

Institutional Control Audit Site

The GIS Documentation, contained within, was collected by the WDNR Project Manager from existing documentation contained in the case file.

This case was closed by the WDNR prior to the existence of GIS submittal requirements being in place.

Certain documents that are currently required in ch. NR 726, Wis. Adm. Code, may therefore be unavailable.

GIS REGISTRY INFORMATION

SITE NAME: A C Humko Food Company
BRRTS #: 06-17-258319 **FID # (if appropriate):** 617007600
COMMERCE # (if appropriate): NA
CLOSURE DATE: 06/11/2002
STREET ADDRESS: 1115 Tiffany Street
CITY: Boyceville

SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection): X= 359723 Y= 510111

CONTAMINATED MEDIA: Groundwater Soil Both

OFF-SOURCE GW CONTAMINATION >ES: Yes No

IF YES, STREET ADDRESS 1: _____
GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL): Yes No

IF YES, STREET ADDRESS 1: _____
GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

CONTAMINATION IN RIGHT OF WAY: Yes No

DOCUMENTS NEEDED:

- Closure Letter, and any conditional closure letter or denial letter issued
- Copy of most recent deed, including legal description, for all affected properties
- Certified survey map or relevant portion of the recorded plat map (if referenced in the legal description) for all affected properties
- County Parcel ID number, if used for county, for all affected properties
- Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.
- Detailed Site Map(s) for all affected properties, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.
- Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)
- Tables of Latest Soil Analytical Results (no shading or cross-hatching)
- Isoconcentration map(s), if required for site investigation (SI) (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. If not available, include the latest extent of contaminant plume map.
- GW: Table of water level elevations, with sampling dates, and free product noted if present
- GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)
- SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour
- Geologic cross-sections, if required for SI. (8.5x14' if paper copy)
- RP certified statement that legal descriptions are complete and accurate
- Copies of off-source notification letters (if applicable)
- Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW)
- Copy of (soil or land use) deed restriction(s) or deed notice if any required as a condition of closure
- Copy of any maintenance plan referenced in the deed restriction.

X
NA
NA
NA
X
X
X
NA
X
X
X
NA
NA
NA
X
X

File



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary

101 S. Webster St.
Box 7921
Madison, Wisconsin 53707-7921
Telephone 608-266-2621
FAX 608-267-3579
TTY 608-267-6897

June 11, 2002

MR. EDWARD F. NUBEL
E & A CORPORATION
1844 RIVER RIDGE ROAD
HUDSON, WI 54016

BRRTS No. 06-17-2558319
FID No. 617007600

Subject: A *Certificate of Completion* for the Environmental Investigation and Cleanup of Property Owned by ACH Food Companies, Inc., located at 1115 Tiffany Street, City of Boyceville, Wisconsin

Dear Mr. Nuebel:

The Department of Natural Resources ("the Department") has received your request for issuance of a *Certificate of Completion* for the environmental investigation and cleanup of property owned by ACH Food Companies, Inc., located at 1115 Tiffany Street, City of Boyceville, Wisconsin, which will be referred to in this letter as "the Property". You have requested that the Department determine whether E&A Corporation has met the requirements under s. 292.15(2), Wis. Stats., for issuance of a *Certificate of Completion*.

The Property encompasses approximately 9.3 acres and is presently occupied by ACH Food Companies, Inc. The property is described on Attachment A of the enclosed Certificate of Completion.

Determination

As you are aware, s. 292.15, Wis. Stats., authorizes the Department to issue a *Certificate of Completion* to a voluntary party that conducts an approved environmental investigation of a property and restores the environment to the extent practicable and minimizes the harmful effects with respect to hazardous substance discharges on or originating from the property. Based on the information received by the department, the Department has determined that the investigation and cleanup of the Property is complete and that all the conditions in s. 292.15(2), Wis. Stats., have been met. Attached is the *Certificate of Completion* for this Property.

While the conditions for issuance of a Certificate of Completion have been met, recent groundwater monitoring data collected from monitoring wells associated with the Property indicates exceedances of ch. NR 140, Wis. Adm. Code, preventive action limits ("PAL") for toluene at MW-7 (f.k.a MW-1), but compliance with enforcement standards ("ES"). The Department may grant an exemption under s. NR 140.28(2), Wis. Adm. Code, when a PAL is attained or exceeded, where the background concentrations of the substances are below the PAL, if the following criteria are met:

- 1. The measured or anticipated increase in concentrations of the substances will be minimized to the extent technically and economically feasible.



Page 2
E & A Corporation
June 11, 2002

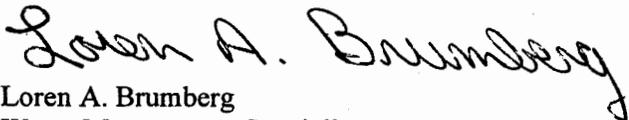
2. Compliance with the PAL is either not technically or economically feasible.
3. The ES for the substance will not be attained or exceeded at the point of standards application.
4. Any existing or projected increase in concentrations of the substances above the background concentrations does not present a threat to public health or welfare.

Based on the information provided, the Department believes that the aforementioned criteria have been or will be met as a result of remediation activities occurring at the Property. Natural attenuation has been proven effective, and concentrations of toluene are decreasing at the site. Therefore, an exemption to the PAL is granted for toluene at MW-7 (f.k.a. MW-1). This letter shall serve as your exemption.

Conclusions

The Department appreciates the work undertaken by E&A Corporation to investigate and clean up contamination associated with the Property. The exemption provided by the *Certificate of Completion* applies to any successor or assignee of E & A Corporation, if the successor or assignee complies with the appropriate conditions, pursuant to s. 292.15(3), Wis. Adm. Code. If you have any questions or concerns regarding this letter or the *Certificate of Completion*, please call me at 715-839-3770 or Attorney Linda Meyer at 608-266-7588.

Sincerely,



Loren A. Brumberg
Waste Management Specialist
Remediation & Redevelopment Program

Attachment: *Certificate of Completion*

C: Michael Prager - RR/3
Linda Meyer - LS/5
Bill Evans - WCR
Rick Bilodeau, Cedar Corporation
Steve Katz, Parsinen Kaplan Rosberg & Gotlieb

State of Wisconsin
Department of Natural Resources

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

Whereas, E&A Corporation has applied for an exemption from liability under s. 292.15, Wis. Stats., for property located at 1115 Tiffany Street, City of Boyceville, Wisconsin, that is owned by ACH Food Companies, Inc. (formerly known as AC Humko Corp.), which is more specifically described by the legal description in Attachment A (“the Property”);

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

Whereas, E&A Corporation has submitted to the Wisconsin Department of Natural Resources (“WDNR”) investigation reports and a remedial action plan for the Property which comply with the requirements set forth in chs. NR 700-726, Wis. Adm. Code, consisting of the documents and reports listed in Attachment B;

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

Whereas, The WDNR has granted E&A Corporation an exemption under section NR 140.28(2)(b), Wis. Adm. Code, for having toluene in the groundwater above the ch. NR 140 preventive action limit (“PAL”);

Whereas, ACH Food Companies, Inc. has filed with the Register of Deeds of Dunn County a deed restriction/affidavit (Attachment C) on the Property which declares that the Property is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitations and restrictions:

The Property may not be used or developed for a residential, commercial, agricultural, or other non-industrial use, unless (at the time that the non-industrial use is proposed) an investigation is conducted to determine the degree and extent of benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, benzo(g,h,i)perylene, chrysene, indeo(1,2,3-cd)pyrene, phenanthrene, and pyrene contamination that remains on the Property and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If contaminated soil that remains on the Property is excavated in the future, it will have to be sampled and analyzed and the treatment or disposal of the soil as a solid or hazardous waste may be necessary.

The following activities are prohibited on that portion of the Property described in the deed restriction/affidavit where a cap or cover has been placed (Exhibit A), unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) excavating or grading of the land surface; (2) filling on the capped area; (3) plowing for agricultural cultivation; and (4) construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. In addition, the cap or cover shall be maintained in compliance with a plan (Attachment D) prepared and submitted to the Wisconsin Department of Natural Resources by a responsible party, as required by section NR 724.13(2), Wis. Adm. Code (1999);

Whereas, on December 13, 2001, WDNR determined response actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharges to the air, land, and waters of the state were completed.

Therefore, based upon the information that has been submitted to the WDNR, the WDNR hereby certifies that the response actions set forth in the WDNR approved remedial action plans for the Property have been completed.

Upon issuance of this Certificate, **E&A Corporation** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to the existence of hazardous substances on or originating from the Property, the release of which occurred prior to the date the environmental investigation required under s. 292.15(2)(a)1., Wis. Stats., was approved. However, the person who owns the property would no longer qualify for this liability exemption if that person fails to maintain or monitor the Property as required by rules promulgated by the WDNR or engages in activities that are inconsistent with the maintenance of the Property. Any releases of a hazardous substance to or from the Property that occur after the date that the environmental investigation was approved will be the responsibility of the current Property owner and any other person who possesses or controls that discharge and any person who caused the discharge.

The protection from liability provided under s. 292.15(2), Wis. Stats., does not apply to any person who has obtained a Certificate of Completion by fraud or misrepresentation, or by the knowing failure to disclose material information or under circumstances in which **E&A Corporation** knew or should have known about more discharges of hazardous substances than were revealed by the investigation approved by the WDNR.

Nothing in this Certificate or in s. 292.15, Wis. Stats., affects the authority of the WDNR to exercise any powers or duties under applicable laws other than ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to any release or threatened release of contaminants at the Property, or the right of the WDNR to seek relief available against any person who is not entitled to protection from liability under s. 292.15, Wis. Stats., with respect to such release or threatened release.

SIGNED AND CERTIFIED this 15 day of May, 2002.



Darrell Bazzell, Secretary
Wisconsin Department of Natural Resources

**ATTACHMENT A
LEGAL PROPERTY DESCRIPTION
ACH FOOD COMPANIES, INC. PROPERTY**

TRACT ONE:

All that part of the Southwest Quarter of the Southwest Quarter of Section 25, Township 30 North, Range 14 West, lying South of the center of the center line of Tiffany Creek and West of Block Two of Adolph Peterson's Second Addition to the Village of Boyceville, Dunn County, Wisconsin, EXCEPT from all the above described premises two parcels, one described in Award of Damages by the State Highway Commission dated February 11, 1995, recorded February 15, 1955 in Vol. 156 of Deeds, page 454, and the other described in Quit Claim Deed from Richard F. Gebhardt and wife Amelia to Dunn County, Wisconsin dated January 13, 1955, recorded January 21, 1955, in Vol. 156 of Deeds, page 437, Dunn County Registry. All of said lands being subject to existing highways and easements.

TRACT TWO:

That part of the South 1/2 of the Southwest 1/4 of the Southwest 1/4 of Section 25, Township 30 North, Range 14 West, North and West of the center line of Tiffany Creek, in Dunn County, Wisconsin. Except from all the above described premises two parcels, one described in Award of Damages by the State Highway Commission dated February 11, 1955, recorded February 15, 1955 in Vol. 156 of Deeds, page 454, and the other described in Quit Claim Deed from Richard F. Gebhardt and wife Amelia to Dunn County, Wisconsin dated January 13, 1955, recorded January 21, 1955, in Vol. 156 of Deeds, page 437, Dunn County Registry. ALL of said lands being subject to existing highways and easements.

Lot Three (3) and the West One Half of Lot Two (2), all in Block Two (2), Peterson's Second Addition to the Village of Boyceville, Dunn County, Wisconsin.

The combined Tracts One and Two, Lot 3 and the West one half of Lot 2 being more precisely described as follows: Commencing at the Southwest corner of Section Twenty Five (25), Township (30) North, Range Fourteen (14) West, Village of Boyceville, Town of Tiffany, Dunn County, Wisconsin;

Thence North 00 degrees 27 minutes 25 seconds East 30.65 feet along the west line of the Southwest Quarter of said Section 25;

Thence North 89 degrees 29 minutes 43 seconds East 33.00 feet to the intersection of the north line of Tiffany Street (as presently located and occupied) with the east line of State Truck Highway Number 79, this being the POINT OF BEGINNING of the parcel herein described;

Thence North 00 degrees 27 minutes 25 seconds East 180.04 feet along said east right of way line;

Thence South 89 degrees 32 minutes 35 seconds East 37.00 feet along said right of way line;

Thence North 00 degrees 27 minutes 25 seconds East 446.69 feet along said right of way line to a point on the north line of the south half of the Southwest Quarter of the Southwest Quarter of said section 25;

Thence North 89 degrees 59 minutes 48 seconds East 954.64 feet along said north line to a meander corner;

Thence South 01 degrees 05 minutes and 30 seconds East 98.57 feet along the meander line;

Thence South 31 degrees 08 minutes 02 seconds West 165.63 feet along said meander line;

Thence North 48 degrees 42 minutes 18 seconds West 164.67 feet along said meander line;

Thence South 73 degrees 43 minutes 02 seconds West 128.79 feet along said meander line;

Thence South 19 degrees 39 minutes 02 seconds West 187.15 feet along said meander line;

Thence South 86 degrees 43 minutes 21 seconds West 163.09 feet along said meander line, and the meander line there terminating;

Thence South 00 degrees 22 minutes 56 seconds West 93.40 feet along the extension of the east line of the west half of Lot 2, Block 2, Peterson's Addition to Boyceville to a witness corner;
Continue thence South 00 degrees 22 minutes 56 seconds West 145.00 feet along said east line to a point on the north right of way of Tiffany Street;
Thence North 89 degrees 57 minutes 01 seconds West 75.00 feet along said north right of way line to the southwest corner of Lot 3, Block 2, Peterson's Addition to Boyceville;
Thence South 84 degrees 31 minutes 35 seconds West 364.85 feet along said north right of way of way to the POINT OF BEGINNING and there terminating.

Including all lands in the South 1/2 of the Southwest One Quarter (1/4) of the Southwest One Quarter (SW 1/4) of said Section Twenty Five (25), lying between the above described meander line and the centerline of Tiffany Creek.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Scott A. Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire, Wisconsin 54702-4001
Telephone 715-839-3700
FAX 715-839-6076
TTY 715-839-2786

December 13, 2001

Mr. Ed Neubel
E&A Corporation
1844 River Ridge Rd.
Hudson, WI 54016

Subject: Certificate of Completion Request Conditional Approval
AC Humko Food Company, 115 Tiffany St., Boyceville, Wisconsin
WDNR BRRTS # 03-17-000241

Dear Mr. Neubel:

On December 13, 2001, your request for a Certificate of Completion (COC) and closure of the case described above was reviewed by the West Central Region Close-out Committee. The West Central Region Close-out Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the COC and closure request, the Close-out Committee has determined that the petroleum contamination on the site from the former underground fuel oil tank system appears to have been investigated and remediated to the extent practicable under site conditions. Your case will be closed under s. NR 726.05, Wis. Adm. Code, and a COC issued if the following conditions are satisfied:

MONITORING WELL ABANDONMENT

The monitoring wells at the site must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to Doug Joseph on Form 3300-5B found at www.dnr.state.wi.us/org/water/dgw/gw/ or provided by the Department of Natural Resources.

DEED RESTRICTION FOR CONTAMINATED SOIL

The closure committee has required that a deed restriction be signed and recorded to address the issue of the remaining soil contamination associated with the site. The purpose of the restriction is to maintain a surface barrier over the remaining soil contamination to prevent it from impacting human health and the environment.

The draft deed restriction, which you provided earlier, has been reviewed by myself and Department legal staff, and I have provided you with our required modifications to that affidavit. You should sign the deed restriction if you own the property, or have the appropriate property owner sign it, and have it recorded by the Dunn County Register of Deeds. Then submit a copy of the recorded document, with the recording information stamped on it, to me. The Department also requires that a signed statement be provided indicating that the property description, as shown on the deed restriction, accurately pertains to this subject property. Please be aware that if a deed restriction is recorded for the wrong property because of an inaccurate legal

description that you have provided, you will be responsible for recording corrected documents at the Register of Deeds Office to correct the problem.

A written engineering control maintenance plan should be provided to the Department outlining how the asphalt surface (or other impervious surface) will be inspected and maintained in the long-term. This maintenance plan must be signed and dated by an authorized representative of AC Humko.

As specified in s. NR 714.07(5), Wis. Adm. Code, where a proposed action to address soil contamination includes a performance standard selected in accordance with s. NR 720.19(2), responsible parties shall publish a public notice as a class I notice under ch. 985, Stats. This public notice shall meet the requirements of s. NR 14.07(5)(a-e), Wis. Adm. Code, and should be published in the Dunn County News. A copy of the published public notice should be submitted to the Department within 15 days of the published date to provide documentation that this requirement has been met.

Residual soil contamination remains at the AC Humko property as indicated in the information submitted to the Department of Natural Resources. If soil in this location (or these locations) is excavated in the future, the property owner at that time will be required to sample and analyze the excavated soil in order to determine whether the contamination still remains. The owner will also have to properly store, treat, or dispose of any excavated materials, based upon the results of that characterization.

Recent groundwater monitoring data at this site indicates exceedances of the NR 140 preventive action limit (PAL) for toluene at MW-7 (f.k.a. MW-1), but compliance with the NR 140 enforcement standard. The Department may grant an exemption to a PAL for a substance of public health concern, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, if all of the following criteria are met:

1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The enforcement standard for the substance will not be attained or exceeded at the point of standards application.
4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the Department believes that the above criteria have been or will be met due to the fact that natural attenuation has been proven effective and concentrations of toluene are decreasing at the site. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for toluene at MW-7. This letter serves as your exemption.

When the above conditions have been satisfied, please submit a letter with supporting documentation to let me know that applicable conditions have been met, and your case will be closed. Since you have also applied for the Voluntary Party Liability Exemption (VPLE) the Department will, upon receipt of the above-referenced documentation, provide you with a formal Certificate of Completion (COC) for this site.

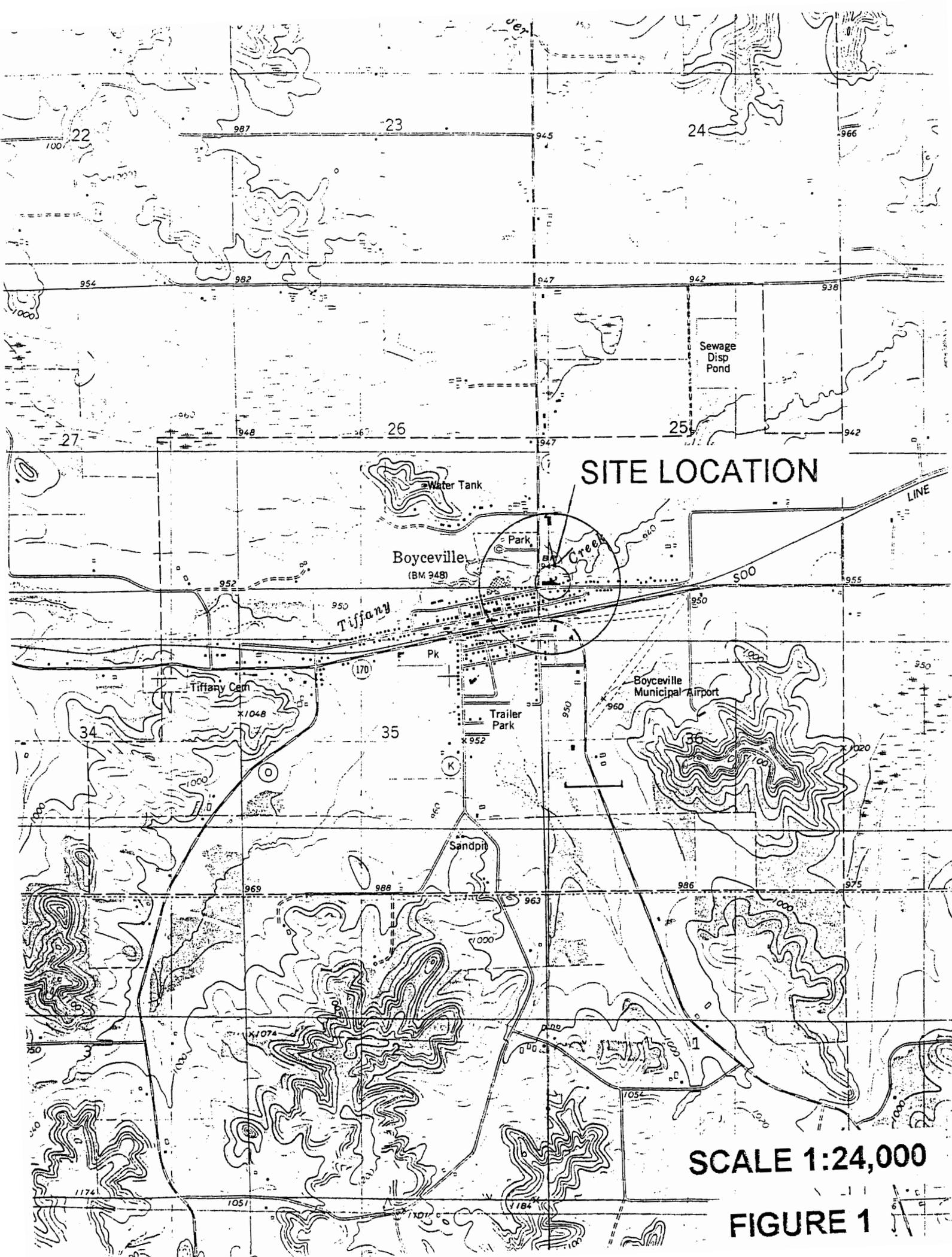
We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 715-839-1602, or Loren Brumberg at 715-839-3770.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Joseph". The signature is fluid and cursive, with a long horizontal stroke at the end.

Doug Joseph
Hydrogeologist
Bureau for Remediation & Redevelopment

c: Loren Brumberg – WCR
Bill Evans - WCR
Michael Prager – RR/3 - Madison
William Phelps - DG/2-Madison
Rick Bilodeau, Cedar Corp., 604 Wilson Ave., Menomonee, WI 54751



SITE LOCATION

SCALE 1:24,000

FIGURE 1

TRACT 2

TRACT 1

ADDITION

PETERSON'S
SECOND
ADDITION
TO
BOYCEVILLE

OUTLOT
TIFFANY STREET

EAST STREET
ADOLPH
PETERSON
O.L.

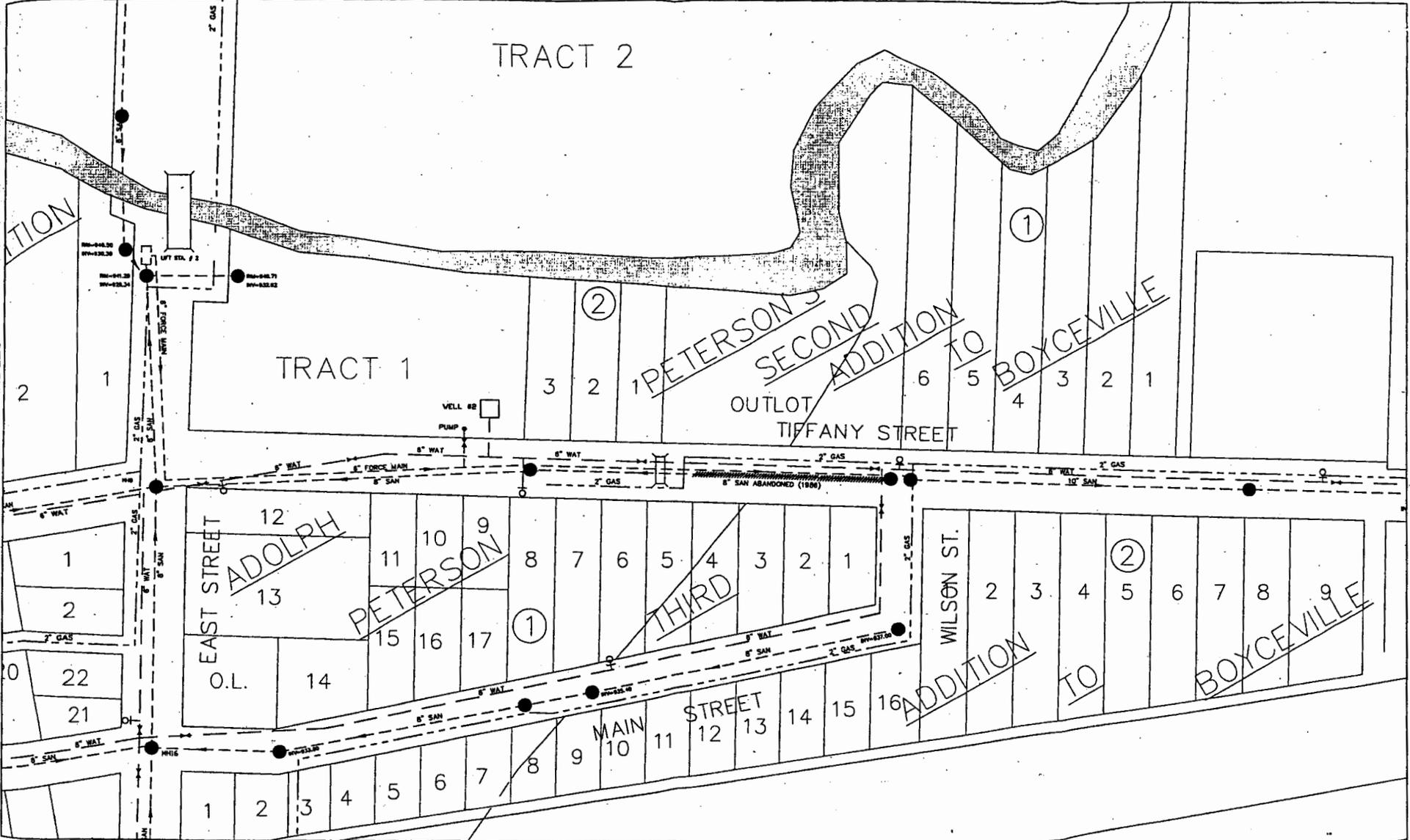
THIRD

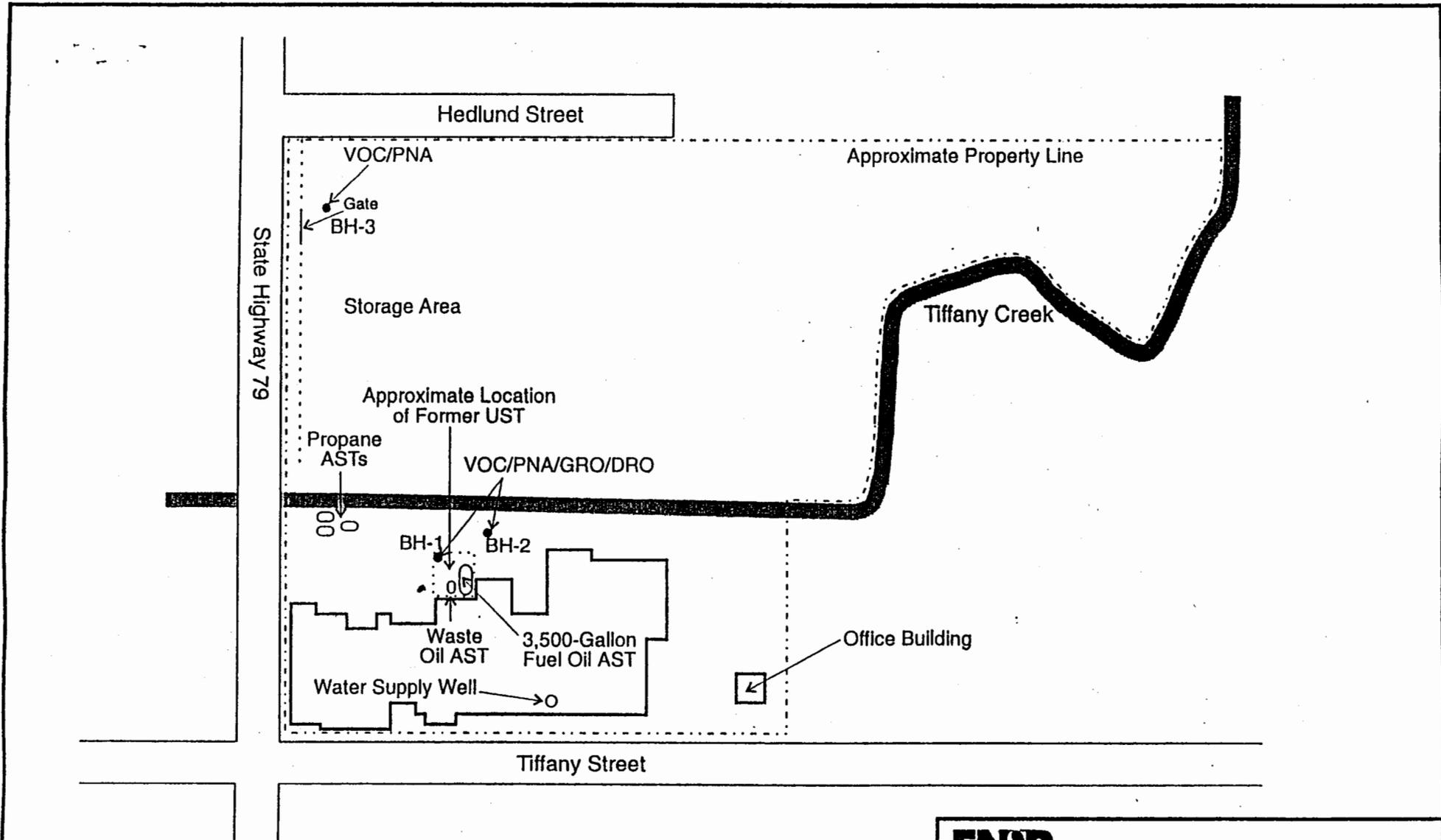
WILSON ST.
ADDITION
TO
BOYCEVILLE

MAIN
STREET

SEE SHEET 44

SEE SHEET 46





Explanation

- Buildings
- Approximate Property Boundary
- Fence
- Soil Boring Location

NOT TO SCALE



ENSR
Consulting - Engineering - Remediation

FIGURE 1
Boring Location
Allied Ingredients, A Division of Allied Processors, Inc.
1115 Tiffany Street
Boyceville, Wisconsin

DRAWN: AJJ	DATE: JUN 1998	PROJECT No.: 8700-992-100	Rev: 0
FILE: FIG1.CDR	CHECKED: PJM		

R:\ENSR\9700\9700-992\FIG1.CDR

TABLE
DRO, GRO, AND PVOC GROUND WATER ANALYSIS RESULTS
E & A CORPORATION
AC HUMKO SPECIALTY INGREDIENTS/FORMER API

Monitoring Well	Date Sampled	Lab ID	DRO mg/L	GRO ug/L	Benzene ug/L PAL=0.5 ES=5	Ethylbenzene ug/L PAL=140 ES=700	MTBE ug/L PAL=12 ES=60	Toluene ug/L PAL=200 ES=1000	1,2,4-TMB ug/L PAL=96* ES=480*	1,3,5-TMB ug/L PAL=96* ES=480*	Xylenes ug/L PAL=1000 ES=10,000
1	8/27/1998	312933	5.7	250	<0.62	<0.52	<1.3	51	<0.54	<0.36	<2.0
1	10/2/1998	319669	5.4	1200	<1.3	<2.2	<1.6	1000	2.4	<2.9	4.5
1	12/3/1998	328760	2.4	2200	<0.65	<1.1	<0.80	2100	1.6	<1.4	3.4
2	8/27/1998	312934	0.67	<50	<0.31	<0.26	<0.66	3.8	<0.27	<0.18	5.7
2	10/2/1998	319670	1.3	<50	<0.13	<0.22	1.8	0.27	<0.22	<0.29	4.0
2	12/3/1998	328761	0.27	<50	0.32	<0.22	4.3	0.29	<0.22	<0.29	4.3
2	12/20/1999	378516	27	<50	<0.10	<0.25	<0.25	17	<0.10	<0.10	1.5
2	4/6/2000	390528	NA	NA	<0.10	1.2	<0.25	0.77	0.18	<0.10	0.99
3	8/27/1998	312935	140	120	<0.62	<0.52	<1.3	34	<0.54	<0.36	<2.0
3	10/2/1998	319671	23	150	<0.13	0.45	<1.3	<0.20	1.3	<0.80	2.0
3	12/3/1998	328762	10	240	<0.26	0.48	<7.3	190	<0.44	<0.58	2.5
3	12/20/1999	378517	24	72	<0.10	0.23	<0.25	59	<0.10	<0.10	1.2
3	4/6/2000	390529	NA	NA	<0.10	0.93	<0.25	130	0.23	<0.10	<0.25
4	12/20/1999	378518	<0.10	<50	<0.10	<0.25	<0.25	<0.10	<0.10	<0.10	0.28
4	4/6/2000	390530	NA	NA	<0.10	<0.25	<0.25	<0.10	<0.10	<0.10	<0.25
5	12/20/1999	378519	0.34	<1000	<2.0	<5.0	<5.0	<2.0	<2.0	<2.0	<5.0
5	4/6/2000	390531	NA	NA	<0.10	<0.25	<0.25	<0.10	<0.10	<0.10	0.38
6	12/20/1999	378520	<0.10	<50	<0.10	<0.25	<0.25	<0.10	<0.10	<0.10	0.33
6	4/6/2000	390532	NA	NA	<0.10	<0.25	<0.25	<0.10	<0.10	<0.10	<0.25
7	12/20/1999	378521	0.64	140	<0.20	1.7	<0.50	100	0.42	<0.20	9.8
7	4/6/2000	390533	NA	NA	0.10	0.42	<0.25	0.36	0.34	<0.10	1.9

DRO = Diesel Range Organics
GRO = Gasoline Range Organics
MTBE = Methyl-Tert-Butyl Ether
TMB = Trimethylbenzene
PAL = Preventive Action Limit (NR 140)

ES = Enforcement Standard (NR 140)
ug/L = micrograms per liter = parts per billion
mg/L = milligrams per liter = parts per million
NA = Not Analyzed
* = 1,2,4-TMB and 1,3,5-TMB combined

*~ 650
for 5 Rows*

Thursday, May 18, 2000
l://working/drgrpvoc

**TABLE
PAH GROUND WATER ANALYSIS RESULTS
E & A CORPORATION
AC HUMKO SPECIALTY INGREDIENTS/FORMER API**

Date Sampled	Lab ID	Acenaphthene	Acenaphthylene	Anthracene PAL=600 ES=3000	Benzo (a) anthracene	Benzo (a) pyrene PAL=0.02 ES=0.2	Benzo (b) fluoranthene PAL=0.02 ES=0.2	Benzo (k) fluoranthene	Benzo (ghi) perylene	Chrysene PAL=0.02 ES=0.2	Dibenzo (a,h) anthracene	Fluoranthene PAL=80 ES=400	Fluorene PAL=80 ES=400	Indeno (1,2,3-cd) pyrene	1-Methyl Naphthalene	2-Methyl Naphthalene	Naphthalene PAL=8 ES=40	Phenanthrene	Pyrene PAL=50 ES=250
--------------	--------	--------------	----------------	----------------------------------	----------------------	--	--	------------------------	----------------------	--------------------------------	--------------------------	----------------------------------	------------------------------	--------------------------	----------------------	----------------------	-------------------------------	--------------	----------------------------

Monitoring Well: 1

8/27/1998	312933	<0.23	<0.58	<0.019	<0.018	<0.029	<0.046	<0.031	<0.11	<0.014	<0.17	<0.11	0.03	<0.088	<0.42	<0.64	<0.23	<0.015	<0.050
10/2/1998	319669	<0.24	<0.60	<0.020	<0.019	<0.030	<0.047	<0.032	<0.11	<0.014	<0.18	<0.11	0.03	<0.091	<0.44	<0.66	<0.24	<0.015	<0.052

Monitoring Well: 2

8/27/1998	312934	<0.23	<0.57	<0.019	<0.018	<0.028	<0.044	<0.030	<0.10	<0.013	<0.16	<0.10	0.03	<0.085	<0.41	<0.62	<0.23	<0.014	<0.048
10/2/1998	319670	<0.25	<0.62	<0.020	<0.019	<0.030	<0.048	<0.032	<0.11	<0.015	<0.18	<0.11	0.03	<0.093	<0.45	<0.67	<0.25	<0.016	<0.053

Monitoring Well: 3

8/27/1998	312935	<0.70	<1.8	<0.057	<0.054	<0.086	<0.14	<0.093	<0.32	<0.041	<0.51	<0.32	0.09	<0.26	<1.3	<1.9	<0.70	<0.045	<0.15
10/2/1998	319671	<0.23	<0.58	<0.019	<0.018	<0.029	<0.046	<0.031	<0.11	<0.014	<0.17	<0.11	0.03	<0.088	<0.42	<0.64	<0.23	<0.015	<0.050

Results reported in ug/L = micrograms per liter = parts per billion

PAL = Preventive Action Limit (NR 140)

ES = Enforcement Standard (NR 140)

Thursday, May 18, 2000

**TABLE
NATURAL ATTENUATION INDICATOR PARAMETERS
E & A CORPORATION
AC HUMKO SPECIALTY INGREDIENTS/FORMER API**

Monitoring Well	Date Sampled	Dissolved Oxygen mg/L	Redox Pot. mv	Nitrate + Nitrite as Nitrogen mg/L	Iron dissolved mg/l	Sulfate dissolved mg/L
1	8/27/1998	NA	NA	NA	NA	NA
1	10/2/1998	NA	NA	NA	NA	NA
1	12/3/1998	0.1	NA	NA	NA	NA
2	8/27/1998	NA	NA	NA	NA	NA
2	10/2/1998	NA	NA	NA	NA	NA
2	12/3/1998	0.2	NA	NA	NA	NA
2	12/20/1999	NA	NA	<0.024	25	10
2	4/6/2000	0.3	NA	0.041	21	<2.0
3	8/27/1998	NA	NA	NA	NA	NA
3	10/2/1998	NA	NA	NA	NA	NA
3	12/3/1998	0.1	NA	NA	NA	NA
3	12/20/1999	0.3	NA	<0.024	32	41
3	4/6/2000	0.3	NA	0.041	27	4.6
4	12/20/1999	1.8	NA	35	1.4	31
4	4/6/2000	2.7	NA	19	<0.024	170
5	12/20/1999	0.5	NA	0.084	0.70	150
5	4/6/2000	3.1	NA	2.4	0.39	300
6	12/20/1999	0.2	NA	2.5	8.4	270
6	4/6/2000	2.3	NA	8.9	1.2	160
7	12/20/1999	NA	NA	<0.024	24	160
7	4/6/2000	0.8	NA	0.50	35	75

NA = Not Analyzed

ug/L = micrograms per liter = parts per billion

mg/L = milligrams per liter = parts per million

mv = millivolts

Redox Pot. = Reduction Oxidation Potential

Cedar Corporation, 5/18/2000

E&A CORPORATION
AC HUMKO SPECIALTY INGREDIENTS

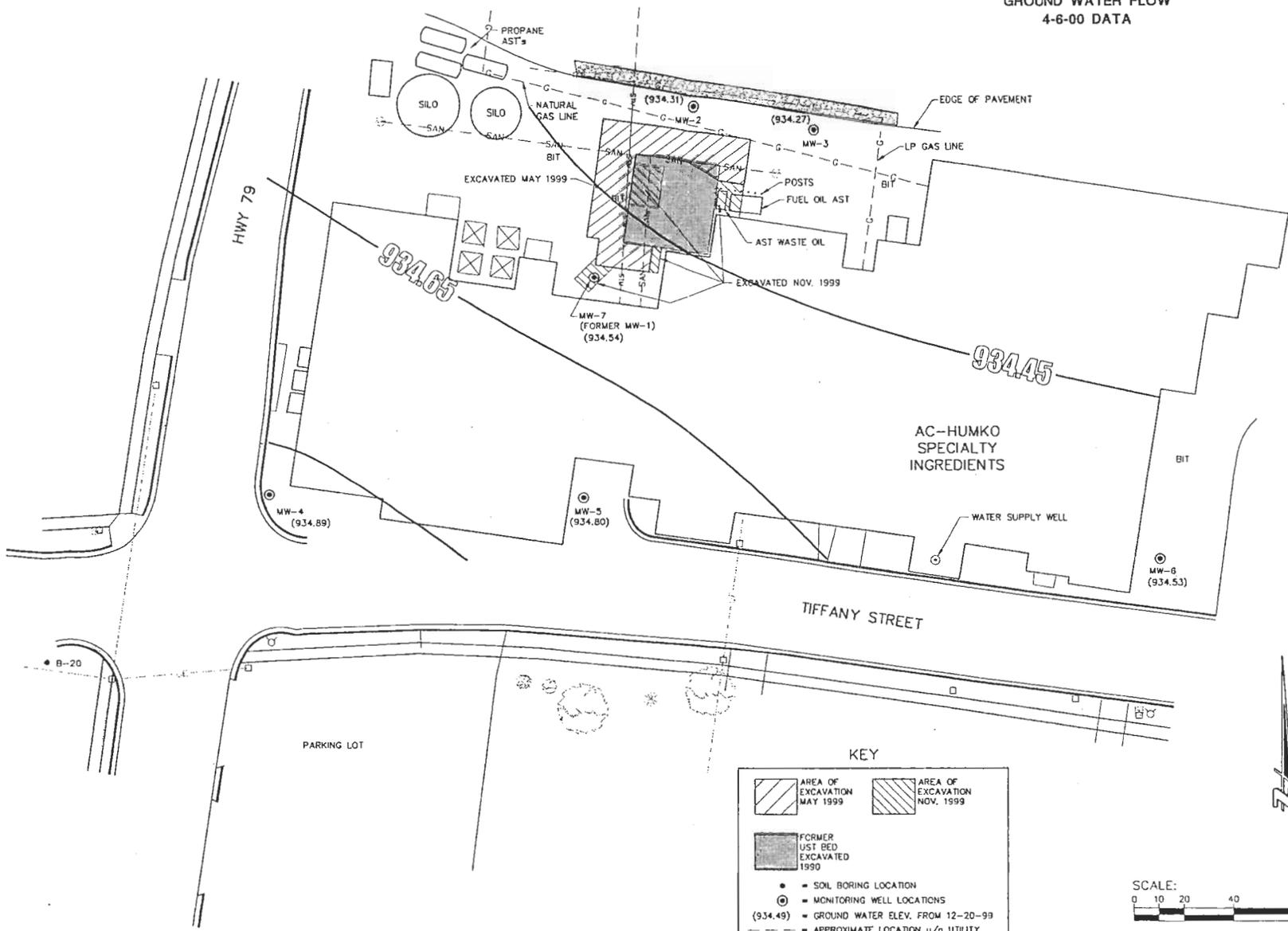
WELL	DATE SAMPLED	NITRATE + NITRITE, mg/L
MW-4	12/20/1999	35
MW-4	04/06/2000	19
MW-4	03/01/2001	39
MW-4	06/04/2001	14

mg/L = MILLIGRAMS PER LITER

**GROUND WATER MONITORING - GROUNDWATER ELEVATION
E & A CORPORATION
AC HUMKO SPECIALTY INGREDIENTS/FORMER API**

Monitoring Well	Date Sampled	Groundwater Elevation	Top OF SCREEN	BOTTOM OF SCREEN
1	8/27/98	933.18	938.51	928.51
1	10/2/98	932.97		
1	10/27/98	933.15		
1	12/3/98	933.11		
2	8/27/98	932.95	936.86	926.86
2	10/2/98	932.76		
2	10/27/98	932.94		
2	12/3/98	932.87		
2	12/20/99	934.49		
2	4/6/00	934.31		
3	8/27/98	933.53	935.78	925.78
3	10/2/98	932.00		
3	10/27/98	933.36		
3	12/3/98	933.05		
3	12/20/99	934.25		
3	4/6/00	934.27		
4	12/20/99	934.72	941.44	931.44
4	4/6/00	934.89		
4	3/1/01	934.00		
4	6/4/01	935.50		
5	12/20/99	934.72	939.71	929.71
5	4/6/00	934.80		
6	12/20/99	934.39	939.25	929.25
6	4/6/00	934.53		
7	12/20/99	934.43	940.02	930.02
7	4/6/00	934.54		

GROUND WATER FLOW
4-6-00 DATA



JOB NO.	1797-007
BOOK NO.	-
DRAWN BY	KAT
CHECKED BY	TAG
DATE	SEPT 1999
REVISIONS	
REFERENCE FILE	A00700se.dwg
DRAWING FILE	APC4600.dwg

504 Wilson Avenue
Menomonie, Wisconsin 54751
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AC HUMKO SPECIALTY INGREDIENTS/FORMER API
1115 TIFFANY STREET
BOYCEVILLE, WI

SHEET NO.

TABLE 1
Summary of Detected Compounds from the Soil and Groundwater Analytical Results
Allied Ingredients
Boyceville, Wisconsin

PARAMETERS	Guidance Concentration ¹	Sample Identification					
		BH-1 (4-8')	BH-2 (7-8')	BH-3 (0-4')	BH-4 (8-12')	BH-5 (4-8')	BH-6 (8-12')
SOIL:							
Volatile Organic Chemicals (ug/kg)							
1. Toluene	1,500	67	ND	ND	ND	ND	ND
2. Xylene	4100	135	ND	ND	ND	ND	ND
3. 1,2,4- Trimethylbenzene	NR	53	ND	324	ND	ND	289
4. Naphthalene	NR	ND	ND	358	ND	ND	ND
Gasoline Range Organics (mg/kg)	100	ND	ND	NA	ND	ND	NA
Diesel Range Organics (mg/kg)	100	53	1500	NA	ND	ND	NA
Polynuclear Aromatic Hydrocarbons (ug/kg)							
	NR	ND	ND	ND	ND	ND	ND
GROUNDWATER:							
Volatile Organic Chemicals (ug/L)							
1. Benzene	5	1.3	ND	ND	ND	ND	ND
2. Toluene	343	3.3	23	1.1	0.79	0.34	11
3. Ethylbenzene	700	0.45	0.80	ND	ND	ND	ND
4. Xylene	620	7.7	3.8	ND	ND	ND	ND
5. 1,2,4- Trimethylbenzene	NR	2.7	0.56	ND	ND	ND	ND
6. 1,3,5- Trimethylbenzene	NR	0.89	ND	ND	ND	ND	ND
7. Chloroform	6	ND	4.6	ND	ND	ND	ND
8. Chloromethane	3	ND	0.31	ND	0.35	0.37	1.0
9. Chlorobenzene	NR	ND	ND	ND	ND	ND	0.38
10. Chloroethane	400	ND	ND	ND	ND	ND	1.1
11. tert-Butylbenzene	NR	0.67	0.72	ND	ND	ND	11
Gasoline Range Organics (ug/L)	NR	57	830	NA	ND	ND	NA
Diesel Range Organics (mg/L)	NR	0.52	21	NA	0.23	0.22	NA
Polynuclear Aromatic Hydrocarbons (ug/L)							
1. 1-Methylnaphthalene	NR	0.70	ND	ND	ND	ND	ND
2. Naphthalene	40 ²	0.54	ND	ND	ND	ND	ND
¹ = Guidance Concentration reported is based on: N.R. 720 for soil and N.R. 140.10 for ground water ² = Guidance Concentration listed is a proposed concentration by the WDNR. NR = Not Reported ND = Not Detected at Laboratory Reporting Limits NA = Not Analyzed for							

SOIL SAMPLE PAH ANALYSIS
AC-HUMKO SPECIALTY INGREDIENTS
BOYCEVILLE, WI

(ALL LABORATORY RESULTS REPORTED IN PARTS-PER-MILLION)

Compound:	Suggested RCL's For PAH in Soils			SAMPLE:	MW-1-2	MW-2-1	MW-3-2	SE / NW	W / W	W / E	W / SW	S / SE	S / E	S / NE	NE / S	NE / E	N / NE	N / N	N / S	N / NW
	Ground Water	Direct Contact Pathway		Number:	312622	312623	312624	349709	349710	349711	349719	349718	349717	349716	349714	349715	349713	349706	349707	349708
	Pathway	Non-Indus.	Industrial	Date:	08/24/1998	08/24/1998	08/24/1998	05/11/1999	05/11/1999	05/11/1999	05/12/1999	05/12/1999	05/12/1999	05/12/1999	05/12/1999	05/12/1999	05/12/1999	05/11/1999	05/11/1999	05/11/1999
	(mg/kg)	(mg/kg)	(mg/kg)	Depth:	04' - 06'	02' - 04'	04' - 06'	8.0'	9.0'	9.0'	9.0'	11.0'	11.0'	11.0'	7.0'	7.0'	7.0'	7.0'	7.0'	7.0'
Acenaphthene	38	900	60,000		<260	<270	<420	<600	<61	<63	<55	<6.0	<58	<60	<61	<67	<63	<68	<60	<63
Acenaphthylene	0.7	18	360		<440	<450	<720	<1000	<100	<110	<94	<100	<99	<100	<100	<110	<110	<120	<100	<110
Anthracene	3,000	5,000	300,000		<26	<27	<42	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	<6.1	<6.7	<6.3	<6.8	<6.0	<6.3
Benzo (a) Anthracene	17	0.088	3.9		38	<27	240	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	40	<6.7	<6.3	7.1	9.0	<6.3
Benzo (b) Fluoranthene	360	0.088	3.9		29	<27	58	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	6.2	<6.7	<6.3	<6.8	<6.0	<6.3
Benzo (k) Fluoranthene	870	0.88	39		55	32	320	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	7.9	<6.7	<6.3	<6.8	<6.0	<6.3
Benzo (a) Pyrene	48	0.0088	0.39		<26	<27	320	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	13	<6.7	<6.3	13	16	<6.3
Benzo (ghi) Perylene	6,800	1.80	39		<26	<27	228	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	12	<6.7	<6.3	23	19	<6.3
Chrysene	37	8.8	390		<26	<27	114	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	12	<6.7	<6.3	7.9	<6.0	<6.3
Dibenzo (a,h) Anthracene	38	0.0088	0.39		<53	<53	<81	<120	<12	<13	<11	<12	<12	<12	<12	<13	<13	<14	<12	<13
Fluoranthene	500	600	40,000		74	<53	137	<120	<12	<13	<11	<12	<12	<12	133	<13	<13	19	<12	<13
Fluorene	100	600	40,000		<53	<53	<81	<120	<12	<13	<11	<12	<12	<12	<12	<13	<13	<14	<12	<13
Indeo (1,2,3-cd) Pyrene	680	0.088	3.9		<26	<27	194	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	7.3	<6.7	<6.3	14	13	<6.3
1-Methyl Naphthalene	23	1,100	70,000		<150	<160	<250	<360	<36	<38	<33	<36	<35	<36	<36	<40	<38	<41	<36	<38
2-Methyl Naphthalene	20	600	40,000		<130	<130	<210	<360	<30	<31	<28	<30	<29	<30	<30	<34	<31	<34	<30	<32
Napthalene	0.4	20	110		<150	<160	<250	<360	<36	<38	<33	<36	<35	<36	<36	<40	<38	<41	<36	<38
Phenanthrene	1.8	18	390		129	<27	67	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	145	<6.7	<6.3	8.2	<6.0	<6.3
Pyrene	8,700	500	30,000		108	<27	939	<60	<6.1	<6.3	<5.5	<6.0	<5.8	<6.0	100	<6.7	9.3	15	8.8	<6.3

PAH = Polynuclear Aromatic Hydrocarbons

RCL = Residual Contaminant Levels (suggested)

mg/kg = Milligrams per Kilogram (parts-per-million)

POST EXCAVATION
SOIL SAMPLE SCREENING / ANALYTICAL RESULTS
AC-HUMKO SPECIALITY INGREDIENTS
BOYCEVILLE, WI

PVOC ANALYTICAL COMPOUNDS													
Sample Location	Sample Depth	Date Sampled	Lab Number	PID (IU's)	GRO (ppm)	DRO (ppm)	BENZENE (ppb)	E. BENZENE (ppb)	MTBE (ppb)	TOLUENE (ppb)	1,2,4 TMB (ppb)	1,3,5 TMB (ppb)	XYLENES (ppb)
South Wall*	UK	04/24/1990	12197	NA	<7.5	109	<5	27.9	NA	20.7	NA	NA	161
East Wall*	UK	04/24/1990	12198	NA	<0.75	<0.50	<5	<5	NA	<5	NA	NA	<5
North Wall*	UK	04/24/1990	12199	NA	<7.5	2280	<5	928	NA	112.8	NA	NA	4238
West Wall*	UK	04/24/1990	12200	NA	<1.5	54	<5	<5	NA	<5	NA	NA	<5
Stockpile*	UK	04/24/1990	12201	NA	<15	350	<5	6.5	NA	8.7	NA	NA	36.8
MW-1-2	04' - 06'	08/24/1998	312622	2.1	NA	1050	<27	<27	55	<27	<27	<27	<81
MW-2-1	02' - 04'	08/24/1998	312623	? 61.4	<5.5	36	<27	<27	<27	<27	43	<27	<82
MW-3-2	04' - 06'	08/24/1998	312624	0	<5.7	799	<29	<29	<29	160	50	<29	110
NE / S	7.0'	05/12/1999	349714	0	NA	133	<30	<30	<30	<30	39	<30	<91
NE / E	7.0'	05/12/1999	349715	0	NA	7.3	<34	<34	<34	<34	<34	<34	<100
N / NE	7.0'	05/12/1999	349713	0	NA	188	<31	<31	<31	51	<31	<31	<94
N / N	7.0'	05/11/1999	349706	1.5	NA	52	<34	<34	<34	<34	<34	<34	<100
N / S	7.0'	05/11/1999	349707	0	NA	30	<30	<30	<30	<30	<30	<30	<90
N / NW	7.0'	05/11/1999	349708	0.7	NA	9.1	<32	<32	<32	<32	<32	<32	<95
SE / NW	8.0'	05/11/1999	349709	20.9	NA	131	<30	<30	<30	37	<30	<30	<89
W / W	9.0'	05/11/1999	349710	3.5	NA	<6.1	<30	<30	<30	<30	<30	<30	<91
W / E	9.0'	05/11/1999	349711	1.6	NA	<6.3	<31	<31	<31	<31	<31	<31	<94
W / SW	9.0'	05/12/1999	349719	0	NA	21	<28	<28	<28	<28	<28	<28	<83
S / SE	11.0'	05/12/1999	349718	4.1	NA	47	<30	<30	<30	<30	<30	<30	<90
S / E	11.0'	05/12/1999	349717	6.3	NA	560	<29	<29	<29	<29	<29	<29	<88
S / NE	11.0'	05/12/1999	349716	4.1	NA	51	<30	<30	<30	181	<30	<30	<90
SS#1	9'	11/16/1999	374436	NA	NA	7.6	<28	<28	<28	<28	<28	177	<83

*no x's
of 720's*

*no x's
of 720's*

*no x's
of 720's*

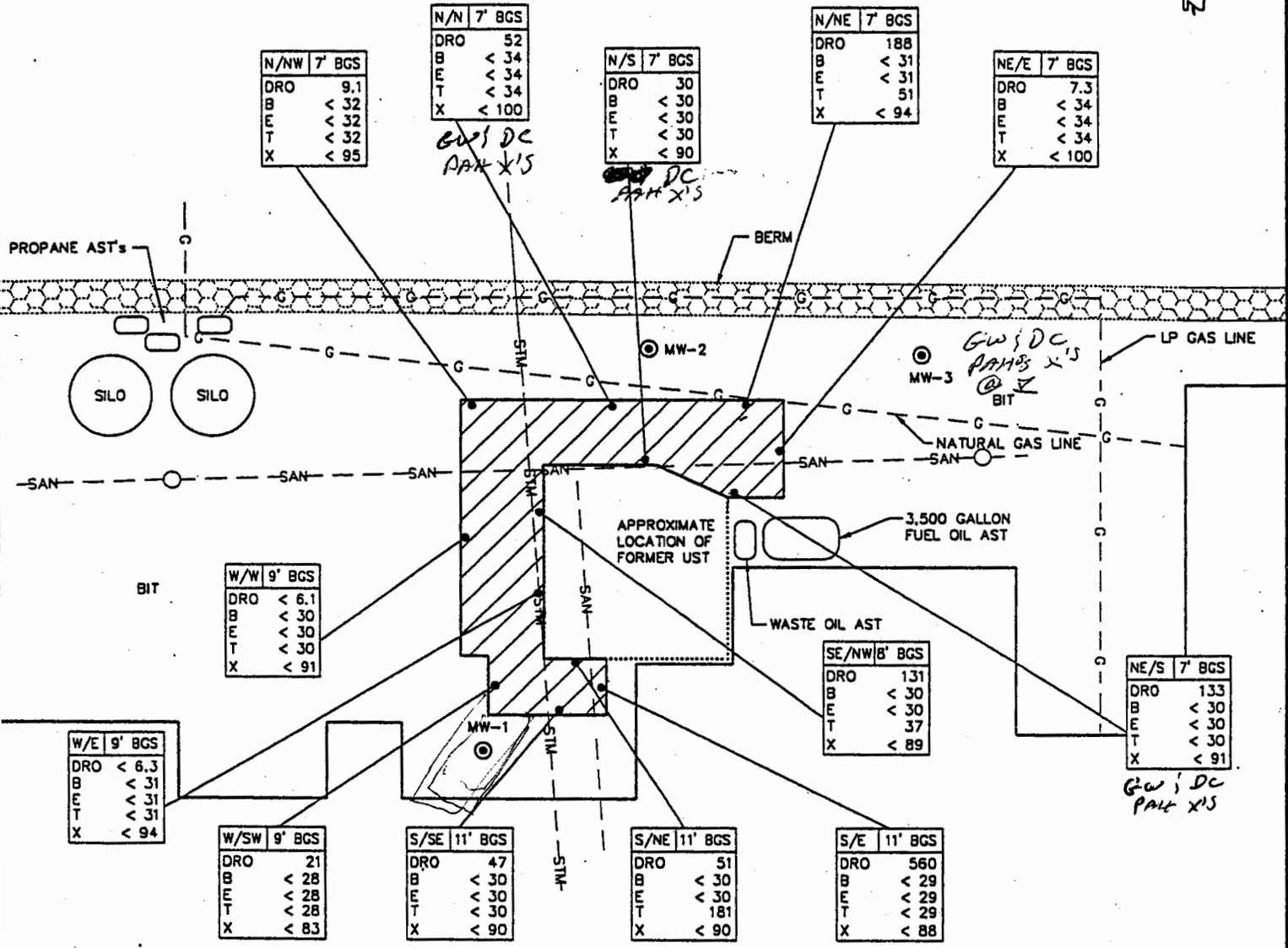
PID = PHOTO IONIZATION DETECTOR
GRO = GASOLINE RANGE ORGANICS
DRO = DIESEL RANGE ORGANICS
E-BENZENE = ETHYLBENZENE

MTBE = METHYL-T-BUTYL ETHER
TMB = TRIMETHYLBENZENE
UK = UNKNOWN
NA = NOT ANALYZED

PPM = PARTS PER MILLION
PPB = PARTS PER BILLION
* GRO & DRO ANALYZED USING TRPH METHOD

EXCAVATION, MAY 1999

TIFFANY CREEK

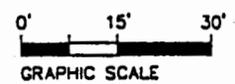


KEY

- = AREA OF EXCAVATION
- = SOIL SAMPLE LOCATION
- ⊙ = MONITORING WELL LOCATIONS
- - - = APPROXIMATE LOCATION u/g UTILITY

SAMPLE LOCATION	DEPTH BELOW GROUND SURFACE, FT.
DRO	= Diesel Range Organics
B	= Benzene
E	= Ethylbenzene
T	= Toluene
X	= Xylenes

* DRO Laboratory Results Reported in PPM
 All Other Laboratory Results Reported in PPB



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DRAWN BY MAP	PROJECT TITLE ALLIED PROCESSORS, INC. 1115 TIFFANY STREET BOYCEVILLE, WI	CHECKED BY RTB
DATE 2-11-99		JOB NO. 1797-006-80
FILE APLDWG		FIGURE
SCALE 1"=60'		

JOB NO.
1797-007

BOOK NO.

DRAWN BY
KAT

CHECKED BY
TAG

DATE
SEPT 1999

REVISIONS

REFERENCE FILE
A0079008.dwg

DRAWING FILE
APC4600A.dwg

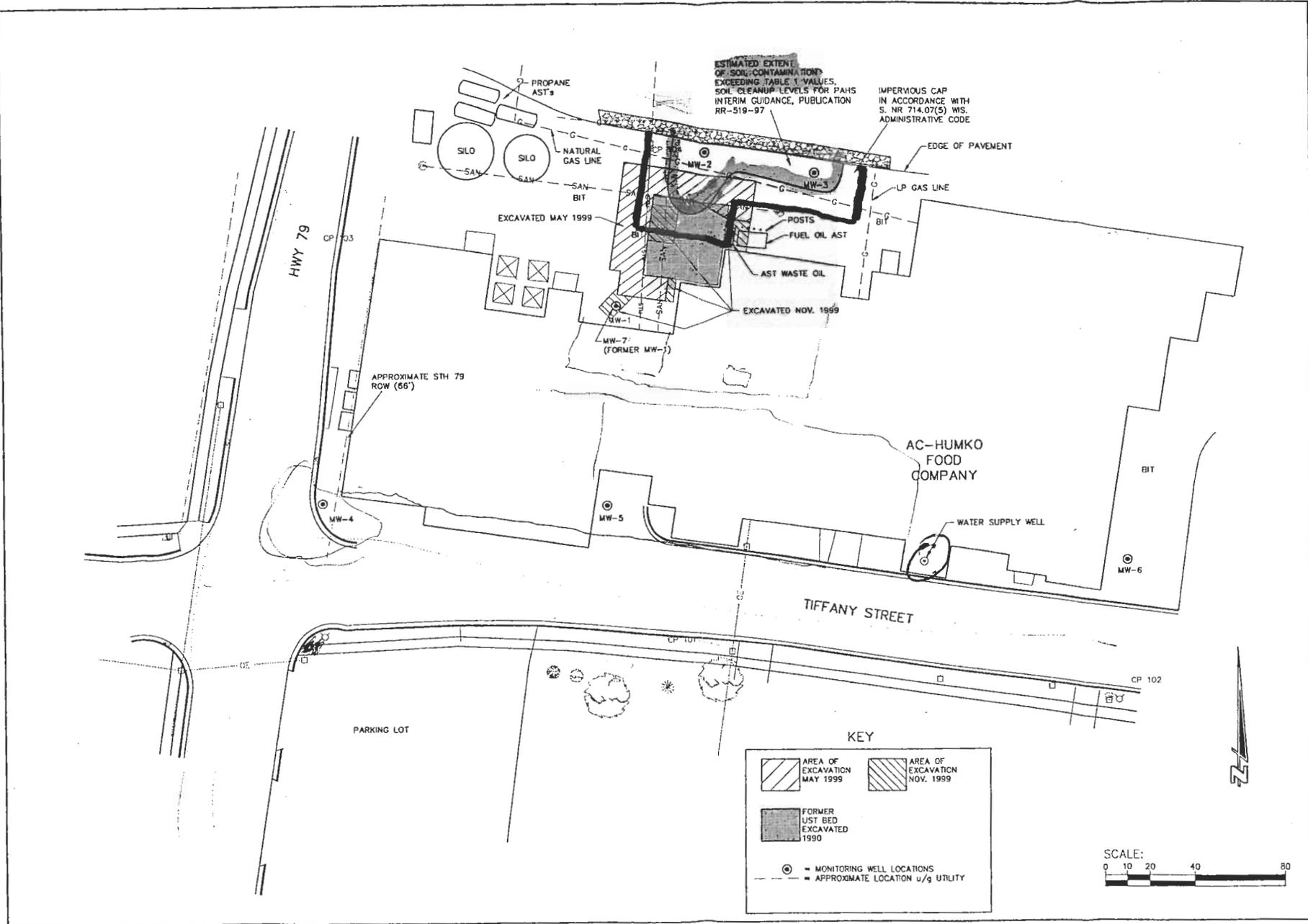
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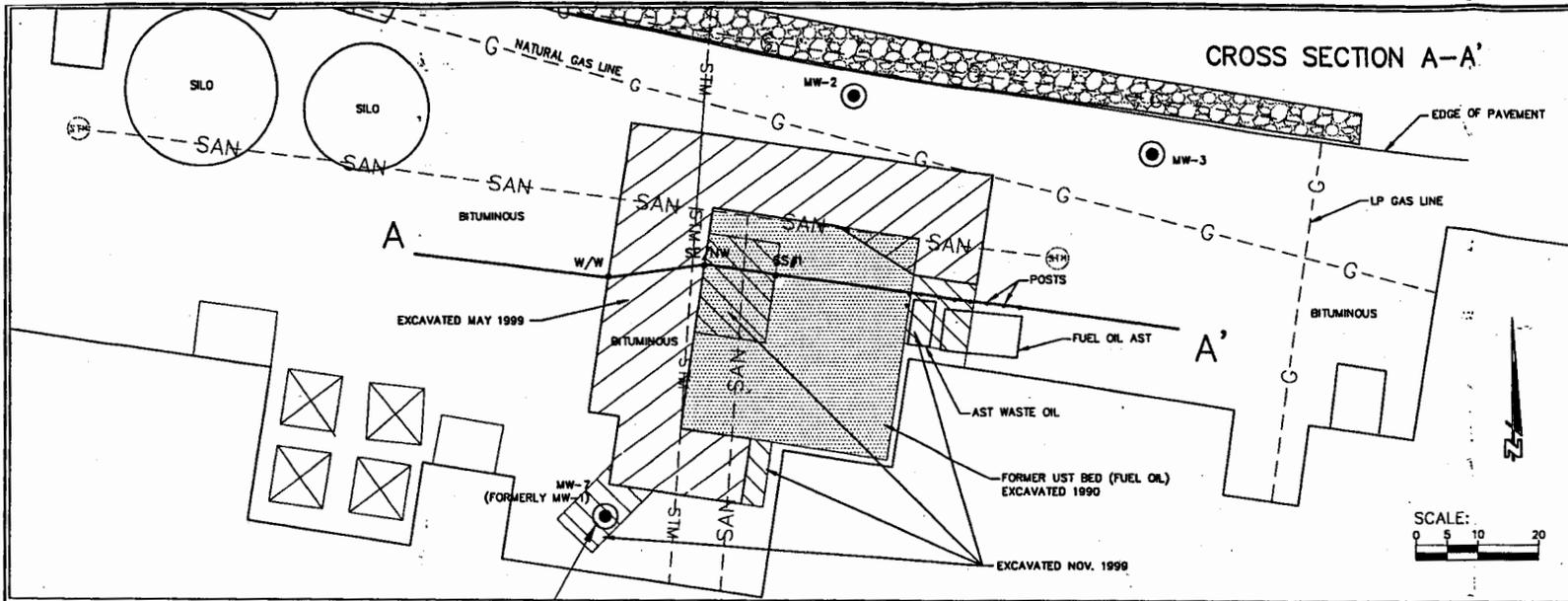
soils • geotechnical • asbestos • environmental geophysics
and remediation • foundation and utility • site work

Cedar
Corporation

AC HUMKO FOOD COMPANY/FORMER API
115 TIFFANY STREET
BOYCEVILLE, WI

SHEET NO.
EXHIBIT
A



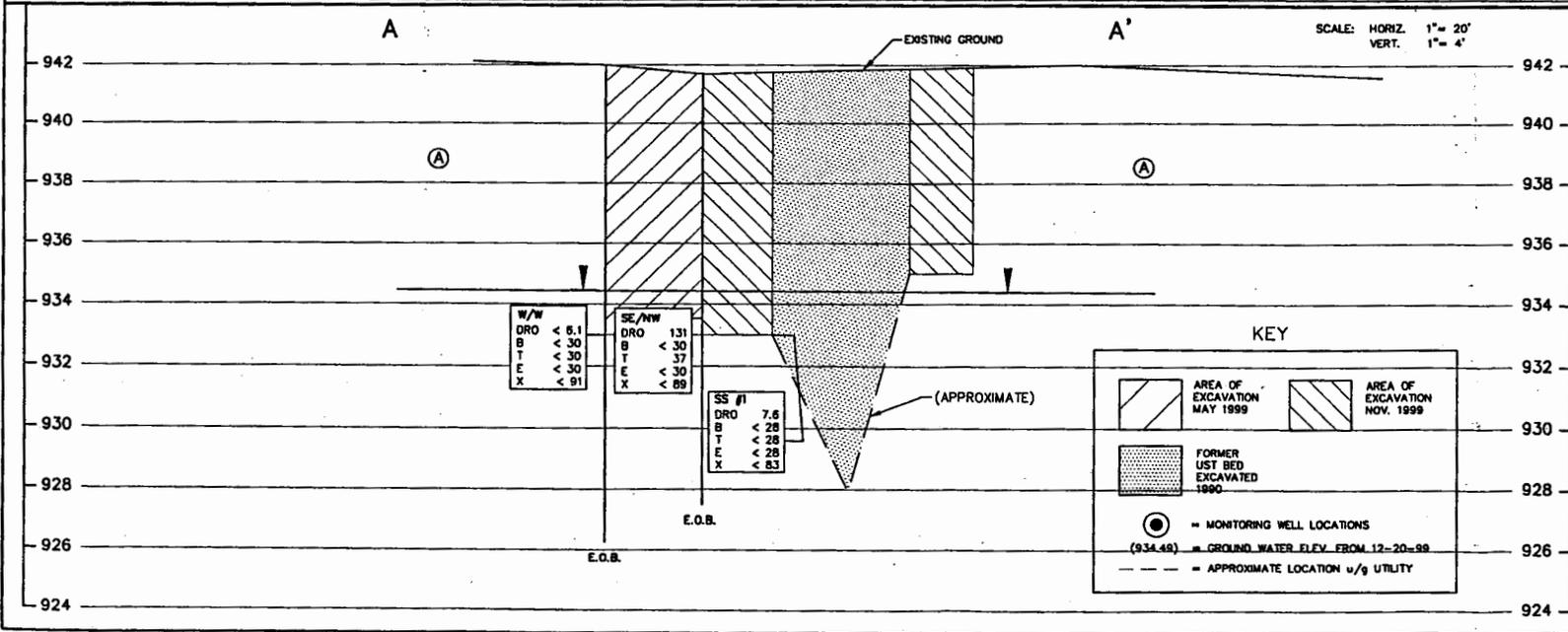
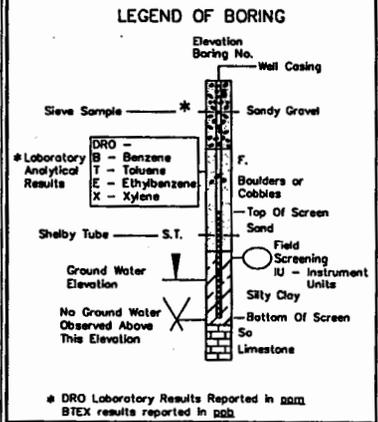


ABBREVIATIONS

F---Fine M---Medium C---Coarse
 Ws---Weathered So---Sound

MATERIAL SYMBOLS

Topsoil	Silt	Sandstone
Sand	Peat	Limestone
Gravel	Clay	Igneous Rock



GEOLOGIC LEGEND

(A) — SILTY SAND AND GRAVEL

GROUNDWATER ELEVATIONS BASED ON APRIL 6, 2000 DATA

Cedar Corporation
 604 Wilson Avenue, Marietta, Georgia 30067
 770-222-8081, 800-472-7272, FAX 770-222-7272, www.cedarcorp.com

AC-HUMKO SPECIALTY INGREDIENTS
 BOYCEVILLE, WI

CROSS SECTION A-A' FIGURE

Drawn By: KAT	Plans Checked: RTB
Code File: A007_AA.DWG	Job Number: 1787-007

DUNN COUNTY
REGISTER OF DEEDS
JAMES M. MRDUTT
RECORDED ON

03-22-2002 11:15 AM

REC FEE: 15.00
TRANS FEE:
FEE EXEMPT #: 3
PAGES: 3

Declaration of Restrictions

In RE: All that part of the Southwest Quarter of the Southwest Quarter of Section 25, Township 30 North, Range 14 West, lying south of the center of the center line of Tiffany Creek and west of Block Two of Adolph Peterson=s Second Addition to the Village of Boyceville, Dunn County, Wisconsin, EXCEPT from all of the above described premises two parcels, one described in Award of Damages by the State Highway Commission dated February 11, 1995, recorded February 15, 1995 in Vol. 156 of Deeds, page 454, and the other described in a Quit Claim Deed from Richard F. Gebhardt and wife Amelia to Dunn County, Wisconsin dated January 13, 1955, recorded January 21, 1955, in Vol. 156 of Deeds, page 437, Dunn County Registry. All of said lands being subject to existing highways and easements.

Recording Area

pd 15.00

Name and Return Address

ACH Food Companies Inc.
1115 Tiffany Street
Boyceville, WI 54725

STATE OF WISCONSIN)
) ss
COUNTY OF DUNN)

Parcel Identification Number (PIN) _____

WHEREAS, ACH Food Companies Inc., FKA AC Humko Corp., a Delaware Corporation, is the owner of the above-described property; and

WHEREAS, one or more petroleum discharges have occurred on this property, benzo (a) anthracene, benzo (b) fluoranthene, benzo (k) fluoranthene, benzo (a) pyrene, benzo (ghi) perylene, chrysene, indeo (1,2,3-cd) pyrene, phenanthrene, and pyrene contaminated soil remains on this property at the following location: North of the former fuel oil UST for approximately 30 feet to the earthen berm found adjacent to Tiffany Creek. The eastern extent is approximately 155 feet east of State Highway 79, the western extent is 230 feet east of State Highway 79; and

WHEREAS, it is the desire and intention of the property owner to impose on the property restrictions which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

NOW THEREFORE, the owner hereby declares that all of the property described above is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitation and restrictions:

The property described above may not be used or developed for a residential, commercial, agricultural, or other non-industrial use, unless (at the time that the non-industrial use is proposed) an investigation is conducted to determine the degree and extent of benzo (a) anthracene, benzo (b) fluoranthene, benzo (k) fluoranthene, benzo (a) pyrene, benzo (ghi) perylene, chrysene, indeo (1,2,3-cd) pyrene, phenanthrene, and pyrene contamination that remains on the property and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If contaminated soil that remains on the property is excavated in the future, it will have to be sampled and analyzed and the treatment or disposal of the soil as a solid or hazardous waste may be necessary.

The following activities are prohibited on that portion of the property described above where a cap or cover has been placed (Exhibit A), unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Excavating or grading of the land surface; (2) Filling on the capped area; (3) Plowing for agricultural cultivation; and (4) Construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. In addition, the cap or cover shall be maintained in compliance with a plan prepared and submitted to the Wisconsin Department of Natural Resources by a responsible party, as required by Section NR724.13(2), Wis. Adm. Code (1999).

This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase, or otherwise. This restriction inures to the benefit of and is enforceable by the Wisconsin Department of Natural Resources, its successors or assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that one or more of the restrictions set forth in this covenant is no longer required. Upon the receipt of such a request, the Wisconsin Department of Natural Resources shall determine whether or not the restrictions contained herein can be extinguished. If the Department determines that the restrictions can be extinguished, an affidavit, attached to a copy of the Department's written determination, may be recorded by the property owner or other interested party to give notice that this deed restriction, or portions of this deed restriction, are no longer binding.

IN WITNESS WHEREOF, the owner of the property has caused this instrument to be executed by Daryl W. Vrbas its CFO, and countersigned by Carmen Sciackitano secretary, this 31st day of January, 2002.

ACH FOOD COMPANIES, INC.

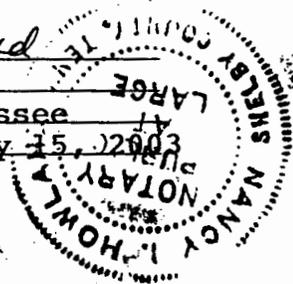
By: Daryl W. Vrbas
Chief Financial Officer

Attest: Carmen Sciackitano
Corporate Secretary

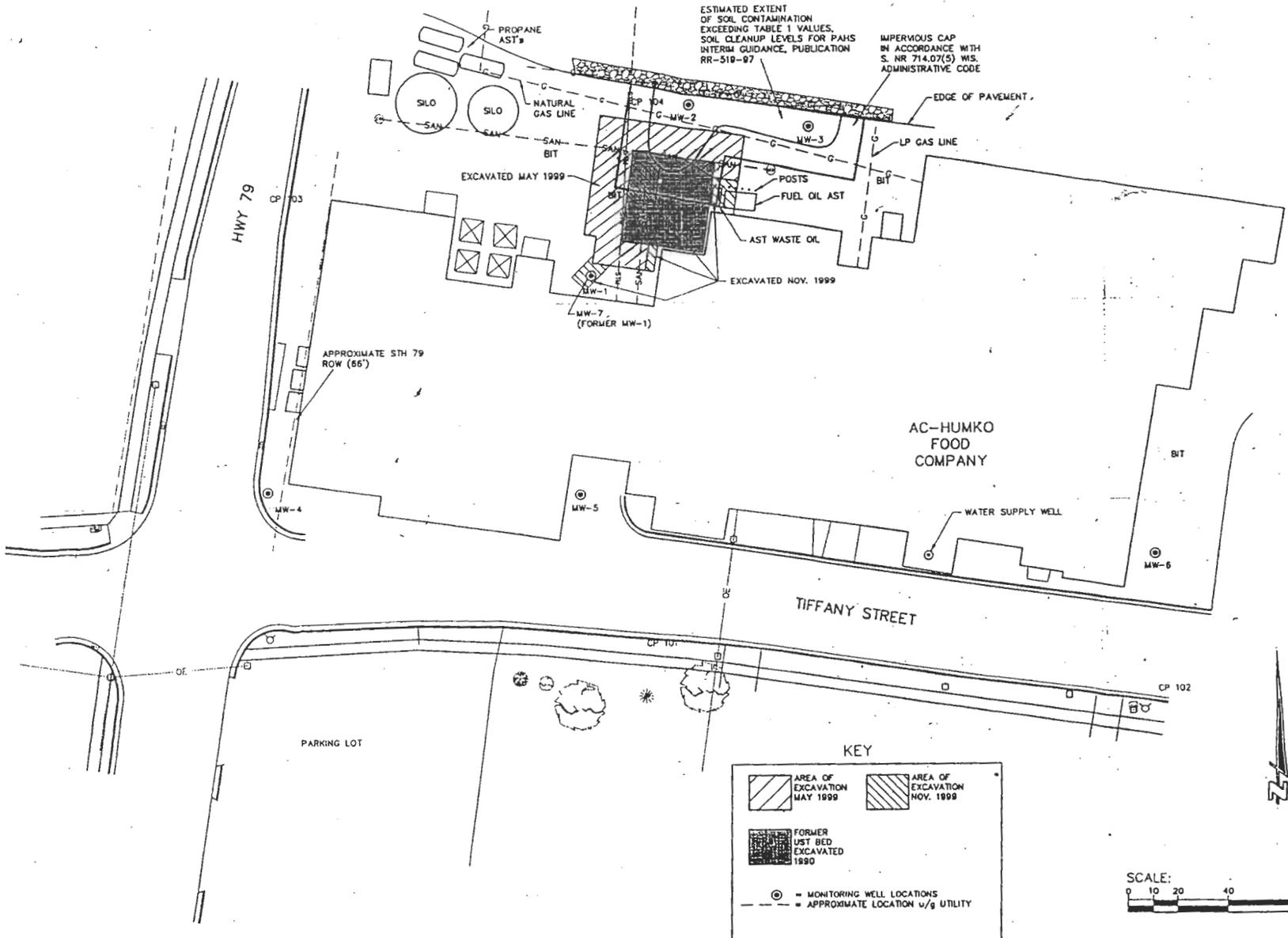
STATE OF Tennessee)
) SS
Shelby COUNTY)

Personally came before me this 31st day of January, 2002 the above named Daryl W. Vrbas and Carmen Sciackitano of the above named corporation to me known to be the persons who executed the foregoing instrument and acknowledged that they executed the foregoing instrument in such capacity under the authority of said corporation.

Nancy I. Howland
Nancy I. Howland
Notary Public, State of Tennessee
Commission Expires January 15, 2003



This instrument drafted by:
Cedar Corporation
Menomonie, WI 54751



KEY

	AREA OF EXCAVATION MAY 1999		AREA OF EXCAVATION NOV. 1999
	FORMER JUST BED EXCAVATED 1990		
	= MONITORING WELL LOCATIONS		
	= APPROXIMATE LOCATION w/g UTILITY		



JOB NO.	1797-007
BOOK NO.	
DRAWN BY	KAT
CHECKED BY	TAC
DATE	SEPT 1999
REVISIONS	
REFERENCE FILE	A007b-one.dwg
DRAWING FILE	APC4E00A.dwg

Cedar corporation

901 Miller Avenue
Muskegon, Michigan 49701

714-325-0091
800-377-7272
800-377-2327
FAX 714-325-2227

AC HUMKO FOOD COMPANY/FORMER API
115 TIFFANY STREET
BOYCEVILLE, WI

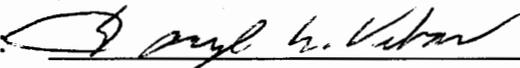
Sheet No.
EXHIBIT A

ACH FOOD COMPANIES, INC.
BOYCEVILLE, WI

Impervious Cap Maintenance Plan ("Plan")

ACH Food Companies Inc., 1115 Tiffany Street, Boyceville, Wisconsin, agrees to maintain the portion of the impervious asphalt cap overlying soil contamination at 1115 Tiffany Street, Boyceville, Wisconsin ("Property") for as long as it owns the Property. The responsibility contained in this Plan shall transfer to subsequent owners along with sale of the Property. The extent of the surface to be maintained is in the area adjacent to the former UST system as identified in Exhibit A. The maintenance plan includes an annual inspection of the impervious cap by owner. Cracks and/or damaged areas of the cap will be repaired or replaced by owner or a subcontracted asphalt/concrete maintenance company. The annual inspection and maintenance will be performed in the spring of the year. Additional maintenance and damage repair will be performed as the need arises. A record of all maintenance activities will be kept by owner or its successors.

For ACH Food Companies, Inc.

By: 

Chief Financial Officer

January 31, 2002
Date