

Source Property Information

BRRTS #:

ACTIVITY NAME:

PROPERTY ADDRESS:

MUNICIPALITY:

PARCEL ID #:

CLOSURE DATE:

FID #:

DATCP #:

PECFA#:

***WTM COORDINATES:**

X: Y:

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

WTM COORDINATES REPRESENT:

- Approximate Center Of Contaminant Source
 Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

CONTINUING OBLIGATIONS

Contaminated Media for Residual Contamination:

- | | |
|--|--|
| <input checked="" type="checkbox"/> <u>Groundwater</u> Contamination > ES (236) | <input checked="" type="checkbox"/> <u>Soil</u> Contamination > *RCL or **SSRCL (232) |
| <input type="checkbox"/> Contamination in ROW | <input type="checkbox"/> Contamination in ROW |
| <input type="checkbox"/> Off-Source Contamination | <input type="checkbox"/> Off-Source Contamination |
| <i>(note: for list of off-source properties
see "Impacted Off-Source Property Information,
Form 4400-246")</i> | <i>(note: for list of off-source properties
see "Impacted Off-Source Property Information,
Form 4400-246")</i> |

Site Specific Obligations:

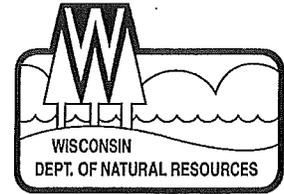
- | | |
|--|---|
| <input type="checkbox"/> Soil: maintain industrial zoning (220)
<i>(note: soil contamination concentrations
between non-industrial and industrial levels)</i> | <input type="checkbox"/> Cover or Barrier (222) |
| <input checked="" type="checkbox"/> Structural Impediment (224) | <input type="checkbox"/> Direct Contact |
| <input type="checkbox"/> Site Specific Condition (228) | <input type="checkbox"/> Soil to GW Pathway |
| | <input type="checkbox"/> Vapor Mitigation (226) |
| | <input type="checkbox"/> Maintain Liability Exemption (230)
<i>(note: local government unit or economic
development corporation was directed to
take a response action)</i> |

Monitoring Wells:

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

- Yes No N/A

* Residual Contaminant Level
**Site Specific Residual Contaminant Level



June 12, 2013

Travel Centers of America LLC
Attn: Kelly Gelske
24601 Center Ridge Rd
Westlake, OH 44145-5634

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Twin City East Travel Center
713 USH 12, Hudson, WI
WDNR BRRTS Activity # 03-56-557225
WDNR FID #656056500

Dear Kelly Gelske:

The Department of Natural Resources (DNR) considers Twin City East Travel Center 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 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 West Central Region Closure Committee reviewed the request for closure on June 6, 2013. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases.

This operating auto and truck fueling facility has a long history of commercial use. Through the years, petroleum has been used on the property and some has made their way into the soil and groundwater on the site. No remedial action was taken except limited soil removal and disposal during the line upgrade. The conditions of closure and continuing obligations required were based on the property being used for commercial purposes.

Continuing Obligations

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

- Groundwater contamination is present above ch. NR 140, Wis. Adm. Code enforcement standards.
- 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.

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 Baldwin Service Center office, at 890 Spruce Street, Baldwin, WI. This letter and information that was submitted with your closure request application 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 the current property owner and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter are met. 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 Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

Groundwater contamination greater than enforcement standards is present on this contaminated property as shown on the **attached map, Figure 7**. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

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

Soil contamination remains as indicated on the **attached map, Figure 6**. 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 concrete slab and canopy as shown on the **attached map, Figure 7**, 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.

General Wastewater Permits for Construction Related Dewatering Activities

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

If you or any other person plan to conduct such activities, you or that person must contact that program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids and oil and grease, a general permit for Pit/Trench Dewatering may be needed.

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

Please send written notifications in accordance with the above requirements to Baldwin Service Center, 890 Spruce Street, Baldwin WI. 54002, to the attention of Patrick Collins.

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 Patrick Collins at 715-684-2914 ext.117.

Sincerely,



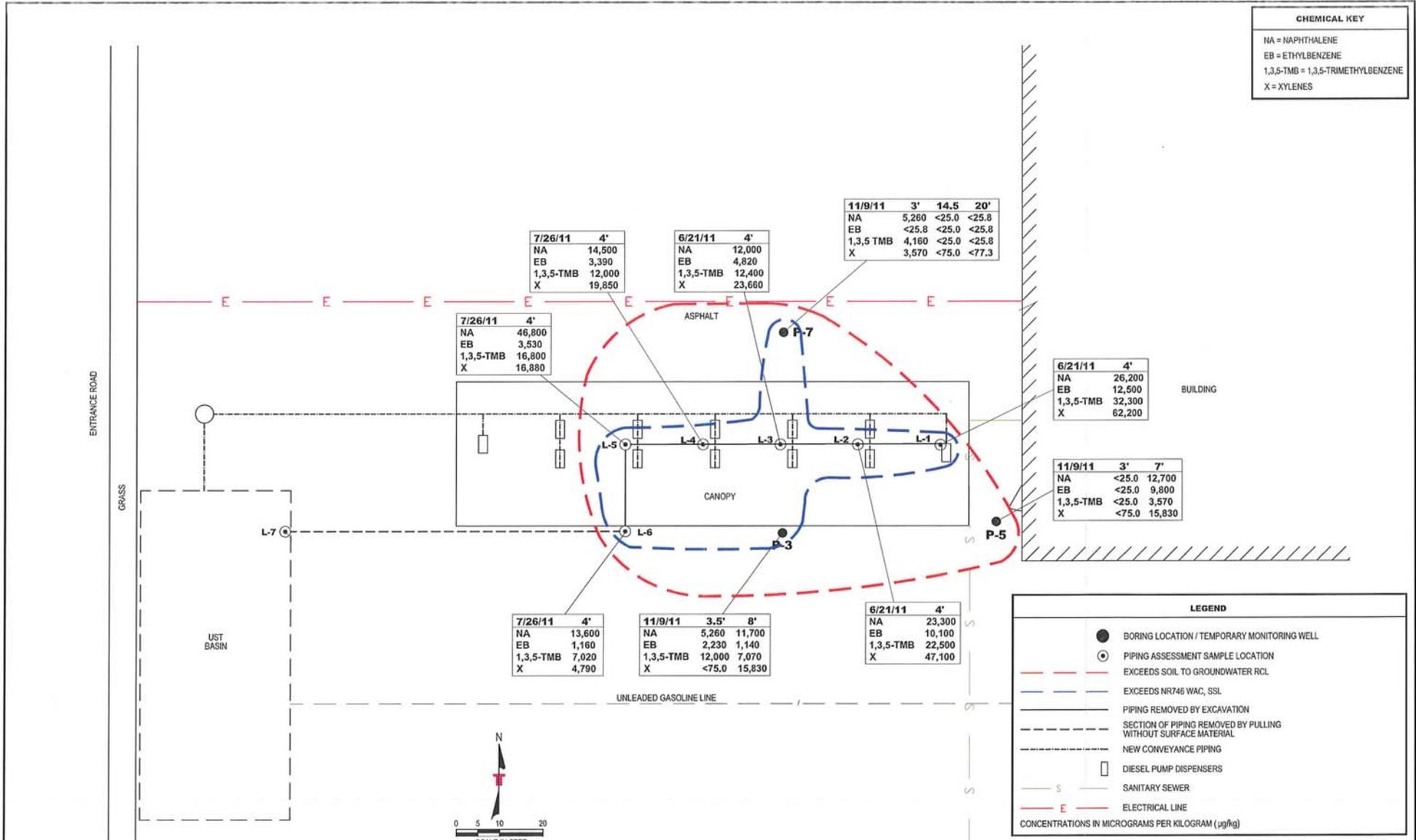
William Evans, Team Supervisor
West Central Region Remediation & Redevelopment Program

Attachments:

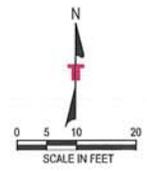
- Fig. 7 remaining groundwater contamination map
- Fig. 6 remaining soil contamination map
- Fig. 7 structural impediments location map
- RR 819

cc: Scott Hodgson, Terracon Consultants, 9856 South 57th St. Franklin, WI 53132
FILE

CHEMICAL KEY	
NA	= NAPHTHALENE
EB	= ETHYLBENZENE
1,3,5-TMB	= 1,3,5-TRIMETHYLBENZENE
X	= XYLENES



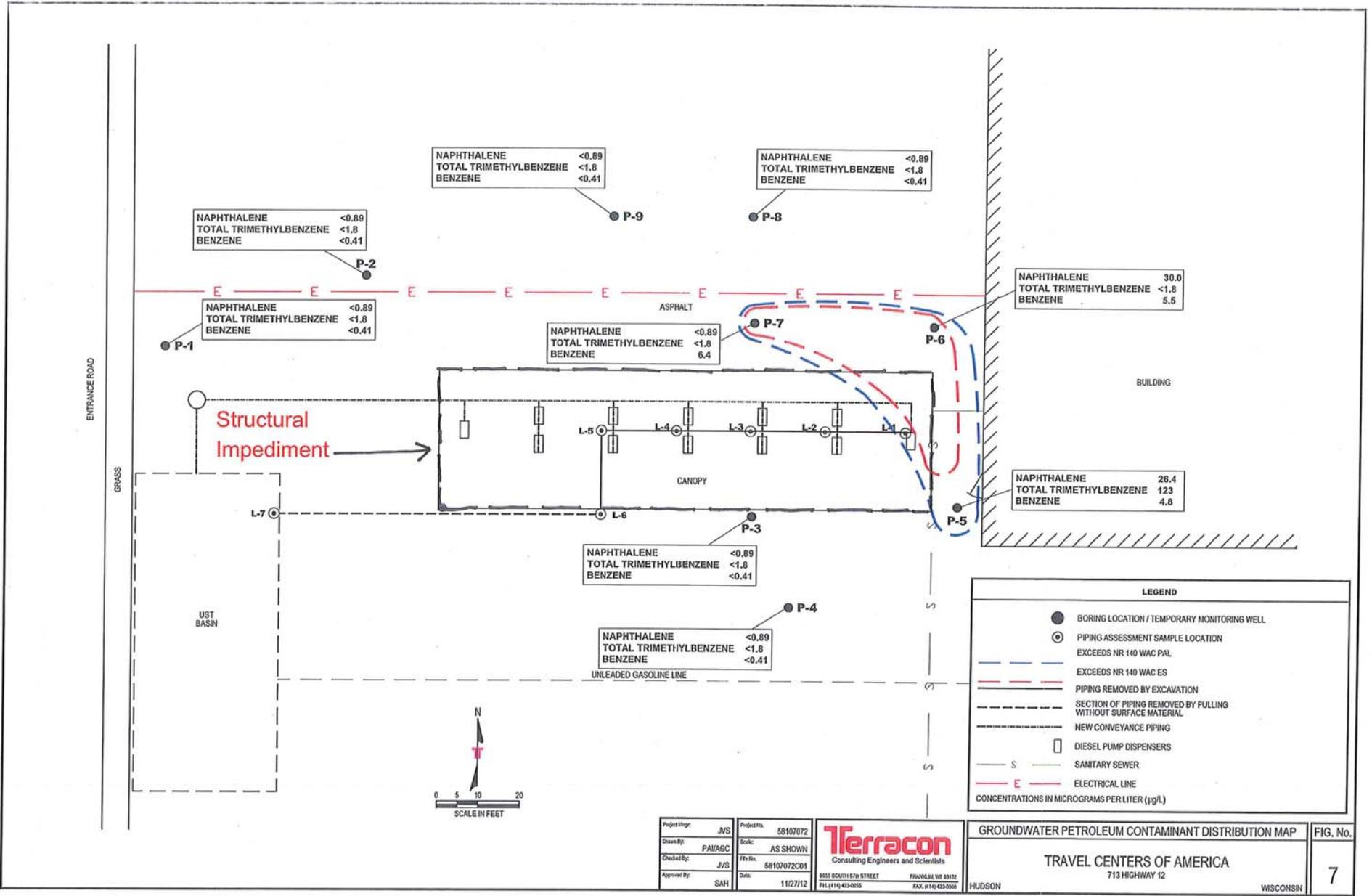
LEGEND	
	BORING LOCATION / TEMPORARY MONITORING WELL
	PIPING ASSESSMENT SAMPLE LOCATION
	EXCEEDS SOIL TO GROUNDWATER RCL
	EXCEEDS NR746 WAC, SSL
	PIPING REMOVED BY EXCAVATION
	SECTION OF PIPING REMOVED BY PULLING WITHOUT SURFACE MATERIAL
	NEW CONVEYANCE PIPING
	DIESEL PUMP DISPENSERS
	SANITARY SEWER
	ELECTRICAL LINE
CONCENTRATIONS IN MICROGRAMS PER KILOGRAM (µg/kg)	



Project Mgr: JVS Drawn By: PAM/AGC Checked By: JVS Approved By: SAH	Project No. 58107072 Scale: AS SHOWN File No. 58107072C01 Date: 11/27/12	 Consulting Engineers and Scientists 8956 SOUTH 57th STREET FRANKLIN, WI 53122 PH. (414) 423-0255 FAX. (414) 423-0266	RESIDUAL SOIL CONTAMINATION MAP TRAVEL CENTERS OF AMERICA 713 HIGHWAY 12 HUDSON WISCONSIN	FIG. No. 6
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11/27/12 10:00 AM 11/27/12 10:00 AM 11/27/12 10:00 AM 11/27/12 10:00 AM 11/27/12 10:00 AM

HW 8251 11/27/12 11:27:23 AM
 G:\projects\58107072\Drawings\58107072CD1.dwg
 11/27/12 11:27:23 AM



Project No:	JVS	Project No:	58107072
Drawn By:	PAI/AGC	Scale:	AS SHOWN
Checked By:	JVS	File No.:	58107072CD1
Approved By:	SAH	Date:	11/27/12

Terracon
 Consulting Engineers and Scientists
 3809 SOUTH 510 STREET FRENCH CREEK, WI 53122
 PH: (414) 423-0955 FAX: (414) 423-0960

GROUNDWATER PETROLEUM CONTAMINANT DISTRIBUTION MAP
 TRAVEL CENTERS OF AMERICA
 713 HIGHWAY 12
 HUDSON WISCONSIN

FIG. No. 7

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. 03-56-557225	Parcel ID No. 020107550		
BRRTS Activity (Site) Name Twin City East Travel Center	WTM Coordinates		
	X 308713	Y 502598	
Street Address 713 US Highway 12	City Hudson	State WI	ZIP Code 54016
Responsible Party (RP) Name Kelly Gelske			
Company Name TravelCenters of America			
Street Address 24601 Center Ridge Road	City Westlake	State OH	ZIP Code 44145
Phone Number (440) 808-7406	Email KGelske@ta-petro.com		

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

Environmental Consultant Name Scott Hodgson			
Consulting Firm Terracon Consultants			
Street Address 9856 South 57th St	City Franklin	State WI	ZIP Code 53132
Phone Number (414) 423-0255	Email sahodgson@terracon.com		
Acres Ready For Use 14.91 acres	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 \$ \$1,200.00

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 TravelCenters of American Hudson/Twin City East Travel Center (TA Hudson) facility is located at 713 Highway 12, Hudson, St. Croix County, Wisconsin (Site), in the southwest ¼ of the southwest ¼ of Section 27, Township 29 North, Range 19 West.

The TA Hudson facility lies at the northeast corner of the intersection of U.S. Highway 12 and Interstate Highway 94 (I-94). The site lies approximately 4 miles east of the St. Croix River. To the west of Highway 12 is an open field followed by a restaurant. South across I-94 is an open field. A small stream borders the site on the east followed by storage units associated with Hudson Storage and to the southeast (adjoining Hudson Storage) is Waterstone Mortgage Corporation. The site is bordered on the north by Brakke Drive followed by a liquor store (Knotty Vines).

The majority of the site is paved with asphalt except for the southern and eastern portions of the property which are covered with grass. The site lies at an elevation of approximately 940 feet above mean sea level.

- B. **Prior and current site usage:** Specifically describe the current and historic occupancy and types of use. The site was operated as a truck stop since at least the early 1990's. TravelCenters (TA Operating LLC) bought the property in the early 2000s and continued to operate it as an auto and truck stop with a convenience store. Diesel fuel is dispensed from seven service island covered by a canopy on the west side of the site. The site is currently owned by HPT TA Properties Trust who aquired the site in January 2007 from TA Operating LLC. The project contact is Ms. Kelly Gelske, TravelCenters of America, Westlake, Ohio.
- C. Describe how and when site contamination was discovered. The diesel tank system piping and dispensers were upgraded during summer 2011. In order to continue dispensing operations the old piping runs were removed during two phases of the project (June and July 2011). On June 2 and July 26, 2011, Terracon performed a tank/pipe system site assessment (TSSA) during the closure/removal and upgrade of the diesel piping and selected dispensers at the subject site. Prior to the piping removal, the product in the piping was gravity drained back to the underground storage tanks (USTs).

Visual, olfactory, and field screening evidence indicated that a release had occurred from the conveyance piping. To confirm that the native soil at the site had been impacted, seven soil samples were collected for laboratory analysis of petroleum volatile organic compounds plus naphthalene (PVOC+N) and diesel range organics (DRO) as recommended in the Assessment and Reporting of Suspected and Obvious Releases from Underground and Aboveground Storage Tank Systems guidance updated September 2010. Terracon collected the native soil samples from approximately one foot below the conveyance piping at approximately 4 feet bgs.

Initially the samples were screened in the field using a photoionization detector (PID). The PID was calibrated using isobutylene and results were reported in parts per million (ppm) isobutylene equivalents. The soil samples selected for laboratory analysis were placed in laboratory supplied containers, placed in an ice chest to cool to approximately 4 degrees Celsius (4°C), and transferred under chain-of-custody protocol to a Wisconsin-certified laboratory for analysis.

Analytical data for the soil samples collected during the removal of the diesel conveyance piping at the site indicated that a release had occurred. Because a release of diesel was confirmed via visual and olfactory evidence, PID screening and laboratory analysis, the WDNR was notified on June 10, 2011 that a release had occurred at the site.

- D. Describe the type(s) and source(s) or suspected source(s) of contamination.
The diesel tank system piping and dispensers
- 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.
03-56-557225 Twin City East-Travel Center (LUST-open); 03-56-115552 Twin City East (LUST-closed); 02-56-559783 Twin City East Hudson (ERP-open)

- 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.

Not applicable. There are no other BRRTS activity/sites immediately adjacent to this site. The contamination related to this case does not extend off site.

- H. **Current zoning** (e.g. industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).

Based on the Town of Hudson zoning map, the site is zoned commercial.

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.

In general, the stratigraphy encountered at the site consists of orangish-brown sand and/or clayey/silty sand beneath approximately three (3) to eight (8) inches of asphalt. Thin, laterally discontinuous layers of clay, sandy clay, and silt were present from approximately three (3) to seven (7) feet below ground surface (bgs) in several borings. Sandy clay was observed at a depth of approximately 18 feet bgs to the boring terminus in the western and northern part of the study area. According to the previous site investigation (BRRTS #03-56-115552), fractured dolomite (Ordovician Sinnipee Group) is present at approximately 75 feet bgs.

- ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.

Not applicable. Fill and/or waste deposits are not known to exist at the site.

- iii. Depth to bedrock, bedrock type, and whether or not it was encountered during the investigation.

According to the previous site investigation, fractured dolomite (Ordovician Sinnipee Group) is present at approximately 75 feet bgs. However, the borings advanced during the 2011 site investigation did not extend to the bedrock.

- 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 majority of the site is paved with asphalt except for the southern and eastern portions of the property which are covered with grass. A convenience store building is centrally located at the site, with a fueling canopies to the south and west. A water treatment building is located within the grass area south of the asphalt pavement.

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.

Based on the Site Investigation (NR 716 Site Investigation Report prepared by Terracon and dated December 4, 2012) the depth to groundwater appears to be approximately 15 to 16 feet below ground surface (bgs), although water levels were not actually measured. This depth is consistent with the measured depth to water reported in the previous site investigation. The water table lies within the predominant sand unit.

- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.

The apparent groundwater levels identified in each of the temporary groundwater monitoring wells was approximately 15 to 16 feet bgs. Based on a review of the WDNR online GIS packet related to the closed LUST case (BRRTS activity number: 03-56-11552) the groundwater levels were measured in April 2002, and ranged from approximately 13.84 feet bgs to 19.03 feet bgs, for an average of 16.3 feet bgs across the site. The groundwater flow at the water table was reported to be to the west-northwest and north-northwest. The water level in the deep monitoring wells, completed in fractured bedrock during the previous investigation, ranged from approximately 95 to 100 feet bgs, with apparent general flow to the southwest.

- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.

The information was not obtained directly for this investigation since no NR 141 monitoring wells were constructed. Based on a review of the above mentioned GIS packet, the general shallow groundwater flow at the site appears to be to the north-northwest with a hydraulic gradient of approximately 0.02 feet per foot (ft/ft). Groundwater at the deep potentiometric surface (approximately 100 feet bgs) in dolomite with apparent flow to the southwest. The bedrock appears to be fairly competent in the screened areas since the wells can easily be drawn down and go dry during purging.

- iv. Identify and describe locations/distance of potable and/or municipal Wells within 1200 feet of the site.

A potable well is located approximately 850 feet west of the site and services 707 Rodeo Circle, Hudson, Wisconsin which includes various retail/commercial business and vacant units.

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.

A Tank/Piping System Site Assessment (TSSA) report dated December 14, 2011 was prepared by Terracon. The piping runs were removed during two phases of the project in order to continue dispensing operations. On June 2 and July 26, 2011, Terracon performed the TSSA during the closure/removal and upgrade of the diesel piping and selected dispensers at the subject site. Prior to the piping removal, the product in the piping was gravity drained back to the underground storage tanks (USTs).

Analytical data for the soil samples collected during the removal of the diesel conveyance piping at the site indicated that a release has occurred. Because a release of diesel was confirmed via visual and olfactory evidence, PID screening and laboratory analysis, the Wisconsin Department of Natural Resources (WDNR) was notified on June 13, 2011 that a release had occurred at the site. In response to the notification, the WDNR opened a new case (BRRTS #03-56-557225) issued a letter to the “Responsible Party” describing the actions required to investigate and remediate the site to the extent practicable.

The site investigation was performed in November 2011, which included advancing nine direct-push soil borings and collecting soil samples. Two to three soil samples from each boring were submitted for analysis of petroleum volatile organic compounds (PVOC) plus naphthalene. Upon completion of soil sampling, each boring was converted into a temporary monitoring well by inserting small diameter polyvinyl chloride (PVC) screen and riser into the boring. After purging until the water was clear, groundwater samples were collected for analysis of volatile organic compounds (VOC). Upon completion of the groundwater sampling the borings were abandoned in general conformance with NR141.

- 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.
Off-site soil and groundwater has not been impacted by the petroleum release at the site.
- 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 diesel fueling islands and canopy on the west side of the site were structural impediments to the investigation. As such, the investigation was limited and not considered to be complete beneath the diesel canopy.

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 remaining soil with soil concentrations exceeding the soil to groundwater pathway RCLs is located in an area approximately 120 feet (east to west) by 60 feet (north to south) under and near the eastern 3/4 of the diesel fuel canopy. The remaining soil contamination at the site exceeding the non-industrial direct contact RCL within the upper 4 feet of the soil column is located under the former piping runs at sample locations L-1 through L-6 and at boring locations P-3 and P-7. This contamination is related to the dispenser/conveyance piping source beneath the diesel fuel canopy.

- ii. Describe the level and types of **soil contaminants** found in the upper four feet of the soil column.
In general, four or more petroleum (diesel fuel) related constituents, including ethylbenzene, naphthalene, 1,2,4-trimethylbenzene (1,2,3-TMB), 1,3,5-trimethylbenzene (1,3,5-TMB), and xylenes were present above their respective soil to groundwater RCL in two soil samples from the soil borings, (P-3 (3.5') and P-7 (3')).

Naphthalene was detected above its non-industrial direct contact RCL within 4 feet of the ground surface in soil sample P-3 (3.5') and P-7 (3') at concentrations of 41,000 ug/kg and 5,260 ug/kg, respectively. Naphthalene was also present above its non-industrial direct contact RCL within 4 feet of the ground surface in samples L-1 through L-6, taken from beneath the former piping runs, at concentrations ranging from 12,000 ug/kg to 46,000 ug/kg. Ethylbenzene was also present above its non-industrial direct contact RCL within 4 feet of the ground surface in samples L-1 and L-2 at concentrations of 12,500 ug/kg and 10,100 ug/kg, respectively.

- 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.

For the detected compounds of concern, residual contaminant levels (RCLs) were obtained from the WDNR RR program RCL spreadsheet (May 2012). The spreadsheet presents RCLs for non-industrial direct contact, industrial direct contact, and soil to groundwater pathway, calculated from the new United States Environmental Protection Agency (USEPA) Soil Screening Level website as outlined in WDNR draft guidance document RR-890 (May 2012). In this case the non-industrial direct contact, as well as the soil to groundwater pathway RCLs, are applicable. Non-industrial land use was used.

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.

Based on results of Terracon's site investigation activities, as documented in Terracon's NR 716 Site Investigation Report (December 2012), the area of VOC (benzene and naphthalene) impacted groundwater exceeding the NR 140 WAC ES and PAL, is limited to the site. The area of groundwater contamination is adjacent to southwest corner of the store and eastern end of the diesel fuel canopy. Terracon estimates that the area of groundwater contamination exceeding NR 140 WAC PAL encompasses an area of approximately 1,250 square feet around temporary wells P-5, P-6, and P-7, while the contamination exceeding the NR 140 WAC ES is contained within the area defined as being above the NR 140 PAL, and is approximately 800 square feet in size encompassing temporary wells P-6 and P-7. The building is slab-on-grade and so the water table lies more than 10 feet below the frost wall. There are no water supply wells within or near the petroleum-related groundwater plume.

- ii. Describe the presence of free product at the site, including the thickness, depth, and locations.
Free product was not encountered outside the diesel dispenser canopy area during the investigation. However, limited product was noted during the removal of the old dispenser lines.

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.

Indoor air samples were not collected during this investigation. The nearest contaminated boring to the building is P-5 in which soil contamination is present starting at approximately 7 feet bgs. Since the building is a slab-on-grade structure, there is more than 5 feet of clean, sandy soil between the contaminated soil and the building foundation. Based on criteria for petroleum sites presented in the WDNR guidance document entitled Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin, dated December 2010, vapor intrusion is likely not an issue and further testing is not required since there is more than 5 feet of clean sandy soil between the contaminated soil and building.

- 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. Vapor intrusion is not anticipated to be a high risk at this site based on the screening criteria noted above.

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.

A small stream/drainage is present near the eastern site boundary. However, since this water body is several hundred feet upgradient of the source, it was not assessed.

- 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. There were no surface water bodies assessed during the investigation.

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.

On December 18, 1996, a leaking underground storage tank (LUST) case file (BRRTS activity number 03-56-115552) was opened at the site due to reported petroleum contamination observed during previous tank system upgrade activities at the site. Following site investigation activities, the site was subsequently closed in April 2003 with GIS registry for residual soil and groundwater contamination in the area of the diesel fuel islands west of the building with no apparent remedial actions taken.

During the most recent tank/piping system upgrades in 2011, contaminated soil excavated to remove conveyance piping/dispensers and install new piping/dispensers was temporarily stockpiled onsite, covered with plastic, and subsequently disposed. Approximately 121.62 tons of contaminated soil was disposed at the Vonco II, LLC solid waste facility near Becker, Minnesota. Also, during the system upgrade approximately 844 gallons of contaminated water removed from excavations was disposed by Midamerica Technical and Environmental Services. These activities were documented in Terracon's System Site Assessment (TSSA) report dated December 14, 2011

No other remedial activities were performed related to this LUST case (BRRTS activity number 03-56-557225).

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.
Not applicable. Immediate and/or interim actions were not taken at the site under ch NR 708 Wis. Adm. Code.
- 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.
Not applicable. There were no active remedial actions, such as construction of a remediation system, performed at the site.
- 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.
The residual contamination will remain within the site boundaries as described in sections B and C. The residual contamination will remain in an area near and under the diesel fuel canopy in the western part of the site near the southwest corner of the building.
- 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.
Concentrations of naphthalene above the NR 720 direct contact RCL exists at six sampled locations (L-1 through L-6) under the fueling islands/canopy on the west side of the site building at a depth of approximately 4 feet. Concentrations of naphthalene above the NR 720 direct contact RCL also exists in samples from two borings (P-3 [3.5] and P-7 [3]). Concentrations of ethylbenzene above the NR 720 direct contact RCL exist at two locations in the vicinity of the fueling islands/canopy on the west side of the site building (L-1 (4') and L-2 (4')).
- F. Describe the remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway.
Concentrations of naphthalene exceeding the soil to groundwater pathway RCL were identified in two soil samples from the soil borings (P-5 (7') and P-3 (8')). Concentrations of ethylbenzene exceeding the soil to groundwater pathway RCL was identified in one soil sample (P-5 (7')). These sample locations are located in the vicinity of the fueling islands/canopy to the west of the site building. Samples L-1 through L-6, collected during the tank/piping assessment, also had one or more PVOOC constituents above the soil to groundwater pathway RCL including ethylbenzene, TMB, xylenes, and naphthalene.
- 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.
Based on the soil and groundwater data collected during the site investigation conducted in November 2011, it appears that the extent of impacted soil and groundwater has been defined. Although relatively high concentrations of diesel fuel related petroleum constituents are present in soil, the contaminated soil is limited to the immediate vicinity of the diesel fuel pump islands. As such, the contaminated soil is inaccessible to removal via excavation. Since the groundwater plume is also limited in extent to the east end of the diesel fuel pump islands, the entire area is paved, and vapor intrusion is not likely an issue, Terracon recommends that no further remedial action be performed.
- 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). Although there are high concentrations in soil, the groundwater has only been slightly impacted above the ES at two locations. As such, natural attenuation should be sufficient to reduce the groundwater contaminant mass.

- 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.

The residual contamination is contained within the site boundaries. The areas of contamination are located beneath an asphalt pavement barrier or dispenser islands, reducing the risk of direct contact. There are no downgradient surface water bodies that could be receptors. Vapor intrusion does not appear to be a high risk based on screening criteria. Although the municipal sewer piping appears to traverse the site in the general vicinity of the soil and groundwater contamination, this is not likely a potential contaminant migration pathway, as the geology of the site is primarily comprised of sand and consequently there would be little difference in conductivity between the native sand and the pipe bedding. The contamination at the site has the potential to migrate in native materials onsite. However; given the limited extent of the contamination, it does not appear to be migrating to other areas of the site or towards off-site properties.

- J. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
Not applicable. A remediation system was not installed at the site.
- 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.
Not applicable.
- 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. Vapor intrusion is not anticipated to be an issue at the site based on screening criteria.
- 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. Surface water bodies lie several hundred feet upgradient and consequently were not assessed.

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 checked="" 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 type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination remaining at ch. NR 720 Industrial Use levels	✓
vi.	<input 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://dnrm.wisconsin.gov/imf/imf.jsp?site=brts2>) 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) represent water 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

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 a 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) and 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 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 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 checked="" 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, 6 (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.

[X] 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, Blaine R. Schroyer, P.E. 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."

Blaine R. Schroyer, P.E.

Printed Name

Principal / Office Manager

Handwritten signature of Blaine R. Schroyer

Signature

4/25/13

Date



Hydrogeologist Certification

I Scott A. Hodgson, P.G. 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.”

Scott A. Hodgson, P.G.

Printed Name

Senior Project Manager

Title

Scott A. Hodgson

Signature

4/25/13

Date

TABLE A.1

Temporary Well Groundwater Analytic Test Results Summary

TravelCenters of America
Hudson, St. Croix County, Wisconsin
Terracon project No. 58107072

		Petroleum VOCs plus Napthalene (EPA Method SW846-8260)--µg/L										
		Benzene	Ethylbenzene	Isopropylbenzene (Cumene)	p-Isopropyltoluene	Toluene	Total Trimethylbenzenes	Total Xylenes	Napthalene	n-Butylbenzene	Sec-Butylbenzene	n-Propylbenzene
NR 140, WAC, PAL ¹		<u>0.5</u>	<u>140</u>	NE	NE	<u>160</u>	<u>96</u>	<u>400</u>	<u>20</u>	NE	NE	NE
NR 140, WAC, ES ²		5	700	NE	NE	800	480	2,000	100	NE	NE	NE
Sample ID	Sample Date	<0.41	<0.54	<0.62	<0.67	<0.67	<1.8	<2.63	<0.89	<0.93	<0.89	<0.81
P-1	11/9/2011	<0.41	<0.54	<0.62	<0.67	<0.67	<1.8	<2.63	<0.89	<0.93	<0.89	<0.81
P-2	11/9/2011	<0.41	<0.54	<0.62	<0.67	<0.67	<1.8	<2.63	<0.89	<0.93	<0.89	<0.81
P-3	11/9/2011	<0.41	<0.54	<0.62	<0.67	<0.67	<1.8	<2.63	<0.89	<0.93	<0.89	<0.81
P-4	11/9/2011	<0.41	<0.54	<0.62	<0.67	<0.67	<1.8	<2.63	<0.89	<0.93	<0.89	<0.81
P-5	11/9/2011	<u>4.8</u>	33.9	6.9	5.5	2.5	<u>123</u>	127.2	<u>26.4</u>	<0.93	9.6	14.8
P-6	11/10/2011	5.5	11.2	6.0	1.4	<0.67	26.8	13.9	<u>30.0</u>	2.6	8.8	8.0
P-7	11/10/2011	6.4	3.2	2.5	1.3	3.0	8.3	4.1	3.9†	2.0	8.1	3.2
P-8	11/10/2011	<0.41	<0.54	<0.62	<0.67	0.73†	<1.8	<2.63	<0.89	<0.93	3.8†	<0.81
P-9	11/10/2011	<0.41	<0.54	<0.62	<0.67	<0.67	<1.8	<2.63	<0.89	<0.93	<0.89	<0.81

Notes:

VOC = Volatile Organic Compounds

¹NR 140, Wisconsin Administrative Code, Preventative Action Limit (PAL)

²NR 140, Wisconsin Administrative Code, Enforcement Standard (ES)

"µg/L" indicates micrograms per liter

"NE" indicates PAL or ES has not been established

Underline Italic values indicate compound detected above the listed Preventative Action Limit (PAL)

Bold values indicate compound detected above the listed Enforcement Standard (ES)

"†" indicates compound detected above the laboratory Limit of Detection, but below the Limit of Quantitation

" < " indicates compound not detected above the listed laboratory Limit of Detection

Table A.2

Soil Analytic Test Results Summary

Travel Centers of America
Hudson, St. Croix County, Wisconsin
Terracon Project No. 58107072

Sample ID	Sample Depth (Feet)	Sample Date	Petroleum Volatile Organic Compounds (PVOCs) plus Naphthalene--µg/kg							
			Benzene	Ethylbenzene	Methyl-tert-butyl ether	Naphthalene	Toluene	1,2-4 Trimethylbenzene	1,3-5 Trimethylbenzene	Xylenes (total)
Tank Piping Assessment										
L-1	4	6/21/2011	<1250	12,500	<1250	26,200	<1250	72,900	32,300	62,200
L-2	4	6/21/2011	<1250	10,100	<1250	23,300	<1250	53,400	22,500	47,100
L-3	4	6/21/2011	<500	4,820	<500	12,000	<500	29,500	12,400	23,660
L-4	4	7/26/2011	<500	3,390	<500	14,500	<500	27,500	12,600	19,850
L-5	4	7/26/2011	<1250	3,530	<1250	46,800	<1250	28,900	16,800	16,880
L-6	4	7/26/2011	<312	1,160	<312	13,600	<312	10,400	7,020	4,790
L-7	4	7/26/2011	<25	<25	<25	<25	<25	<25	<25	<75
NR 716 Site Investigation										
P-1	2	11/9/2011	<47.2	<47.2	<47.2	<47.2	<47.2	<47.2	<47.2	<142
P-1	14.5	11/9/2011	<35.7	<35.7	<35.7	<35.7	<35.7	<35.7	<35.7	<107.1
P-2	2	11/9/2011	<42.4	<42.4	<42.4	<42.4	<42.4	<42.4	<42.4	<127.1
P-2	14.5	11/9/2011	<40.3	<40.3	<40.3	<40.3	<40.3	<40.3	<40.3	<120.9
P-3	3.5	11/9/2011	<702	2,230	<702	41,000	<702	18,900	12,000	7,390
P-3	8	11/9/2011	<312	1,140	<312	11,700	<312	9,640	7,070	5,790
P-4	2	11/9/2011	<26.3	<26.3	<26.3	<26.3	<26.3	<26.3	<26.3	<78.9
P-4	15.5	11/9/2011	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<75.0
P-5	3	11/9/2011	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<75.0
P-5	7	11/9/2011	<312	3,570	<312	12,700	<312	20,800	9,800	15,830
P-6	2	11/10/2011	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<75.0
P-6	14.5	11/10/2011	<34.2	<34.2	<34.2	<34.2	<34.2	<34.2	<34.2	<103
P-6	18	11/10/2011	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<75.0
P-7	3	11/10/2011	<208	2,190	<208	5,260	<208	6,160	4,160	3,570
P-7	14.5	11/10/2011	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<75.0
P-7	20	11/10/2011	<25.8	<25.8	<25.8	<25.8	<25.8	<25.8	<25.8	<77.3
P-8	2	11/10/2011	<32.5	<32.5	<32.5	<32.5	<32.5	<32.5	<32.5	<97.4
P-8	14.5	11/10/2011	<31.6	<31.6	<31.6	<31.6	<31.6	<31.6	<31.6	<94.9
P-9	2	11/10/2011	<31.6	<31.6	<31.6	<31.6	<31.6	<31.6	<31.6	<94.9
P-9	14.5	11/10/2011	<33.3	<33.3	<33.3	<33.3	<33.3	<33.3	<33.3	<100
Soil to Groundwater RCL ¹			5.1	1,570	27	658.7	1,107.2	1,379.3	1,379.3	3,940
Non-Industrial Direct Contact RCL ²			1,490	7,470	59,400	5,150	818,000	89,800	182,000	258,000

Notes:

¹ Residual Contaminant Level (RCL) for the soil to groundwater pathway per WDNR RR Program RCL Spreadsheet, which lists RCLs calculated from the US EPA Regional Soil Screening Level Web Calculator based on May 2012 data.

² Non-industrial direct contact RCL per WDNR RR Program RCL Spreadsheet, which lists RCLs calculated from the US EPA Regional Soil Screening Level Web Calculator based on May 2012 data.

µg/kg = micrograms per kilogram

Bold values indicate compound detected above the soil to groundwater RCL

Bold, Underlined values indicate compound detected above the non-industrial direct contact RCL within 4 feet of ground surface

Attachment

A.3.

Post-remedial Soil Analytical Table(s)

Not Applicable. Remediation was not conducted at the site

TABLE A.4

Soil Above RCLs Analytic Test Results Summary

Travel Centers of America
Hudson, St. Croix County, Wisconsin
Terracon Project No. 58107072

Sample ID	Sample Depth (Feet)	Sample Date	Petroleum Volatile Organic Compounds (PVOCs) plus Naphthalene--µg/kg							
			Benzene	Ethylbenzene	Methyl-tert-butyl ether	Naphthalene	Toluene	1,2-4 Trimethylbenzene	1,3-5 Trimethylbenzene	Xylenes (total)
Tank Piping Assessment										
L-1	4	6/21/2011	<1250	12,500	<1250	26,200	<1250	72,900	32,300	62,200
L-2	4	6/21/2011	<1250	10,100	<1250	23,300	<1250	53,400	22,500	47,100
L-3	4	6/21/2011	<500	4,820	<500	12,000	<500	29,500	12,400	23,660
L-4	4	7/26/2011	<500	3,390	<500	14,500	<500	27,500	12,600	19,850
L-5	4	7/26/2011	<1250	3,530	<1250	46,800	<1250	28,900	16,800	16,880
L-6	4	7/26/2011	<312	1,160	<312	13,600	<312	10,400	7,020	4,790
NR 716 Site Investigation										
P-3	3.5	11/9/2011	<702	2,230	<702	41,000	<702	18,900	12,000	7,390
P-3	8	11/9/2011	<312	1,140	<312	11,700	<312	9,640	7,070	5,790
P-5	7	11/9/2011	<312	3,570	<312	12,700	<312	20,800	9,800	15,830
P-7	3	11/10/2011	<208	2,190	<208	5,260	<208	6,160	4,160	3,570
Soil to Groundwater RCL ¹			5.1	1,570	27	658.7	1,107.2	1,379.3	1,379.3	3,940
Non-Industrial Direct Contact RCL ²			1,490	7,470	59,400	5,150	818,000	89,800	182,000	258,000

Notes:

¹ Residual Contaminant Level (RCL) for the soil to groundwater pathway per WDNR RR Program RCL Spreadsheet, which lists RCLs calculated from the US EPA Regional Soil Screening Level Web Calculator based on May 2012 data.

² Non-industrial direct contact RCL per WDNR RR Program RCL Spreadsheet, which lists RCLs calculated from the US EPA Regional Soil Screening Level Web Calculator based on May 2012 data.

µg/kg = micrograms per kilogram

Bold values indicate compound detected above the soil to groundwater RCL

Bold, Underlined values indicate compound detected above the non-industrial direct contact RCL within 4 feet of ground surface

Attachment
A.5.
Vapor Analytical Table(s)

Not Applicable. A vapor intrusion assessment was not conducted as part of the site investigation

Attachment

A.6.

Other Media of Concern (e.g., sediment or surface water)

Not Applicable. Other media of concern was not impacted at the site.

Attachment
A.7.
Water Level Elevations

Not Applicable. The temporary groundwater monitoring wells installed as part of the site investigation were not surveyed and depth to groundwater was not measured. For an approximate groundwater depths please refer to WDNR GIS registry for Twin City East Auto Truck Stop (Former Unical A/T) BRRTs activity number: 03-56-115552

Attachment

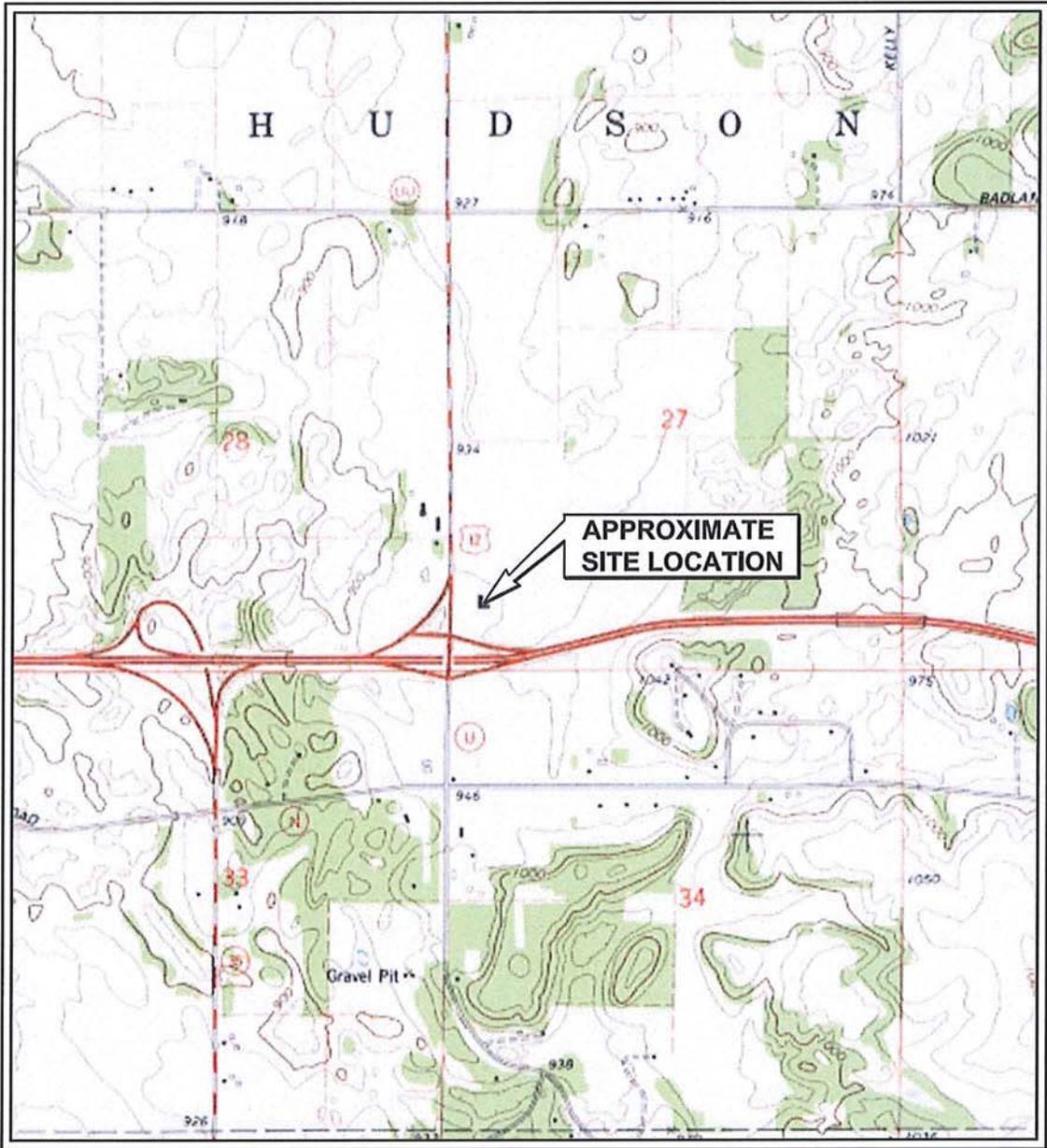
A.8.

Other

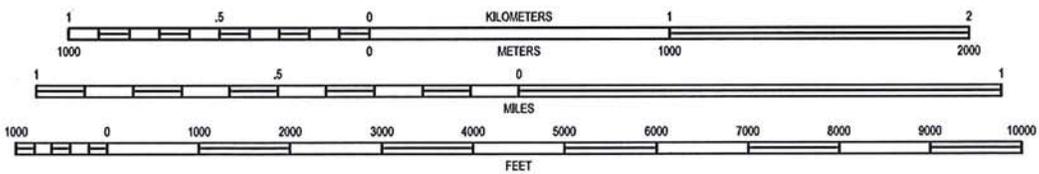
Not Applicable. Natural attenuation data was not tabulated and/or engineered remedial systems were not installed as part of this site investigation.

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SCALE 1:24 000



CONTOUR INTERVAL 20 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

NORHLINE QUADRANGLE
WISCONSIN - ST. CROIX COUNTY
1974

7.5 MINUTE SERIES (TOPOGRAPHIC) **B.1.a Location Map**

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Mngr:	JVS	Project No.	58107072
Drawn By:	JLM (41)	Scale:	AS SHOWN
Checked By:	JVS	File No.	58107072.dwg
Approved By:	BRS	Date:	9/14/2011

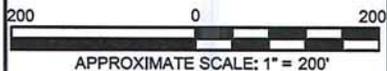
Terracon
Consulting Engineers and Scientists
9856 SOUTH 57th STREET FRANKLIN, WI 53132
PH. (414) 423-0255 FAX. (414) 423-0566

SITE LOCATION TOPOGRAPHIC MAP
HUDSON/TWIN CITY EAST TRAVEL CENTER
TRAVEL CENTERS OF AMERICA
713 HIGHWAY 12
HUDSON WISCONSIN

FIGURE
(161)



DIAGRAM IS FOR GENERAL LOCATION ONLY AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES



Project Mngt:	SAH	Project No.	58107072
Drawn By:	AGC	Scale:	AS SHOWN
Checked By:	SAH	File No.	58107072 SD
Approved By:	SAH	Date:	11/27/12

Terracon
Consulting Engineers and Scientists

9856 SOUTH 57th STREET FRANKLIN, WI 53132
PH. (414) 423-0255 FAX. (414) 423-0566

Detailed SITE MAP B.1.b.1

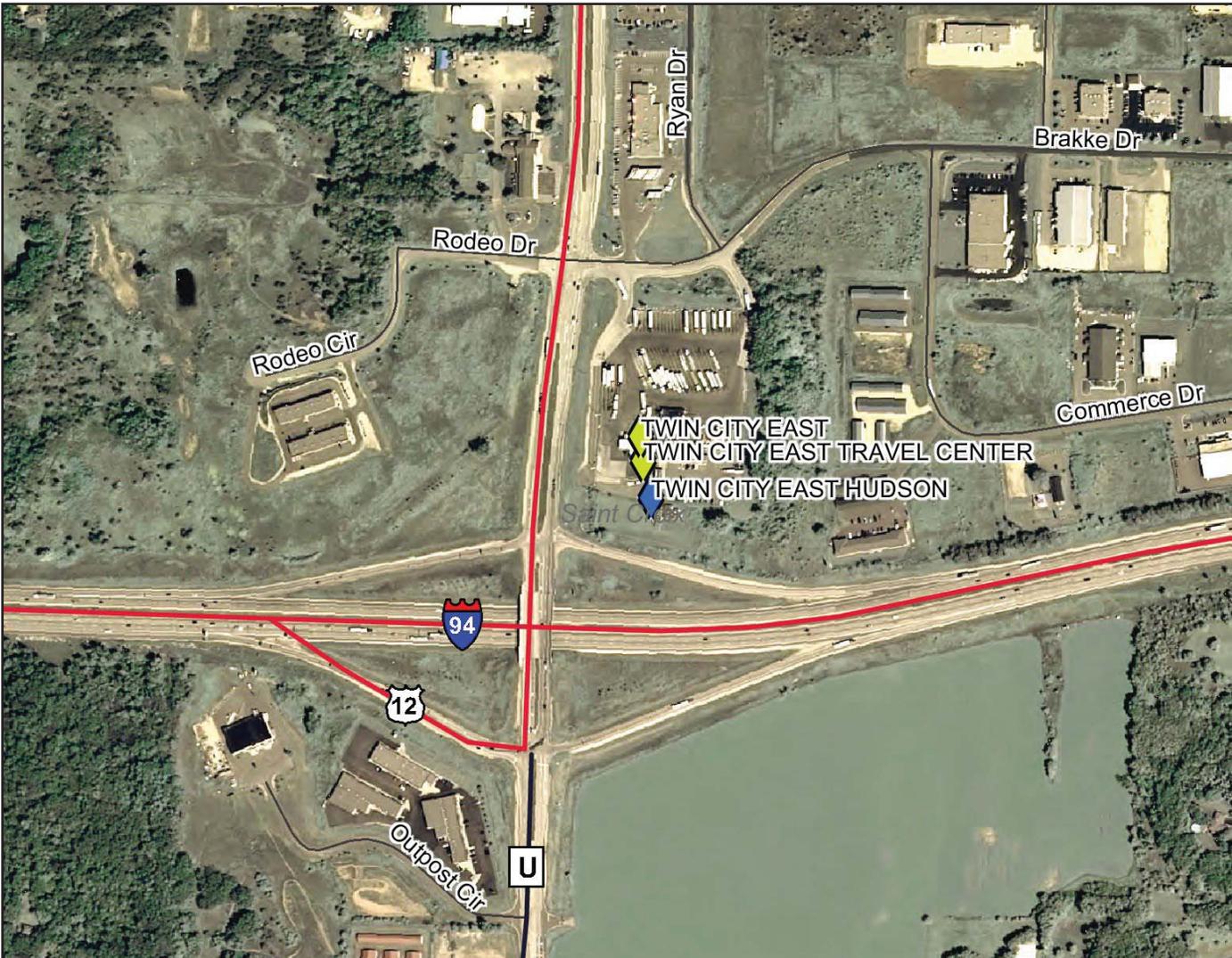
TRAVEL CENTERS OF AMERICA
713 HIGHWAY 12

HUDSON

WISCONSIN

FIGURE

B1c. RR Sites Map--Twin City East Travel Center Hudson



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

0 650 1300 1950 ft.

Map created on Aug 6, 2013

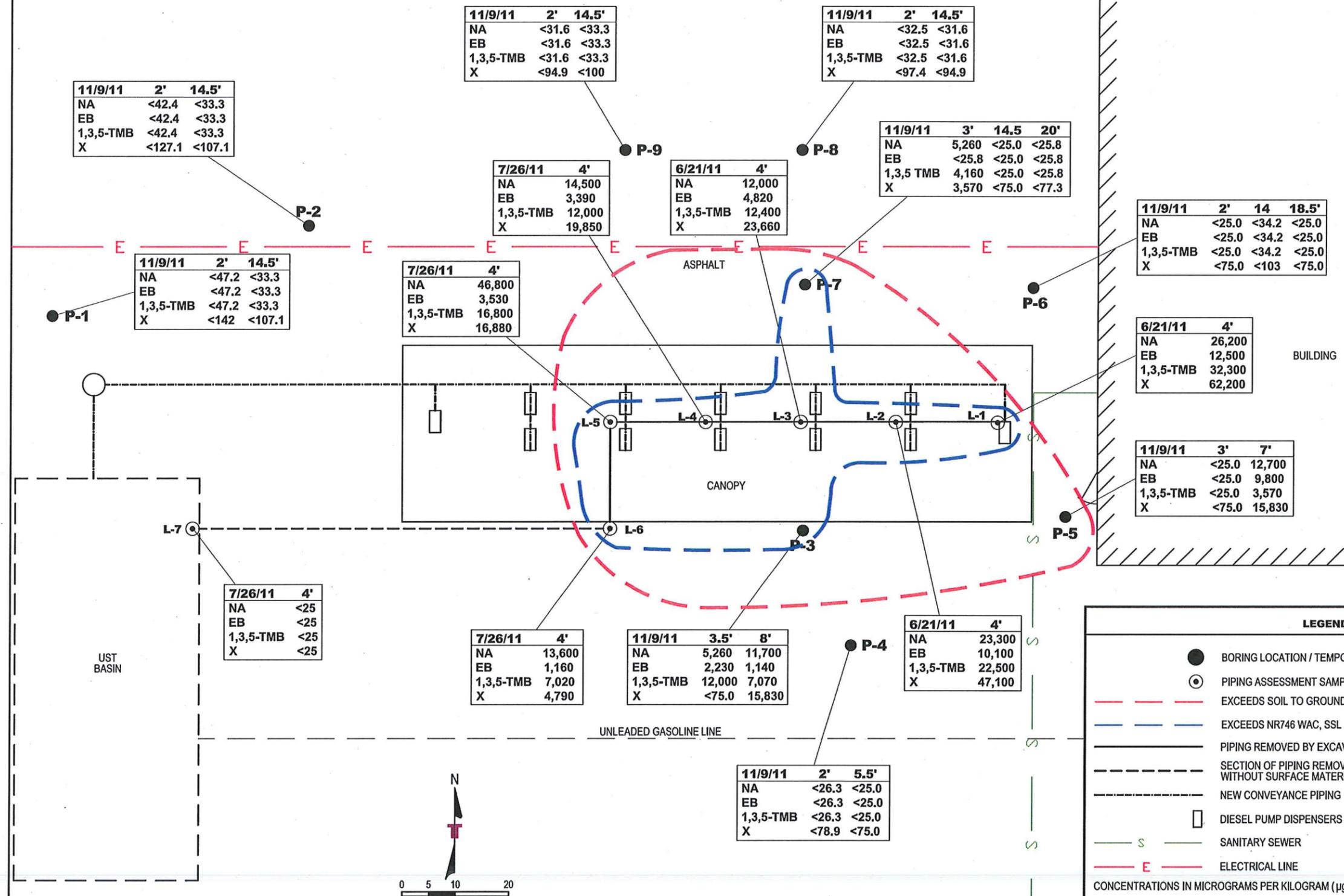
Note: Not all RR Sites have been geo-located yet.



Scale: 1:6,900

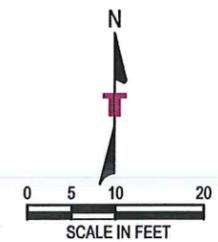
This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

CHEMICAL KEY	
NA	= NAPHTHALENE
EB	= ETHYLBENZENE
1,3,5-TMB	= 1,3,5-TRIMETHYLBENZENE
X	= XYLENES



LEGEND	
●	BORING LOCATION / TEMPORARY MONITORING WELL
⊙	PIPING ASSESSMENT SAMPLE LOCATION
---	EXCEEDS SOIL TO GROUNDWATER RCL
---	EXCEEDS NR746 WAC, SSL
---	PIPING REMOVED BY EXCAVATION
---	SECTION OF PIPING REMOVED BY PULLING WITHOUT SURFACE MATERIAL
---	NEW CONVEYANCE PIPING
□	DIESEL PUMP DISPENSERS
S	SANITARY SEWER
E	ELECTRICAL LINE

CONCENTRATIONS IN MICROGRAMS PER KILOGRAM (µg/kg)



Pre-Remedial Soil Contamination Figures B.2a

Project Mgr:	JVS	Project No.	58107072
Drawn By:	PAI/AGC	Scale:	AS SHOWN
Checked By:	JVS	File No.	58107072C01
Approved By:	SAH	Date:	11/27/12

Terracon
Consulting Engineers and Scientists
9856 SOUTH 57th STREET FRANKLIN, WI 53132
PH. (414) 423-0255 FAX. (414) 423-0566

SOIL CONTAMINANT DISTRIBUTION MAP	
TRAVEL CENTERS OF AMERICA	
713 HIGHWAY 12	
HUDSON	WISCONSIN

FIG. No.

N:\Projects\2011\058107072\Figures\58107072C01.dwg

Layout/Layout1a

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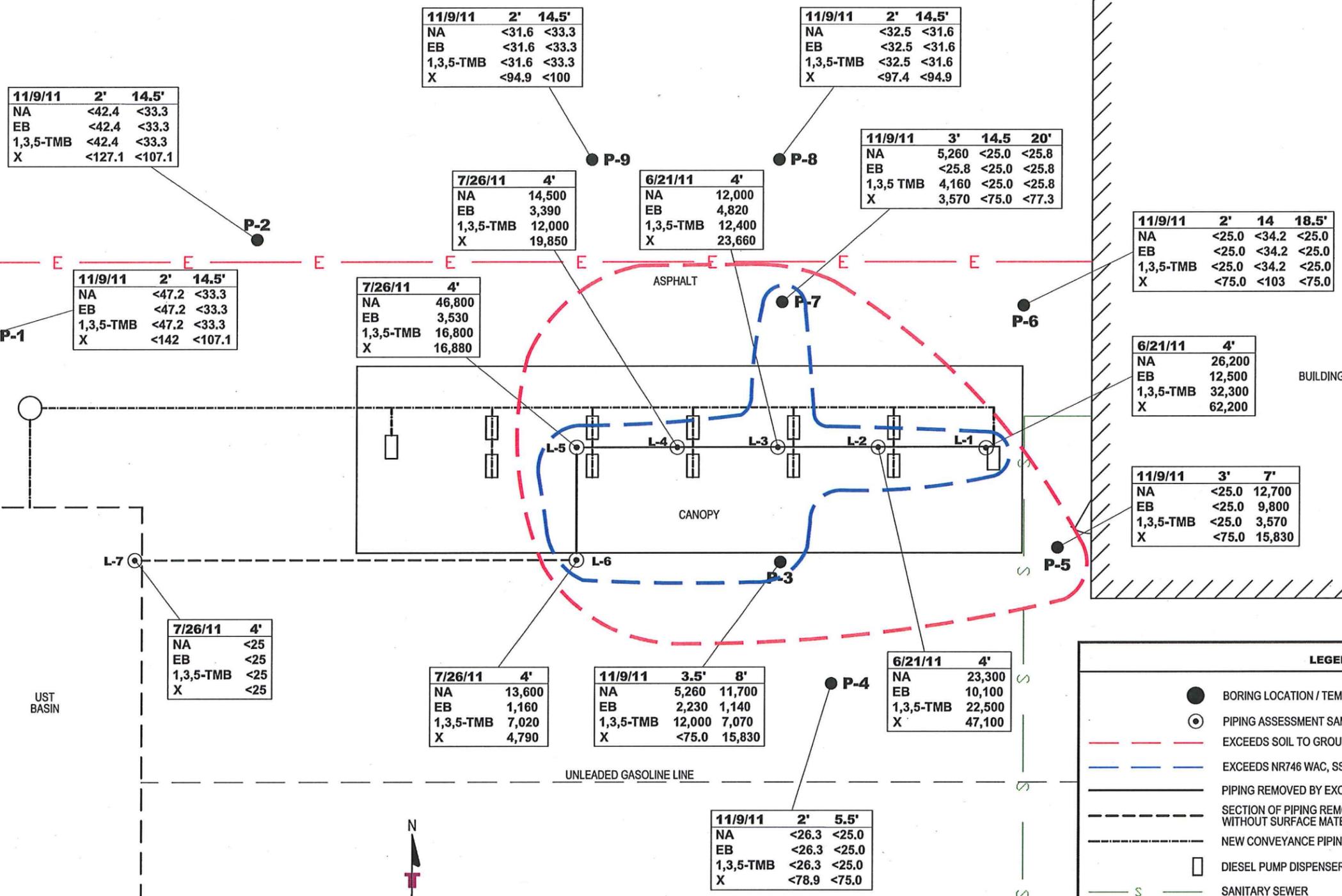
Attachment

B.2.b.

Pre and Post-remedial Soil Contamination Figure(s)

Not Applicable. Remediation was not conducted at the site.

CHEMICAL KEY	
NA	= NAPHTHALENE
EB	= ETHYLBENZENE
1,3,5-TMB	= 1,3,5-TRIMETHYLBENZENE
X	= XYLENES



ENTRANCE ROAD

GRASS

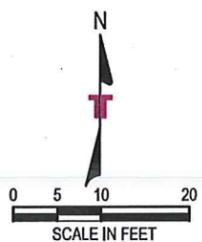
UST BASIN

ASPHALT

CANOPY

UNLEADED GASOLINE LINE

BUILDING



LEGEND	
●	BORING LOCATION / TEMPORARY MONITORING WELL
⊙	PIPING ASSESSMENT SAMPLE LOCATION
---	EXCEEDS SOIL TO GROUNDWATER RCL
---	EXCEEDS NR746 WAC, SSL
---	PIPING REMOVED BY EXCAVATION
---	SECTION OF PIPING REMOVED BY PULLING WITHOUT SURFACE MATERIAL
---	NEW CONVEYANCE PIPING
□	DIESEL PUMP DISPENSERS
S	SANITARY SEWER
E	ELECTRICAL LINE

CONCENTRATIONS IN MICROGRAMS PER KILOGRAM (µg/kg)

Pre/Post remaining Soil Contamination B.2.c

Project Mng:	JVS	Project No.	58107072
Drawn By:	PAI/AGC	Scale:	AS SHOWN
Checked By:	JVS	File No.	58107072C01
Approved By:	SAH	Date:	11/27/12

Terracon
Consulting Engineers and Scientists
9858 SOUTH 57th STREET FRANKLIN, WI 53132
PH. (414) 423-0255 FAX. (414) 423-0566

RESIDENTIAL GAS DISTRIBUTION MAP
TRAVEL CENTERS OF AMERICA
713 HIGHWAY 12
HUDSON WISCONSIN

FIG. No.

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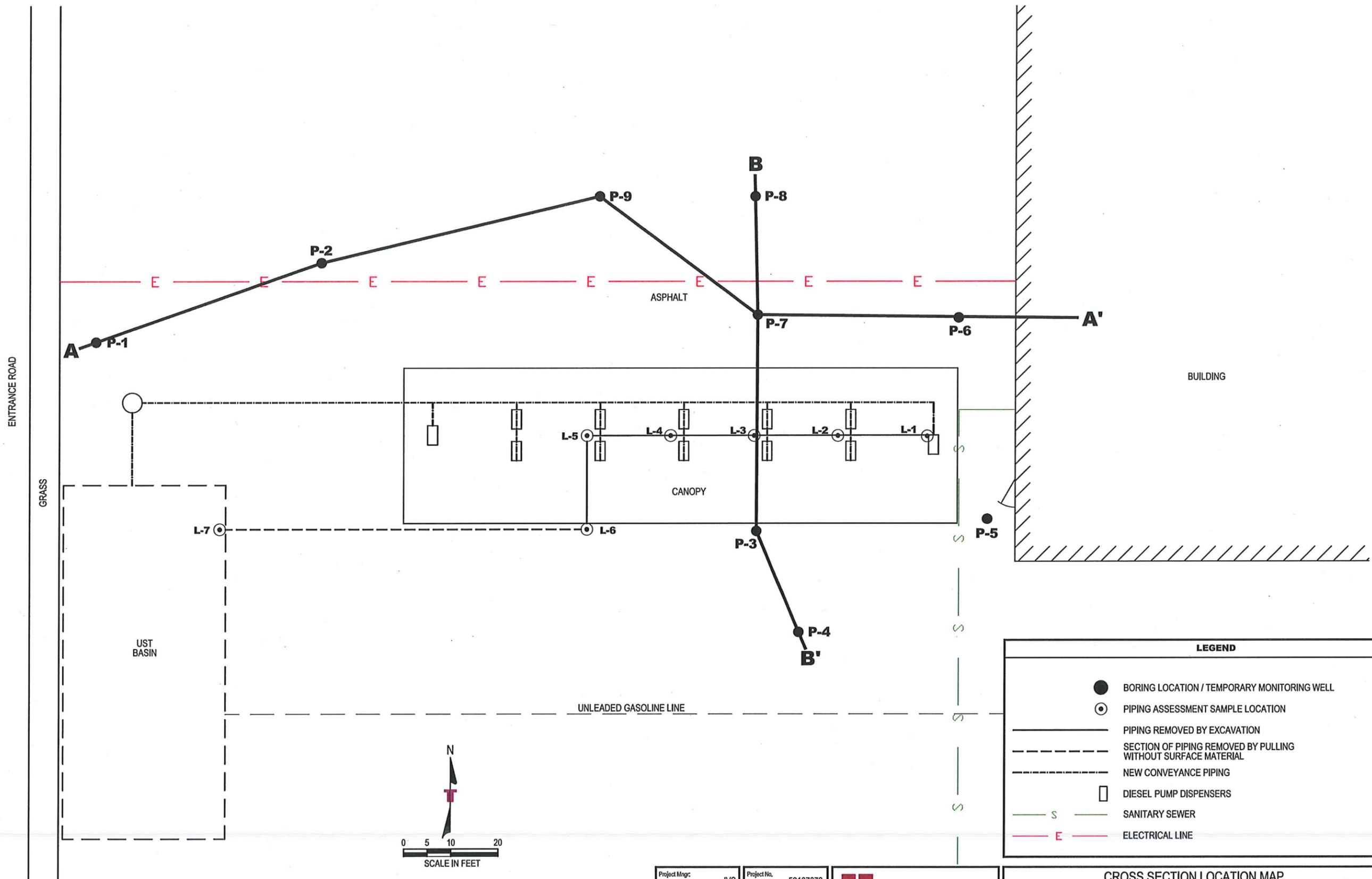
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Layout/Layout.c

6/15/2012 12:27 PM



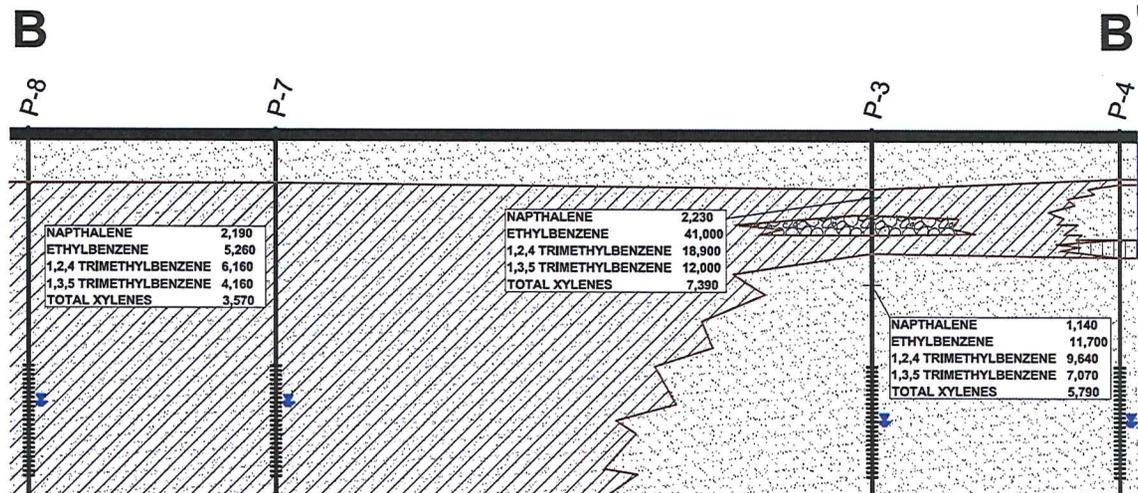
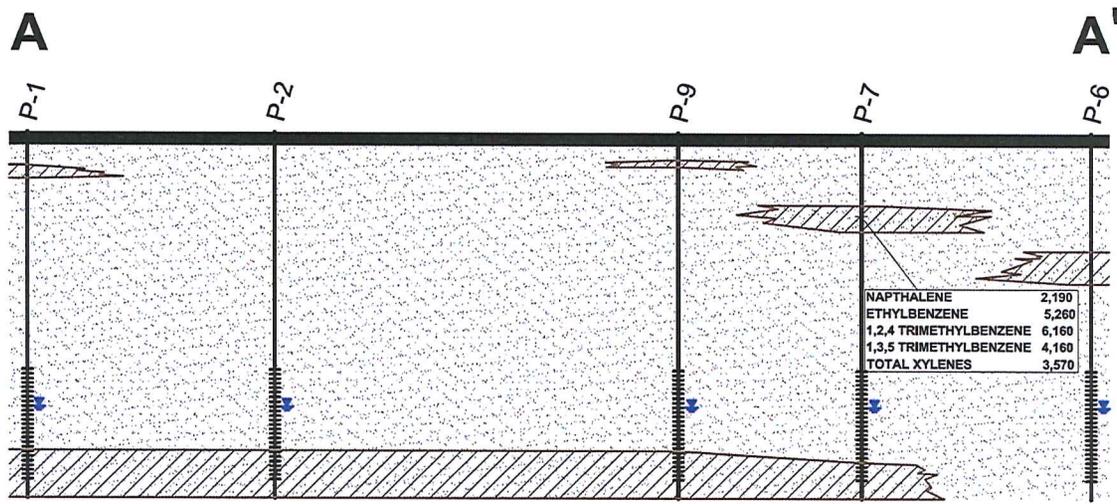
Geologic Cross-Sections Figures B.3.a

Project Mngr:	JVS	Project No.	58107072
Drawn By:	PAI/AGC	Scale:	AS SHOWN
Checked By:	JVS	File No.	58107072C01
Approved By:	SAH	Date:	11/27/12

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 Consulting Engineers and Scientists
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 PH. (414) 423-0255 FAX. (414) 423-0566

CROSS SECTION LOCATION MAP
 TRAVEL CENTERS OF AMERICA
 HUDSON WISCONSIN

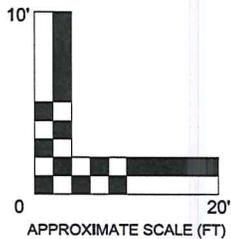
FIG. No.



Geologic Cross Sections Figures B.3.a

LEGEND	
	SAND
	CLAY, CLAYEY SAND, AND SILT & CLAYEY SAND
	SANDY SILT
	SAND AND GRAVEL

CONCENTRATIONS IN MICROGRAMS PER LITER (ug/L)



Project Mng'r:	SAH	Project No.:	58107072
Drawn By:	JLC	Scale:	AS SHOWN
Checked By:	JLC	File No.:	58107072 CS
Approved By:	SAH	Date:	6/15/12

Terracon
Consulting Engineers and Scientists

9856 SOUTH 57th STREET FRANKLIN, WI 53132
PH. (414) 423-0255 FAX. (414) 423-0566

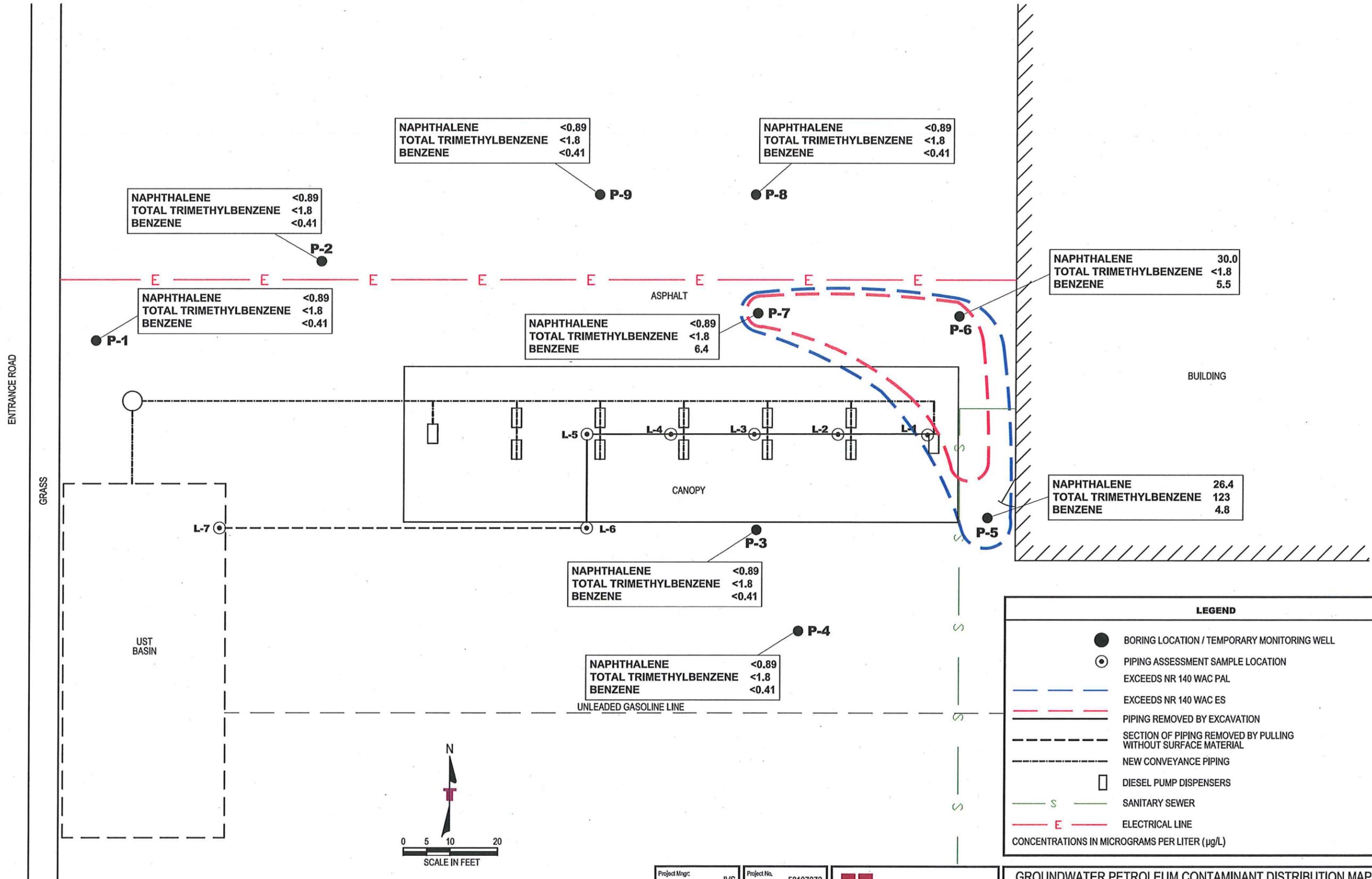
GEOLOGIC CROSS SECTIONS	
TRAVEL CENTERS OF AMERICA 713 HIGHWAY 12 HUDSON WISCONSIN	

FIG. No.

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Layout\youthb

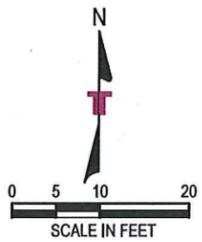
11/27/2012 10:28 AM



LEGEND

- BORING LOCATION / TEMPORARY MONITORING WELL
- ⊙ PIPING ASSESSMENT SAMPLE LOCATION
- EXCEEDS NR 140 WAC PAL
- EXCEEDS NR 140 WAC ES
- PIPING REMOVED BY EXCAVATION
- SECTION OF PIPING REMOVED BY PULLING WITHOUT SURFACE MATERIAL
- NEW CONVEYANCE PIPING
- DIESEL PUMP DISPENSERS
- S SANITARY SEWER
- E ELECTRICAL LINE

CONCENTRATIONS IN MICROGRAMS PER LITER (µg/L)



Groundwater Isoconcentration Figures B.3.b

Project Mngr:	JVS	Project No.	58107072
Drawn By:	PAI/AGC	Scale:	AS SHOWN
Checked By:	JVS	File No.	58107072C01
Approved By:	SAH	Date:	11/27/12

Terracon
Consulting Engineers and Scientists

9856 SOUTH 57th STREET FRANKLIN, WI 53132
PH (414) 423-0255 FAX (414) 423-0566

GROUNDWATER PETROLEUM CONTAMINANT DISTRIBUTION MAP	FIG. No.
TRAVEL CENTERS OF AMERICA	
713 HIGHWAY 12	
HUDSON	WISCONSIN

Attachment
B.3.c.
Groundwater Flow Direction Figure(s)

Not Applicable. The temporary groundwater monitoring wells installed as part of the site investigation were not surveyed and depth to groundwater was not measured. For an approximate groundwater depths please refer to WDNR GIS registry for Twin City East Auto Truck Stop (Former Unical A/T) BRRTs activity number: 03-56-115552.

Attachment
B.3.d
Monitoring Wells

Not Applicable. Temporary groundwater monitoring wells were installed as part of the site investigation and were abandoned immediately after sampling.

Attachment
B.4
Vapor Maps and Other Media

B.4.a
Not Applicable.

B.4.b Other media of concern
Not Applicable

B.4.c Other
Not Applicable

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.1.

Location Map(s)

Not applicable, a cap maintenance plan
was not required as part of this
investigation

Attachment

D.2.

Brief Description(s)

Not applicable, a cap maintenance plan
was not required as part of this
investigation

Attachment

D.3.

Description of Maintenance
Action(s)

Not applicable, a cap maintenance plan
was not required as part of this
investigation

Attachment

D.4.

Inspection Log

Not applicable, a cap maintenance plan
was not required as part of this
investigation

Attachment
E
Monitoring Well Information

No applicable. Permanent monitoring wells were not installed as part of this site investigation.

Attachment
F
Notifications to Owners of Impacted Properties

No applicable. There were no off-site properties impacted by the release at the site.

Attachment
G.1
Deeds-Source Property

Document No. _____

**SPECIAL WARRANTY DEED
STATE OF WISCONSIN**

846885

17

KATHLEEN H. WALSH
REGISTER OF DEEDS
ST. CROIX CO., WI

RECEIVED FOR RECORD

03/21/2007 12:30PM

WARRANTY DEED
EXEMPT #

REC FEE: 17.00
TRANS FEE: 19387.50
COPY FEE:
CC FEE:
PAGES: 4

[Hudson, WI (3.192)]

RETURN TO:

Once recorded, please return to:

Stewart Title Guaranty
200 S. College Street #1640
Charlotte, NC 28202

Tax Parcel No.: 020-1075-50-000

THIS DEED, made by and between **TA OPERATING LLC**, a Delaware limited liability company, having a place of business at 24601 Center Ridge Road, Suite 200, Westlake, Ohio 44145 ("Grantor") and **HPT TA PROPERTIES TRUST**, a Maryland real estate investment trust, with a place of business c/o Hospitality Properties Trust, 400 Centre Street, Newton, Massachusetts 02458 ("Grantee")

WITNESSTH, That grantor, for and in consideration of the sum of Ten dollars and other good and valuable consideration to it paid by Grantee, the receipt of whereof is hereby acknowledged, conveys to Grantee, it's successors and assigns forever, the real estate situated in the County of St. Croix and State of Wisconsin, and further described in Exhibit A attached hereto and made a part hereof by reference.

This is not homestead property.

Together with all and singular the hereditaments and appurtenances thereunto belonging;

And Grantor warrants that title is good, indefeasible in fee simple and free and clear of encumbrances except (i) taxes and assessments both general and special not yet due and payable; (ii) zoning ordinances, if any; and (iii) reservations, restrictions, easements and conditions of record and will warrant and defend the same again claims arising by, through or under Grantor and its successors and assigns only.

IN WITNESS WHEREOF, Grantor, has caused these presents to be signed by John R. Hoadley, it's Exec Vice President and Treasurer, at Boston, Massachusetts, and its corporate seal to be hereunto affixed, this 31st day of January, 2007.

Signed and Sealed in the Presence of:

Louis A. Monti
Print Name: Louis A. Monti

Linda Freitas
Print Name: Linda Freitas

TA OPERATING LLC

By: John R. Hoadley
Name: John R. Hoadley
Its: Executive Vice President and Treasurer

COMMONWEALTH OF MASSACHUSETTS)
COUNTY OF Suffolk) ss:

Personally came before me, this 31st day of January, 2007, TA OPERATING LLC by John Hoadley, Exec + Treasurer of the above named company, to me known to be the persons who executed the foregoing instrument, and to me known to be such Exec + Treasurer of said company, and acknowledged that John Hoadley executed the foregoing instrument as such officer as the deed of said company, by its authority.

Linda Freitas
Notary Public
My commission expires:



This instrument was drafted by:

Elizabeth S. Wigon, Esq.
Sullivan & Worcester LLP
One Post Office Square
Boston, MA 02109

EXHIBIT A

Legal Description

[See copy attached.]

3.192 Hudson, WI
713 Highway 12
P.O. Box 230
Hudson, WI 54016
(TCA Site No. 192)

Exhibit "A "

A parcel of land located in the Southwest Quarter of the Southwest Quarter (SW 1/4 SW 1/4) of Section Twenty-Seven (27), Township Twenty-Nine (29) North, Range Nineteen (19) West, in the Town of Hudson, St. Croix County, Wisconsin, described as follows: Commencing at the Southwest corner of Section 27; thence North 02°02'37" East, 82.40 feet along the West line of the Southwest 1/4 of Section 27; thence South 88°00'38" East, 24.87 feet; thence North 04°26'00" East, 360.00 feet along the centerline of U.S. Highway "12"; thence South 83°34'00" East, 100.00 feet to the point of beginning; thence North 04°26'00" East, 310.50 feet; thence Northeasterly 435.20 feet along the arc of a 11,559.16-foot radius curve concave to the West whose chord bears North 03°21'17" East, 435.17 feet; thence South 89°59'50" West, 48.01 feet; thence North 02°42'04" East, 31.54 feet; thence North 89°59'50" East, 789.76 feet; thence South 00°00'35" West, 912.04 feet to the Northerly right-of-way line of interstate "94"; thence Southwesterly 80.07 feet along the arc of a 3629.72-foot radius curve concave to the North whose chord bears South 82°29'57" West, 80.07 feet; thence continuing along said Northerly right-of-way line North 78°21'22" West, 728.15 feet to the point of beginning, containing 358,030 square feet (15.106 acres) more or less. EXCEPT that parcel to State of Wisconsin, Department of Transportation by Award of Damages recorded October 29, 1996, in Volume 1205, on Page 642, as Document No. 551401.

All of the above-described land being the same as follows: A parcel located in the Southwest Quarter (SW1/4) of Section Twenty-Seven (27), Township Twenty-Nine (29) North, Range Nineteen (19) West, in the Town of Hudson, St. Croix County, Wisconsin, further described as follows: From the Southwest corner of said Section 27 go North along the Section line a distance of 82.4 feet; thence South 88°00' East along the centerline of East-bound lane of Interstate "94" a distance of 24.9 feet; thence North 4°26' East along centerline of U.S. Highway "12" a distance of 360.0 feet; thence South 85°34' East a distance of 100.0 feet to point of beginning for parcel to be described herein, said point of beginning being the intersection of the North right-of-way line of Interstate "94" and the East right-of-way line of U.S. Highway "12"; thence South 78°19' East along said North right-of-way line a distance of 570.0 feet; thence due North a distance of 672.0 feet; thence due West a distance of 55.0 feet; thence due North a distance of 235.0 feet; thence due West a distance of 500.0 feet; thence South 2°10' West a distance of 48.0 feet along the East right-of-way line of U.S. Highway "12"; thence South 87°42' East a distance of 48.0 feet; thence Southerly on a curve concave to the West having a radius of 11,559.16 feet and a long chord bearing South 3°22' West a distance of 433.0 feet; thence South 4°26' West a distance of 310.5 feet to the point of beginning. All bearings above are grid bearings taken from I-94 surveys and are not true bearings; EXCEPT the Northerly 16-foot strip along the East 500 feet of the above described parcel.

A parcel located in the Southwest Quarter (SW1/4) of Section Twenty-Seven (27), Township Twenty-Nine (29) North, Range Nineteen (19) West, further described as follows: From the Southwest corner of said Section 27 go North along the section line a distance of 82.4 feet; thence South 88°00' East along the centerline of the East-bound lane of Interstate "94" a distance of 24.9 feet; thence North 4°26' East along the centerline of U.S. Highway "12" a distance of 360.0 feet; thence South 85°34' East a distance of 100.0 feet; thence South 78° 19' East along the North right-of-way line of Interstate "94" a distance of 570.0 feet to the point of beginning for the parcel to be conveyed herein; thence due North a distance of 672.0 feet; thence due West a distance of 55.0 feet; thence due North a distance of 219.0 feet; thence due East a distance of 290.0 feet; thence due South a distance of 911.4 feet to the North right-of-way line of Interstate "94"; thence Westerly along said right-of-way line a distance of 79.2 feet on a chord of a curve concave to the North having a radius of 3629.7 feet; thence North 78°19' West along said right-of-way line a distance of 160.0 feet to the point of beginning. All bearings being taken from I-94 highway bearings which are grid bearings, not true.

EXCEPT that parcel to State of Wisconsin, Department of Transportation by Award of Damages recorded October 29, 1996, in Volume 1205, Page 642, as Document No. 551401.

2012 Property Record | St Croix County, WI

Assessed values not finalized until after Board of Review.
Property information is valid as of .

OWNER

HPT TA PROPERTIES TRUST
24601 CENTRE RIDGE RD STE 200
WESTLAKE, OH 44145

CO-OWNER(S)

PROPERTY DESCRIPTION

SEC 27 T29N R19W SW SW PARC DESC IN 439/549 & 446/454 EXC
NWY 16FT SLNG W 500FT OF TRACT DESC IN 439/549 & EXC
HWY PROJ 1022-02-21

PROPERTY INFORMATION

Parcel ID: [020107550000](#)

Alternate ID:

School Districts:

SCH DIST OF HUDSON

Other Districts:

WITC

Property Address:

601 BRAKKE DR

Municipality:

TOWN OF HUDSON

DEED INFORMATION

Section	Town	Range	Qtr	Qtr Section	Qtr Section
27	29N	19W		SW	SW

Lot:

Block:

Plat Name

NOT AVAILABLE

Volume	Page	Document #
2711	559	846885
1562	452	782058
1002	279	634319

TAX INFORMATION

Net Tax Before: 33,226.73

Lottery Credit: .00

First Dollar Credit: 62.85

Net Tax After: 33,163.88

	Amt. Due	Amt. Paid	Balance
Tax	33,163.88	16,581.94	16,581.94
Special Assmnt	.00	.00	.00
Special Chrg	.00	.00	.00
Delinquent Chrg	.00	.00	.00
Private Forest	.00	.00	.00
Woodland Tax	.00	.00	.00
Managed Forest	.00	.00	.00
Prop. Tax Interest		.00	.00
Spec. Tax Interest		.00	.00
Prop. Tax Penalty		.00	.00
Spec. Tax Penalty		.00	.00
Other Charges	.00	.00	.00
TOTAL	33,163.88	16,581.94	16,581.94
Over-Payment		.00	

LAND VALUATION

Valuation Date: 20110513

Code	Acres	Land Value	Improvements	Total
G2	14.910	1,085,000	1,173,800	2,258,800
	14.910	1,085,000	1,173,800	2,258,800

Total Acres: 14.910

Assessment Ratio: .9926

Mill Rate: 0.014709904

Fair Market Value: 2,275,700.00

INSTALLMENTS

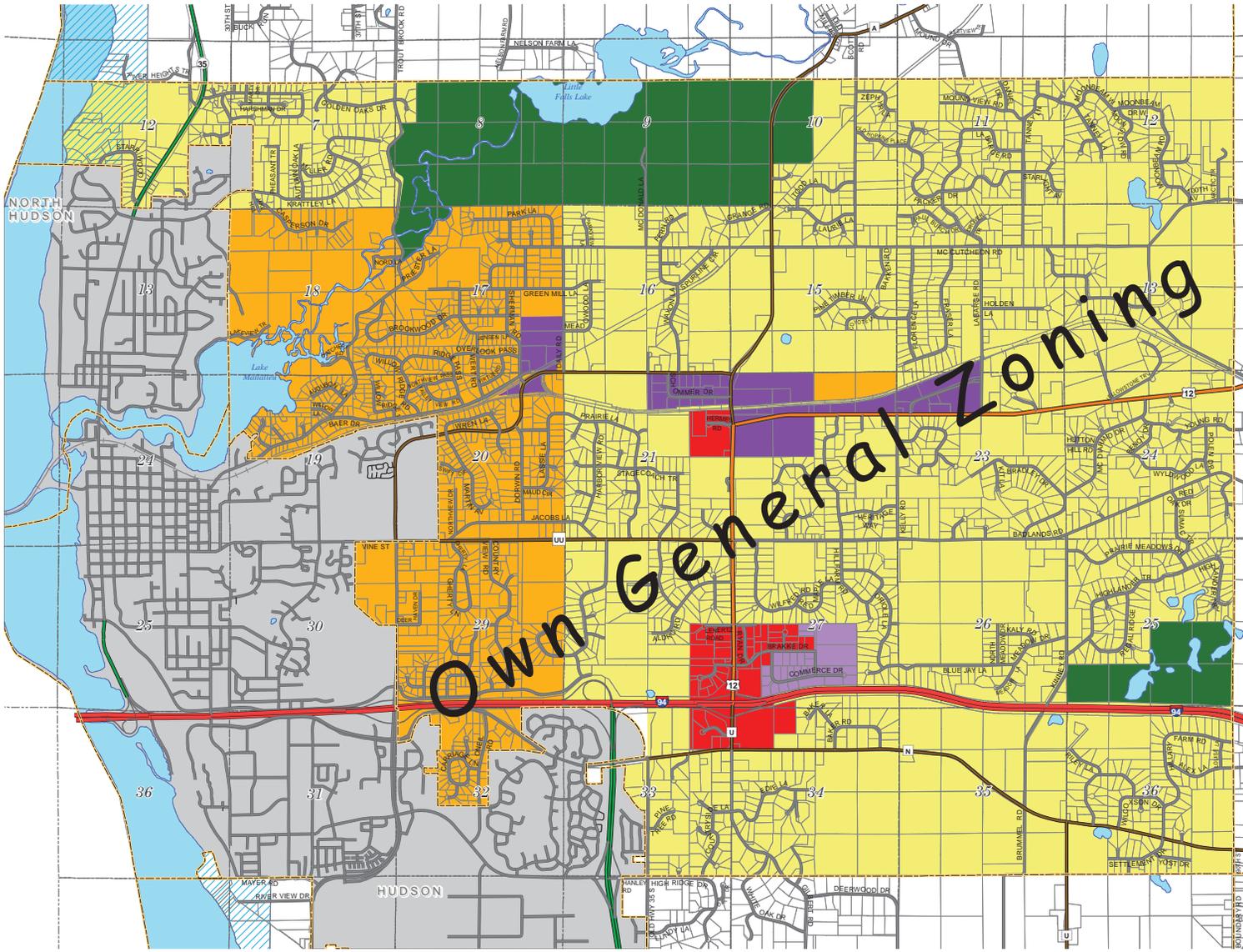
Period	End Date	Amount
1	01/31/13	16,581.94
2	07/31/13	16,581.94

PAYMENT HISTORY (POSTED PAYMENTS)

Date	Receipt #	Source	Type	Amount	General Tax Status	Special Assess. Status	Interest	Penalty	Total
01/22/13	26649	C	T	16,581.94	P	N	.00	.00	16,581.94

Official County Zoning Map St. Croix County, Wisconsin

Town of Hudson
T29N, R19 & 20W



R20W

R19W

Own General Zoning

Zoning Districts

- Residence
- Agricultural Residential
- Commercial
- Industrial
- Commercial/Lt. Industrial
- Conservancy
- Agricultural
- Agricultural Two
- Lower St. Croix Riverway

St. Croix County Planning & Zoning
1101 Carmichael Rd.
Hudson, WI
Phone: 715.386.4680
Email: pz@co.saint-croix.wi.us
www.co.saint-croix.wi.us



This official county zoning map is a visual representation of the zoning district boundaries as created and amended by the St. Croix County Board of Supervisors through county zoning ordinance amendments on file with the St. Croix County Clerk.
Last revision: 6/30/2008

Contact the Planning & Zoning Department for floodplain, shoreland, and wetland zoning.

Statement of Accurate Legal Description

To the best of my knowledge, the attached property legal description depicted on the current deed is complete, accurate, and identifies the parcel with soil and groundwater impacted with petroleum products, which was identified on the property located at 713 US Highway 12, Hudson, Wisconsin, parcel tax parcel number 020-1075-50-000 referred to as the Property.

Kelly Gelske
Printed Name

4-24-13
Date

KAG
Signature
Kelly Gelske
TravelCenters of America