County, Wis.
My commission (expires) 2/28/71



Village of Butler

Waukesha County, Wisconsin



ZONING DISTRICT MAP

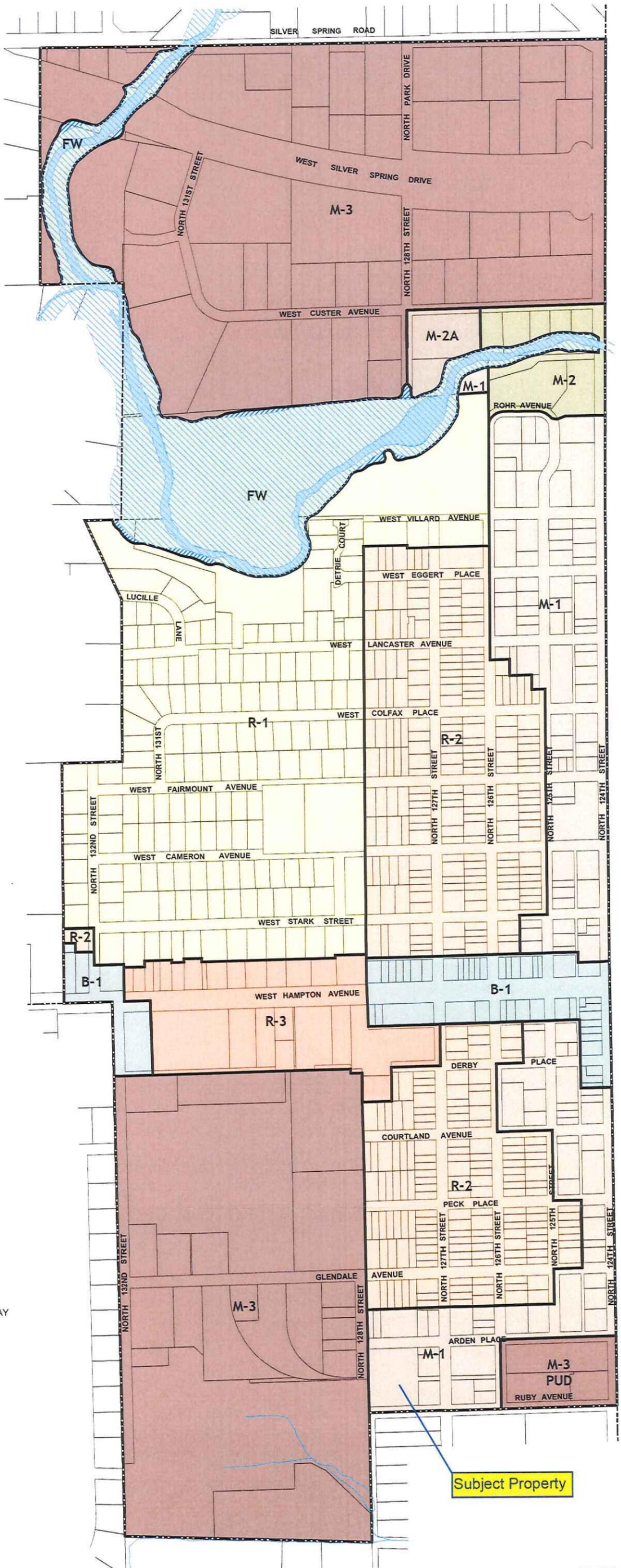
LEGEND

- R-1 SINGLE - FAMILY RESIDENTIAL DISTRICT
- R-2 TWO - FAMILY RESIDENTIAL DISTRICT
- R-3 MULTI - FAMILY RESIDENTIAL DISTRICT
- B-1 COMMUNITY BUSINESS DISTRICT
- M-1 INDUSTRIAL DISTRICT
- M-2 LIGHT INDUSTRIAL AND WAREHOUSING DISTRICT
- M-2A LIGHT INDUSTRIAL AND WAREHOUSING DISTRICT
- M-3 HEAVY INDUSTRIAL DISTRICT
- FW FLOODWAY DISTRICT
- FF FLOODPLAIN FRINGE DISTRICT
- FLOODWAY c.2008

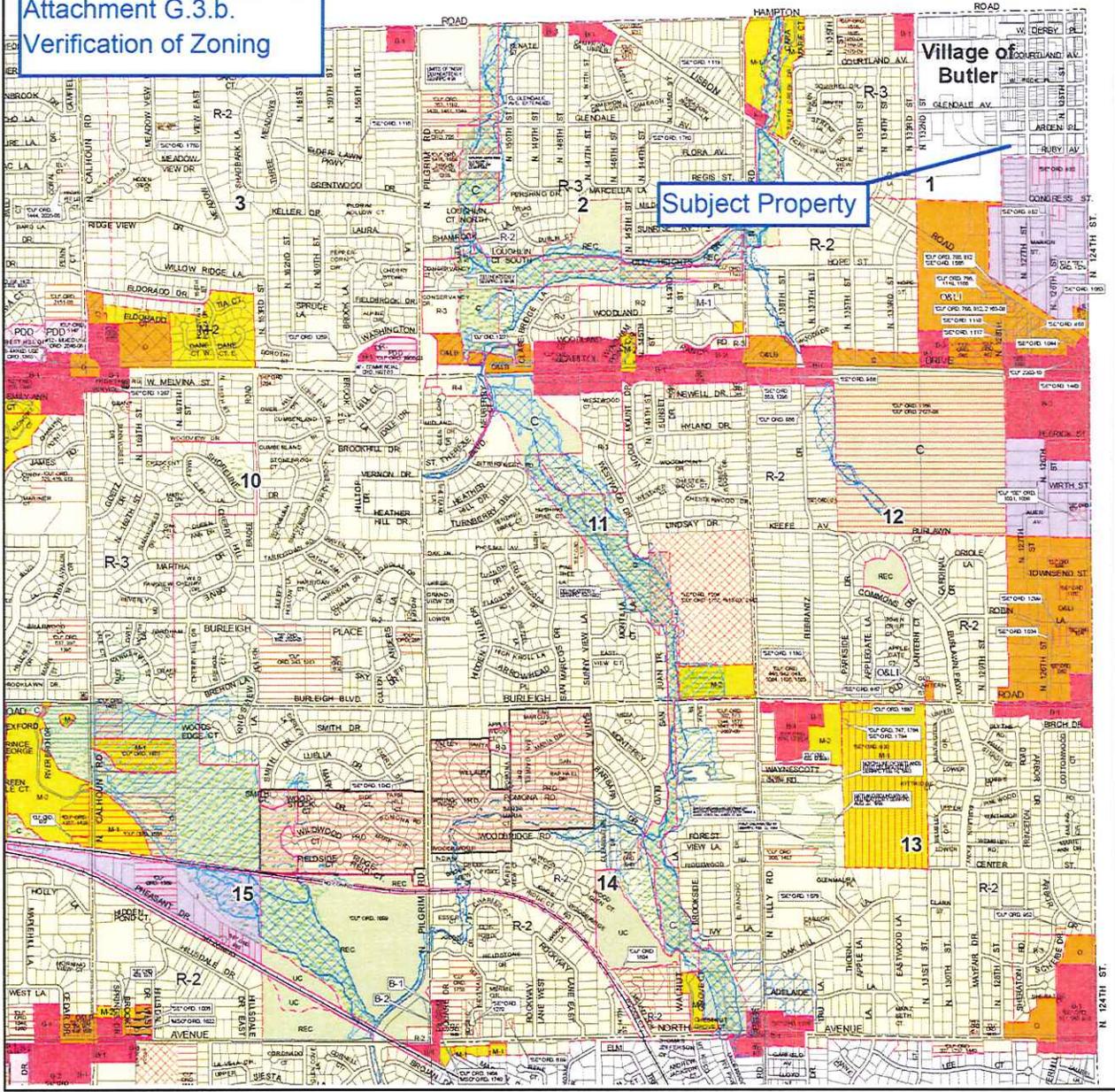
NOTES:

1. THE BOUNDARIES OF THE FW FLOODWAY DISTRICT ARE BASED ON FLOODWAY BOUNDARIES AS SHOWN ON THE FEMA FLOOD BOUNDARY AND FLOODWAY MAP DATED NOVEMBER 19, 2008 AND DETAILED FLOODWAY DELINEATION INFORMATION FROM REGISTERED LAND SURVEYORS WHERE APPLICABLE.
2. DATE OF ORIGINAL MAP ADOPTION UNKNOWN. MAP UPDATE WITH AMENDMENTS THROUGH OCTOBER 1, 2008.

PLAN PREPARED BY R.A. SMITH NATIONAL, INC. NOVEMBER 3, 2004



Attachment G.3.b.
Verification of Zoning



General Zoning Map
City of Brookfield
Waukesha County, Wisconsin

Northeastern Quarter

TO THE USER
This data is provided by the City of Brookfield for informational purposes only. The City does not warrant or guarantee the accuracy or reliability of this data. The recipient of this data assumes any risk of its use for any purpose.

LEGEND

BASE ZONING	MODIFIED SUBURBAN OVERLAY Modified Suburban Overlay established by Ordinance 11633 unless otherwise noted
Single-Family Residential R-1 Single-Family Residence R-2 Single-Family Residence R-3 Single-Family Residence R-4 Two-Family Residence	CS Clustered Suburban CSMS Mixed CTS Conical Suburban MSO Modified Suburban
Multi-Family Residential M-1 Multi-Family Residence M-2 Multi-Family Residence	NS New Suburban RC Residential Cluster
Business B-1 Local Business B-1R Local Business Restricted B-2 General Business B-3 Regional Business	RCNS Mixed TND Traditional Neighborhood Design
Office O Office O&LB Office and Limited Business O&LI Office and Limited Industry O&LRC Office and Limited Residential/Commercial	FLOOD OVERLAY FF Flood Fringe FW Floodway FS Flood Storage
Light Industrial and Commercial Mixed Use L&CM NO. 1 Light Industrial Commercial Mixed Use	SHORELINE/WETLAND OVERLAY SW Shoreland/Wetland NSW Non-Shoreland/Wetland SP Shoreland Protection UP Upland Woodland Preservation
Industry I Industry	
Planned Development PDD Planned Development District	
Nature/Recreation C Conservancy REC Recreational UC Upland Conservancy	
ORDINANCES	SPECIAL EXCEPTIONS SE Special Exception per Sec. 17.21 of the City of Brookfield Code
CU Conditional Use per Sec. 17.09 of the City of Brookfield Code	CU/SE Conditional Use and Special Exception (see above)

The boundaries of the Conservancy, Flood Overlay, and Shoreland/Wetland Overlay Districts, as drawn, are intended to represent approximate limits of such districts. Exact boundaries shall be determined by field delineation or engineering survey and verification of actual field conditions, subject to approval by the appropriate government agencies.

* See Wetland Preservation and Upland Conservancy District Zoning Map for all pertinent topographic information
** See "Flood Insurance Study", published by FEMA, August 19, 1966 and related maps for official floodland data and location of regional floodway overlay district.

Responsible Party Statement

Benz Oil Property

12733 West Arden Place, Butler, WI

WDNR BRRTS #02-68-183136

Facility ID #268137870

I, Lee Konkel, believe that to the best of my knowledge, a legal description has been attached for each property that is within, or partially within, the contaminated site boundary at the above-referenced site.

A handwritten signature in cursive script, reading "Lee Konkel", is written over a horizontal line.

Lee Konkel
Benz Oil Company, Inc.
Milwaukee, Wisconsin