

**Lauridsen, Keld B - DNR**

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**From:** Dufek, Nic [Nic.Dufek@Foth.com]  
**Sent:** Tuesday, January 10, 2012 9:45 AM  
**To:** Lauridsen, Keld B - DNR  
**Cc:** Meister, Ron  
**Subject:** Attached are results for Betterbrite  
**Attachments:** 4055258\_fr.pdf; 4055258\_coc.pdf

Hello,

I have attached copies of the total chrome samples collected from the influent and effluent in Dec 2011. It was later than I anticipate collecting the samples, but with no hard copy documentation for sampling events, it fell through the cracks. For this I apologize.

I spoke with Ron M. about the sample collection and relayed what we talked about. The samples for this round will be added to the misc. spending funds. We will sample 2 times a year. I would recommend we sample during the wet season and dry season. With that said, April and October are probably the best spanned months to do this. If/when we receive the 2012-2013 work at Better-Brite; we will include these sampling events in the budget. Minus the lab fees/sample processing, the "extra" expense are relatively minor.

The results of the samples are fairly close to what I thought they would be. Influent had a total chrome of 6.85 mg/L, and the effluent had a total chrome of ~ 0.77 mg/L. I can only assume the hex chrome concentrations would be substantially lower than these numbers if we had analyzed for it.

FYI, Ideal Air couldn't make it out yesterday (they finally called me at 1630), and I am now waiting for the Tech to call me when he is 15 min away from the site to look at the heater. I will give them your billing info as we previously discussed. Hopefully this is as simple an issue to fix as last year when we had this problem.

If you have any questions about anything discussed in this email, please feel free to give me a call (Ron M. is out of office).

Thanks,

**Nicholas E. Dufek**

Nicholas E. Dufek  
Project Environmental Technician  
Foth Infrastructure & Environment, LLC  
2737 South Ridge Rd, Suite 600  
PO Box 12326, Green Bay, WI 54307  
Office: 920-496-6826 - Cell: 920-819-1886  
(Fax) 920-497-8516  
Email: Nic.Dufek@Foth.com

01/10/2012

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**From:** Tod Noltemeyer [mailto:Tod.Noltemeyer@pacelabs.com]  
**Sent:** Tuesday, January 03, 2012 4:31 PM  
**To:** Dufek, Nic  
**Subject:** Attached are results for Betterbrite sample batch 4055258

Project Manager  
Pace Analytical - WI  
6409 Odana Road  
Suite D  
Madison, WI 53719  
(608) 232-3300

[Tod.Noltemeyer@pacelabs.com](mailto:Tod.Noltemeyer@pacelabs.com)

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January 03, 2012

NIC DUFEK  
FOTH INFRASTRUCTURE & ENVIRONM  
2737 SOUTH RIDGE ROAD  
Green Bay, WI 54304

RE: Project: BETTER-BRITE  
Pace Project No.: 4055258

Dear NIC DUFEK:

Enclosed are the analytical results for sample(s) received by the laboratory on December 27, 2011. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

*Tod Noltemeyer*

Tod Noltemeyer

tod.noltemeyer@pacelabs.com  
Project Manager

Enclosures



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: BETTER-BRITE  
Pace Project No.: 4055258

### Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302  
Florida/NELAP Certification #: E87948  
Illinois Certification #: 200050  
Kentucky Certification #: 82  
Louisiana Certification #: 04168  
Minnesota Certification #: 055-999-334  
New York Certification #: 11888

North Carolina Certification #: 503  
North Dakota Certification #: R-150  
South Carolina Certification #: 83006001  
US Dept of Agriculture #: S-76505  
Wisconsin Certification #: 405132750  
Wisconsin DATCP Certification #: 105-444

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## REPORT OF LABORATORY ANALYSIS

Page 2 of 10

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## SAMPLE SUMMARY

Project: BETTER-BRITE

Pace Project No.: 4055258

Lab ID	Sample ID	Matrix	Date Collected	Date Received
4055258001	WTP-INFLUENT-122311	Water	12/23/11 10:00	12/27/11 10:00
4055258002	WTP-EFFLUENT-122311	Water	12/23/11 15:00	12/27/11 10:00

## REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: BETTER-BRITE  
Pace Project No.: 4055258

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
4055258001	WTP-INFLUENT-122311	EPA 6010	MMZ	1	PASI-G
4055258002	WTP-EFFLUENT-122311	EPA 6010	MMZ	1	PASI-G

### REPORT OF LABORATORY ANALYSIS

Page 4 of 10

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## PROJECT NARRATIVE

**Project:** BETTER-BRITE  
**Pace Project No.:** 4055258

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**Method:** EPA 6010  
**Description:** 6010 MET ICP  
**Client:** FOTH INFRASTRUCTURE & ENVIRONMENT  
**Date:** January 03, 2012

**General Information:**

2 samples were analyzed for EPA 6010. All samples were received in acceptable condition with any exceptions noted below.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Duplicate Sample:**

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

**Additional Comments:**

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

Page 5 of 10

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## ANALYTICAL RESULTS

Project: BETTER-BRITE

Pace Project No.: 4055258

Sample: WTP-INFLUENT-122311 Lab ID: 4055258001 Collected: 12/23/11 10:00 Received: 12/27/11 10:00 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP Analytical Method: EPA 6010 Preparation Method: EPA 3010									
Chromium	6850	ug/L	5.0	0.79	1	12/29/11 16:15	01/03/12 11:02	7440-47-3	



## ANALYTICAL RESULTS

Project: BETTER-BRITE

Pace Project No.: 4055258

Sample: WTP-EFFLUENT-122311 Lab ID: 4055258002 Collected: 12/23/11 15:00 Received: 12/27/11 10:00 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP . Analytical Method: EPA 6010 Preparation Method: EPA 3010									
Chromium	765 ug/L		5.0	0.79	1	12/29/11 16:15	01/03/12 11:14	7440-47-3	

### QUALITY CONTROL DATA

Project: BETTER-BRITE

Pace Project No.: 4055258

QC Batch: MPRP/6431

Analysis Method: EPA 6010

QC Batch Method: EPA 3010

Analysis Description: 6010 MET

Associated Lab Samples: 4055258001, 4055258002

METHOD BLANK: 552518

Matrix: Water

Associated Lab Samples: 4055258001, 4055258002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium	ug/L	<0.79	5.0	01/03/12 10:55	

LABORATORY CONTROL SAMPLE: 552519

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	500	518	104	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 552520

552521

Parameter	Units	4055258001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
Chromium	ug/L	6850	500	500	7320	7300	94	89	75-125	.4 20	

## QUALIFIERS

Project: BETTER-BRITE  
Pace Project No.: 4055258

## DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

## LABORATORIES

PASI-G Pace Analytical Services - Green Bay

## QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: BETTER-BRITE

Pace Project No.: 4055258

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
4055258001	WTP-INFLUENT-122311	EPA 3010	MPRP/6431	EPA 6010	ICP/5466
4055258002	WTP-EFFLUENT-122311	EPA 3010	MPRP/6431	EPA 6010	ICP/5466

4055258



# CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed and accurate.

Page: 1 of 1  
Cooler # \_\_\_\_\_ of \_\_\_\_\_

COG # 20112312

Required Ship to Lab:		Required Project Information:		Required Invoice Information:		TAT: Standard 10 day <input checked="" type="checkbox"/> Rush <input type="checkbox"/> Mark One				
Lab Name:	Pace Analytical Services	Facility ID #	Botter-Brito	Send Invoice to:	Accounts Payable					
Address:		Task Code #		Address:		If Rush, Date due				
1241 Bellevue Street - Suite 9, Green Bay, WI		Site Address		City/State		QC level Required: Standard <input checked="" type="checkbox"/> Special <input type="checkbox"/> Mark one				
Lab PM:	Tod Nottmeyer	City		State		Lab Project ID (lab use)				
Phone/Fax:	(608) 232-3300	Project Contact:	Nic Dufek	Send EDD to:		Requested Analyses				
Lab PM email		Phone/Fax:	920-497-2500	CC Hardcopy report to	Nic Dufek	Filtered (Y/N)				
Applicable Lab Quote #:		Email:	Nic.Dufek@Foth.com	CC Hardcopy report to		N				
ITEM #	SAMPLE ID Samples IDs MUST BE UNIQUE	Valid Matrix Codes MATRIX SURFACE WATER GROUNDWATER WASTE WATER WASTE PRODUCT SOIL SLURRY WASTE AIR GAS	MATRIX CODE	SAMPLE TYPE G-GRAB C-COMP	SAMPLE DATE	SAMPLE TIME	# OF CONTAINERS	Preservatives Unpreserved H2SO4 HNO3 HCl H2O2 NaOH Na2S2O3 Methanol Other	Total Chrome	Comments/ Lab Sample I.D.
1	WTP-Influent-122311			ww	12/23/2011	1000	1	X	X	001 1-250 ucl D
2	WTP-Effluent-122311			ww	12/23/2011	1500	1	X	X	002 ↓
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										

Additional Comments/Special Instructions:		RELINQUISHED BY / AFFILIATION		DATE	TIME	ACCEPTED BY / AFFILIATION		DATE	TIME	Sample Receipt Conditions			
Samples on Ice at 4C		J. Key		12/23/11	8:35	D. Nottmeyer		12/23/11	9:15	Y/N	Y/N	Y/N	
		D. Nottmeyer		12/23/11	10:00	A. Dufek		12/23/11	10:00	Y/N	Y/N	Y/N	
										Y/N	Y/N	Y/N	
										Y/N	Y/N	Y/N	
SHIPPING METHOD: (mark as appropriate)		SAMPLER NAME AND SIGNATURE											
UPS COURIER FEDEX		PRINT Name of SAMPLER		Nic Dufek		DATE Signed		12/23/11	Time:	Temp in °C	Samples on Ice?	Sample intact?	Trip Blank?
US MAIL		SIGNATURE of SAMPLER											



# Sample Condition Upon Receipt

Client Name: Foehn Project # 4055258

Courier: ☐ Fed Ex ☐ UPS ☐ USPS ☐ Client ☐ Commercial ☒ Pace Other \_\_\_\_\_

Tracking #: \_\_\_\_\_

Custody Seal on Cooler/Box Present: ☐ yes ☒ no Seals intact: ☐ yes ☒ no

Custody Seal on Samples Present: ☐ yes ☒ no Seals intact: ☐ yes ☒ no

Packing Material: ☐ Bubble Wrap ☐ Bubble Bags ☒ None Other \_\_\_\_\_

Thermometer Used NA

Type of Ice: ☒ Wet ☐ Blue ☐ Dry ☐ None

☒ Samples on ice, cooling process has begun.

Cooler Temperature NOE

Biological Tissue is Frozen: ☐ yes ☒ no

Temp Blank Present: ☒ yes ☐ no

Temp should be above freezing to 6°C for all sample except Biota.

Biota Samples should be received ≤ 0°C.

Comments: \_\_\_\_\_

Person examining contents:  
Date: 12/27/11  
Initials: \_\_\_\_\_

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
-Pace Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <u>W</u>		
All containers needing preservation have been checked.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	13.
All containers needing preservation are found to be in compliance with EPA recommendation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Initial when completed <u>UB</u> Lot # of added preservative _____
Samples checked for dechlorination:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	16.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):		

Client Notification/ Resolution:

Field Data Required? Y / N

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

Project Manager Review: \_\_\_\_\_

Date: 12/27/11

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp, incorrect containers)

**Lauridsen, Keld B - DNR**

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**From:** Brochocki, Philip R [Philip.Brochocki@Foth.com]  
**Sent:** Monday, November 29, 2010 11:43 AM  
**To:** Dufek, Nic; Lauridsen, Keld B - DNR  
**Subject:** RE: Better-Brite Trench  
**Attachments:** 4039586\_coc.pdf; 4039586\_fr.pdf

Guys here are the results for trench sampling.

Grass Trench: 17,100 µg/L (South Trench)

Lot Trench: 4,380 µg/L (East Trench)

Samples were not filtered.

Looking at the 2009 five year report it is my understanding the raw surface water at the Zinc Shop sump was 14,800 in July 2009. Obviously there is some mixing going on.

Were you guys able to get together on arrangements to pull the trench pump?

Keld let me know if we can help with any of the unresolved groundwater issues at Better-Brite.

Thanks

Phil

My Email address has changed to Philip.Brochocki@Foth.com; please update your records.

Philip R. Brochocki, PG  
Foth Infrastructure & Environment, LLC  
2737 South Ridge Road, Suite 600, P.O. Box 12326  
Green Bay, WI 54307-2326  
Ph: (920) 496-6801 / Fax (920) 497-8516  
<http://www.foth.com>



Go Green, keep it on the screen. Please do not print this email unless necessary.

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**From:** Dufek, Nic  
**Sent:** Wednesday, November 17, 2010 10:54 AM  
**To:** 'Keld.Lauridsen@wisconsin.gov'  
**Cc:** Brochocki, Philip R  
**Subject:** Re: Better-Brite Trench

Next wk is going to be tough for me with hunting and Thanksgiving. It sounds like the week after will work

11/29/2010

(Please Print Clearly)

Company Name:	Foth I & E
Branch/Location:	Green Bay
Project Contact:	Phil Brochowski
Phone:	920 497-2500
Project Number:	09W017
Project Name:	Better Brite Small trench sample
Project State:	WI
Sampled By (Print):	Nick Dufek
Sampled By (Sign):	
PO #:	
Regulatory Program:	



UPPER MIDWEST REGION

MN: 612-607-1700 WI: 920-469-2436

Page 1 of

## CHAIN OF CUSTODY

\*Preservation Codes  
A=None B=HCL C=H2SO4 D=HNO3 E=DI Water F=Methanol G=NaOH  
H=Sodium Bisulfate Solution I=Sodium Thiosulfate J=Other

FILTERED?  
(YES/NO)

PRESERVATION  
(CODE)\*

ANALYST REQUESTED

ANALYST REQUESTED

ANALYST REQUESTED

ANALYST REQUESTED

ANALYST REQUESTED

ANALYST REQUESTED

ANALYST REQUESTED

ANALYST REQUESTED

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ANALYST REQUESTED

ANALYST REQUESTED

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D



# Sample Condition Upon Receipt

Pace Analytical

Client Name: Foth I & E Project # 4039586

Courier: ☐ Fed Ex ☐ UPS ☐ USPS ☒ Client ☐ Commercial ☐ Pace Other \_\_\_\_\_

Tracking #: \_\_\_\_\_

Custody Seal on Cooler/Box Present: ☐ yes ☒ no Seals intact: ☐ yes ☒ no

Custody Seal on Samples Present: ☐ yes ☒ no Seals intact: ☐ yes ☒ no

Packing Material: ☐ Bubble Wrap ☒ Bubble Bags ☒ None Other \_\_\_\_\_

Thermometer Used N/A Type of Ice: ☒ Wet ☐ Blue ☐ Dry ☐ None ☒ Samples on ice, cooling process has begun

Cooler Temperature ROI Biological Tissue is Frozen: ☐ yes ☒ no

Temp Blank Present: ☐ yes ☒ no

Temp should be above freezing to 6°C for all sample except Biota.

Biota Samples should be received ≤ 0°C.

Comments:

Person examining contents:

Date: 11/12/10

Initials: Km

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
-Pace Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <u>W</u>		
All containers needing preservation have been checked.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	13.
All containers needing preservation are found to be in compliance with EPA recommendation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Initial when completed <u>Km</u> Lot # of added preservative
Samples checked for dechlorination:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	16.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):		

Client Notification/ Resolution:

Field Data Required?

Y / N

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

Project Manager Review:

MAT for TN

Date: 11.13.10

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp, incorrect containers)

November 19, 2010

PHIL BROCHOCKI  
FOTH INFRASTRUCTURE & ENVIRONM  
2737 South Ridge Rd  
Suite 600  
Green Bay, WI 54307

RE: Project: BETTER-BRITE TRENCH  
Pace Project No.: 4039586

Dear PHIL BROCHOCKI:

Enclosed are the analytical results for sample(s) received by the laboratory on November 12, 2010. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Tod Noltemeyer

tod.noltemeyer@pacelabs.com  
Project Manager

Enclosures

## REPORT OF LABORATORY ANALYSIS

Page 1 of 10

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## CERTIFICATIONS

Project: BETTER-BRITE TRENCH  
Pace Project No.: 4039586

### Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302  
California Certification #: 09268CA  
Florida/NELAP Certification #: E87948  
Illinois Certification #: 200050  
Kentucky Certification #: 82  
Louisiana Certification #: 04168  
Minnesota Certification #: 055-999-334  
New York Certification #: 11888

New York Certification #: 11888  
North Carolina Certification #: 503  
North Dakota Certification #: R-150  
South Carolina Certification #: 83006001  
US Dept of Agriculture #: S-76505  
Wisconsin Certification #: 405132750  
Wisconsin DATCP Certification #: 105-444

## REPORT OF LABORATORY ANALYSIS

Page 2 of 10

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### SAMPLE SUMMARY

Project: BETTER-BRITE TRENCH

Pace Project No.: 4039586

Lab ID	Sample ID	Matrix	Date Collected	Date Received
4039586001	GRASS TRENCH	Water	11/12/10 09:00	11/12/10 17:25
4039586002	LOT TRENCH	Water	11/12/10 09:30	11/12/10 17:25

### REPORT OF LABORATORY ANALYSIS

Page 3 of 10

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### SAMPLE ANALYTE COUNT

Project: BETTER-BRITE TRENCH  
Pace Project No.: 4039586

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
4039586001	GRASS TRENCH	EPA 6010	DLB	1	PASI-G
4039586002	LOT TRENCH	EPA 6010	DLB	1	PASI-G

### REPORT OF LABORATORY ANALYSIS

Page 4 of 10

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## PROJECT NARRATIVE

Project: BETTER-BRITE TRENCH

Pace Project No.: 4039586

---

Method: EPA 6010

Description: 6010 MET ICP

Client: FOTH INFRASTRUCTURE & ENVIRONMENT

Date: November 19, 2010

### General Information:

2 samples were analyzed for EPA 6010. All samples were received in acceptable condition with any exceptions noted below.

### Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

### Sample Preparation:

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

### Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

### Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

### Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

### Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

### Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

### Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

### Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

Page 5 of 10

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## ANALYTICAL RESULTS

Project: BETTER-BRITE TRENCH

Pace Project No.: 4039586

Sample: GRASS TRENCH      Lab ID: 4039586001      Collected: 11/12/10 09:00      Received: 11/12/10 17:25      Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP</b> Analytical Method: EPA 6010      Preparation Method: EPA 3010									
Chromium	17100	ug/L	5.0	0.44	1	11/16/10 06:55	11/17/10 20:48	7440-47-3	

## ANALYTICAL RESULTS

Project: BETTER-BRITE TRENCH

Pace Project No.: 4039586

Sample: LOT TRENCH      Lab ID: 4039586002      Collected: 11/12/10 09:30      Received: 11/12/10 17:25      Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP      Analytical Method: EPA 6010      Preparation Method: EPA 3010									
Chromium	4380	ug/L	5.0	0.44	1	11/16/10 06:55	11/17/10 20:52	7440-47-3	



### QUALITY CONTROL DATA

Project: BETTER-BRITE TRENCH

Pace Project No.: 4039586

QC Batch: MPRP/4792

Analysis Method: EPA 6010

QC Batch Method: EPA 3010

Analysis Description: 6010 MET

Associated Lab Samples: 4039586001, 4039586002

METHOD BLANK: 385223

Matrix: Water

Associated Lab Samples: 4039586001, 4039586002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium	ug/L	<0.44	5.0	11/17/10 19:32	

LABORATORY CONTROL SAMPLE: 385224

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	500	538	108	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 385225

385226

Parameter	Units	4039511001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
Chromium	ug/L	2.5J	500	500	546	550	109	109	75-125	.6 20	

## QUALIFIERS

Project: **BETTER-BRITE TRENCH**

Pace Project No.: **4039586**

## DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is NELAP accredited. Contact your Pace PM for the current list of accredited analytes.

## LABORATORIES

PASI-G Pace Analytical Services - Green Bay

### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: BETTER-BRITE TRENCH  
Pace Project No.: 4039586

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
4039586001	GRASS TRENCH	EPA 3010	MPRP/4792	EPA 6010	ICP/4073
4039586002	LOT TRENCH	EPA 3010	MPRP/4792	EPA 6010	ICP/4073

**Lauridsen, Keld B - DNR**

---

**From:** Ken Pabich [kpabich@mail.de-pere.org]  
**Sent:** Friday, September 25, 2009 11:18 AM  
**To:** Lauridsen, Keld B - DNR  
**Cc:** Scott Thoresen  
**Subject:** RE: Request for Pavement

Hi Keld --

After we gave them the price, they decided not to move forward. I did give the map to our Public Works director and he was going to check into it with his staff. I have cc'd Scott, so he knows that we still need to address the potential covered well.

Thanks

Ken

---

**From:** Lauridsen, Keld B - DNR [mailto:Keld.Lauridsen@wisconsin.gov]  
**Sent:** Friday, September 25, 2009 11:15 AM  
**To:** Ken Pabich  
**Subject:** RE: Request for Pavement

Ken,

Do you have an update on the paving project on the former Better Brite property? Has anybody been able to locate the missing monitoring well?

Thanks,

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue.  
Green Bay, WI 54313-6727

Phone (920) 662-5420  
Fax (920) 662-5197  
E-mail Keld.Lauridsen@wisconsin.gov  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

---

**From:** Lauridsen, Keld B - DNR  
**Sent:** Thursday, September 17, 2009 10:33 AM  
**To:** 'Ken Pabich'

09/28/2009

**Subject:** RE: Request for Pavement

Ken,

I think it would be a good idea to have somebody try to confirm the monitoring well location prior to cutting the asphalt. Would the City of De Pere or your contractor have access to a metal detector?

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue.  
Green Bay, WI 54313-6727

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Fax (920) 662-5197  
E-mail Keld.Lauridsen@wisconsin.gov  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

---

**From:** Lauridsen, Keld B - DNR  
**Sent:** Tuesday, September 15, 2009 3:07 PM  
**To:** 'Ken Pabich'  
**Subject:** RE: Request for Pavement

Ken,

The pavement needs to be removed so we can access a small metal plate sitting on top of the monitoring well itself. In order for us to collect water samples and monitor current groundwater conditions, we need to be able to remove the metal cover and insert a plastic bailer into the well so a water sample can be collected. We may need to retrofit the existing cover with a new cover so it is flush with the surface. I assume a small dip in the asphalt wouldn't be a good idea as somebody could trip and fall.

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
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Green Bay, WI 54313-6727

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E-mail Keld.Lauridsen@wisconsin.gov  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

09/28/2009

---

**From:** Ken Pabich [mailto:kpabich@mail.de-pere.org]  
**Sent:** Tuesday, September 15, 2009 1:34 PM  
**To:** Lauridsen, Keld B - DNR  
**Subject:** RE: Request for Pavement

Thanks -- I will see if the owner is still willing to pay for the work.

For the other monitoring well -- what type of access is needed. It looks like it is in the middle of the drive way movement (from what I could tell) -- Could it just be a small circle cut??

thanks

Ken

---

**From:** Lauridsen, Keld B - DNR [mailto:Keld.Lauridsen@wisconsin.gov]  
**Sent:** Tuesday, September 15, 2009 11:43 AM  
**To:** Ken Pabich  
**Subject:** RE: Request for Pavement

Ken,

I went to the Better Brite Zinc Shop site yesterday and looked at the small area the Thrift Shop requested to be paved. The Department has no concerns regarding that and you can proceed to have the area paved.

It appears that when the other area was paved, one of our monitoring wells (MW10) associated with the Better Brite Zinc Shop site was accidentally paved over. I have attached a map showing the location of MW10 circled in red. When on-site yesterday, I did bring a metal detector and identified a location where I believe the monitoring well is located underneath the pavement. I marked this spot with pink paint. It would be great if it could be confirmed that the monitoring well is still there and the pavement removed somehow so groundwater samples can be collected again.

Let me know if you need anything else.

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue.  
Green Bay, WI 54313-6727

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Fax (920) 662-5197  
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Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

---

**From:** Ken Pabich [mailto:kpabich@mail.de-pere.org]  
**Sent:** Tuesday, September 01, 2009 2:54 PM  
**To:** Lauridsen, Keld B - DNR  
**Subject:** Request for Pavement

Hi Keld --

Thanks for taking the time to discuss the project. The attached map shows the request. The Thrift Shop request to have the area shown on the map paved. People are driving through the site and create ruts in the area.

I told them that it would need DNR approval and that the City would most likely contract the work and request payment from them.

Please let me now your thoughts.

Thanks

Ken

**Ken Pabich**  
Director of Planning and Economic Development  
City of De Pere  
335 S. Broadway St.  
De Pere, WI 54115  
p: 920-339-4043  
f: 920-339-4049

09/28/2009

1 inch = 50 feet

WD-99-2

WD-100-2

WD-103-1

Owners of the thrift shop requested to have  
this area in blue paved.

6TH

WD-103

WD-104

WD-100-3

BUTLER

BUTLER

WD-860

359



**Lauridsen, Keld B - DNR**

---

**From:** Lauridsen, Keld B - DNR  
**Sent:** Thursday, April 16, 2009 3:01 PM  
**To:** 'JKennedy@gbmsd.org'  
**Cc:** 'PMcCarthy@gbmsd.org'; 'MKersten@gbmsd.org'; 'DBusch@gbmsd.org'; Urban, Bruce G  
**Subject:** DNR  
Better Brite

John,

Please see my responses below. If you need additional clarification, please let me know.

Hope you have a nice weekend,

Thanks,

-Keld

-----Original Message-----

**From:** JKennedy@gbmsd.org [<mailto:JKennedy@gbmsd.org>]  
**Sent:** Wednesday, April 08, 2009 1:41 PM  
**To:** Lauridsen, Keld B - DNR  
**Subject:** RE: Manifest from Better Brite

That will be fine.

John Kennedy  
Environmental Programs Manager  
GBMSD  
920-438-1071

"Lauridsen, Keld  
B - DNR"  
<Keld.Lauridsen@wisconsin.gov>

04/08/2009 12:57  
PM

"JKennedy@gbmsd.org"  
<JKennedy@gbmsd.org>

To

cc

Subject

RE: Manifest from Better Brite

John,

I may not be able to get back to you until early next week as things are really hectic for me right now. Hope that is OK.

Good to hear from you again John.

-Keld

-----Original Message-----

From: JKennedy@gbmsd.org [mailto:JKennedy@gbmsd.org]  
Sent: Tuesday, April 07, 2009 8:28 AM  
To: Lauridsen, Keld B - DNR  
Cc: PMcCarthy@gbmsd.org; DBusch@gbmsd.org; MKersten@gbmsd.org  
Subject: Manifest from Better Brite

Hi Keld:

Was wondering if you can help me understand something about Better Brite. Earlier today Bill Oldenburg gave me a copy of a manifest from Better Brite for a shipment of haz waste. This is the first time I've seen an original manifest, or even a copy of one from that facility. The date of shipment was 5/28/08, and it was signed by Mike Strenski, a GBMSD employee. I have a number of questions and comments that you may be able to help me with.

1) The manifest lists the generator as "WDNR-Better Brite". Does this mean that historically the DNR has handled the manifests from all haz waste shipments from that site? Does that also mean that they hold the records and have filed the annual Haz Waste Report with the DNR?

\*\*\*As far as I'm aware, all haz. waste sludge generated as part of the treatment operations at the Better Brite Zinc Shop for the last 10 years or so has been handled with WDNR-Better Brite as the generator. WDNR should have received copies of all haz. waste shipments from the site and we have filed the annual haz. waste reports. The De Pere Waste Water Treatment facility may also have copies of all the manifests.\*\*\*

2) I have only the "Generator's Initial Copy". Do you have the final return copy which verifies that the material reached its final destination and was disposed of?

\*\*\*Yes I do\*\*\*

3) Do we know if proper notices were sent to the DNR upon receiving the final completed return copy of the manifest?

\*\*\*We have the manifest with all signatures needed which should be all that is needed.\*\*\*

4) As it was signed by Mike Strenski, does he understand that he is personally liable if that material should turn up in an unapproved location and can be prosecuted in criminal court? Were these manifests signed by De Pere POTW employees in the past? Did the DNR, as the generator, authorize those signatories for these legal documents? If so, did those employees receive the adequate level of haz materials training?

\*\*\*WDNR staff used to sign the manifests but at some point it was decided that De Pere staff could sign on behalf of WDNR. This has been done for years and I assume it was an effort to save WDNR time as De Pere staff were there during drum pick-up anyway. The waste has been handled by a reputable company and I personally don't see how somebody that signed for the waste being picked up can be held liable for illegal disposal by a waste hauler/landfill operator. I have not been involved in any training effort so I'm not sure how that was handled.\*\*\*

Prior to our merger with De Pere, I had several talks with Mike Kersten and other De Pere staff about any historical haz waste shipments. According to Mr. Kersten, the De Pere POTW has not shipped out any haz waste for a number of years, and therefore does not file the annual haz waste report with the DNR. I would like concurrence by the DNR that the Better Brite facility is not part of the De Pere wastewater plant, and therefore not part of GBMSD. I don't want to find ourselves in violation of the State's haz waste reporting rules.

\*\*\*WDNR has always handled the haz. waste reporting for this site and the Better Brite facility has never been considered part of the De Pere Waste Water facility for haz. Waste reporting purposes.\*\*\*

My understanding is that GBMSD no longer operates the treatment equipment at the Better Brite facility. This should preclude future problems with manifest administration.

\*\*\*I agree.\*\*\*

Thanks for your help.

Regards,  
John

John Kennedy  
Environmental Programs Manager  
GBMSD  
920-438-1071

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue.  
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## **Lauridsen, Keld B - DNR**

---

**From:** Lauridsen, Keld B - DNR  
**Sent:** Thursday, March 12, 2009 2:14 PM  
**To:** Judy Schmidt-Lehman; Larry Delo; 'Scott Thoresen'  
**Cc:** 'PMcCarthy@gbmsd.org'; 'MKersten@gbmsd.org'; Urban, Bruce G - DNR;  
'PBrochocki@foth.com'  
**Subject:** Better Brite

The Department has just finalized the paper work for us to be able to bring in a contractor to continue operations at the Better Brite treatment facility on South Sixth Street in De Pere. The selected consultant is Foth Infrastructure and Environment (Foth) located here in Green Bay. The main contact with Foth for this project will be Mr. Phil Brochocki. Foth will try to come up to speed before March 31 where GBMSD has indicated that you will no longer be able to continue operations. This will probably involve them spending some time at the Better Brite site during treatment operations.

As a side note, I also wanted to mention that no chromium contaminated groundwater from a contaminated site (Midwest Plating) in Appleton was ever delivered and treated at the Better Brite facility in De Pere. The Department had received prior authorization from the City of De Pere to potentially pursue this in order to provide the most cost effective treatment for the contaminated groundwater from Midwest Plating. However, a more cost effective way of dealing with the contaminated water on-site was identified which then eliminated the need for transporting it to De Pere.

Again, the Department really appreciates all the assistance the City of De Pere has provided to this project.

Let me know if you have any questions.

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue.  
Green Bay, WI 54313-6727

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# CITY OF DE PERE

335 South Broadway  
De Pere, WI 54115  
Fax No.: 920/339-4049  
Web: <http://www.de-pere.org>  
November 18, 2008



Mr. Keld Lauridsen  
Wisconsin Department of Natural Resources  
Northeast Region  
PO Box 10448  
Green Bay, WI 54307-0448

**RE: Intergovernmental Agreement Between the Wisconsin Department of Natural Resources and the City of De Pere for the Operation of a Wastewater Pretreatment System**

Dear Mr. Lauridsen:

The City has reviewed your request to consider continuing to operate under the above Agreement for a limited time in order to allow the Department of Natural Resources (DNR) and the Green Bay Metropolitan Sewerage District (which acquired De Pere's wastewater treatment facilities on January 1, 2008) to come to an alternative arrangement.

As you know, the City sent formal notification of its termination of the above Agreement to DNR officials on February 18, 2008. In order to assist the DNR and continue the cooperative relationship between it and the City, the City is willing to continue to perform its tasks identified under the Agreement for an additional six-month period (through May 19, 2009). Hopefully, this will be sufficient time for the DNR and Green Bay Metropolitan Sewerage District to reach alternative arrangements.

If you have any questions, please feel free contact me at 339-4040.

Very truly yours,

A handwritten signature in black ink, which appears to read "Lawrence M. Delo", is positioned above the printed name.

Lawrence M. Delo  
City Administrator

LMD:jld

cc: Matthew Frank, DNR Secretary  
Bruce Urben, Remediation and Redevelopment Team Leader

H:\jdupont\Letters\2008\Lauridsen 11-18-08-183-001-04.doc

## SERVICES AGREEMENT

This Services Agreement is made and entered into effective January 1, 2008, by and between the Green Bay Metropolitan Sewerage District, a Wisconsin municipal corporation ("GBMSD") and the City of De Pere, a Wisconsin municipal corporation ("De Pere").

### WITNESSETH:

WHEREAS, De Pere entered into an Intergovernmental Agreement with the State of Wisconsin Department of Natural Resources (the "Department") for operation of a wastewater pretreatment system for remedial action under the Federal Superfund Program for the Better Brite Plating Company, Chrome and Zinc Shops (the "Better Brite Site"), a copy of which is attached hereto as Exhibit A (the "Better Brite Agreement"); and

WHEREAS, De Pere assigned employees from its municipal sewerage treatment plant to perform the services it was required to provide pursuant to the Better Brite Agreement; and

WHEREAS, GBMSD acquired De Pere's municipal sewerage treatment plant from De Pere as a result of GBMSD's annexation of De Pere which became effective as of midnight, December 31, 2007 and hired the majority of the employees who had previously worked for De Pere at the municipal sewerage treatment plant; and

WHEREAS GBMSD and De Pere have agreed that GBMSD will provide the services described in this Agreement to assist De Pere in complying with its obligations under the Better Brite Agreement.

NOW, THEREFORE, in consideration of the foregoing and the agreements set forth below, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, GBMSD and De Pere agree as follows:

1. Services Provided by GBMSD. As a subcontractor to De Pere, GBMSD will provide the services required by Paragraphs (A), (D), (E) and (L) of Article III of the Better Brite Agreement. The parties acknowledge that remediation of the Zinc shop has terminated and that

GBMSD's obligations shall be confined to the operation of the Chrome shop. GBMSD will also maintain records and provide reports to De Pere concerning its services under this Agreement which will be adequate to enable De Pere to comply with its reporting obligations to the Department under Paragraphs (H) and (I) of Article III of the Better Brite Agreement.

2. De Pere's Responsibilities. During the term of this Agreement, De Pere shall continue to be obligated to comply with its responsibilities required by Paragraphs (B), (C), (F), (G), (H), (I), (J), and (K) of Article III of the Better Brite Agreement.

3. Billing. GBMSD shall provide De Pere with an itemized quarterly bill for services completed in that quarter in the format required by Paragraph (G) of Article III of the Better Brite Agreement. The itemized bill shall account for time by task and include fringe benefits, travel and supplies necessary for GBMSD to perform the services required by this Agreement, and a ten percent (10%) administrative charge. De Pere shall make direct payment to GBMSD within fifteen (15) days of its receipt of the quarterly bill.

4. Term and Termination. This Agreement shall be effective as of January 1, 2008 until terminated by:

- (a) The mutual written consent of both GBMSD and De Pere; or
- (b) Either party providing sixty (60) days' written notice to the other party; or
- (c) by GBMSD, by fifteen (15) days' written notice to De Pere, if it determines, in its sole discretion, that the facilities provided by the Department and De Pere are inadequate to enable it to provide its services under this Agreement or if it determines, at its sole discretion, that provision of the services creates safety concerns for its employees or property.

5. No Assumption of Liabilities by GBMSD. Other than providing the services described in Paragraph 1, above, of this Agreement, GBMSD does not assume any of De Pere's other responsibilities or liabilities arising out of the Better Brite Agreement, De Pere's ownership

of the Better Brite Site, operations at the Better Brite Site or liabilities under the environmental laws of the United States and/or the State of Wisconsin associated with the Better Brite site.

6. Indemnity by GBMSD. GBMSD agrees to indemnify and hold harmless De Pere from and against any damages or losses, including reasonable attorney's fees, which De Pere suffers which are caused by or arise out of GBMSD's breach of this Agreement or negligent performance of the services GBMSD provides under this Agreement; provided, however, that GBMSD shall not be required to indemnify De Pere for any damages or losses which are caused by, or arise out of acts or omissions by De Pere in connection with its responsibilities under the Better Brite Agreement or for violations of United States and/or Wisconsin environmental laws with respect to ownership and/or operation of the Better Brite Site.

7. Indemnification by De Pere. De Pere agrees to indemnify and hold harmless GBMSD from and against any damages or losses, including reasonable attorney's fees, which GBMSD suffers which are caused by or arise out of negligent performance by De Pere of its obligations under the Better Brite Agreement and for any claims which arise under environmental laws of the United States and/or Wisconsin which relate to ownership and operation of the Better Brite Site, including GBMSD's provision of services under this Agreement.

8. Insurance. De Pere shall, during the term of this Agreement, maintain property and casualty insurance on the Better Brite Site which shall cover the full value of the structure and of the personal property and equipment maintained at the Site.

9. Notices. All notices required or permitted to be given under this Agreement shall be in writing and shall be considered to be given or received when (a) hand delivered, (b) one day after being sent by prepaid express or courier delivery service, (c) sent by facsimile transmission actually received by the receiving equipment with written confirmation thereof, or



(d) three days after being deposited in the United States mail, certified mail, postage prepaid, return receipt requested, in each case addressed as follows:

If to De Pere: De Pere City Clerk  
City of De Pere  
335 South Broadway  
De Pere, WI 54115

If to GBMSD: Executive Director  
Green Bay Metropolitan Sewerage District  
2231 North Quincy Street  
Green Bay, WI 54301

10. Assignment. Neither party shall have the right to assign any right or obligation under this Agreement without obtaining the prior written consent of the other party.

11. Binding Effect. This Agreement is binding upon the parties and their respective past, present or future parents, affiliates, predecessors, successors, transferees, assigns, representatives, principals, agents, officers, directors, and employees.

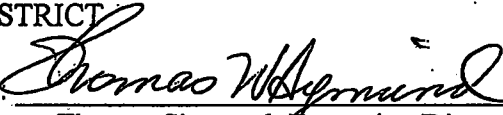
12. Governing Law. This Agreement shall be governed by the laws of the State of Wisconsin.

13. Acknowledgment. The undersigned, by execution hereof, acknowledge that they have read and understand this Agreement and agree to each and every provision hereof.

IN WITNESS WHEREOF, the parties have executed this Agreement in their respective capacities described below.

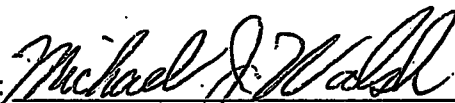
GREEN BAY METROPOLITAN SEWERAGE  
DISTRICT

By:

  
Thomas Sigmund, Executive Director

CITY OF DE PERE

By:

  
Michael Walsh, Mayor

By:

  
Charlene M. Peterson, Clerk-Treasurer

FIRST AMENDMENT TO  
INTERGOVERNMENTAL AGREEMENT BETWEEN  
THE WISCONSIN DEPARTMENT OF NATURAL RESOURCES AND THE  
CITY OF DE PERE FOR THE OPERATION OF A WASTEWATER  
PRETREATMENT SYSTEM

THIS AMENDMENT is made and entered into this 2<sup>nd</sup> day of August, 2004, by and between the State of Wisconsin, Department of Natural Resources ("the Department") and the City of De Pere, a Wisconsin Municipal Corporation ("the City").

WHEREAS, the Department and City are parties to an Intergovernmental Agreement dated November 20, 1996 ("the Agreement"), for the Operation of a Wastewater Pretreatment System, a copy of which is attached hereto and incorporated by reference as Exhibit A; and

WHEREAS, the Agreement sets forth the division of responsibilities between the City and Department in connection with a Wastewater Pretreatment System, consisting of extraction, collection, transportation and treatment of zinc and/or chrome contaminated groundwater at the former Better Brite Zinc and Chrome Shops (located at 315 S. 6<sup>th</sup> Street and the 500 Block of Lande Street, respectively); and

WHEREAS, the remediation efforts and consequent groundwater pretreatment at the Lande Street facility ceased in 1999; and

WHEREAS, the Department has undertaken the remediation of the former Midwest Plating Plant, 1315 W. Fourth Street, Appleton, Wisconsin; and

WHEREAS, the Department has determined that the groundwater generated from the remediation activities at Midwest Plating can be treated at the 315 S. 6<sup>th</sup> Street pretreatment facility, hereinafter referred to as "the Site" under the terms and conditions of the Agreement as modified hereunder.

NOW, THEREFORE, in consideration of the promises, covenants, and agreements contained herein, the Department and the City amend the Agreement as follows:

1. Due to the temporary nature of the Midwest Plating remediation, the Department shall be solely responsible for transporting the groundwater and for all costs associated with treating such groundwater, including transportation, treatment, and disposal of sludge generated by such treatment. No costs attributable to the treatment of the Midwest Plating location groundwater will be allocated to any entity other than the Department.

Amended Intergovernmental Agreement Between the  
Wisconsin Department of Natural Resources and the  
City of De Pere for the Operation of a Wastewater Pretreatment System  
Page: 2

2. Costs for such treatment service shall be billed according to the attached memo from Robert Kennedy to Keld Lauridsen, incorporated by reference as Exhibit B. Such costs shall be adjusted on January 1<sup>st</sup> of each year such groundwater is treated to reflect actual costs incurred. City shall prepare and submit invoices for such service to:

OMNNI Associates  
Attn: Brian Wayner  
One Systems Drive  
Appleton, WI 54914-1654

Such invoices shall be paid within 30 days of the date of invoice. Payments made after such 30 days shall be subject to statutory interest as a surcharge.

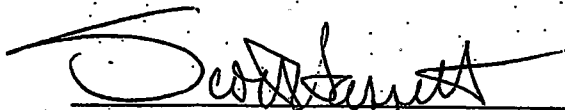
3. The terms and provisions of this Amendment relating to the Midwest Plating treatment shall expire when that remediation ceases or the agreement is terminated, whichever occurs first.

4. All other terms and conditions of the Agreement shall remain in full force and effect and are not modified hereunder.

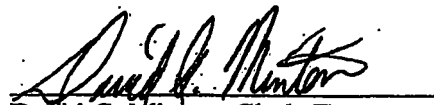
Dated this 2<sup>nd</sup> day of August, 2004.

WISCONSIN DEPARTMENT OF  
NATURAL RESOURCES

CITY OF DE PERE

  
Scott Hassett, Secretary

  
Michael J. Walsh, Mayor

  
David G. Minten, Clerk-Treasurer

INTERGOVERNMENTAL AGREEMENT BETWEEN THE  
WISCONSIN DEPARTMENT OF NATURAL RESOURCES AND THE  
CITY OF DE PERE FOR THE OPERATION OF A  
WASTEWATER PRETREATMENT SYSTEM

THIS AGREEMENT is made and entered into this 20th day of November, 1996 by and between the State of Wisconsin, Department of Natural Resources ("the Department") and the City of De Pere ("the City").

WHEREAS, the United States Environmental Protection Agency ("EPA") has undertaken an interim remedial action under the federal Superfund Program at the Better Brite Plating Company, Chrome and Zinc Shops, ("the Site"), which consists of continued operations of a groundwater collection system, continued operations of a wastewater pretreatment facility, installation and maintenance of fencing to secure the Site, installation of groundwater monitoring wells to monitor the migration of contamination from the Site and installation of measures to control surface water runoff from the Site; and

WHEREAS, the Department and the City have previously entered into an agreement executed the 13th of November, 1991, under which the City agreed to operate "the System" for the purposes of this agreement, such System consisting of a collection/extraction sump at the Zinc Shop and an extraction well and French drain at the Chrome Shop, transporting the contaminated water from the Zinc Shop to the Chrome Shop for treatment, a chemical precipitation pretreatment plant constructed at the Chrome Shop and any additional wastewater collection devices constructed as part of the interim remedial action; and

WHEREAS, throughout the term of the above referenced agreement, the City has owned and operated, and continues to own and operate, a wastewater treatment system, including a sanitary sewer system which is accessible from the Site and which may be used for transporting and final treatment of pretreated water taken from the Site; and

WHEREAS, EPA has the authority under 42 U.S.C. 9601, et seq. to take steps to remediate the contamination on the Site and by and through such authority has requested and authorized the Department and the City to be present at the Site and to undertake all remedial activities. As such, the Department and the City's activities at the Site for purposes of carrying out the terms of this Agreement are not to be construed as an "occupancy" of a "facility" for purposes of 42 U.S.C. 9601, et seq; and

WHEREAS, it is in the public interest that EPA, the Department, and the City cooperate in the interim remedial action activities at the Site as provided herein;

NOW, THEREFORE, in consideration of the promises, covenants, and agreements contained herein, the Department and the City agree as follows:

- I. **PURPOSE.** The purpose of this Intergovernmental Agreement is to set forth the terms and conditions of a labor and materials cost sharing agreement between the the Department and the City under which the City shall operated the System at the Site. This Agreement formalizes the transfer of funds received by the Department under the Superfund State Contract with EPA to the City for the purpose of continuing the System as part of the interim remedial action selected by the EPA for the Site. It is understood by the Department and the <sup>City</sup> that their participation <sup>RES</sup> under this Agreement is subject to the receipt of funding by the EPA for the Site. <sup>K7</sup>
- II. **TERM.** (A) This Agreement shall commence on November 15, 1996 and shall remain in full force and effect for a period of two (2) years or until final remedial action, whichever occurs first. This Agreement shall automatically renew unless terminated as otherwise provided herein. The term of this Agreement is subject to the availability of funding for the System from the Department and EPA.  
  
(B) During the term of this Agreement, there will be no right to termination of this Agreement except if funds assigned for the interim remedial action are no longer available from the Department and EPA or if the interim remedial action is inconsistent with the Superfund State Contract for the Site. If funds are no longer available from the Department or EPA or if the remedial action is deemed inconsistent with the Department's Superfund Contract for the Site, the Department will notify City as soon as practicable of the termination of this Agreement. Nothing in this paragraph shall limit either party to terminate this Agreement or otherwise void the responsibilities therein upon material breach.
- III. **CITY RESPONSIBILITIES.** The City shall:  
  
(A) Provide the qualified personnel to operate and maintain the System. Such operation and maintenance shall specifically include contacting the Department or EPA (or their contractors if so directed) to request transportation of contaminated groundwater collected from the Zinc Shop to the Chrome Shop, monitoring the System to assure proper functioning, monitoring chemical levels within the System; providing the chemicals necessary for operation of the System, making any repairs to the System and taking all other reasonable steps to operate the System, maintain the Site and serve the ultimate purpose of the pretreatment and final treatment of the contaminated groundwater collected and treated under this Agreement. However, the City is not responsible for the final transportation or disposal of the sludge generated by operation of the System. The City is also responsible for monitoring conditions within the System to assure the health and safety of its personnel.

(B) Provide the trained personnel, equipment, and materials required to maintain the Site in a reasonably orderly appearance. Such Site maintenance includes garbage removal, snow removal, lawn mowing, and Site security.

(C) Maintain public and non-public utilities (water, natural gas, electricity, and sanitary sewer) at the Site as required for operation and maintenance of the System.

(D) Permit the discharge of the pretreated groundwater into the sanitary sewer system and cause the final treatment of such pretreated wastewater that is discharged. It is understood that prior to the discharge of such pretreated wastewater, the City shall analyze such water to assure compliance with Section 19.034(5)(h) (Sewerage System Regulations, as may from time to time be amended), City of De Pere Municipal Code. The analysis shall be performed by persons deemed competent to perform such analysis. Such analysis shall be as suggested by the specifications for the Site. In addition, the Department may require complete laboratory testing of any sample on a quarterly basis.

(E) Obtain necessary labor and equipment to temporarily store the sludge created by the System according to federal and state law.

(F) Prepare and submit to the Department on or before the date of execution of this Agreement, a budget delineating estimated costs for services and materials to be provided by the City under this Agreement.

(G) Provide the Department with an itemized quarterly bill for services completed in that quarter. The itemized bill shall account for time by task and include the total expenses for salary, account for time by task, fringe benefits, travel and supplies necessary for the City to fulfill its responsibilities under this Agreement. In addition thereto, a ten per cent (10%) administrative charge shall be added. Said bill shall delineate the total amount to be paid by the Department and shall be sent within fifteen (15) days of the end of each federal fiscal quarter to:

Bruce Urban  
Remediation and Redevelopment Team Leader  
Wisconsin Department of Natural Resources  
Northeast Region  
P. O. Box 10448  
Green Bay, WI 53703-0448  
(414) 492-5860

(H) Provide the Department with a quarterly progress report for service completed each period. The progress report shall include the quantity of water treated and effluent analysis results and a summary of the operation and maintenance activities undertaken by the City. The progress report shall be sent within fifteen (15) days of the end of each federal fiscal quarter to:

Bruce Urban  
Remediation and Redevelopment Team Leader  
Wisconsin Department of Natural Resources  
Northeast Region  
P. O. Box 10448  
Green Bay, WI 53703-0448  
(414) 492-5860

(I) Maintain books, records, computer records, documents, and other evidence directly pertinent to performance of work under this Agreement and in accordance with generally accepted accounting principles and practices in accordance with the federal Office of Management and Budget Circulars A-87 and A-102. The City shall retain these books, records, computer records, and other evidence and the financial information and data used by the City in the preparation or support of any cost submission for ten (10) years from the termination of this Agreement or until any litigation related to the Site is completed, whichever is longer. The Department and EPA or any duly authorized representatives shall have access upon reasonable notice to such books, records, documents, and other evidence for the purpose of inspection, audit, and copying. The City shall provide suitable facilities for such access and inspection.

(J) Upon request, provide witnesses and documentation of activities performed and costs incurred under this Agreement to the Department and EPA, to the greatest extent possible, during the period of performance and for ten (10) years from termination of this Agreement or until litigation related to the Site is completed, whichever is longer.

(K) Obtain the Department's approval prior to contracting for any services to be funded under this Agreement which will exceed \$25,000, and notify the Department if more than forty (40) personnel work hours per week will be required to complete activities under this Agreement.

(L) Arrange for transportation of the contaminated groundwater from the Zinc Shop to the Chrome Shop and transportation, storage, or disposal of pretreatment plant sludge upon reaching temporary storage capacity at the Chrome Shop in accordance with the terms of sec. III (E) of this Agreement. Hazardous waste.

manifests for these activities will be signed by the City. Copy two (2) of the manifests, the generator retained copy, shall be sent to:

Bruce Urban  
Remediation and Redevelopment Team Leader  
Wisconsin Department of Natural Resources  
Northeast Region  
P. O. Box 10448  
Green Bay, WI 53703-0448  
(414) 492-5860

(M) Indemnify the Department and all of its officers, employees and agents against, and hold them harmless from, any and all claims, actions, suits, proceedings, costs, including attorney fees, expenses, damages and liabilities for injury or death of any person or persons and for loss of, or damage to, any property arising out of, or connected with, or resulting from, the occupancy, use, acts or omissions of the City's employees, agents or representatives in connection with this Agreement. This provision shall not, however, be interpreted as obligating future state legislative appropriations in a manner inconsistent with state constitutional or statutory limitations. However, the City shall not be responsible for claims or causes of action to the extent that they result from acts or omissions of the Department, its officers, employees or authorized representatives. In the event that funding for the completion of remediation of the Site ceases and an action is filed against the City to obtain remediation of the Site on the basis that the City is an "occupant" of a "facility" under the terms of this Agreement and pursuant to 42 U.S.C. ss. 9601 et seq., and if the Department is joined as a party to such an action, the Department will provide for its own defense in litigation of the action.

IV. DEPARTMENT RESPONSIBILITIES. The Department shall:

(A) Monitor the operation and performance of the System and advise the City of any changes necessary to achieve remediation of the Site in compliance with the Department's and EPA's interim and final remedial action plans.

(B) Pay, within thirty (30) days of invoicing, an amount equal to ninety five per cent 95% of the actual costs of the operation and maintenance of the System, plus ten percent (10%) administrative costs, billed on a quarterly basis, for the final treatment of the wastewater discharged and maintenance of the Site as described in section III of this Agreement and including all clerical and administrative activities undertaken by the City pursuant to this Agreement.



## V. SITE ACCESS.

The Department and EPA have the authority to undertake remedial investigation and actions at the Site and have been authorized to enter the Site by the United States Bankruptcy Court of the Eastern District of Wisconsin. The City derives its right to access this Site under this Agreement. The City shall permit the Department and EPA to make physical inspections of the System in order to assure the integrity of the System in compliance with the terms of this Agreement. To avoid conflict with work activities required of the City under this Agreement, the Department and EPA will provide reasonable notice of any such inspection.

## VI. COST SHARING

(A) For the purpose of complying with this Agreement and contingent upon receipt by the Department of funds from the EPA and the availability of funds from the Wisconsin Environmental Fund, the Department will reimburse the City for the actual allowable costs to comply with this Agreement which are incurred by the City during the period of this Agreement.

(B) Costs of operation and maintenance of the System, final treatment of the wastewater discharged, and Site maintenance as described in section III of this Agreement, shall be allocated as follows, with an annual cap calculated from October 1 of each year of this Agreement (exclusive of an additional ten per cent (10%) administrative cost) as follows::

EPA	Ninety per cent (90%)
Department	Five per cent (5%) and any costs attributable to the City's allocation which exceed the annual cap and the additional ten per cent (10%) administrative fee
City	Five per cent (5%), with an annual cap not to exceed five thousand dollars (\$5,000).

(C) In the event of termination of this Agreement because of the non-availability of Department of EPA funding, the City and the Department agree to arrange for reimbursement to the City for fifty per cent (50%) of the actual costs incurred by the City for work undertaken by the City according to the terms of this Agreement, it being understood that in no case shall the City's liability exceed five thousand dollars (\$5,000).

# Memo

To: Keld Lauridsen WDNR

4-29-04

From: Bob Kennedy DPWWTP

RE: Better-Brite Costs per batch

The following estimate reflects time and chemicals used to condition, settle, and press out one 5500 gallon batch of waste ground water. My estimate is that each batch creates 1/8 of a drum of sludge, and you have the cost figures on hauling and disposing of the sludge. Keld, you will still have to figure out how to bill Roxanne for sludge disposal, that is the one area I do not work with at all.

Time:	3 ½ hours at 2004 estimated rate of \$43.50	\$152.25
H2SO4:	4 gals at \$1.09/gal	\$ 4.36
NaHSO3:	9 gals at \$1.53/gal	\$ 13.77
MgOH:	11 gals at \$2.87/gal	\$ 31.57
Polymer:	0.04 gals at \$25.00/gal	\$ 1.00
Utilities:	\$45.00/5500 gallon batch	\$ 45.00
Disposal drums & freight:	\$3.27/batch	<u>\$ 3.27</u>
Total Cost estimate/5500 gallon batch		\$251.22

To show this on the invoice we will break it down into a per gallon charge.

$\$251.22/5500 \text{ gals} = \$ 0.046/\text{gal}$

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be entered into this 26th day of November, 1996.

George E. Meyer  
George E. Meyer, Secretary  
Wisconsin Department of Natural Resources

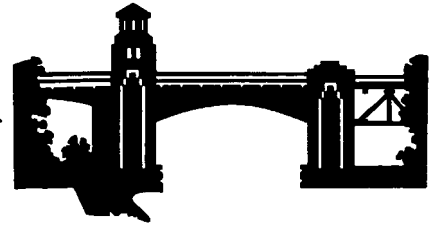
Michael J. Walsh  
Michael J. Walsh, Mayor  
City of De Pere

David G. Minten  
David G. Minten, Clerk-Treasurer  
City of De Pere

# CITY OF DE PERE

335 South Broadway  
De Pere, WI 54115  
Fax No.: 920/339-4049  
Web: <http://www.de-pere.org>  
**VIA CERTIFIED MAIL**

February 18, 2008



City Attorney's Office  
(920) 339-4042

Mr. Matthew J. Frank  
Secretary, Depart. of Natural Resources  
101 S. Webster Street  
P.O. Box 7921  
Madison, WI 53707-7921

Mr. Bruce Urban  
Remediation and Redevelopment Team Leader  
Wisconsin Department of Natural Resources  
Northeast Region  
P.O. Box 10448  
Green Bay, WI 53703-0448

**RE: Intergovernmental Agreement Between the Wisconsin Department of Natural Resources and the City of De Pere for the operation of a Wastewater Pretreatment System**

Dear Messrs. Frank and Urban:

The City of De Pere hereby notifies you that it is terminating the November 20, 1996 Intergovernmental Agreement between the Wisconsin Department of Natural Resources and the City of De Pere for the operation of a Wastewater Pretreatment System, as amended on August 2, 2004. Termination of this agreement will be effective November 19, 2008 at the conclusion of the current two-year contract term.

As you are aware, with the annexation of the City of De Pere into the Green Bay Metropolitan Sewerage District, the City no longer runs or operates its own POTW. Continuation of this agreement therefore is more appropriate with the Metropolitan Sewerage District than the City of De Pere.

Very truly yours,

Lawrence M. Delo  
City Administrator

LMD:jlh

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# Memorandum



Green Bay  
Metropolitan  
Sewerage District

TO: Tom Sigmund

FROM: Pete McCarthy, Bill Angoli, Mark Vanden Heuvel

DATE: January 30, 2008

SUBJECT: Recommended Upgrades to Better Brite Superfund Treatment Facilities

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The following is a list of action items we recommend for implementation if GBMSD is to provide operations and maintenance (O&M) services. They are listed as items that should be completed as soon as possible for this facility and items that can be deferred over the next six to nine months.

## **Physical Improvements**

### **Immediate Action Items:**

- 1) Provide landline, cell phone or radio communications between O&M personnel at the site and personnel at the De Pere Facility.
- 2) Provide an emergency alarm device which contacts the plant with a common alarm and/or in case of an accident.
- 3) Number all valves and label all piping for operator safety and for the O&M Manual.
- 4) Contract with an electrical contractor to determine the reliability of electrical panel, wiring, conduits and equipment within the facility and to bring all electrical and control systems up to code, including but not limited to:
  - a) Check for electrical equipment integrity and condition.
  - b) Clean dirty and corroded contacts and switches.
  - c) Replace all switches and breakers that are not operational.
  - d) Remove all switches and breakers not being used.
  - e) Close all electrical enclosures.
  - f) Clean wiring connections and replace corroded connections and wiring. If necessary, replace wiring with tinned coated copper wire and conduit with hot dipped galvanized or PVC coated conduit.

- 5) Provide all equipment with lockout devices.
- 6) Provide emergency stop buttons near the pumps.
- 7) Fix the well pump controls to provide automatic pump-down of the well with float switches and/or ultrasonic level detectors.
- 8) Add a well pump fail alarm with operator notification.
- 9) Upgrade the level sensing controls in the storage tank to provide ultrasonic level detectors, high level alarms with operator notification, and a high-high level alarm with well pump shut down.
- 10) Upgrade the level sensing controls in the reaction tank to provide ultrasonic level detectors, high level alarms with operator notification, and a high-high level alarm with transfer pump shut down.
- 11) Check and repair the chemical transfer pump. The pump is badly corroded and failure could cause a spill in the building.
- 12) Fix the acid pump switch on the control panel and check if the outlet for the acid pump has power and does not trip when operating. Presently, it requires plugging the acid pump into the polymer pump electrical outlet and turning on the polymer switch on the control panel.
- 13) Upgrade and move the emergency shower and eyewash to a location near the door.
- 14) Buy a new pH meter. The range of the existing meter is only 6.7 to 7.3 s.u.
- 15) Buy a new stair ladder with handrails and wheels for accessing the tops of the tanks.
- 16) Make sure all chemical containers are closed tightly to prevent evaporation into the working space, a room with limited ventilation.
- 17) Review the amount of chemicals used in the process. It may not be necessary to store 55 gallon drums for long periods if smaller containers can be purchased.
- 18) Provide a storage cabinet for personal protective equipment in the building that will protect the equipment from the chemical environment, prevent additional exposure to O&M personnel who use the equipment, and provide better access to the equipment.
- 19) Develop an air handling and monitoring system to protect the building and employees in the building.

- a) Calculate the air changes per hour required when the building is occupied and upgrade to code as necessary.
- b) Provide a timer for the existing large ventilation fan OR replace the existing large fan with a two-speed fan OR install a small fan in addition to the existing fan in order to provide continual low ventilation of the building when the operator is not present.
- c) Provide a low temperature contact and alarm with operator notification that will also shut down the low ventilation fan operation.
- d) Provide a switch on outside of building to turn on the high-speed ventilation system before entry by the operator.
- e) Provide an air monitoring equipment and alarm system for H<sub>2</sub>S and bi-sulfite with operator notification.

**Deferrable Action Items (6-9 months):**

- 20) Determine the structural integrity of existing corroded tank stands and replace with new coated metal stands as necessary.
- 21) Provide vent piping on all tanks to outside of the building.
- 22) Provide a hood and a vent fan for chemical testing.
- 23) Replace the existing metal grating with non-corrosive grating over the sump pit.
- 24) Provide better storage of chemicals on site. Chemicals may need to be stored in a separate dedicated building to provide safe movement in the process building and minimize airborne chemicals in the working environment.
- 25) Provide fume hoods as needed for process safety within the building.
- 26) Remove any equipment or piping that is not in use.
- 27) Review any remaining personnel safety issues within the building after these action items are completed.

**Administrative Improvements**

- 28) Determine whether a one- or two-worker operation is necessary for the safety of employees.
- 29) Find all maintenance records for the equipment.
- 30) Develop an O&M Manual for this facility that includes:
  - a) Effluent limitations to be complied with by the process system
  - b) A clear discussion of the chemistry of the treatment system
  - c) Identification of all chemicals used, their concentrations, and supplier contacts

- d) The target pHs to be met in the batch operation
- e) The means of measuring chemical transfer amounts (metering, liquid levels, pump stroke counts)
- f) Mixing times for various stages of batch treatment
- g) Operation of the plate and frame press, including pressure targets and holding times
- h) Discussion of chemical sludge disposal
- i) Chemical handling procedures
- j) Calibration requirements
- k) Required operational lab tests by EPA method
- l) Maintenance procedures for process equipment items (manufacturers manuals where available)
- m) Lock Out – Tag Out procedures
- n) General safety procedures (not specifically covered in items 1h and 1l above)
- o) We should observe the treatment process with a chemist, an operator, and someone from maintenance to help better understand the process and equipment. This will help with the development of the O&M Manual as well as the necessary improvements.



**Lauridsen, Keld B - DNR**

---

**From:** Lauridsen, Keld B - DNR  
**Sent:** Friday, September 21, 2007 9:31 AM  
**To:** 'Robert Kennedy'  
**Subject:** RE: motor

Thanks Bob. Excellent job as always.

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue.  
P.O. Box 10448  
Green Bay, WI 54307-0448

Phone (920) 662-5420  
Fax (920) 662-5197  
E-mail Keld.Lauridsen@wisconsin.gov  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

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**From:** Robert Kennedy [mailto:[rkennedy@mail.de-pere.org](mailto:rkennedy@mail.de-pere.org)]  
**Sent:** Friday, September 21, 2007 8:32 AM  
**To:** Lauridsen, Keld B - DNR  
**Subject:** motor

Keld-

My maintenance supervisor found and purchased a Dayton motor for the polymer mixer at Grainger.  
The cost was \$65 and change.

The price for OEM through Lliqui-systems was \$236 plus shipping.

Our maintenance crew will have to attach a cord & plug, but that is all it will take.

Have a good weekend, and a good trip to Denmark.

**Robert Kennedy**  
**Technical Services Supervisor**  
**De Pere WWTP**  
**920-339-4094**  
**920-339-4048 fax**

09/21/2007

Notice: Please complete Form 3300-5 and return it to the appropriate DNR office and bureau. Completion of this report is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file this form may result in a forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be used for any other purpose. NOTE: See the instructions for more information.

Route to: ☐ Drinking Water ☐ Watershed/Wastewater ☐ Waste Management ☐ Remediation/Redevelopment ☐ Other

(1) GENERAL INFORMATION			(2) FACILITY /OWNER INFORMATION	
WI Unique Well No.	DNR Well ID No.	County Brown	Facility Name Better Brite	
Common Well Name MW-4		Gov't Lot (if applicable)	Facility ID	License/Permit/Monitoring No.
1/4 of 1/4 of Sec. ; T. N; R. <input type="checkbox"/> E <input type="checkbox"/> W			Street Address of Well 320 South 6th Street	
ft. <input type="checkbox"/> N. <input type="checkbox"/> S., ft. <input type="checkbox"/> E. <input type="checkbox"/> W.			City, Village, or Town De Pere	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/> ) or Well Location <input type="checkbox"/>			Present Well Owner Better Brite	Original Owner Better Brite
Lat. ° ' " Long. ° ' " or			Street Address or Route of Owner 320 South 6th Street	
State Plane ft. N. ft. E. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Zone			City, State, Zip Code De Pere, Wisconsin	
Reason For Abandonment site closed		WI Unique Well No. of Replacement Well		

(3) WELL/DRILLHOLE/BOREHOLE INFORMATION		(4) PUMP, LINER, SCREEN, CASING, & SEALING MATERIAL			
Original Construction Date		Pump & Piping Removed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable		
<input checked="" type="checkbox"/> Monitoring Well	If a Well Construction Report is available, please attach.	Liner(s) Removed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable		
<input type="checkbox"/> Water Well		Screen Removed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable		
<input type="checkbox"/> Drillhole / Borehole		Casing Left in Place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Construction Type:		Was Casing Cut Off Below Surface?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<input checked="" type="checkbox"/> Drilled	<input type="checkbox"/> Driven (Sandpoint)	Did Sealing Material Rise to Surface?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<input type="checkbox"/> Other (Specify)		Did Material Settle After 24 Hours?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Formation Type:		If Yes, Was Hole Retopped?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<input checked="" type="checkbox"/> Unconsolidated Formation	<input type="checkbox"/> Bedrock	Required Method of Placing Sealing Material			
Total Well Depth (ft) 15.4	Casing Diameter (in.)	<input type="checkbox"/> Conductor Pipe - Gravity <input type="checkbox"/> Conductor Pipe - Pumped			
(From ground surface)	Casing Depth (ft.)	<input type="checkbox"/> Screened & Poured <input checked="" type="checkbox"/> Other (Explain) Gravity			
Lower Drillhole Diameter (in.)		(Bentonite Chips)			
Was Well Annular Space Grouted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown		Sealing Materials			
If Yes, To What Depth? Feet		For monitoring wells and monitoring well boreholes only			
Depth to Water (Feet) 12.0		<input type="checkbox"/> Neat Cement Grout <input type="checkbox"/> Bentonite Chips			
		<input type="checkbox"/> Sand-Cement (Concrete) Grout <input type="checkbox"/> Granular Bentonite			
		<input type="checkbox"/> Concrete <input type="checkbox"/> Bentonite-Cement Grout			
		<input type="checkbox"/> Clay-Sand Slurry <input type="checkbox"/> Bentonite - Sand Slurry			
		<input checked="" type="checkbox"/> Chipped Bentonite			
(5) Sealing Material Used	From (Ft.)	To (Ft.)	Sacks Sealant	Mix Ratio or Mud Weight	
bentonite and on-site soil	Surface	1.0	0.5	50# bag	
3/8-inch bentonite chips	1.0	15.4	1.5	50# bags	

(6) Comments Removed flush mount & concrete. Filled with bentonite chips & topped with bentonite & on-site soil.

(7) Name of Person or Firm Doing Sealing Work Subsurface Testing Services, Inc.		Date of Abandonment 9/7/06
Signature of Person Doing Work <i>John H. Carlson</i>	Date Signed 9-14-06	
Street or Route 1035 Kepler Drive	Telephone Number 920-468-1978	
City, State, Zip Code Green Bay, Wisconsin 54311-8320		

Date Received	Noted By
Comments	

Notice: Please complete Form 3300-5 and return it to the appropriate DNR office and bureau. Completion of this report is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file this form may result in a forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be used for any other purpose. NOTE: See the instructions for more information.

Route to: ☐ Drinking Water ☐ Watershed/Wastewater ☐ Waste Management ☐ Remediation/Redevelopment ☐ Other

(1) GENERAL INFORMATION

WI Unique Well No.	DNR Well ID No.	County
		Brown
Common Well Name <u>MW-4A</u> Gov't Lot (if applicable)		
1/4 of 1/4 of Sec. ; T. N; R. <input type="checkbox"/> E <input type="checkbox"/> W		
Grid Location		
ft. <input type="checkbox"/> N. <input type="checkbox"/> S. ft. <input type="checkbox"/> E. <input type="checkbox"/> W.		
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/> ) or Well Location <input type="checkbox"/>		
Lat. " " Long. " " or		
State Plane ft. N. ft. E. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Zone		
Reason For Abandonment		WI Unique Well No.
site closed		of Replacement Well

(2) FACILITY /OWNER INFORMATION

Facility Name	
Better Brite	
Facility ID	License/Permit/Monitoring No.
Street Address of Well	
320 South 6th Street	
City, Village, or Town	
De Pere	
Present Well Owner	Original Owner
Better Brite	Better Brite
Street Address or Route of Owner	
320 South 6th Street	
City, State, Zip Code	
De Pere, Wisconsin	

(3) WELL/DRILLHOLE/BOREHOLE INFORMATION

Original Construction Date	
<input checked="" type="checkbox"/> Monitoring Well	If a Well Construction Report is available, please attach.
<input type="checkbox"/> Water Well	
<input type="checkbox"/> Drillhole / Borehole	
Construction Type:	
<input checked="" type="checkbox"/> Drilled	<input type="checkbox"/> Driven (Sandpoint)
<input type="checkbox"/> Other (Specify)	
Formation Type:	
<input checked="" type="checkbox"/> Unconsolidated Formation	<input type="checkbox"/> Bedrock
Total Well Depth (ft) <u>29.5</u>	Casing Diameter (in.)
(From ground surface)	Casing Depth (ft.)
Lower Drillhole Diameter (in.)	
Was Well Annular Space Grouted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown	
If Yes, To What Depth? Feet	
Depth to Water (Feet) <u>12.0</u>	

(4) PUMP, LINER, SCREEN, CASING, & SEALING MATERIAL

Pump & Piping Removed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Liner(s) Removed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Screen Removed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable
Casing Left in Place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Was Casing Cut Off Below Surface?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Did Sealing Material Rise to Surface?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Did Material Settle After 24 Hours?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, Was Hole Retopped?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Required Method of Placing Sealing Material	
<input type="checkbox"/> Conductor Pipe - Gravity	<input type="checkbox"/> Conductor Pipe - Pumped
<input type="checkbox"/> Screened & Poured	<input checked="" type="checkbox"/> Other (Explain) Gravity
(Bentonite Chips)	
Sealing Materials	For monitoring wells and monitoring well boreholes only
<input type="checkbox"/> Neat Cement Grout	<input type="checkbox"/> Bentonite Chips
<input type="checkbox"/> Sand-Cement (Concrete) Grout	<input type="checkbox"/> Granular Bentonite
<input type="checkbox"/> Concrete	<input type="checkbox"/> Bentonite-Cement Grout
<input type="checkbox"/> Clay-Sand Slurry	<input type="checkbox"/> Bentonite - Sand Slurry
<input type="checkbox"/> Bentonite-Sand Slurry	
<input checked="" type="checkbox"/> Chipped Bentonite	

(5) Sealing Material Used	From (Ft.)	To (Ft.)	Sacks Sealant	Mix Ratio or Mud Weight
bentonite and on-site soil	Surface	1.0	0.25	50# bag
3/8-inch bentonite chips	1.0	29.5	3	50# bags

(6) Comments Removed flush mount & concrete. Filled with bentonite chips & topped with bentonite & on-site soil.

(7) Name of Person or Firm Doing Sealing Work		Date of Abandonment
Subsurface Testing Services, INC.		9/7/06
Signature of Person Doing Work	Date Signed	
<i>John H. Carlson</i>	9-14-06	
Street or Route	Telephone Number	
1035 Kepler Drive	920-468-1978	
City, State, Zip Code		
Green Bay, Wisconsin 54311-8320		

Date Received	Noted By
Comments	

Mr. and Mrs. Gerald Rasmussen  
320 S. 6th Street  
De Pere, Wisconsin 54115

June 28, 2006

Dear Sir

In regards to the wells at 320 South 6<sup>th</sup> St. on the property of Deloris & Gerald Rasmussen we would like them removed. I would also like something in writing to show what the readings are.

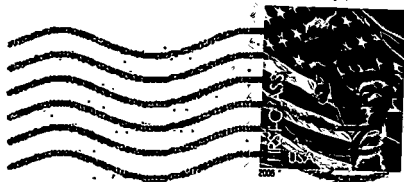
Thank you  
Deloris Rasmussen  
320 S 6<sup>th</sup> St  
De Pere Wis 54115  
Phone (920) 336-9724



Gerald E Rasmussen  
320 S 6th St  
De Pere, WI 54115-1214

GREEN BAY WI 543

29 JUN 2006 PM 2 T



Wisconsin D. N. R

2 984 Shawano Ave  
P.O Box 16448



Green Bay

Wis. 54307

70

Keld Lauridsen

## Lauridsen, Keld B - DNR

---

**From:** Jones, Casey L - DNR  
**Sent:** Friday, January 12, 2007 12:51 PM  
**To:** Lauridsen, Keld B - DNR  
**Subject:** Better Brite documentation  
**Attachments:** Well abandonment Bid Draft.doc; STS well abandon receipt.jpg

Don't know if this is what you were looking for . . . ? I attached the bid proposal and the receipt regarding the Better Brite well abandonment. I'm assuming you still have the letter from the property owner requesting the wells be abandoned that you can also attach to the abandonment forms . . .

Let me know if you need anything else.



*Casey L. Jones*

DOT Hydrogeologist/Waste Registry LTE

WI Department of Natural Resources

Remediation and Redevelopment Program

625 Cty Rd Y, Suite 700, Oshkosh, WI 54901

PHONE: 920-303-5424

FAX: 920-424-4404

E-MAIL: [Casey.Jones@wisconsin.gov](mailto:Casey.Jones@wisconsin.gov)

## Request for Bid

Monitoring Well Abandonment per NR 141 at three sites in NE Wisconsin.

### Site Locations:

- Sturgeon Bay Landfill (3 wells, but 2 are missing) 1 hour looking for 2 missing wells
- Better Brite (2 wells)
- Porter Wells (3 wells)

Site photos and maps below.

Once date for work is set, the DNR will notify the property owners (48 hours notice).

This bid is for well abandonment only (well logs attached).

Site work to begin within 30 days of WDNR Purchase order being issued unless otherwise directed by WDNR.

Photographic documentation and WDNR well abandonment forms (Form 3300-005) to be submitted to Department 14 days after work is done.

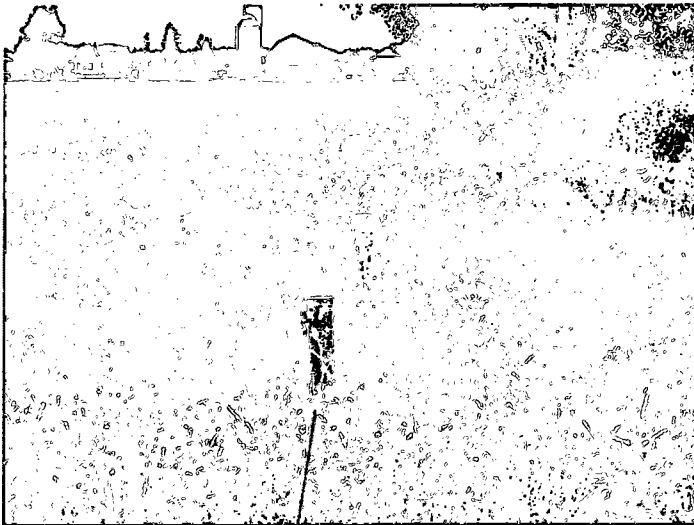
**\*\*Include unit costs for transportation, staff time, materials, etc.**

If you are interested in bidding on this project please submit a cost estimate by Friday, July 21, 2006 (fax or e-copy with mailed hard copy OK) to:

Wisconsin Department of Natural Resources  
Attn: Casey Jones  
625 E. County Y, Suite 700  
Oshkosh WI 54901-9731  
Fax: 920-424-4404  
email: Casey.Jones@dnr.state.wi.us

Any questions regarding this bid scope should be submitted via email by Wednesday, July 19, 2006.

**PORTER SITE: W2172 Ranch Road, Seymour, WI**



Three wells (2 visible, 3<sup>rd</sup> one in line with rest in the tall grass).  
Photo taken looking west.



Looking north at the site from Ranch Road.



## Sturgeon Bay Landfill Site: Access from Division Road

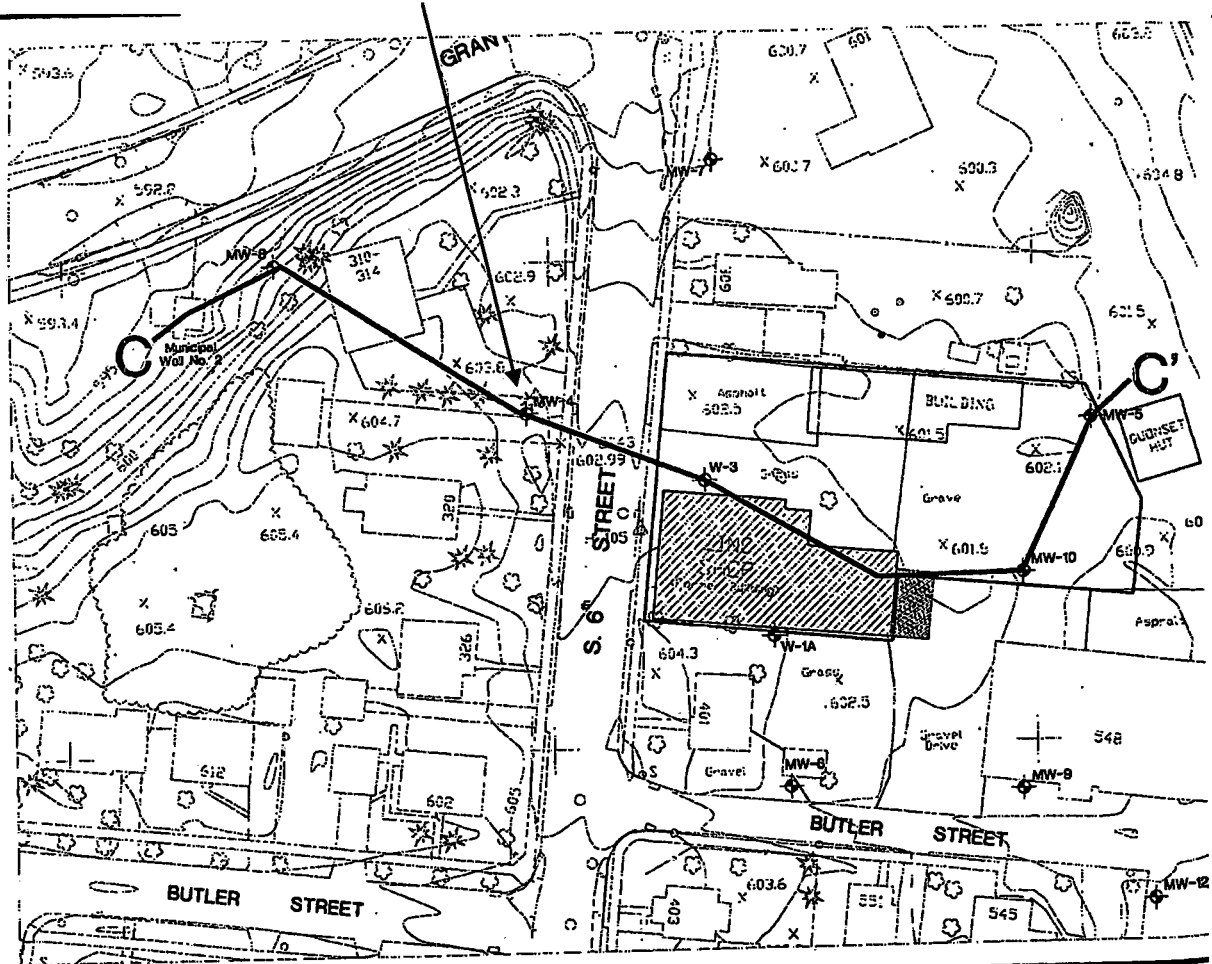


- MW-2 has an orange cone on it and is next to the utility pole.
- Missing MW-4 is on the City of Sturgeon Bay's property, it was in a wooded area (there are 2 old soil cutting drums still there that MW-4 was nearby)
- Missing MW-3 was along the property boundary near a concrete pile and brushy area.

Spend one hour looking for missing monitoring wells, a metal detector may help locate MW-3, but probably not MW-4 as it is near the waste disposal area.

## **Better Brite Off-Site Wells**

- Nested wells MW-4 and MW-4A located at 320 S. 6<sup>th</sup> Street, Depere (Approximately 30 feet deep)



Please  
ST  
P.C  
BE  
TERMS

TO: FINANCE  
Green Bay

R + R - OSH  
RECEIVED

SEP 22 2006



STS CONSULTANTS

TRACKED ☐  
REVIEWED ☐

WI DEPT OF NATURAL RESOURCES  
Remediation & Redevelopment Program  
625 Counth Rd. Y, Suite 700  
Oshkosh WI. 54901  
Attention: Mr. Casey L. Jones

Invoice Date : 9/20/2006  
Invoice # : D36  
Project : 200605747  
Project Manager : Tesch, Thomas  
Project Principal : Botz, James J  
Invoice Group/Org. : \*\* 9401D

If you have questions, please call:

Tesch, Thomas (920)406-3160  
Botz, James J (920)406-3175

For Professional Services Rendered through: 9/16/2006

Well Abandonment Services related to the Sturgeon Bay Landfill, Better Brite Company and the Porter Site in Northeast, Wisconsin

Expenses

Unit Pricing - Rate

2,159.68

Total Expenses

2,159.68

Current Invoice

-2,159.68

Amount Due This Invoice

\$2,159.68

okay to pay  
Casey L. Jones  
9/22/06

274 RRFP 2724 RRQY = \$400.<sup>00</sup>  
274 RRFP 2724 RRSD = \$1759.<sup>68</sup>

Project Budget : \$2,182.50  
Billed to Date : \$2,159.68  
Remaining Budget: \$22.82

Outstanding Prior Invoice Aging

Under 30	31-60	61-90	Over 90
\$0.00	\$0.00	\$0.00	\$0.00

PLEASE REMIT ONE COPY OF INVOICE WITH YOUR PAYMENT.  
A FINANCE CHARGE OF 1 1/2% PER MONTH (18% ANNUALLY) WILL BE ADDED  
TO ALL INVOICES UNPAID AFTER 30 DAYS

**Work Order #** \_\_\_\_\_  
32875  
**Last Service:** 06/28/2004  
**Next Service:** 06/01/2005

**Last Service:** 08/28/2004      **Frequency:** Annual  
**Next Service:** 08/01/2005      **Month:** June  
**Service M<sup>o</sup>7:**

**P.O. BOX 12055 • 787 POTTS AVE. • GREEN BAY, WI 54307-2055**  
**Phone 920-494-3346 Fax 920-494-2224**

DATE: 6-21-20

X  
10. 84. 92

**Work Order #** 21523  
**Last Service:** 06/11/2003  
**Next Service:** 06/01/2004

**Frequency:** Annual  
**Month:** June

**SERVICEMAN:**

**CUSTOMER'S SIGNATURE**

DATE: \_\_\_\_\_ 20\_\_\_\_

**Work Order #** \_\_\_\_\_  
12235  
**Last Service:** 07/11/2002  
**Next Service:** 06/01/2003

**Last Service:** 07/11/2002      **Frequency:** Annual  
**Next Service:** 05/01/2003      **Month:** June  
**Service Req:**

**P.O. BOX 12055 • 787 POTTS AVE. • GREEN BAY, WI 54307-2055**  
**Phone 920-494-3346 Fax 920-494-2224**

DATE: 12/11





# N'S FIRE & SAFETY, INC.

Fire Fighting and Safety Equipment  
P.O. BOX 120551 • 787 POTTS AVE. • GREEN BAY, WI 54307-2055  
Phone 920-494-3346 Fax 920-494-2224

# 59478 WORK ORDER

CUSTOMER: WIS-33075

LOCATION: 1

SERVICE: -----

WI Dept. of Natural Res.  
c/o Keld Lauridsen  
P.O.Box 10448  
Green Bay, WI 54307-0448  
Contact:  
Phone: 492-5943

Wisconsin Department  
of Natural Resources  
315 S. 6-th Street  
De Pere, WI 54115  
Contact: Keld Lauridsen  
Phone: 492-5921

Last: 8/14/00  
Next: 0/00/00  
Freq: 1  
Aniv: 6

Route: DE PERE Blanket PO:  
Slpr: DMN

Service:  
Notes

P/N	Q	CARBON DIOXIDE	UNIT	AMOUNT	P/N	Q	FIRE HOSE	UNIT	AMOUNT
S30000		Co2 Extinguisher Inspected			S30028		Service Fire Hose		
R31002		0-5# Extinguisher Recharge			H32028		Hydro-Test Fire Hose		
R31003		10# Extinguisher Recharge			S31000		Re-Rack Fire Hose		
R31004		15# Extinguisher Recharge			FD22100		Re-Couple Hose-1 end		
R31005		20# Extinguisher Recharge			P/N	Q	MISCELLANEOUS	UNIT	AMOUNT
R32003		0-20# Exting. Hydro-Test			B18026		Pull Pin Assembly		
R32007		20# + Cylinder Hydro-Test			B18090		"O" Ring Replaced		
P/N	Q	DRY CHEMICAL S/P	UNIT	AMOUNT	B18005		Gauge Replaced		
S30040	2	Dry Chemical S/P Inspected					Metal Valve Stem		
R31012		2 1/2# Dry Chemical Recharge			A17073		SCB-5 Bracket		
R31013		5# Dry Chemical Recharge			A10032		30865 Bracket		
R31014		6# Dry Chemical Recharge			A11020		79758 Bracket		
R31015		10# Dry Chemical Recharge			1518152	1	certification Colln		
R31016		20# Dry Chemical Recharge			P/N	Q	NEW EQUIPMENT	UNIT	AMOUNT
M33004	1	6-Year Maintenance							
H32015		Dry Chemical Hydro-Test							
HR35004		Hydro-Test & Refill DC							
P/N	Q	DRY CHEMICAL C/O	UNIT	AMOUNT					
S30041		Dry Chemical C/O Inspected							
R31017		5# C/O Recharge w./Cart.							
R31018		10# C/O Recharge w./Cart.							
R31019		20# C/O Recharge w./Cart.							
R31020		30# C/O Recharge w./Cart.							
H32019		C/O 12-Year Hydro-Test							
P/N	Q	NEW FIRE EXTINGUISHERS	UNIT	AMOUNT					
A10002		2 1/2# ABC SY-0216							
A10027		5# ABC SY-0516							
A10006		10# ABC SY-1014							
A10007		20# ABC SY-2014							
P/N	Q	RESTAURANT SYSTEMS	UNIT	AMOUNT					
C34008		Semi-Annual Insp. 1-System							
C34009		Semi-Annual Insp. 2nd Sys.							
C34010		Semi-Annual Insp. Tank							
S30044		Annual Inspection Only-Sys.							
S30045		Annual Inspection-2nd Tank							
H32000		Hydro-Test System Tank			A18000	1	Trans/Comp Chrg		
R31200		Recharge Ansul System					TOTAL COLUMN 1		
A12085		Fusible Link 360°					TOTAL COLUMN 2		
A12086		Fusible Link 500°					SUB TOTAL		
A12017		R-102 Cap - Rubber					TAX		
A17115		R-102 Cap - Metal					TOTAL		
P/N	Q	OTHER SYSTEMS	UNIT	AMOUNT					
C34012		Semi-Annual Insp. Halon Sys.							
C34011		Semi-Annual Insp. Co2 Sys.							
C34014		Semi-Annual Insp. SPA-50							

SUB TOTAL

SERVICEMAN: DN

CUSTOMER'S SIGNATURE

DATE

7-3

20

01

# VAN'S FIRE & SAFETY, INC.

Fire Fighting and Safety Equipment  
P.O. BOX 12055 • 787 POTTS AVE. • GREEN BAY, WI 54307-2055  
Phone 920-494-3346 Fax 920-494-2224

## 48723 WORK ORDER

Printed on: 8/14/00 10:00 AM  
Customer: WIS-33075  
Location: 1  
Service: 1  
Last: 7/16/99  
Next: 0/00/00  
Freq: 1  
Aniv: 6

CUSTOMER: WIS-33075

LOCATION: 1

SERVICE: 1

Wisconsin Department  
of Natural Resources  
P.O.Box 10448  
Green Bay, WI 54307-0448  
Contact:  
Phone: 492-5943

Wisconsin Department  
of Natural Resources  
~~517 E. 315 S. 6th~~  
De Pere, WI 54115  
Contact: Keld Lauridsen  
Phone: 492-5921

Last: 7/16/99  
Next: 0/00/00  
Freq: 1  
Aniv: 6

Route: DE PERE Blanket PO:  
Slpr: DMN

Location  
moved

Service:  
Notes

P/N	Q	CARBON DIOXIDE	UNIT	AMOUNT	P/N	Q	FIRE HOSE	UNIT	AMOUNT
S30000		Co2 Extinguisher Inspected			S30028		Service Fire Hose		
R31002		0-5# Extinguisher Recharge			H32026		Hydro-Test Fire Hose		
R31003		10# Extinguisher Recharge			S31000		Re-Rack Fire Hose		
R31004		15# Extinguisher Recharge			FD22100		Re-Couple Hose-1 end		
R31005		20# Extinguisher Recharge			P/N	Q	MISCELLANEOUS	UNIT	AMOUNT
R32003		0-20# Exting. Hydro-Test			B18026		Pull Pin Assembly		
R32007		20# + Cylinder Hydro-Test			B18090		"O" Ring Replaced		
P/N	Q	DRY CHEMICAL S/P	UNIT	AMOUNT	B18005		Gauge Replaced		
S30040	3	Dry Chemical S/P Inspected					Metal Valve Stem		
R31012		2 1/2# Dry Chemical Recharge			A17073		SCB-5 Bracket		
R31013		5# Dry Chemical Recharge			A10032		30865 Bracket		
R31014		6# Dry Chemical Recharge			A11020		79758 Bracket		
R31015		10# Dry Chemical Recharge			P/N	Q	NEW EQUIPMENT	UNIT	AMOUNT
R31016		20# Dry Chemical Recharge							
M33004		6-Year Maintenance							
H32015		Dry Chemical Hydro-Test							
HR35004		Hydro-Test & Refill DC							
P/N	Q	DRY CHEMICAL C/O	UNIT	AMOUNT					
S30041		Dry Chemical C/O Inspected							
R31017		5# C/O Recharge w./Cart.							
R31018		10# C/O Recharge w./Cart.							
R31019		20# C/O Recharge w./Cart.							
R31020		30# C/O Recharge w./Cart.							
H32019		C/O 12-Year Hydro-Test							
P/N	Q	NEW FIRE EXTINGUISHERS	UNIT	AMOUNT					
A10002		2 1/2# ABC SY-0216							
A10027		5# ABC SY-0516							
A10006		10# ABC SY-1014							
A10007		20# ABC SY-2014							
P/N	Q	RESTAURANT SYSTEMS	UNIT	AMOUNT					
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C34009		Semi-Annual Insp. 2nd Sys.							
C34010		Semi-Annual Insp. Tank							
S30044		Annual Inspection Only-Sys.							
S30045		Annual Inspection-2nd Tank							
H32000		Hydro-Test System Tank			A18000	1	Trans/Comp Chrg		
R31200		Recharge Ansul System					TOTAL COLUMN 1		
A12085		Fusible Link 360°					TOTAL COLUMN 2		
A12086		Fusible Link 500°					SUB TOTAL		
A12017		R-102 Cap - Rubber					TAX		
A17115		R-102 Cap - Metal					TOTAL		
P/N	Q	OTHER SYSTEMS	UNIT	AMOUNT					
C34012		Semi-Annual Insp. Halon Sys.							
C34011		Semi-Annual Insp. Co2 Sys.							
C34014		Semi-Annual Insp. SPA-50							

SUB TOTAL

SERVICEMAN: DW

CUSTOMER'S SIGNATURE [Signature]

DATE

8-14-00

19

## **Lauridsen, Keld B.**

---

**From:** Lauridsen, Keld B.  
**Sent:** Monday, May 17, 2004 3:58 PM  
**To:** Kalnicky, Richard A  
**Subject:** RE: Better Brite

Dick,

I met with Mr. and Mrs. Rasmussen today at their home at 320 South Sixth Street in De Pere to discuss the potential abandonment of the two monitoring wells located on their property. We had a good discussion about the issues and they agreed to allow the monitoring wells to remain on their property for now. The monitoring wells are very useful for future monitoring of plume expansion.

I appreciate your response about the potential funding for the well abandonment. We may have to discuss this again at some point in the future.

Thanks,

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448  
Green Bay, WI 54307-0448

Phone (920) 492-5921  
Fax (920) 492-5859  
E-mail Keld.Lauridsen@dnr.state.wi.us  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

-----Original Message-----

**From:** Kalnicky, Richard A  
**Sent:** Friday, May 14, 2004 2:34 PM  
**To:** Lauridsen, Keld B.  
**Cc:** Kalnicky, Richard A  
**Subject:** RE: Better Brite

Keld, the only reason I can think of to not do the well abandonment at this time is that we still need the monitoring wells for monitoring purposes connected with the Better Brite remediation. Bob Strous told me that on state lead sites, we have removed monitoring wells after they are no longer needed and have used the Environmental Fund to pay for this--the same funding source that funded their original installation. Likewise, per John Burnett, we have used Superfund Site Assessment funds to remove monitoring wells originally funded by that same funding source.

In this case, the costs should be charged against the Better Brite Superfund grant, activity code RRQR--same budget string that you have been using for the groundwater monitoring contracts. We have plenty of unused funds in the LTRA portion of the Better Brite grant. You should follow our normal procurement guidelines. If the cost is under \$5,000, go ahead with the contractor that you feel comfortable with. If between \$5,000 and \$25,000, compare prices from 3 or more vendors.

I see no problem with keeping these wells, or parts of them, if they can be of use in the future and there is no health risk in keeping/reusing them.

Hope this response helps. Let me know if you need further assistance.

-----Original Message-----

**From:** Lauridsen, Keld B.  
**Sent:** Friday, May 14, 2004 1:26 PM  
**To:** Kalnicky, Richard A  
**Subject:** Better Brite

Dick,

I received a letter from a homeowner (Mr. and Mrs. Rasmussen at 320 S. Sixth Street) in the vicinity of the Better Brite Superfund site in De Pere. They are requesting us to remove the monitoring wells on their property. If we were to do the abandonment, how would we go about getting funding for that?

I would prefer to keep the wells as I think they could be very useful at some point in the future when pumping at the Zinc Shop is discontinued. Do you know how the Department stands legally regarding those wells? I assume that if they request us to remove them, then we have to comply with their request.

My plan is to meet with them on-site after I hear from you.

Hope all is well,

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448  
Green Bay, WI 54307-0448

Phone (920) 492-5921  
Fax (920) 492-5859  
E-mail Keld.Lauridsen@dnr.state.wi.us  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

**Lauridsen, Keld B.**

---

**From:** Lauridsen, Keld B.  
**Sent:** Tuesday, May 18, 2004 10:36 AM  
**To:** 'Peterson.Jon@epamail.epa.gov'  
**Subject:** RE: Well abandonment at Better Brite

Still working on it. Mark Gordon will send a letter to Mr. Mayka shortly asking for official approval.

Hope all is well,

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448  
Green Bay, WI 54307-0448

Phone (920) 492-5921  
Fax (920) 492-5859  
E-mail Keld.Lauridsen@dnr.state.wi.us  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

-----Original Message-----

**From:** Peterson.Jon@epamail.epa.gov [mailto:Peterson.Jon@epamail.epa.gov]  
**Sent:** Tuesday, May 18, 2004 10:25 AM  
**To:** Lauridsen, Keld B.  
**Subject:** Re: Well abandonment at Better Brite

What the heck happened with the WDNR's plans to take wastewater from another Site. Are you coordinating that through the Madison office as Jim Mayka had suggested?

"Lauridsen, Keld  
B."  
<Keld.Lauridsen@  
dnr.state.wi.us>

05/17/2004 04:01  
PM

To  
To  
Peterson.Jon@epamail.epa.gov  
cc

bcc

Fax to

Subject  
Well abandonment at Better Brite

Jon,

I met with Mr. and Mrs. Rasmussen today at their home at 320 South Sixth Street in De Pere to discuss the potential abandonment of the two monitoring wells located on their property. We had a good discussion about the issues and they agreed to allow the monitoring wells to remain on their property for now. The monitoring wells are very useful for future monitoring of plume expansion.

Let me know if you need anything else.

Hope all is well,

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448  
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## Interoffice Memorandum



**Date:** September 4, 2001  
**To:** Keld Lauridsen, Wisconsin Department of Natural Resources (WDNR)  
**cc:** Mick Warner, RMT  
**From:** Kate Schaefer, RMT KS  
**Subject:** Better Brite Reseeding

Per your request, the following information recaps the events that occurred between RMT, Inc., Willems Landscape, the Better Brite Site, and the WDNR from June 14, 2001 to July 27, 2001.

On June 14, 2001, Kate Schaefer spoke to Mr. Dan Peeters at Willems Landscape in DePere, Wisconsin, regarding the reseeding of the Better Brite site in DePere. It was determined that due to the wet conditions, reseeding of the site would not be completed until July, 2001. After this conversation with Mr. Peeters, Kate spoke with Mr. Keld Lauridsen of the WDNR. Mr. Lauridsen stated that finishing the work in July was not a problem, and RMT agreed to keep Mr. Lauridsen apprised of site activities.

On July 25, 2001, Kate Schaefer called Mr. Peeters. The work at the site had been completed by this time; therefore, Kate asked for a summary of the activities that took place at the site. During the preliminary site visit, prior to work being started, Mr. Peeters noticed that one of the wells was irregular. Due to the ground settling, this well protruded too far out of the ground. On this preliminary visit, Mr. Peeters thought that they could fix the problem. When they returned to the site to do the work, the cap on this well was gone. Mr. Peeters reseeded the site, but did not attempt to fix the well.

On July 26, 2001, Kate Schaefer spoke to Mr. Lauridsen to update the WDNR on the site activities. Because RMT was not notified about the completion of the work at the site, RMT was unable to notify Mr. Lauridsen about the status of the project as it was completed. Regarding the well issue, Mr. Lauridsen explained that HSI had taken responsibility for the wells on the property. The WDNR was to inform HSI that there is work that needs to be completed at the site. Kate was to confirm what steps were being taken to ensure the grass was growing and what would happen if the grass does not grow. Also, Kate was to confirm who was present on the day the work was done.

On July 27, 2001, Kate spoke to Mr. Peeters who explained that the seeding is guaranteed. If necessary, he will go out and reseed the site. The only company that was on-site when the work was done was Willems Landscape, HSI was not there. This information was promptly conveyed back to Mr. Lauridsen.

If you have any questions or need further information, please feel free to call me at (608) 662-5226.

4/1/2004

To: Keld

From: Jon - 312/353-1264

Fax: 920/492-5859



11/20/2001  
Mr. and Mrs. Gerald Rasmussen

320 S. 6th Street

De Pere, Wisconsin 54115

This is in regards to the wells  
that were put on our property because  
of Better Brine 10-26-92

The ten years are up now, and we  
would like to have them removed  
when the weather permits this spring.

We feel if the wells were gone and  
we want to sell our house it would be  
better if the wells were gone.

Thank you

Gerald Rasmussen

320 So 6th St

De Pere Wis 54115

Phone (920) 336-9724

## **Lauridsen, Keld B**

---

**From:** Lauridsen, Keld B  
**Sent:** Wednesday, June 06, 2001 2:53 PM  
**To:** 'Jim Crowley'  
**Subject:** RE: Better Brite

Jim,

I guess I can discuss the issue with the monitoring well with Mick when he returns.

Do you have date scheduled for the landscaper to be on site?

I appreciate the follow up.

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448  
Green Bay, WI 54307-0448

Phone (920) 492-5921  
Fax (920) 492-5859  
E-mail laurik@dnr.state.wi.us  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

-----  
**From:** Jim Crowley(SMTP:Jim.Crowley@rmtinc.com)  
**Sent:** Tuesday, June 05, 2001 11:12 AM  
**To:** Lauridsen, Keld B  
**Cc:** Mick Warner  
**Subject:** Re: Better Brite

Keld -

Mick is out of the office and asked me to follow-up on the monitoring well issue. HSI Geotrans installed the monitoring wells which look to be affected by frost heave. Monitoring well installation was not in our scope of work. RMT could attempt to remedy this problem, but would not include it as part of the reseeding work we are doing to close out our contract.

Please contact Mick Warner or me with any questions.

>>> "Lauridsen, Keld B" <LauriK@mail01.dnr.state.wi.us> 05/25/01 04:39PM >>>  
<<Mvc-001x.jpg>> <<Mvc-002x.jpg>> <<Mvc-003x.jpg>> <<Mvc-004x.jpg>>  
<<Mvc-005x.jpg>> <<Mvc-006x.jpg>>  
Let me know if you need anything else. Have a great weekend.

-Keld

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448

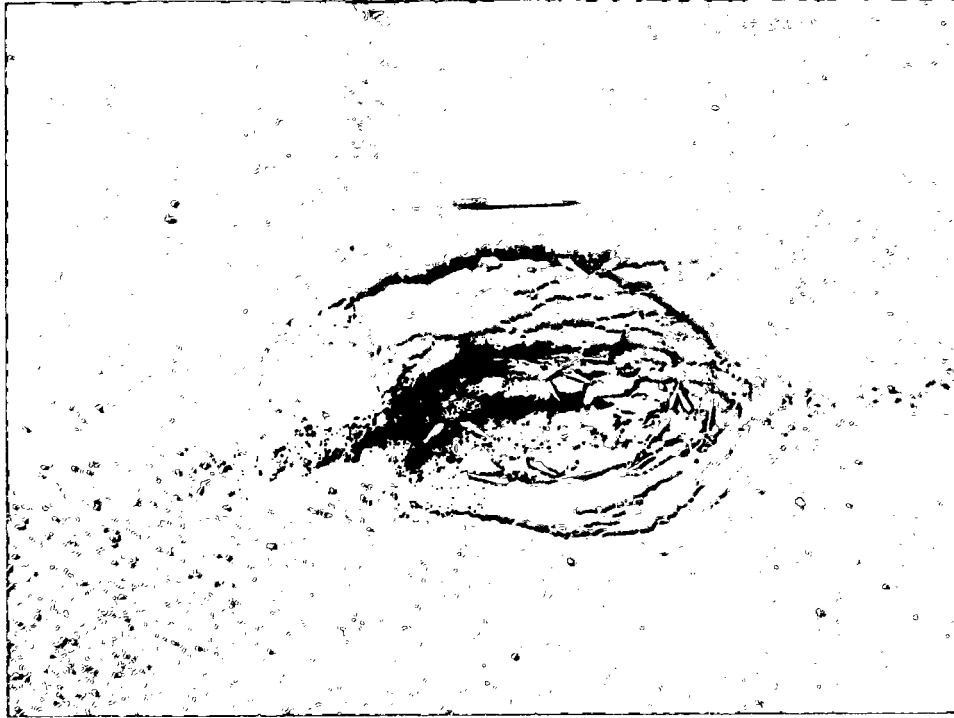
Green Bay, WI 54307-0448.

Phone (920) 492-5921

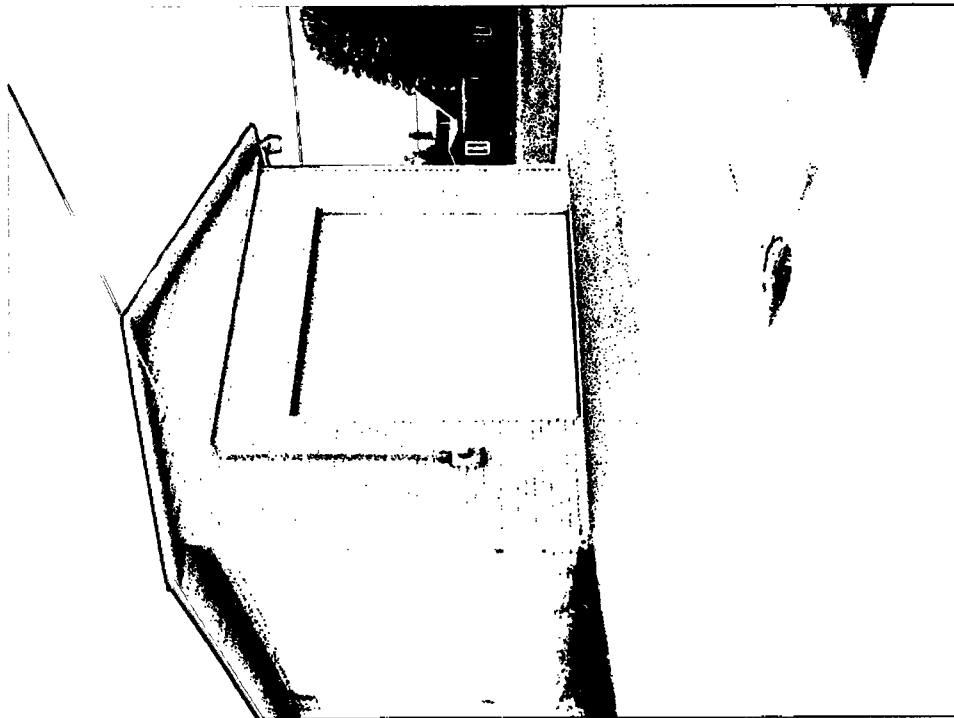
Fax (920) 492-5859

E-mail [laurik@dnr.state.wi.us](mailto:laurik@dnr.state.wi.us)

Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)



**Figure 1 Settling at the Zinc Shop. All Photos taken on May 25, 2001, by Keld Lauridsen .**



**Figure 2 Zinc Shop.**



**Figure 3 Standing water in backyard of neighboring property owner at Chrome Shop.**



**Figure 4 Standing water in backyard of neighboring property owner at Chrome Shop.**



**Figure 5 Standing water in backyard of neighboring property owner at Chrome Shop.**



**Figure 6 Monitoring well MW116 at Chrome Shop not sealed properly (winter heaving or settling problem).**

Attachment C

RPM/OSC: J. Peterson / L. Howard**TRI REPORTING CALENDAR YEAR 2000  
CHECK LIST for SUPERFUND SITES**

Please complete the check list to determine if your Superfund site meets the reporting requirements under Emergency Planning and Community-Right-to-Know Act (EPCRA) section 313. The site needs to manufacture, process, or otherwise use EPCRA section 313 listed toxic chemicals in quantities that exceed thresholds for TRI reporting. See attached EPCRA section 313 toxic chemical list and threshold determinations (Attachment F). **If any of the questions below are answered "yes," please proceed to complete the TRI Report Form R and finalize it with your supervisor's approval and return to Sangsook Choi by June 20, 2001.** If you have any questions, please contact Sangsook Choi at 3-1869 or Thelma Codina, TRI Program Manager in WPTD at 6-6219.

EPA ID W1560010118 Site Name Better Brite Plating Co.Action RA001

1. Was your Superfund site involved in activities that **manufacture or process** toxic chemicals listed in EPCRA section 313 except for those chemicals listed as persistent, bioaccumulative and toxic (PBT), in quantities exceeding 25,000 pounds per toxic chemical over the calendar year 2000?

Yes           No ~~X~~

Definition: The term "**manufacture**" means to produce, prepare, compound, or import an EPCRA section 313 chemical [cause existence of that chemical in this country either by chemical reaction or importation].

The term "**process**" means the preparation of a listed EPCRA section 313 chemical, after its manufacture, for distribution in commerce [Both incorporation of a chemical and for distribution in commerce have to be present to meet the definition of process]. Processing is usually the incorporation of a EPCRA section 313 chemical into a product. Sending waste off-site for recycling also qualifies for distribution in commerce.

2. Was your Superfund site involved in activities that **otherwise use** toxic chemicals listed

in EPCRA section 313 except for those chemicals listed as persistent, bioaccumulative and toxic (PBT), in quantities exceeding 10,000 pounds per toxic chemical over the calendar year 2000?

Yes \_\_\_\_\_

No ☒

Definition: The term "otherwise use" means any use of an EPCRA section 313 chemical, including an EPCRA section 313 chemical contained in a mixture or other trade name product, or waste that is not covered by the terms "manufacture" or "process" [Use of chemical, but the chemical is not sent out for distribution in commerce].

3. Was your Superfund site involved in activities that manufacture, process, or otherwise use toxic chemicals listed as persistent, bioaccumulative and toxic (PBT) in EPCRA section 313, in quantities exceeding 100 pounds per toxic PBT chemical over the calendar year 2000?

Yes \_\_\_\_\_

No ☒

PBT chemicals are identified with an asterisk (\*) in EPCRA section 313 chemical list.

4. Was your Superfund site involved in activities that manufacture, process, or otherwise use of toxic chemicals listed as a subset of PBT chemicals that are highly persistent and highly bioaccumulative in EPCRA section 313, in quantities exceeding 10 pounds per the calendar year 2000?

Yes \_\_\_\_\_

No ☒

5. Was your Superfund site involved in activities that manufacture, process, or otherwise use of dioxin and dioxin-like compounds category in EPCRA section 313, in quantities exceeding 0.1 gram per the calendar year 2000?

Yes \_\_\_\_\_

No ☒

If any one of the above questions is answered "yes," then your Superfund site is subject to TRI reporting requirements under EPCRA section 313. Therefore, please proceed to complete the TRI Report Form R by following the instructions (Attachment D) for submitting TRI Reports and return it to Sangsook Choi by June 20, 2001.

OR

If you answered "no" to all of the above questions, your Superfund site is not required to TRI reporting, please sign it and have your supervisor's signature and return this check list to Sangsook Choi for our record.



Here are some examples of Superfund activities that should be reported under this policy:

- The use of non-PBT toxic chemicals (e.g., oxidizing agents) to destroy contaminants at a site if the toxic chemical exceeds the 10,000 lb/year threshold and is listed under EPCRA section 313.
- The manufacture of non-PBT chemicals (e.g., precipitation) from contaminants at a site if the resultant toxic chemical exceeds the 25,000 lb/year threshold and is listed under EPCRA section 313.
- The manufacture of a PBT chemical (e.g., incineration) at a site if the resultant PBT chemical exceeds the 100 lb/year thresholds, or 0.1 gram/year (dioxins and dioxin-like compounds) threshold.

Examples of Superfund activities that should not be reported under this policy include:

- The actual contaminants of concern at the site.
- Containment or off-site disposal of contaminants.
- Recovery of contaminants (e.g., air stripping, carbon adsorption) in the same chemical form that they were originally present at a contaminated site.

Submitted by

*Keld Ruvied* 6/13/01  
Name/Signature Date

Approved by

*B. John* 6/18/01  
Name/Signature Date

United States Environmental Protection Agency  
Region V77 West Jackson Boulevard  
Chicago, Illinois 60604

Superfund Division

Facsimile Cover Sheet  
Telephone Number  
312-886-4071

To:

*Kold Laurelsen*

Office phone:

Machine No:

*920-492-5859*

From:

*Linda Howard*

Office phone:

*312-886-0810*

Mail code:

Date:

*6/5/01*Number of pages,  
including cover:

MESSAGE:

*Fax will be sent in  
two sections.**Section One*

Signature:

# Fax

Name: Keld Lauredsen  
Organization: WDNR  
Fax: 920/492-5859  
Phone: 920/492-5921  
From: Linda Howard  
Date: 6/5/2001  
Subject: Toxic Release Inventory Reporting

Comments: [Keld, we need some information on the Better Brite Site. Attached is a cover memo (explaining what and why info is needed), and Attachments C, D, E and F. Attachment C is to be filled out by you. If you answer yes to any question then Attachment D would also need to be completed. Attachments E and F are for your information. Please read and sign Attachment C and (if appropriate) Attachment D and fax it back to me by COB June 15. My fax number is 312/353-5541. If you have questions contact Jon Peterson (312/353-1264) or myself (312/886-0810). Thanks much.]

From the desk of...

1. HQ generated a list of potential Superfund sites that might be subject to TRI reporting from the sites in WasteLAN. **See the attached (Attachment A) list of potential Superfund sites.** The list of potential Superfund sites are further defined into two separate lists: one with RPMs assigned and the other that are not on the NPL list (See Attachments B).
2. **Please have RPMs and the OSC determine if their sites meet the reporting requirements under TRI by completing the attached check lists (Attachment C).**
3. If it meets the requirements, then please have RPMs and OSCs complete the attached TRI

Report Form R with Instructions (Attachment D) and submit to us by June 20, 2001.

4. If there is any Superfund site not identified in the HQ generated list (Attachment A) of potential Superfund sites which meet the TRI Reporting Criteria, please inform Sangsook Choi and then proceed to complete the check lists and TRI Report Form R and submit to us along with the other documents by June 20, 2001.

If you, RPMs, or OSCs have any questions or need clarification, please contact Sangsook Choi at 3-1869 or contact her thru e-mail. If you have specific technical questions, please contact Thelma Codina who is TRI Program Manager in WPTD at 6-6219.

Attachments A, B, C, D, E and F

cc: Wendy Carney      James Mayka      Rick Karl

(IMPORTANT: Type or print; read instructions before completing form)

United States  
Environmental Protection  
Agency**FORM R****TOXIC CHEMICAL RELEASE  
INVENTORY REPORTING FORM**Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986,  
also known as Title III of the Superfund Amendments and Reauthorization Act**WHERE TO SEND COMPLETED FORMS:** 1. EPCRA Reporting Center  
P.O. Box 3348  
Morrifield, VA 22116-3348  
ATTN: TOXIC CHEMICAL RELEASE INVENTORY  
2. APPROPRIATE STATE OFFICE  
(See instructions in Appendix F)Enter "X" here if this  
is a revision

For EPA use only

**Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.****PART I. FACILITY IDENTIFICATION INFORMATION****SECTION 1. REPORTING YEAR****SECTION 2. TRADE SECRET INFORMATION****2.1** Are you claiming the toxic chemical identified on page 2 trade secret?  
☐ Yes (Answer question 2.2; Attach substantiation forms) ☐ No (Do not answer 2.2; Go to Section 3)  
**2.2** Is this copy ☐ Sanitized ☐ Unsanitized  
(Answer only if "YES" in 2.1)**SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)**

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official: Signature: Date Signed:

**SECTION 4. FACILITY IDENTIFICATION****4.1** TRI Facility ID Number  
Facility or Establishment Name Facility or Establishment Name or Mailing Address (if different from street address)  
Street Mailing Address  
City/County/State/Zip Code City/State/Zip Code Country (Non-US)**4.2** This report contains information for:  
(Important: check a or b; check c or d if applicable) a. ☐ An entire facility b. ☐ Part of a facility c. ☐ A Federal facility d. ☐ GOCO**4.3** Technical Contact Name Telephone Number (include area code)**4.4** Public Contact Name Telephone Number (include area code)**4.5** SIC Code (s) (4 digits) Primary a. b. c. d. e. f.**4.6** Latitude Degrees Minutes Seconds Longitude Degrees Minutes Seconds**4.7** Dun & Bradstreet Number(s) (9 digits) **4.8** EPA Identification Number (RCRA I.D. No.) (12 characters) **4.9** Facility NPDES Permit Number(s) (9 characters) **4.10** Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)

a. b. a. b. a. b. a. b.

**SECTION 5. PARENT COMPANY INFORMATION****5.1** Name of Parent Company NA ☐**5.2** Parent Company's Dun & Bradstreet Number NA ☐

Attachment D

OSWER 9360.7-15P

**Instructions For Submitting TRI Reports**

Below are TRI reporting instructions that address issues specific to EPA fund-lead Superfund sites. The instructions are meant to assist regional EPA staff who are filling out the TRI reports for eligible Superfund sites in their region. These instructions are limited to certain data elements (i.e., those issues that may be unique to EPA fund-lead sites) on the first page of the Form R and do not address the other data elements of the Form R into which the facility should enter data.

**Part I. Facility Identification Information****Section 4. Facility Identification****4.1 Facility Name, Location, and TRI Facility Identification Number.**

**Facility Name.** Each EPA fund-lead site should use the following format for entering the site name in the facility name data field: "U.S. EPA Fund-lead Superfund site/site name." For example, the Summitville Superfund site would be

U.S. EPA Fund-lead Superfund site/Summitville

**Facility Address.** Enter the physical address of the Superfund site. If the site is not located on a road that has a name, enter a description of the address in the street field, such as "Grayson Peak -- 5 miles east of Rte. 620."

**Mailing Address.** Enter the mailing address of the regional EPA Superfund coordinator.

**4.3 Technical Contact**

**Technical Contact/Telephone Number.** Enter the name and telephone number of the regional EPA Superfund Remedial Project Manager or On-Scene Coordinator in these data fields.

**4.4 Public Contact**

**Public Contact/Telephone Number.** Enter "Same as Section 4.3" in these data fields.

**4.5 Standard Industrial Classification (SIC) Code.** Enter 9511 as the primary SIC Code (This SIC Code is for activities defined as Air and Water Resource and Solid Waste Management). If other SIC Codes also apply to the site, please enter these SIC codes as well.

**4.7 Dun & Bradstreet Number(s).** Enter "NA."

**4.8 EPA Identification Number(s).** Enter any appropriate RCRA permit number for the Superfund site.

Attachment D

-2-

OSWER 9360.7-15P

4.9 NPDES Permit Number(s). Enter any appropriate NPDES permit numbers for the Superfund site.

4.10 Underground Injection Well Code (UIC) Identification Number(s). Enter any appropriate UIC permit numbers for the Superfund site.

### Section 5. Parent Company Information

5.1 Name of Parent Company. Enter "U.S. EPA Fund-lead Superfund Sites"

5.2 Parent Company's Dun & Bradstreet Number. Enter "NA."



## Attachment E

OSWER 9360.7-15P

**Summary of TRI Reporting Criteria for Superfund Sites**

- 1) **Fund-financed removals or remedial actions that were underway at a Superfund site during the calendar year need to be evaluated.**

Cleanup activities paid for in their entirety by the Trust Fund and subject to Federal contracts that were underway during the reporting calendar year should be evaluated pursuant to EPA policy. EPA has established this policy to meet the spirit of Executive Order 13148. Potentially Responsible Party-lead activities and State-lead activities are not covered by this policy. Federal facility-lead activities by DoD, DoE and other federal agencies at federal facility Superfund sites already are covered by Executive Order 13148.

- 2) **The site needs to have had the equivalent of 10 or more full-time employees working for the site during the calendar year.**

A full-time employee is defined as 2,000 work hours per year, and ten full-time employees is 20,000 work hours per year. Work hours include paid leave and holidays. Employees include contractors, subcontractors, EPA remedial project managers and on-scene coordinators, other EPA support staff, and other federal agency staff. All employees at the Superfund site should be considered, even if they are not working directly on the cleanup. If the total number of hours worked by all employees is 20,000 hours or more, even if the actual number of individuals working at the site is less than ten, the site meets the ten employee threshold. Hours worked by employees that visit the site intermittently also should be considered. See 40 C.F.R. §372.3.

For removals and remedial actions in attachment 3, obligations of less than \$2.2 million were eliminated from considerations because it has been estimated that less than ten employees would be on site.

- 3) **The site needs to manufacture, process, or otherwise use EPCRA section 313 listed toxic chemicals in quantities that exceed thresholds for TRI reporting.**

Only certain activities that "manufacture," "process," or "otherwise use" a listed toxic chemical are covered by EPCRA section 313. These activities are defined by 42 U.S.C. §11023(b)(1)(C) and 40 C.F.R. §372.3. For an up-to-date list of toxic chemicals covered by EPCRA section 313, see [www.epa.gov/tri](http://www.epa.gov/tri) or contact the Regional TRI coordinator.

EPCRA Section 313 sets thresholds for these chemical activities. There are separate thresholds for the "manufacture," "process" and "otherwise use" of a listed toxic chemical. Except for those chemicals listed as persistent, bioaccumulative and toxic (PBT), the chemical activity thresholds are 25,000 pounds per year for the "manufacturing" and "processing" of a listed toxic chemical and 10,000 pounds per year

## Attachment E

-2-

OSWER 9360.7-15P

for otherwise using" a listed toxic chemical. See EPCRA §313(f), 42 U.S.C. §11023; 40 C.F.R. §372.25. For chemicals listed as PBT, EPA established a reporting threshold of 100 pounds per year for the "manufacture," "process" or "otherwise use" of the toxic chemical. See 40 C.F.R. §372.28. For a subset of PBT chemicals that are highly persistent and highly bioaccumulative EPA established a reporting threshold of 10 pounds per year. For the dioxin and dioxin-like compounds category, EPA has established a reporting threshold of 0.1 grams.

Examples of Superfund activities that should be reported under this policy include:

- The use of non-PBT toxic chemicals (e.g., oxidizing agents) to destroy contaminants at a site if the toxic chemical exceeds the 10,000 lb/year threshold and is listed under EPCRA section 313.
- The manufacture of non-PBT chemicals (e.g., precipitation) from contaminants at a site if the resultant toxic chemical exceeds the 25,000 lb/year threshold and is listed under EPCRA section 313.
- The manufacture of a PBT chemical (e.g., incineration) at a site if the resultant PBT chemical exceeds the 100 lb/year, 10 lb/year thresholds, or 0.1 gram/year (dioxins and dioxin-like compounds) thresholds.

Examples of Superfund activities that should not be reported under this policy include:

- The actual contaminants of concern at the site.
- Containment or off-site disposal of contaminants.
- Recovery of contaminants (e.g., air stripping, carbon adsorption) in the same chemical form that they were originally present at a contaminated site.

Attachment F

**Facility Eligibility Determination for Submitting an EPCRA Section 313 Report****B.4 Threshold Determinations**

EPCRA section 313 reporting is required if threshold quantities are exceeded. Separate thresholds apply to the amount of the EPCRA section 313 chemical that is manufactured, processed or otherwise used.

You must submit a report for any EPCRA section 313 chemical, which is not listed as a PBT chemical, that is manufactured or processed at your facility in excess of the following threshold:

- ☐ 25,000 pounds per toxic chemical or category over the calendar year.

You must submit a report for any EPCRA section 313 chemical, which is not listed as a PBT chemical, that is otherwise used at your facility in excess of the following threshold:

- ☐ 10,000 pounds per toxic chemical or category over the calendar year.

You must submit a report for any EPCRA section 313 chemical, which is listed as a PBT chemical that is manufactured, processed or otherwise used at your facility above the designated threshold for that chemical.

The chemical names, CAS Registry numbers and their reporting thresholds are listed in the table below. See Table IIc of these instructions for lists of individual members of the dioxin and dioxin-like compounds chemical category and the polycyclic aromatic compounds chemical category.

Chemical or chemical category name	CAS RN or chemical category code	Threshold (pounds, unless noted otherwise)
Pentachlorobenzene	608-93-5	10
Polychlorinated biphenyls (PCBs)	1336-36-3	10
Tetrabromobisphenol A	79-94-7	100
Toxaphene	8001-35-2	10
Trifluralin	1582-09-8	100
Mercury	7439-97-6	10
Mercury compounds	N458	10
Dioxin and dioxin-like compounds category (manufacturing; and the processing or otherwise use of dioxin and dioxin-like compounds category if the dioxin and dioxin-like compounds are present as contaminants in a chemical and if they were created during the manufacturing of that chemical)	N150	0.1 grams
Polycyclic aromatic compounds category (PACs)	N590	100

Chemical or chemical category name	CAS RN or chemical category code	Threshold (pounds, unless noted otherwise)
Aldrin	309-00-2	100
Benzo[g,h,i]perylene	191-24-2	10
Chlordane	57-74-9	10
Heptachlor	76-44-8	10
Hexachlorobenzene	118-74-1	10
Isodrin	465-73-6	10
Methoxychlor	72-43-5	100
Octachlorostyrene	29082-74-4	10
Pendimethalin	40487-42-1	100

## Table II. EPCRA Section 313 Chemical List For Reporting Year 2000 (including Toxic Chemical Categories)

Individually listed EPCRA Section 313 chemicals with CAS Registry Numbers are arranged alphabetically starting on page II-3. Following the alphabetical list, the EPCRA Section 313 chemicals are arranged in CAS Registry Number order. Covered chemical categories follow.

Certain EPCRA Section 313 chemicals listed in Table II have parenthetical "qualifiers." These qualifiers indicate that these EPCRA Section 313 chemicals are subject to the section 313 reporting requirements if manufactured, processed, or otherwise used in a specific form or when a certain activity is performed. The following chemicals are reportable only if they are manufactured, processed, or otherwise used in the specific form(s) listed below:

<u>Chemical</u>	<u>CAS Registry Number</u>	<u>Qualifier</u>
Aluminum (fume or dust)	7429-90-5	<u>Only</u> if it is a fume or dust form.
Aluminum oxide (fibrous forms)	1344-28-1	<u>Only</u> if it is a fibrous form.
Ammonia (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing)	7664-41-7	<u>Only</u> 10% of aqueous forms. 100% of anhydrous forms.
Asbestos (friable)	1332-21-4	<u>Only</u> if it is a friable form.
Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	7647-01-0	<u>Only</u> if it is an aerosol form as defined.
Phosphorus (yellow or white)	7723-14-0	<u>Only</u> if it is a yellow or white form.
Sulfuric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	7664-93-9	<u>Only</u> if it is an aerosol form as defined.
Vanadium (except when contained in an alloy)	7440-62-2	<u>Except</u> if it is contained in an alloy.
Zinc (fume or dust)	7440-66-6	<u>Only</u> if it is in a fume or dust form.

The qualifier for the following two chemicals is based on the chemical activity rather than the form of the chemical. These chemicals are subject to EPCRA section 313 reporting requirements only when the indicated activity is performed.

<u>Chemical/ Chemical Category</u>	<u>CAS Number</u>	<u>Qualifier</u>
Dioxin and dioxin-like compounds (manufacturing; and the processing or otherwise use of dioxin and dioxin-like compounds if the dioxin and dioxin-like compounds are present as contaminants in a chemical and if they were created during the manufacture of that chemical.)	NA	<u>Only</u> if they are manufactured at the facility; or are processed or otherwise used when present as contaminants in a chemical but only if they were created during the manufacture of that chemical.
Isopropyl alcohol (manufacturing — strong acid process, no supplier notification)	67-63-0	<u>Only</u> if it is being manufactured by the strong acid process.
Saccharin (manufacturing, no supplier notification)	81-07-2	<u>Only</u> if it is being manufactured.

There are no supplier notification requirements for isopropyl alcohol and saccharin since the processors and users of these chemicals are not required to report. Manufacturers of these chemicals do not need to notify their customers that these are reportable EPCRA section 313 chemicals.

Table II

**Note:** Chemicals may be added to or deleted from the list. The Emergency Planning and Community Right-to-Know Information Hotline, (800) 424-9346, or (703) 412-9877, will provide up-to-date information on the status of these changes. See section B.4.b of the instructions for more information on the *de minimis* values listed below. There are no *de minimis* levels for PBT chemicals since the *de minimis* exemption is not available for these chemicals (an asterisk appears where a *de minimis* limit would otherwise appear in Table II). However, for purposes of the supplier notification requirement only, such limits are provided in Appendix D.

## Chemical Qualifiers

This table contains the list of individual EPCRA Section 313 chemicals and categories of chemicals subject to 2000 calendar year reporting. Some of the EPCRA Section 313 chemicals listed have parenthetical qualifiers listed next to them. An EPCRA Section 313 chemical that is listed without a qualifier is subject to reporting in all forms in which it is manufactured, processed, and otherwise used.

**Fume or dust.** Two of the metals on the list (aluminum and zinc) contain the qualifier "fume or dust." Fume or dust refers to dry forms of these metals but does not refer to "wet" forms such as solutions or slurries. As explained in Section B.3.a of these instructions, the term manufacture includes the generation of an EPCRA Section 313 chemical as a byproduct or impurity. In such cases, a facility should determine if, for example, it generated more than 25,000 pounds of aluminum fume or dust in the reporting year as a result of its activities. If so, the facility must report that it manufactures "aluminum (fume or dust)." Similarly, there may be certain technologies in which one of these metals is processed in the form of a fume or dust to make other EPCRA Section 313 chemicals or other products for distribution in commerce. In reporting releases, the facility would only report releases of the fume or dust.

EPA considers dusts to consist of solid particles generated by any mechanical processing of materials including crushing, grinding, rapid impact, handling, detonation, and decrepitation of organic and inorganic materials such as rock, ore, and metal. Dusts do not tend to flocculate, except under electrostatic forces. A fume is an airborne dispersion consisting of small solid particles created by condensation from a gaseous state, in distinction to a gas or vapor. Fumes arise from the heating of solids such as lead. The condensation is often accompanied by a chemical reaction, such as oxidation. Fumes flocculate and sometimes coalesce.

**Manufacturing qualifiers.** Two of the entries to the section 313 EPCRA Section 313 chemical list contain a qualifier relating to manufacture. For isopropyl alcohol, the qualifier is "manufacturing — strong acid process." For saccharin, the qualifier simply is "manufacturing." For isopropyl alcohol, the qualifier means that only facilities manufacturing isopropyl alcohol by the strong acid process are required to report. In the case of saccharin, only manufacturers of the EPCRA Section 313 chemical are subject to the reporting requirements. A facility that processes or otherwise uses either EPCRA Section 313 chemical would not be required to report for those EPCRA Section 313 chemicals. In both cases, supplier notification does not apply because only manufacturers, not users, of the EPCRA Section 313 chemical must report.

**Ammonia (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing).** The qualifier for ammonia means that anhydrous forms of ammonia are 100% reportable and aqueous forms are limited to 10% of total aqueous ammonia. Therefore when determining threshold and releases and other waste management quantities all anhydrous ammonia is included but only 10% of total aqueous ammonia is included. Any evaporation of ammonia from aqueous ammonia solutions is considered anhydrous ammonia and should be included in threshold determinations and release and other waste management calculations.

**Sulfuric acid and Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size).** The qualifier for sulfuric acid and hydrochloric acid means that the only forms of this chemical that are reportable are aerosols. Aqueous solutions are not covered by this listing but any aerosols generated from aqueous solutions are covered.

**Nitrate compounds (water dissociable; reportable only when in aqueous solution).** The qualifier for the nitrate compounds category limits the reporting to nitrate compounds that dissociate in water, generating nitrate ion. For the purposes of threshold

Table II

determinations the entire weight of the nitrate compound must be included in all calculations. For the purposes of reporting releases and other waste management quantities only the weight of the nitrate ion should be included in the calculations of these quantities.

**Phosphorus (yellow or white).** The listing for phosphorus is qualified by the term "yellow or white." This means that only manufacturing, processing, or otherwise use of phosphorus in the yellow or white chemical form triggers reporting. Conversely, manufacturing, processing, or otherwise use of "black" or "red" phosphorus does not trigger reporting. Supplier notification also applies only to distribution of yellow or white phosphorus.

**Asbestos (friable).** The listing for asbestos is qualified by the term "friable," referring to the physical characteristic of being able to be crumbled, pulverized, or reducible to a powder with hand pressure. Only manufacturing, processing, or otherwise use of asbestos in the friable form triggers reporting. Supplier notification applies only to distribution of mixtures or other trade name products containing friable asbestos.

**Aluminum Oxide (fibrous forms).** The listing for aluminum oxide is qualified by the term "fibrous forms." Fibrous refers to a man-made form of aluminum oxide that is processed to produce strands or filaments which can be cut to various lengths depending on the application. Only manufacturing, processing, or otherwise use of aluminum oxide in the fibrous form triggers reporting. Supplier notification applies only to distribution of mixtures or other trade name products containing fibrous forms of aluminum oxide.

### a. Individually-Listed Toxic Chemicals Arranged Alphabetically

CAS Number	Chemical Name	<i>De Minimis</i> Limit
71751-41-2	Ahamectin [Avermectin B1]	1.0
30560-19-1	Acephate (Acetylphosphoramidothioic acid O,S-dimethyl ester)	1.0
75-07-0	Acetaldehyde	0.1
60-35-5	Acetamide	0.1
75-05-8	Acetonitrile	1.0
98-86-2	Acetophenone	1.0
53-96-3	2-Acetylaminofluorene	0.1
62476-59-9	Acifluorfen, sodium salt [5-(2-Chloro-4-(trifluoromethyl)phenoxy)-2-nitrobenzoic acid, sodium salt]	1.0
107-02-8	Acrolicin	1.0
79-06-1	Acrylamide	0.1
79-10-7	Acrylic acid	1.0
107-13-1	Acrylonitrile	0.1
15972-60-8	Alachlor	1.0
116-06-3	Aldicarb	1.0
309-00-2	Aldrin [1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro-1,4,4a,5,8,8a-hexahydro-(1.alpha.,4.alpha.,4a.beta.,5.alpha.,8.alpha.,8a.beta.)-]	*
28057-48-9	d-trans-Allethrin [d-trans-Chrysanthemic acid of d-allethrine]	1.0
107-18-6	Allyl alcohol	1.0
107-11-9	Allylamine	1.0
107-05-1	Allyl chloride	1.0
7429-90-5	Aluminum (fume or dust)	1.0
20859-73-8	Aluminum phosphide	1.0
1344-28-1	Aluminum oxide (fibrous forms)	1.0
834-12-8	Ametryn (N-Ethyl-N'-(1-methylethyl)-6-(methylthio)-1,3,5-triazine-2,4-diamine)	1.0
117-79-3	2-Aminoanthraquinone	0.1
60-09-3	4-Aminoazobenzene	0.1
92-67-1	4-Aminobiphenyl	0.1
82-28-0	1-Amino-2-methylantraquinone	0.1

Notes for Sections A and B of following list of TRI chemicals:

"Color Index" indicated by "C.I."

\* There are no *de minimis* levels for PBT chemicals, except for supplier notification purposes (see Appendix D)

United States Environmental Protection Agency  
Region V77 West Jackson Boulevard  
Chicago, Illinois 60604

Superfund Division

Facsimile Cover Sheet  
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Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
33089-61-1	Amitraz	1.0	314-40-9	Bromacil	1.0
61-82-5	Amitrole	0.1		(5-Bromo-6-methyl-3-(1-methylpropyl)-2,4(1H,3H)-pyrimidinedione)	
7664-41-7	Ammonia	1.0	53404-19-6	Bromacil, lithium salt	1.0
	(includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing)			[2,4(1H,3H)-Pyrimidinedione, 5-bromo-6-methyl-3-(1-methylpropyl), lithium salt]	
101-05-3	Anilazine	1.0	7726-95-6	Bromine	1.0
	[4,6-Dichloro-N-(2-chlorophenyl)-1,3,5-triazin-2-amine]		35691-65-7	1-Bromo-1-(bromomethyl)-1,3-propanedicarbonitrile	1.0
62-53-3	Aniline	1.0	353-59-3	Bromochlorodifluoromethane (Halon 1211)	1.0
90-04-0	o-Anisidine	0.1	75-25-2	Bromoform (Tribromomethane)	1.0
104-94-9	p-Anisidine	1.0	74-83-9	Bromomethane (Methyl bromide)	1.0
134-29-2	o-Anisidine hydrochloride	0.1	75-63-8	Bromotrifluoromethane (Halon 1301)	1.0
120-12-7	Anthracene	1.0	1689-84-5	Bromoxynil	1.0
7440-36-0	Antimony	1.0		(3,5-Dibromo-4-hydroxybenzonitrile)	
7440-38-2	Arsenic	0.1	1689-99-2	Bromoxynil octanoate	1.0
1332-21-4	Asbestos (friable)	0.1		(Octanoic acid, 2,6-dibromo-4-cyanophenylester)	
1912-24-9	Atrazine	1.0	357-57-3	Brucine	1.0
	(6-Chloro-N-ethyl-N'-(1-methylethyl)-1,3,5-triazine-2,4-diamine)		106-99-0	1,3-Butadiene	0.1
7440-39-3	Barium	1.0	141-32-2	Butyl acrylate	1.0
22781-23-3	Bendiocarb	1.0	71-36-3	n-Butyl alcohol	1.0
	[2,2-Dimethyl-1,3-benzodioxol-4-ol methylcarbamate]		78-92-2	sec-Butyl alcohol	1.0
1861-40-1	Benfluralin	1.0	75-65-0	tert-Butyl alcohol	1.0
	(N-Butyl-N-ethyl-2,6-dinitro-4-(trifluoromethyl)-benzenamine)		106-88-7	1,2-Butylene oxide	1.0
17804-35-2	Benomyl	1.0	123-72-8	Butyraldehyde	1.0
98-87-3	Benzal chloride	1.0	7440-43-9	Cadmium	0.1
55-21-0	Benzamide	1.0	156-62-7	Calcium cyanamide	1.0
71-43-2	Benzene	0.1	133-06-2	Captan	1.0
92-87-5	Benzidine	0.1		[1H-Isoindole-1,3(2H)-dione, 3a,4,7,7a-tetrahydro-2-[(trichloromethyl)thio]-]	
98-07-7	Benzoic trichloride (Benzotrichloride)	0.1	63-25-2	Carbaryl [1-Naphthalenol, methylcarbamate]	1.0
191-24-2	Benzo(g,h,i)perylene	*	1563-66-2	Carbofuran	1.0
98-88-4	Benzoyl chloride	1.0	75-15-0	Carbon disulfide	1.0
94-36-0	Benzoyl peroxide	1.0	56-23-5	Carbon tetrachloride	0.1
100-44-7	Benzyl chloride	1.0	463-58-1	Carbonyl sulfide	1.0
7440-41-7	Beryllium	0.1	5234-68-4	Carboxin	1.0
82657-04-3	Bifenthrin	1.0		(5,6-Dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide)	
92-52-4	Biphenyl	1.0	120-80-9	Catechol	1.0
111-91-1	Bis(2-chloroethoxy) methane	1.0	2439-01-2	Chinomethionat	1.0
111-44-4	Bis(2-chloroethyl) ether	1.0		[6-Methyl-1,3-dithiolo[4,5-b]quinoxalin-2-one]	
542-88-1	Bis(chloromethyl) ether	0.1	133-90-4	Chloramben	1.0
108-60-1	Bis(2-chloro-1-methylethyl)ether	1.0		[Benzoic acid, 3-amino-2,5-dichloro-]	
56-35-9	Bis(tributyltin) oxide	1.0	57-74-9	Chlordane	*
10294-34-5	Boron trichloride	1.0		[4,7-Methanoindan, 1,2,3,4,5,6,7,8-octachloro-2,3,3a,4,7,7a-hexahydro-]	
7637-07-2	Boron trifluoride	1.0			



Table 11

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
115-28-6	Chlorendic acid	0.1	7440-47-3	Chromium	1.0
90982-32-4	Chlorimuron ethyl [1-ethyl-2-[[[(4-chloro-6-methoxyprimidin-2-yl)amino]carbonyl]amino]sulfonyl] benzoate]	1.0	4680-78-8	C.I. Acid Green 3	1.0
7782-50-5	Chlorine	1.0	6459-94-5	C.I. Acid Red 114	0.1
10049-04-4	Chlorine dioxide	1.0	569-64-2	C.I. Basic Green 4	1.0
79-11-8	Chloroacetic acid	1.0	989-38-8	C.I. Basic Red 1	1.0
532-27-4	2-Chloroacetophenone	1.0	1937-37-7	C.I. Direct Black 38	0.1
4080-31-3	1-(3-Chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride	1.0	2602-46-2	C.I. Direct Blue 6	0.1
106-47-8	p-Chloroaniline	0.1	28407-37-6	C.I. Direct Blue 218	1.0
108-90-7	Chlorobenzene	1.0	16071-86-6	C.I. Direct Brown 95	0.1
510-15-6	Chlorobenzilate [Benzeneacetic acid, 4-chloro-.alpha.-(4-chlorophenyl)-.alpha.-hydroxy-, ethyl ester]	1.0	2832-40-8	C.I. Disperse Yellow 3	1.0
75-68-3	1-Chloro-1,1-difluoroethane (HCFC-142b)	1.0	3761-53-3	C.I. Food Red 5	0.1
75-45-6	Chlorodifluoromethane (HCFC-22)	1.0	81-88-9	C.I. Food Red 15	1.0
75-00-3	Chloroethane (Ethyl chloride)	1.0	3118-97-6	C.I. Solvent Orange 7	1.0
67-66-3	Chloroform	0.1	97-56-3	C.I. Solvent Yellow 3	1.0
74-87-3	Chloromethane (Methyl chloride)	1.0	842-07-9	C.I. Solvent Yellow 14	1.0
107-30-2	Chloromethyl methyl ether	0.1	492-80-8	C.I. Solvent Yellow 34 (Auramine)	0.1
563-47-3	3-Chloro-2-methyl-1-propene	0.1	128-66-5	C.I. Vat Yellow 4	1.0
104-12-1	p-Chlorophenyl isocyanate	1.0	7440-48-4	Cobalt	0.1
76-06-2	Chloropicrin	1.0	7440-50-8	Copper	1.0
126-99-8	Chloroprene	1.0	8001-58-9	Creosote	0.1
542-76-7	3-Chloropropionitrile	1.0	120-71-8	p-Cresidine	0.1
63938-10-3	Chlorotetrafluoroethane	1.0	108-39-4	m-Cresol	1.0
354-25-6	1-Chloro-1,1,2,2-tetrafluoroethane (HCFC-124a)	1.0	95-48-7	o-Cresol	1.0
2837-89-0	2-Chloro-1,1,1,2-tetrafluoroethane (HCFC-124)	1.0	106-44-5	p-Cresol	1.0
1897-45-6	Chloroethalonil [1,3-Benzenedicarbonitrile, 2,4,5,6-tetrachloro-]	1.0	1319-77-3	Cresol (mixed isomers)	1.0
95-69-2	p-Chloro-o-toluidine	0.1	4170-30-3	Crotonaldehyde	1.0
75-88-7	2-Chloro-1,1,1-trifluoroethane (HCFC-133a)	1.0	98-82-8	Cumene	1.0
75-72-9	Chlorotrifluoromethane (CFC-13)	1.0	80-15-9	Cumene hydroperoxide	1.0
460-35-5	3-Chloro-1,1,1-trifluoropropane (HCFC-253fb)	1.0	135-20-6	Cupferron	0.1
5598-13-0	Chlorpyrifos methyl [O,O-Dimethyl-O-(3,5,6-trichloro-2-pyridyl)phosphorothioate]	1.0	21725-46-2	[Benzeneamine, N-hydroxy-N-nitroso, ammonium salt]	
64902-72-3	Chlorsulfuron [2-Chloro-N-[[[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino]carbonyl]benzenesulfonamide]	1.0	1134-23-2	Cyanazine	1.0
			110-82-7	Cycloate	1.0
			108-93-0	Cyclohexane	1.0
			68359-37-5	Cyclohexanol	1.0
				Cyfluthrin	1.0
				[3-(2,2-Dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid, cyano(4-fluoro-3-phenoxyphenyl) methyl ester]	
			68085-85-8	Cyhalothrin	1.0
				[3-(2-Chloro-3,3,3-trifluoro-1-propenyl)-2,2-dimethylcyclopropane-carboxylic acid cyano(3-phenoxyphenyl)methyl ester]	
			94-75-7	2,4-D	0.1
			533-74-4	[Acetic acid, (2,4-dichlorophenoxy)-] Dazomet	1.0
				(Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione)	

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
53404-60-7	Dazomet, sodium salt [Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione, ion(1-), sodium]	1.0	1717-00-6	1,1-Dichloro-1-fluoroethane (HCFC-141b)	1.0
94-82-6	2,4-DB	1.0	75-43-4	Dichlorofluoromethane (HCFC-21)	1.0
1929-73-3	2,4-D butoxyethyl ester	0.1	75-09-2	Dichloromethane (Methylene chloride)	0.1
94-80-4	2,4-D butyl ester	0.1	127564-92-5	Dichloropentafluoropropane	1.0
2971-38-2	2,4-D chlorocrotyl ester	0.1	13474-88-9	1,1-Dichloro-1,2,2,3,3-pentafluoropropane (HCFC-225cc)	1.0
1163-19-5	Dccabromodiphenyl oxide	1.0	111512-56-2	1,1-Dichloro-1,2,3,3,3-pentafluoropropane (HCFC-225cb)	1.0
13684-56-5	Desmedipham	1.0	422-44-6	1,2-Dichloro-1,1,2,3,3-pentafluoropropane (HCFC-225bb)	1.0
1928-43-4	2,4-D 2-ethylhexyl ester	0.1	431-86-7	1,2-Dichloro-1,1,3,3,3-pentafluoropropane (HCFC-225da)	1.0
53404-37-8	2,4-D 2-ethyl-4-methylpentyl ester	0.1	507-55-1	1,3-Dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb)	1.0
2303-16-4	Diallate [Carbamothioic acid, bis(1-methylethyl)-S-(2,3-dichloro-2-propenyl) ester]	1.0	136013-79-1	1,3-Dichloro-1,1,2,3,3-pentafluoropropane (HCFC-225ca)	1.0
615-05-4	2,4-Diaminoanisole	0.1	128903-21-9	2,2-Dichloro-1,1,1,3,3-pentafluoropropane (HCFC-225na)	1.0
39156-41-7	2,4-Diaminoanisole sulfate	0.1	422-48-0	2,3-Dichloro-1,1,1,2,3-pentafluoropropane (HCFC-225ha)	1.0
101-80-4	4,4'-Diaminodiphenyl ether	0.1	422-56-0	3,3-Dichloro-1,1,1,2,2-pentafluoropropane (HCFC-225ca)	1.0
95-80-7	2,4-Diaminotoluene	0.1	97-23-4	Dichlorophene [2,2'-Methylenebis(4-chlorophenol)]	1.0
25376-45-8	Diaminotoluene (mixed isomers)	0.1	120-83-2	2,4-Dichlorophenol	1.0
333-41-5	Diazinon	1.0	78-87-5	1,2-Dichloropropane	1.0
334-88-3	Diazomethane	1.0	10061-02-6	trans-1,3-Dichloropropene	0.1
132-64-9	Dibenzofuran	1.0	78-88-6	2,3-Dichloropropene	1.0
96-12-8	1,2-Dibromo-3-chloropropane (DBCP)	0.1	542-75-6	1,3-Dichloropropylene	0.1
106-93-4	1,2-Dibromooethane (Ethylene dibromide)	0.1	76-14-2	Dichlorotetrafluoroethane (CFC-114)	1.0
124-73-2	Dibromotetrafluoroethane (Halon 2402)	1.0	34077-87-7	Dichlorotrifluoroethane	1.0
84-74-2	Dibutyl phthalate	1.0	90454-18-5	Dichloro-1,1,2-trifluoroethane	1.0
1918-00-9	Dicamba (3,6-Dichloro-2-methoxybenzoic acid)	1.0	812-04-4	1,1-Dichloro-1,2,2-trifluoroethane (HCFC-123b)	1.0
99-30-9	Dichloran [2,6-Dichloro-4-nitroaniline]	1.0	354-23-4	1,2-Dichloro-1,1,2-trifluoroethane (HCFC-123a)	1.0
95-50-1	1,2-Dichlorobenzene	1.0	306-83-2	2,2-Dichloro-1,1,1-trifluoroethane (HCFC-123)	1.0
541-73-1	1,3-Dichlorobenzene	1.0	62-73-7	Dichlorvos [Phosphoric acid, 2,2-dichloroethenyl dimethyl ester]	0.1
106-46-7	1,4-Dichlorobenzene	0.1	51338-27-3	Diclofop methyl [2-[4-(2,4-Dichlorophenoxy)phenoxy]propanoic acid, methyl ester]	1.0
25321-22-6	Dichlorobenzene (mixed isomers)	0.1	115-32-2	Dicosol [Benzonemethanol, 4-chloro-.alpha.-4-(chlorophenyl)-.alpha.-(trichloromethyl)-]	1.0
91-94-1	3,3'-Dichlorobenzidine	0.1	77-73-6	Dicyclopentadiene	1.0
612-83-9	3,3'-Dichlorobenzidine dihydrochloride	0.1			
64969-34-2	3,3'-Dichlorobenzidine sulfate	0.1			
75-27-4	Dichlorobromomethane	1.0			
764-41-0	1,4-Dichloro-2-butene	1.0			
110-57-6	trans-1,4-Dichloro-2-butene	1.0			
1649-08-7	1,2-Dichloro-1,1-difluoroethane (HCFC-132b)	1.0			
75-71-8	Dichlorodifluoromethane (CFC-12)	1.0			
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	0.1			
540-59-0	1,2-Dichloroethylene	1.0			

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
1464-53-5	Dicpoxybutane	0.1	122-66-7	1,2-Diphenylhydrazine (1hydrazobenzene)	0.1
111-42-2	Diethanolamine	1.0	2164-07-0	Dipotassium endosulfate [7-Oxabicyclo(2.2.1)heptane-2,3-dicarboxylic acid, dipotassium salt]	1.0
38727-55-8	Diethyl ethyl	1.0	136-45-8	Dipropyl isocinchomeronate	1.0
117-81-7	Di(2-ethylhexyl) phthalate (DEHP)	0.1	138-93-2	Disodium cyanodithioimidocarbonate	1.0
64-67-5	Diethyl sulfate	0.1	94-11-1	2,4-D isopropyl ester	0.1
35367-38-5	Diisobenzuron	1.0	541-53-7	2,4-Dithiobiuret	1.0
101-90-6	Diglycidyl resorcinol ether	0.1	330-54-1	Diuron	1.0
94-58-6	Dihydrosafrole	0.1	2439-10-3	Dodine [Dodecylguanidine monoacetate]	1.0
55290-64-7	Dimethipin [2,3-Dihydro-5,6-dimethyl-1,4-dithiin-1,1,4,4-tetraoxide]	1.0	120-36-5	2,4-DP	0.1
60-51-5	Dimethoate	1.0	1320-18-9	2,4-D propylene glycol butyl ether ester	0.1
119-90-4	3,3'-Dimethoxybenzidine	0.1	2702-72-9	2,4-D sodium salt	0.1
20325-40-0	3,3'-Dimethoxybenzidine dihydrochloride (o-Dianisidine dihydrochloride)	0.1	106-89-8	Epichlorohydrin	0.1
111984-09-9	3,3'-Dimethoxybenzidine hydrochloride (o-Dianisidine hydrochloride)	0.1	13194-48-4	Phthoprop [Phosphorodithioic acid O-ethyl S,S-dipropyl ester]	1.0
124-40-3	Dimethylamine	1.0	110-80-5	2-Ethoxyethanol	1.0
2300-66-5	Dimethylamine dicamba	1.0	140-88-5	Ethyl acrylate	0.1
60-11-7	4-Dimethylaminoazobenzene	0.1	100-41-4	Ethylbenzene	1.0
121-69-7	N,N-Dimethylaniline	1.0	541-41-3	Ethyl chloroformate	1.0
119-93-7	3,3'-Dimethylbenzidine (o-Tolidine)	0.1	759-94-4	Ethyl dipropylthiocarbamate (EPTC)	1.0
612-82-8	3,3'-Dimethylbenzidine dihydrochloride (o-Tolidine dihydrochloride)	0.1	74-85-1	Ethylene	1.0
41766-75-0	3,3'-Dimethylbenzidine dihydrofluoride (o-Tolidine dihydrofluoride)	0.1	107-21-1	Ethylene glycol	1.0
79-44-7	Dimethylcarbamyl chloride	0.1	151-56-4	Ethyleneimine (Aziridine)	0.1
2524-03-0	Dimethyl chlorothiophosphate	1.0	75-21-8	Ethylene oxide	0.1
68-12-2	N,N-Dimethylformamide	0.1	96-45-7	Ethylene thiourea	0.1
57-14-7	1,1-Dimethyl hydrazine	0.1	75-34-3	Ethylidene dichloride	1.0
105-67-9	2,4-Dimethylphenol	1.0	52-85-7	Famphur	1.0
131-11-3	Dimethyl phthalate	1.0	60168-88-9	Fenarimol [alpha-(2-Chlorophenyl)-alpha-(4-chlorophenyl)-5-pyrimidinemethanol]	1.0
77-78-1	Dimethyl sulfate	0.1	13356-08-6	Fenbutatin oxide (Hexakis(2-methyl-2-phenylpropyl) distannoxane)	1.0
99-65-0	m-Dinitrobenzene	1.0	66441-23-4	Fenoxaprop ethyl [2-(4-((6-Chloro-2-benzoxazolyl)oxy)phenoxy)propanoic acid, ethyl ester]	1.0
528-29-0	o-Dinitrobenzene	1.0	72490-01-8	Fenoxycarb [(2-(4-Phenoxy phenoxy)ethyl)carbamic acid ethyl ester]	1.0
100-25-4	p-Dinitrobenzene	1.0	39515-41-8	Fenpropathrin [2,2,3,3-Tetramethylcyclopropane carboxylic acid cyano(3-phenoxyphenyl)methyl ester]	1.0
88-85-7	Dinitrobutyl phenol (Dinoseb)	1.0			
534-52-1	4,6-Dinitro-o-cresol	1.0			
51-28-5	2,4-Dinitrophenol	1.0			
121-14-2	2,4-Dinitrotoluene	0.1			
606-20-2	2,6-Dinitrotoluene	0.1			
25321-14-6	Dinitrotoluene (mixed isomers)	1.0			
39300-45-3	Dinocap	1.0			
123-91-1	1,4-Dioxane	0.1			
957-51-7	Diphenamid	1.0			
122-39-4	Diphenylamine	1.0			

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
55-38-9	Fenthion	1.0	302-01-2	Hydrazine	0.1
	[O,O-Dimethyl O-[3-methyl-4-(methylthio)phenyl] ester, phosphorothioic acid]		10034-93-2	Hydrazine sulfate	0.1
51630-58-1	Penvalerate	1.0	7647-01-0	Hydrochloric acid	1.0
	[4-Chloro-alpha-(1-methylethyl) benzenecetic acid cyano (3-phenoxyphenyl) methyl ester]			(acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	
14484-64-1	Perham	1.0	74-90-8	Hydrogen cyanide	1.0
	[Tris(dimethylcarbamodithioato- S,S')iron]		7664-39-3	Hydrogen fluoride	1.0
69806-50-4	Fluazifop butyl	1.0	123-31-9	Hydroquinone	1.0
	[2-[4-[[5-(trifluoromethyl)-2-pyridinyl]oxy]phenoxy]propanoic acid, butyl ester]		35554-44-0	Imazalil	1.0
2164-17-2	Fluometuron	1.0		[1-[2-(2,4-Dichlorophenyl)-2-(2-propenyloxy)ethyl]-1H-imidazole]	
	[Urea, N,N-dimethyl-N'-[3-(trifluoromethyl)phenyl]-]		55406-53-6	3-Iodo-2-propynyl butylcarbamate	1.0
7782-41-4	Fluorine	1.0	13463-40-6	Iron pentacarbonyl	1.0
51-21-8	Fluorouracil (5-Fluorouracil)	1.0	78-84-2	Isobutyraldehyde	1.0
69409-94-5	Fluvalinate	1.0	465-73-6	Isodrin	*
	[N-[2-Chloro-4-(trifluoromethyl)phenyl]-DL-valine(+)-cyano(3-phenoxyphenyl)methyl ester]		25311-71-1	Isfenphos[2-[[[ethoxy[(1-methylethyl)amino]phosphinothioyl]oxy] benzoic acid 1-methylethyl ester]	1.0
133-07-3	Folpet	1.0	67-63-0	Isopropyl alcohol	1.0
72178-02-0	Fomesafen	1.0		(manufacturing-strong acid process, no supplier notification)	
	[5-(2-Chloro-4-(trifluoromethyl)phenoxy)-N-methylsulfonyl-2-nitrobenzamide]		80-05-7	4,4'-Isopropylidenediphenol	1.0
50-00-0	Formaldehyde	0.1	120-58-1	Isosafrole	1.0
64-18-6	Formic acid	1.0	77501-63-4	Lactofen	1.0
76-13-1	Freon 113	1.0		[Benzoic acid, 5-[2-Chloro-4-(trifluoromethyl)phenoxy]-2-nitro-, 2-ethoxy-1-methyl-2-oxoethyl ester]	
	[Ethane, 1,1,2-trichloro-1,2,2,-trifluoro-]		7439-92-1	Lead	0.1
76-44-8	Heptachlor	*	58-89-9	Lindane	0.1
	[1,4,5,6,7,8,8-Heptachloro-3a, 4,7,7a-tetrahydro-4,7-methano-1H-indene]			[Cyclohexane, 1,2,3,4,5,6-hexachloro-, (1.alpha.,2.alpha.,3.beta., 4.alpha., 5.alpha., 6.beta.)-]	
118-74-1	Hexachlorobenzene	*	330-55-2	Linuron	1.0
87-68-3	Hexachloro-1,3-butadiene	1.0	554-13-2	Lithium carbonate	1.0
319-84-6	alpha-Hexachlorocyclohexane	1.0	121-75-5	Malathion	1.0
77-47-4	Hexachlorocyclopentadiene	1.0	108-31-6	Maleic anhydride	1.0
67-72-1	Hexachloroethane	1.0	109-77-3	Malononitrile	1.0
1335-87-1	Hexachloronaphthalene	1.0	12427-38-2	Maneb	1.0
70-30-4	Hexachlorophene	1.0		[Carbamodithioic acid, 1,2-ethanedithylbis-, manganese complex]	
680-31-9	Hexamethylphosphoramide	0.1	7439-96-5	Manganese	1.0
110-54-3	n-Hexane	1.0	93-65-2	Mecoprop	0.1
51235-04-2	Hexazinone	1.0	149-30-4	2-Mercaptobenzothiazole (MBT)	1.0
67485-29-4	Hydramethylnon	1.0	7439-97-6	Mercury	*
	[Tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone[3-[4-(trifluoromethyl)phenyl]-1-[2-[4-(trifluoromethyl)phenyl]ethenyl]-2-propenylidene]hydrazono]		150-50-5	Merphos	1.0
			126-98-7	Methacrylonitrile	1.0
			137-42-8	Metham sodium (Sodium methylthiocarbamate)	1.0
			67-56-1	Methanol	1.0

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
20354-26-1	Methazole	1.0	88671-89-0	Myclobutanil	1.0
	[2-(3,4-Dichlorophenyl)-4-methyl-1,2,4-oxadiazolidine-3,5-dione]			[.alpha.-Butyl-.alpha.-(4-chlorophenyl)-1H-1,2,4-triazole-1-propanenitrile]	
2032-65-7	Methiocarb	1.0	142-59-6	Nabam	1.0
94-74-6	Methoxone	0.1	300-76-5	Naled	1.0
	((4-Chloro-2-methylphenoxy) acetic acid) (MCPA)		91-20-3	Naphthalene	1.0
3653-48-3	Methoxone sodium salt	0.1	134-32-7	alpha-Naphthylamine	0.1
	((4-Chloro-2-methylphenoxy) acetate sodium salt)		91-59-8	beta-Naphthylamine	0.1
72-43-5	Methoxychlor	*	7440-02-0	Nickel	0.1
	[Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-methoxy-]]		1929-82-4	Nitrapyrin	1.0
109-86-4	2-Methoxyethanol	1.0		(2-Chloro-6-(trichloromethyl)pyridine)	
96-33-3	Methyl acrylate	1.0	7697-37-2	Nitric acid	1.0
1634-04-4	Methyl tert-butyl ether	1.0	139-13-9	Nitrilotriacetic acid	0.1
79-22-1	Methyl chlorocarbonate	1.0	100-01-6	p-Nitroaniline	1.0
101-14-4	4,4'-Methylenebis(2-chloroaniline) (MBOCA)	0.1	99-59-2	5-Nitro-o-anisidine	1.0
101-61-1	4,4'-Methylenebis(N,N-dimethyl)benzenamine	0.1	98-95-3	Nitrobenzene	0.1
74-95-3	Methylene bromide	1.0	92-93-3	4-Nitrobiphenyl	0.1
101-77-9	4,4'-Methylenedianiline	0.1	1836-75-5	Nitrofen	0.1
78-93-3	Methyl ethyl ketone	1.0		[Benzene, 2,4-dichloro-1-(4-nitrophenoxy)-]	
60-34-4	Methyl hydrazine	1.0	51-75-2	Nitrogen mustard	0.1
74-88-4	Methyl iodide	1.0		[2-Chloro-N-(2-chloroethyl)-N-methylethanamine]	
108-10-1	Methyl isobutyl ketone	1.0	55-63-0	Nitroglycerin	1.0
624-83-9	Methyl isocyanate	1.0	88-75-5	2-Nitrophenol	1.0
556-61-6	Methyl isothiocyanate [Isothiocyanatomethane]	1.0	100-02-7	4-Nitrophenol	1.0
75-86-5	2-Methylacetonitrile	1.0	79-46-9	2-Nitropropane	0.1
80-62-6	Methyl methacrylate	1.0	924-16-3	N-Nitrosodi-n-butylamine	0.1
924-42-5	N-Methylolacrylamide	1.0	55-18-5	N-Nitrosodichthylamine	0.1
298-00-0	Methyl parathion	1.0	62-75-9	N-Nitrosodimethylamine	0.1
109-06-8	2-Methylpyridine	1.0	86-30-6	N-Nitrosodiphenylamine	1.0
872-50-4	N-Methyl-2-pyrrolidone	1.0	156-10-5	p-Nitrosodiphenylamine	1.0
9006-42-2	Metiram	1.0	621-64-7	N-Nitrosodi-n-propylamine	0.1
21087-64-9	Metribuzin	1.0	759-73-9	N-Nitroso-N-ethylurea	0.1
7786-34-7	Mevinphos	1.0	684-93-5	N-Nitroso-N-methylurea	0.1
90-94-8	Michler's ketone	0.1	4549-40-0	N-Nitrosomethylvinylamine	0.1
2212-67-1	Molinate	1.0	59-89-2	N-Nitrosomorpholine	0.1
	(1H-Azepine-1-carbothioic acid, hexahydro-, S-ethyl ester)		16543-55-8	N-Nitrosornicotine	0.1
1313-27-5	Molybdenum trioxide	1.0	100-75-4	N-Nitrosopiperidine	0.1
76-15-3	Monochloropentafluoroethane (CFC-115)	1.0	99-55-8	5-Nitro-o-toluidine	1.0
150-68-5	Monuron	1.0	27314-13-2	Norflurazon	1.0
505-60-2	Mustard gas	0.1		[4-Chloro-5-(methylamino)-2-[3-(trifluoromethyl)phenyl]-3(2H)-pyridazinone]	
	[Ethane, 1,1'-thiobis[2-chloro-]]		2234-13-1	Octachloronaphthalene	1.0
			29082-74-4	Octachlorostyrene	*
			19044-88-3	Oryzalin	1.0
				[4-(Dipropylamino)-3,5-dinitrobenzene sulfonamide]	
			20816-12-0	Osmium tetroxide	1.0

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
301-12-2	Oxydemeton methyl	1.0	29232-93-7	Pirimiphos methyl	1.0
19666-30-9	[S-(2-(Diethylsulfinyl)ethyl) O,O-dimethyl ester phosphorothioic acid]	1.0		[O-(2-(Diethylamino)-6-methyl-4-pyrimidinyl)-O,O-dimethylphosphorothioate]	
42874-03-3	Oxydiazon	1.0	1336-36-3	Polychlorinated biphenyls (PCBs)	*
10028-15-6	[3-[2,4-Dichloro-5-(1-methylethoxy)phenyl]-5-(1,1-dimethylethyl)-1,3,4-oxadiazol-2(3H)-one]	1.0	7758-01-2	Potassium bromate	0.1
123-63-7	Oxyfluorfen	1.0	128-03-0	Potassium dimethyldithiocarbamate	1.0
1910-42-5	Ozone	1.0	137-41-7	Potassium N-methyldithiocarbamate	1.0
56-38-2	Paraldehyde	1.0	41198-08-7	Profenofos	1.0
	Paraquat dichloride	1.0		[O-(4-Bromo-2-chlorophenyl)-O-ethyl-S-propyl phosphorothioate]	
	Parathion	1.0	7287-19-6	Prometryn	1.0
1114-71-2	[Phosphorothioic acid, O,O-diethyl-O-(4-nitrophenyl)ester]	1.0		[N,N'-Bis(1-methylethyl)-6-methylthio-1,3,5-triazine-2,4-diamine]	
	Pebulate	1.0	23950-58-5	Pronamide	1.0
40487-42-1	[Butylethylcarbamothioic acid S-propyl ester]	*	1918-16-7	Propachlor	1.0
	Pendimethalin	*		[2-Chloro-N-(1-methylethyl)-N-phenylacetamide]	
608-93-5	[N-(1-Ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine]	*	1120-71-4	Propane sulfonic	0.1
76-01-7	Pentachlorobenzene	1.0	709-98-8	Propanil	1.0
87-86-5	Pentachloroethane	0.1		[N-(3,4-Dichlorophenyl)propanamide]	
57-33-0	Pentachlorophenol (PCP)	1.0	2312-35-8	Propargite	1.0
79-21-0	Pentobarbital sodium	1.0	107-19-7	Propargyl alcohol	1.0
594-42-3	Peracetic acid	1.0	31218-83-4	Propetamphos	1.0
52645-53-1	Perchloromethyl mercaptan	1.0		[3-[(Ethylamino)methoxyphosphinothioyl]oxy]-2-butenic acid, 1-methylethyl ester]	
	Permethrin	1.0	60207-90-1	Propiconazole	1.0
	[3-(2,2-Dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid, (3-phenoxyphenyl) methyl ester]			[1-[2-(2,4-Dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl-1H-1,2,4-triazole]	
85-01-8	Phenanthrene	1.0	57-57-8	beta-Propiolactone	0.1
108-95-2	Phenol	1.0	123-38-6	Propionaldehyde	1.0
26002-80-2	Phenothrin	1.0	114-26-1	Propoxur	1.0
	[2,2-Dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylic acid (3-phenoxyphenyl)methyl ester]			[Phenol, 2-(1-methylethoxy)-, methylcarbamate]	
95-54-5	1,2-Phenylenediamine	1.0	115-07-1	Propylene (Propene)	1.0
108-45-2	1,3-Phenylenediamine	1.0	75-55-8	Propyleneimine	0.1
106-50-3	p-Phenylenediamine	1.0	75-56-9	Propylene oxide	0.1
615-28-1	1,2-Phenylenediamine dihydrochloride	1.0	110-86-1	Pyridine	1.0
624-18-0	1,4-Phenylenediamine dihydrochloride	1.0	91-22-5	Quinoline	1.0
90-43-7	2-Phenylphenol	1.0	106-51-4	Quinone	1.0
57-41-0	Phenytol	0.1	82-68-8	Quintozene	1.0
75-44-5	Phosgene	1.0		(Pentachloronitrobenzene)	
7803-51-2	Phosphine	1.0	76578-14-8	Quizalofop-ethyl	1.0
7723-14-0	Phosphorus (yellow or white)	1.0		[2-[4-[(6-Chloro-2-quinoxalinyloxy)phenoxy]propanoic acid ethyl ester]	
85-44-9	Phthalic anhydride	1.0			
1918-02-1	Picloram	1.0			
88-89-1	Picric acid	1.0			
51-03-6	Piperonyl butoxide	1.0			

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
10453-86-8	Resmethrin	1.0		[Phosphoric acid, 2-chloro 1-(2,4,5-trichlorophenyl) ethenyl dimethyl ester]	
	[[5-(Phenylmethyl)-3-furanyl]methyl-2,2-dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylate]		64-75-5	Tetracycline hydrochloride	1.0
81-07-2	Saccharin (manufacturing, no supplier notification)	0.1	7696-12-0	Tetramethrin	1.0
94-59-7	Saflure	0.1		[2,2-Dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylic acid (1,3,4,5,6,7-hexahydro-1,3-dioxo-2H-indol-2-yl)methyl ester]	
7782-49-2	Selenium	1.0	7440-28-0	Thallium	1.0
74051-80-2	Sethoxydim	1.0	148-79-8	Thiabendazole	1.0
	[2-[1-(Ethoxymino)butyl]-5-[2-(ethylthio)propyl]-3-hydroxyl-2-cyclohexen-1-one]			[2-(4-Thiazolyl)-1H-benzimidazole]	
7440-22-4	Silver	1.0	62-55-5	Thioacetamide	0.1
122-34-9	Simazine	1.0	28249-77-6	Thiobencarb	1.0
26628-22-8	Sodium azide	1.0		[Carbamic acid, diethylthio-, S-(p-chlorobenzyl)ester]	
1982-69-0	Sodium dicamba	1.0	139-65-1	4,4'-Thiodianiline	0.1
	[3,6-Dichloro-2-methoxybenzoic acid, sodium salt]		59669-26-0	Thiodicarb	1.0
128-04-1	Sodium dimethyldithiocarbamate	1.0	23564-06-9	Thiophanate ethyl	1.0
62-74-8	Sodium fluoroacetate	1.0		[[1,2-Phenylenebis(iminocarbonothioyl)] biscarbamic acid diethylester]	
7632-00-0	Sodium nitrite	1.0	23564-05-8	Thiophanate methyl	1.0
131-52-2	Sodium pentachlorophenate	1.0	79-19-6	Thiosemicarbazide	1.0
132-27-4	Sodium o-phenylphenoxide	0.1	62-56-6	Thiourea	0.1
100-42-5	Styrene	0.1	137-26-8	Thiram	1.0
96-09-3	Styrene oxide	0.1	1314-20-1	Thorium dioxide	1.0
[7664-93-9	Sulfuric acid	1.0	7550-45-0	Titanium tetrachloride	1.0
	(acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)		108-88-3	Toluene	1.0
2699-79-8	Sulfuryl fluoride (Vikane)	1.0	584-84-9	Toluene-2,4-diisocyanate	0.1
35400-43-2	Sulprofos	1.0	91-08-7	Toluene-2,6-diisocyanate	0.1
	[O-Ethyl O-[4-(methylthio)phenyl] phosphorodithioic acid S-propylester]		26471-62-5	Toluene diisocyanate (mixed isomers)	0.1
34014-18-1	Tebuthiuron	1.0	95-53-4	o-Toluidine	0.1
	[N-[5-(1,1-Dimethylethyl)-1,3,4-thiadiazol-2-yl]-N,N'-dimethylurea]		636-21-5	o-Toluidine hydrochloride	0.1
3383-96-8	Temephos	1.0	8001-35-2	Toxaphene	*
5902-51-2	Terbacil	1.0	43121-43-3	Triadimefon	1.0
	[5-Chloro-3-(1,1-dimethylethyl)-6-methyl-2,4(1H,3H)-pyrimidinedione]			[1-(4-Chlorophenoxy)-3,3-di-methyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone]	
79-94-7	Tetrabromobisphenol A	*	2303-17-5	Triallate	1.0
630-20-6	1,1,1,2-Tetrachloroethane	1.0	68-76-8	Triaziquone	1.0
79-34-5	1,1,2,2-Tetrachloroethane	1.0		[2,5-Cyclohexadiene-1,4-dione, 2,3,5-tris(1-aziridinyl)-]	
127-18-4	Tetrachloroethylene	0.1	101200-48-0	Tribenuron methyl	1.0
	(Perchloroethylene)			[2-[[(4-Methoxy-6-methyl-1,3,5-triazin-2-yl)-methylamino]-carbonyl(amino)sulfonyl] benzoic acid, methyl ester]	
354-11-0	1,1,1,2-Tetrachloro-2-fluoro ethane (HCFC-121a)	1.0	1983-10-4	Tributyltin fluoride	1.0
354-14-3	1,1,2,2-Tetrachloro-1-fluoro ethane (HCFC-121)	1.0	2155-70-6	Tributyltin methacrylate	1.0
961-11-5	Tetrachlorvinphos	1.0	78-48-8	S,S,S-Tributyltrithio-phosphate (DTF)	1.0

Table II

CAS Number	Chemical Name	De Minimis Limit
52-68-6	Trichlorfon [Phosphoric acid, (2,2,2-trichloro-1-hydroxyethyl)-, dimethyl ester]	1.0
76-02-8	Trichloroacetyl chloride	1.0
120-82-1	1,2,4-Trichlorobenzene	1.0
71-55-6	1,1,1-Trichloroethane (Methyl chloroform)	1.0
79-00-5	1,1,2-Trichloroethane	1.0
79-01-6	Trichloroethylene	0.1
75-69-4	Trichlorofluoromethane (CFC-11)	1.0
95-95-4	2,4,5-Trichlorophenol	1.0
88-06-2	2,4,6-Trichlorophenol	0.1
96-18-4	1,2,3-Trichloropropane	0.1
57213-69-1	Triclopyr triethylammonium salt	1.0
121-44-8	Trichlamine	1.0
1582-09-8	Trifluralin	*
26644-46-2	[Benzeneamine, 2,6-dinitro-N,N-dipropyl-4-(trifluoromethyl)-]	1.0
95-63-6	Triforine	1.0
2655-15-4	[N,N'-(1,4-Piperazinediyl)bis(2,2,2-trichloroethylidene)]bisformamide]	1.0
639-58-7	1,2,4-Trimethylbenzene	1.0
76-87-9	2,3,5-Trimethylphenyl methylcarbamate	1.0
126-72-7	Triphenyltin chloride	1.0
72-57-1	Triphenyltin hydroxide	1.0
51-79-6	Tris(2,3-dibromopropyl) phosphate	0.1
7440-62-2	Trypan blue	0.1
50471-44-8	Urethane (Ethyl carbamate)	0.1
108-05-4	Vanadium (except when contained in an alloy)	1.0
593-60-2	Vinclozolin	1.0
75-01-4	[3-(3,5-Dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione]	1.0
75-35-4	Vinyl acetate	0.1
108-38-3	Vinyl bromide	0.1
95-47-6	Vinyl chloride	0.1
106-42-3	Vinylidene chloride	1.0
1330-20-7	m-Xylene	1.0
87-62-7	o-Xylene	1.0
7440-66-6	p-Xylene	1.0
1222-67-7	Xylene (mixed isomers)	1.0
	2,6-Xyldine	0.1
	Zinc (fume or dust)	1.0
	Zincb	1.0
	[Carbamodithioic acid, 1,2-ethanediyibis-, zinc complex]	

b. Individually Listed Toxic Chemicals Arranged by CAS Registry Number			De Minimis Limit
CAS Number	Chemical Name		
50-00-0	Formaldehyde		0.1
51-03-6	Piperonyl butoxide		1.0
51-21-8	Fluorouracil (5-Fluorouracil)		1.0
51-28-5	2,4-Dinitrophenol		1.0
51-75-2	Nitrogen mustard [2-Chloro-N-(2-chloroethyl)-N-methylethanamine]		0.1
51-79-6	Urethane (Ethyl carbamate)		0.1
52-68-6	Trichlorfon [Phosphonic acid, (2,2,2-trichloro-1-hydroxyethyl) dimethyl ester]		1.0
52-85-7	Famphur		1.0
53-96-3	2-Acetylaminofluorene		0.1
55-18-5	N-Nitrosodiethylamine		0.1
55-21-0	Benzamide		1.0
55-38-9	Fenthion [O,O-Dimethyl O-[3-methyl-4-(methylthio)phenyl] ester, phosphorothioic acid]		1.0
55-63-0	Nitroglycerin		1.0
56-23-5	Carbon tetrachloride		0.1
56-35-9	Bis(tributyltin) oxide		1.0
56-38-2	Parathion [Phosphorothioic acid, O,O-diethyl-O-(4-nitrophenyl) ester]		1.0
57-14-7	1,1-Dimethyl hydrazine		0.1
57-33-0	Pentobarbital sodium		1.0
57-41-0	Phenytoin		0.1
57-57-8	beta-Propiolactone		0.1
57-74-9	Chlordane		*
58-89-9	[4,7-Methanoindan, 1,2,3,4,5,6,7,8,8-octachloro-2,3,3a,4,7,7a-hexahydro-] Lindane [Cyclohexane, 1,2,3,4,5,6-hexachloro-, (1.alpha.,2.alpha.,3.beta.,4.alpha.,5.alpha.,6.beta.)-]		0.1
59-89-2	N-Nitrosomorpholine		0.1
60-09-3	4-Aminoazobenzene		0.1
60-11-7	4-Dimethylaminoazobenzene		0.1
60-34-4	Methyl hydrazine		1.0
60-35-5	Acetamide		0.1
60-51-5	Dimethoate		1.0
61-82-5	Amitrole		0.1
62-53-3	Aniline		1.0
62-55-5	Thioacetamide		0.1



Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
62-56-6	Thiourea	0.1	75-44-5	Phosgene	1.0
62-73-7	Dichlorvos [Phosphoric acid, 2,2-dichloroethyl dimethyl ester]	0.1	75-45-6	Chlorodifluoromethane (HCFC-22)	1.0
62-74-8	Sodium fluoroacetate	1.0	75-55-8	Propyleneimine	0.1
62-75-9	N-Nitrosodimethylamine	0.1	75-56-9	Propylene oxide	0.1
63-25-2	Carbaryl [1-Naphthalenol, methylcarbamate]	1.0	75-63-8	Bromotrifluoromethane (Halon 1301)	1.0
64-18-6	Formic acid	1.0	75-65-0	tert-Butyl alcohol	1.0
64-67-5	Diethyl sulfate	0.1	75-68-3	1-Chloro-1,1-difluoroethane (HCFC-142b)	1.0
64-75-5	Tetracycline hydrochloride	1.0	75-69-4	Trichlorofluoromethane (CFC-11)	1.0
67-56-1	Methanol	1.0	75-71-8	Dichlorodifluoromethane (CFC-12)	1.0
67-63-0	Isopropyl alcohol (manufacturing-strong acid process, no supplier notification)	1.0	75-72-9	Chlorotrifluoromethane (CFC-13)	1.0
67-66-3	Chloroform	0.1	75-86-5	2-Methylacetonitrile	1.0
67-72-1	Hexachloroethane	1.0	75-88-7	2-Chloro-1,1,1-trifluoroethane (HCFC-133a)	1.0
68-12-2	N,N-Dimethylformamide	0.1	76-01-7	Pentachloroethane	1.0
68-76-8	Triaziquone [2,5-Cyclohexadiene-1,4-dione, 2,3,5-tris(1- aziridinyl)-]	1.0	76-02-8	Trichloroacetyl chloride	1.0
70-30-4	Hexachlorophene	1.0	76-06-2	Chloropicrin	1.0
71-36-3	n-Butyl alcohol	1.0	76-13-1	Freon 113 [Ethane, 1,1,2-trichloro-1,2,2-trifluoro-]	1.0
71-43-2	Benzene	0.1	76-14-2	Dichlorotetrafluoroethane (CFC-114)	1.0
71-55-6	1,1,1-Trichloroethane (Methyl chloroform)	1.0	76-15-3	Monochloropentafluoroethane (CFC-115)	1.0
72-43-5	Methoxychlor [Benzene, 1,1'-(2,2,2- trichloroethylidene)bis[4-methoxy-]]	*	76-44-8	Heptachlor [1,4,5,6,7,8,8-Heptachloro-3a,4,7,7a- tetrahydro-4,7-methano-1H-indene]	*
72-57-1	Trypan blue	0.1	76-87-9	Triphenyltin hydroxide	1.0
74-83-9	Bromomethane (Methyl bromide)	1.0	77-47-4	Hexachlorocyclopentadiene	1.0
74-85-1	Ethylene	1.0	77-73-6	Dicyclopentadiene	1.0
74-87-3	Chloromethane (Methyl chloride)	1.0	77-78-1	Dimethyl sulfate	0.1
74-88-4	Methyl iodide	1.0	78-48-8	S,S,S-Tributyltrithiophosphate (DEF)	1.0
74-90-8	Hydrogen cyanide	1.0	78-84-2	Isobutyraldehyde	1.0
74-95-3	Methylene bromide	1.0	78-87-5	1,2-Dichloropropane	1.0
75-00-3	Chloroethane (Ethyl chloride)	1.0	78-88-6	2,3-Dichloropropene	1.0
75-01-4	Vinyl chloride	0.1	78-92-2	sec-Butyl alcohol	1.0
75-05-8	Acetonitrile	1.0	78-93-3	Methyl ethyl ketone	1.0
75-07-0	Acetaldehyde	0.1	79-00-5	1,1,2-Trichloroethane	1.0
75-09-2	Dichloromethane (Methylene chloride)	0.1	79-01-6	Trichloroethylene	0.1
75-15-0	Carbon disulfide	1.0	79-06-1	Acrylamide	0.1
75-21-8	Ethylene oxide	0.1	79-10-7	Acrylic acid	1.0
75-25-2	Bromoform (Tri bromomethane)	1.0	79-11-8	Chloroacetic acid	1.0
75-27-4	Dichlorobromomethane	1.0	79-19-6	Thiosemicarbazide	1.0
75-34-3	Ethylidene dichloride	1.0	79-21-0	Peracetic acid	1.0
75-35-4	Vinylidene chloride	1.0	79-22-1	Methyl chlorocarbonate	1.0
75-43-4	Dichlorofluoromethane (HCFC-21)	1.0	79-34-5	1,1,2,2-Tetrachloroethane	1.0
			79-44-7	Dimethylcarbamyl chloride	0.1
			79-46-9	2-Nitropropane	0.1

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
79-94-7	Tetrabromobisphenol A	*	95-69-2	p-Chloro-o-toluidine	0.1
80-05-7	4,4'-Isopropylidenediphenol	1.0	95-80-7	2,4-Diaminotoluene	0.1
80-15-9	Cumene hydroperoxide	1.0	95-95-4	2,4,5-Trichlorophenol	1.0
80-62-6	Methyl methacrylate	1.0	96-09-3	Styrene oxide	0.1
81-07-2	Saccharin (manufacturing, no supplier notification)	0.1	96-12-8	1,2-Dibromo-3-chloropropane (DBCP)	0.1
81-88-9	C.I. Food Red 15	1.0	96-18-4	1,2,3-Trichloropropane	0.1
82-28-0	1-Amino-2-methylantraquinone	0.1	96-33-3	Methyl acrylate	1.0
82-68-8	Quintozene [Pentachloronitrobenzene]	1.0	96-45-7	Ethylene thiourea	0.1
84-74-2	Dibutyl phthalate	1.0	97-23-4	Dichlorophene [2,2'-Methylenebis(4-chlorophenol)]	1.0
85-01-8	Phenanthrene	1.0	97-56-3	C.I. Solvent Yellow 3	1.0
85-44-9	Phthalic anhydride	1.0	98-07-7	Benzoic trichloride (Benzotrichloride)	0.1
86-30-6	N-Nitrosodiphenylamine	1.0	98-82-8	Cumene	1.0
87-62-7	2,6-Xylidine	0.1	98-86-2	Acetophenone	1.0
87-68-3	Hexachloro-1,3-butadiene	1.0	98-87-3	Benzal chloride	1.0
87-86-5	Pentachlorophenol (PCP)	0.1	98-88-4	Benzoyl chloride	1.0
88-06-2	2,4,6-Trichlorophenol	0.1	98-95-3	Nitrobenzene	0.1
88-75-5	2-Nitrophenol	1.0	99-30-9	Dichloran [2,6-Dichloro-4-nitroaniline]	1.0
88-85-7	Dinitrobutyl phenol (Dinoseb)	1.0	99-55-8	5-Nitro-o-toluidine	1.0
88-89-1	Picric acid	1.0	99-59-2	5-Nitro-o-anisidine	1.0
90-04-0	o-Anisidine	0.1	99-65-0	m-Dinitrobenzene	1.0
90-43-7	2-Phenylphenol	1.0	100-01-6	p-Nitroaniline	1.0
90-94-8	Michler's ketone	0.1	100-02-7	4-Nitrophenol	1.0
91-08-7	Toluene-2,6-diisocyanate	0.1	100-25-4	p-Dinitrobenzene	1.0
91-20-3	Naphthalene	1.0	100-41-4	Ethylbenzene	1.0
91-22-5	Quinoline	1.0	100-42-5	Styrene	0.1
91-59-8	beta-Naphthylamine	0.1	100-44-7	Benzyl chloride	1.0
91-94-1	3,3'-Dichlorobenzidine	0.1	100-75-4	N-Nitrosopiperidine	0.1
92-52-4	Biphenyl	1.0	101-05-3	Anilazine [4,6-Dichloro-N-(2-chlorophenyl)-1,3,5-triazin-2-amine]	1.0
92-67-1	4-Aminobiphenyl	0.1	101-14-4	4,4'-Methylenebis(2-chloroaniline) (MBOCA)	0.1
92-87-5	Benzidine	0.1	101-61-1	4,4'-Methylenebis(N,N-dimethyl)benzenamine	0.1
92-93-3	4-Nitrobiphenyl	0.1	101-77-9	4,4'-Methylenedianiline	0.1
93-65-2	Mecoprop	0.1	101-80-4	4,4'-Diaminodiphenyl ether	0.1
94-11-1	2,4-D isopropyl ester	0.1	101-90-6	Diglycidyl resorcinol ether	0.1
94-36-0	Benzoyl peroxide	1.0	104-12-1	p-Chlorophenyl isocyanate	1.0
94-58-6	Dihydrosafrole	0.1	104-94-9	p-Anisidine	1.0
94-59-7	Safrole	0.1	105-67-9	2,4-Dimethylphenol	1.0
94-74-6	Methoxone	0.1	106-42-3	p-Xylene	1.0
	((4-Chloro-2-methylphenoxy) acetic acid) (MCPA)	0.1	106-44-5	p-Cresol	1.0
94-75-7	2,4-D [Acetic acid, (2,4-dichlorophenoxy)-]	0.1	106-46-7	1,4-Dichlorobenzene	0.1
94-80-4	2,4-D butyl ester	0.1	106-47-8	p-Chloroaniline	0.1
94-82-6	2,4-DIB	1.0	106-50-3	p-Phenylenediamine	1.0
95-47-6	o-Xylene	1.0	106-51-4	Quinone	1.0
95-48-7	o-Cresol	1.0			
95-50-1	1,2-Dichlorobenzene	1.0			
95-53-4	o-Toluidine	0.1			
95-54-5	1,2-Phenylenediamine	1.0			
95-63-6	1,2,4-Trimethylbenzene	1.0			

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
106-88-7	1,2-Butylene oxide	1.0	119-93-7	3,3'-Dimethylbenzidine (o-Tolidine)	0.1
106-89-8	Epichlorohydrin	0.1	120-12-7	Anthracene	1.0
106-93-4	1,2-Dibromoethane (Ethylene dibromide)	0.1	120-36-5	2,4-DP	0.1
106-99-0	1,3-Butadiene	0.1	120-58-1	Isosafrole	1.0
107-02-8	Acrolein	1.0	120-71-8	p-Cresidine	0.1
107-05-1	Allyl chloride	1.0	120-80-9	Catechol	1.0
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	0.1	120-82-1	1,2,4-Trichlorobenzene	1.0
107-11-9	Allylamine	1.0	120-83-2	2,4-Dichlorophenol	1.0
107-13-1	Acrylonitrile	0.1	121-14-2	2,4-Dinitrotoluene	0.1
107-18-6	Allyl alcohol	1.0	121-44-8	Triethylamine	1.0
107-19-7	Propargyl alcohol	1.0	121-69-7	N,N-Dimethylaniline	1.0
107-21-1	Ethylene glycol	1.0	121-75-5	Malathion	1.0
107-30-2	Chloromethyl methyl ether	0.1	122-34-9	Simazine	1.0
108-05-4	Vinyl acetate	0.1	122-39-4	Diphenylamine	1.0
108-10-1	Methyl isobutyl ketone	1.0	122-66-7	1,2-Diphenylhydrazine (Hydrazobenzene)	0.1
108-31-6	Maleic anhydride	1.0	123-31-9	Hydroquinone	1.0
108-38-3	m-Xylene	1.0	123-38-6	Propionaldehyde	1.0
108-39-4	m-Cresol	1.0	123-63-7	Paraldehyde	1.0
108-45-2	1,3-Phenylenediamine	1.0	123-72-8	Butyraldehyde	1.0
108-60-1	Bis(2-chloro-1-methylethyl) ether	1.0	123-91-1	1,4-Dioxane	0.1
108-88-3	Toluene	1.0	124-40-3	Dimethylamine	1.0
108-90-7	Chlorobenzene	1.0	124-73-2	Dibromotetrafluoroethane (Halon 2402)	1.0
108-93-0	Cyclohexanol	1.0	126-72-7	Tris(2,3-dibromopropyl) phosphate	0.1
108-95-2	Phenol	1.0	126-98-7	Methacrylonitrile	1.0
109-06-8	2-Methylpyridine	1.0	126-99-8	Chloroprene	1.0
109-77-3	Malononitrile	1.0	127-18-4	Tetrachloroethylene (Perchloroethylene)	0.1
109-86-4	2-Methoxyethanol	1.0	128-03-0	Potassium dimethyldithiocarbamate	1.0
110-54-3	n-Hexane	1.0	128-04-1	Sodium dimethyldithiocarbamate	1.0
110-57-6	trans-1,4-Dichloro-2-butene	1.0	128-66-5	C.I. Vat Yellow 4	1.0
110-80-5	2-Ethoxyethanol	1.0	131-11-3	Dimethyl phthalate	1.0
110-82-7	Cyclohexane	1.0	131-52-2	Sodium pentachlorophenate	1.0
110-86-1	Pyridine	1.0	132-27-4	Sodium o-phenylphenoxide	0.1
111-42-2	Diethanolamine	1.0	132-64-9	Dibenzofuran	1.0
111-44-4	Bis(2-chloroethyl) ether	1.0	133-06-2	Captan	1.0
111-91-1	Bis(2-chloroethoxy) methane	1.0		[1H-Isoindole-1,3(2H)-dione, 3a,4,7,7a-tetrahydro-2-[(trichloromethyl)thio]-]	
114-26-1	Propoxur [Phenol, 2-(1-methylethoxy)-, methylcarbamate]	1.0	133-07-3	Folpet	1.0
115-07-1	Propylene (Propene)	0.1	133-90-4	Chloramben [Benzoic acid, 3-amino-2,5-dichloro-]	
115-28-6	Chloroacetic acid	1.0	134-29-2	o-Anisidine hydrochloride	0.1
115-32-2	Dicofol [Benzenemethanol, 4-chloro-.alpha.-4-(chlorophenyl)-.alpha.-(trichloromethyl)-]	1.0	134-32-7	alpha-Naphthylamine	0.1
116-06-3	Aldicarb	0.1	135-20-6	Cupferron [Benzeneamine, N-hydroxy-N-nitroso, ammonium salt]	0.1
117-79-3	2-Aminoanthraquinone	0.1	136-45-8	Dipropyl isocinchomerate	1.0
117-81-7	Di(2-ethylhexyl) phthalate	0.1			
118-74-1	Hexachlorobenzene	*			
119-90-4	3,3'-Dimethoxybenzidine	0.1			

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
137-26-8	Thiram	1.0	354-25-6	1-Chloro-1,1,2,2-tetrafluoroethane (HCFC-124a)	1.0
137-41-7	Potassium N-methyldithiocarbamate	1.0	357-57-3	Brucine	1.0
137-42-8	Metham sodium (Sodium methyldithiocarbamate)	1.0	422-44-6	1,2-Dichloro-1,1,2,3,3-pentafluoropropane (HCFC-225bb)	1.0
138-93-2	Disodium cyanodithioimido-carbonate	1.0	422-48-0	2,3-Dichloro-1,1,1,2,3-pentafluoropropane (HCFC-225ba)	1.0
139-13-9	Nitrioltriacetic acid	0.1	422-56-0	3,3-Dichloro-1,1,1,2,2-pentafluoropropane (HCFC-225ca)	1.0
139-65-1	4,4'-Thiodianiline	0.1	431-86-7	1,2-Dichloro-1,1,3,3,3-pentafluoropropane (HCFC-225da)	1.0
140-88-5	Ethyl acrylate	0.1	460-35-5	3-Chloro-1,1,1-trifluoropropane (HCFC-253fb)	1.0
141-32-2	Butyl acrylate	1.0	463-58-1	Carbonyl sulfide	1.0
142-59-6	Nabam	1.0	465-73-6	Isodrin	*
148-79-8	Thiabendazole	1.0	492-80-8	C.I. Solvent Yellow 34 (Auramine)	0.1
149-30-4	[2-(4-Thiazolyl)-1H-benzimidazole] 2-Mercaptobenzothiazole (MBT)	1.0	505-60-2	Mustard gas [Ethane, 1,1'-thiobis(2-chloro-)]	0.1
150-50-5	Merphos	1.0	507-55-1	1,3-Dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb)	1.0
150-68-5	Monuron	1.0	510-15-6	Chlorobenzilate [Benzeneacetic acid, 4-chloro- $\alpha$ -(4-chlorophenyl)- $\alpha$ -hydroxy-, ethyl ester]	1.0
151-56-4	Ethylencimine (Aziridine)	0.1	528-29-0	o-Dinitrobenzene	1.0
156-10-5	p-Nitrosodiphenylamine	1.0	532-27-4	2-Chloroacetophenone	1.0
156-62-7	Calcium cyanamide	1.0	533-74-4	Dazomet (Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione)	1.0
191-24-2	Benzo(g,h,i)perylene	*	534-52-1	4,6-Dinitro-o-cresol	1.0
298-00-0	Methyl parathion	1.0	540-59-0	1,2-Dichloroethylene	1.0
300-76-5	Naled	1.0	541-41-3	Ethyl chloroformate	1.0
301-12-2	Oxydemeton methyl [S-(2-(Ethylsulfinyl)ethyl) O,O-dimethyl ester phosphorothioic acid]	1.0	541-53-7	2,4-Dithiobiuret	1.0
302-01-2	Hydrazine	0.1	541-73-1	1,3-Dichlorobenzene	1.0
306-83-2	2,2-Dichloro-1,1,1-trifluoroethane (HCFC-123)	1.0	542-75-6	1,3-Dichloropropylene	0.1
309-00-2	Aldrin [1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro-1,4,4a,5,8,8a-hexahydro-(1 $\alpha$ ,4 $\alpha$ ,4a $\beta$ ,5 $\alpha$ ,8 $\alpha$ ,8a $\beta$ )-]	*	542-76-7	3-Chloropropionitrile	1.0
314-40-9	Bromacil (5-Bromo-6-methyl-3-(1-methylpropyl)-2,4(1H,3H)-pyrimidinedione)	1.0	542-88-1	Bis(chloromethyl) ether	0.1
319-84-6	$\alpha$ -Hexachlorocyclohexane	1.0	554-13-2	Lithium carbonate	1.0
330-54-1	Diuron	1.0	556-61-6	Methyl isothiocyanate [Isothiocyanatomethane]	1.0
330-55-2	Linuron	1.0	563-47-3	3-Chloro-2-methyl-1-propene	0.1
333-41-5	Diazinon	1.0	569-64-2	C.I. Basic Green 4	1.0
334-88-3	Diazomethane	1.0	584-84-9	Toluene-2,4-diisocyanate	0.1
353-59-3	Bromochlorodifluoromethane (Halon 1211)	1.0	593-60-2	Vinyl bromide	0.1
354-11-0	1,1,1,2-Tetrachloro-2-fluoroethane (HCFC-121a)	1.0	594-42-3	Perchloromethyl mercaptan	1.0
354-14-3	1,1,2,2-Tetrachloro-1-fluoroethane (HCFC-121)	1.0	606-20-2	2,6-Dinitrotoluene	0.1
354-23-4	1,2-Dichloro-1,1,2-trifluoroethane (HCFC-123a)	1.0	608-93-5	Pentachlorobenzene	*

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
612-82-8	3,3'-Dimethylbenzidine dihydrochloride (o-Tolidine dihydrochloride)	0.1	1335-87-1	Hexachloronaphthalene	1.0
612-83-9	3,3'-Dichlorobenzidine dihydrochloride	0.1	1336-36-3	Polychlorinated biphenyls (PCBs)	*
615-05-4	2,4-Diaminoanisole	0.1	1344-28-1	Aluminum oxide (fibrous forms)	1.0
615-28-1	1,2-Phenylenediamine dihydrochloride	1.0	1464-53-5	Diepoxybutane	0.1
621-64-7	N-Nitrosodi-n-propylamine	0.1	1563-66-2	Carbofuran	1.0
624-18-0	1,4-Phenylenediamine dihydrochloride	1.0	1582-09-8	Trifluralin	*
624-83-9	Methyl isocyanate	1.0		[Benzeneamine, 2,6-dinitro-N,N-dipropyl-4-(trifluoromethyl)]	
630-20-6	1,1,1,2-Tetrachloroethane	1.0	1634-04-4	Methyl tert-butyl ether	1.0
636-21-5	o-Toluidine hydrochloride	0.1	1649-08-7	1,2-Dichloro-1,1-difluoroethane (HCFC-132b)	1.0
639-58-7	Triphenyltin chloride	1.0	1689-84-5	Bromoxynil	1.0
680-31-9	Hexamethylphosphoramide	0.1		(3,5-Dibromo-4-hydroxybenzonitrile)	
684-93-5	N-Nitroso-N-methylurea	0.1	1689-99-2	Bromoxynil octanoate	1.0
709-98-8	Propanil (N-(3,4-Dichlorophenyl) propanamide)	1.0		(Octanoic acid, 2,6-dibromo-4-cyanophenyl ester)	
759-73-9	N-Nitroso-N-ethylurea	0.1	1717-00-6	1,1-Dichloro-1-fluoroethane (HCFC-141b)	1.0
759-94-4	Ethyl dipropylthiocarbamate (EPTC)	1.0	1836-75-5	Nitrofen	0.1
764-41-0	1,4-Dichloro-2-butene	1.0		[Benzene, 2,4-dichloro-1-(4-nitrophenoxy)-]	
812-04-4	1,1-Dichloro-1,2,2-trifluoroethane (HCFC-123b)	1.0	1861-40-1	Benfluralin	1.0
834-12-8	Amotryn	1.0		(N-Butyl-N-ethyl-2,6-dinitro-4-(trifluoromethyl)benzenamino)	
	(N-Ethyl-N'-(1-methylethyl)-6-(methylthio)-1,3,5-triazine-2,4-diamine)		1897-45-6	Chlorothalonil	1.0
842-07-9	C.I. Solvent Yellow 14	1.0		[1,3-Benzenedicarbonitrile, 2,4,5,6-tetrachloro-]	
872-50-4	N-Methyl-2-pyrrolidone	1.0	1910-42-5	Paraquat dichloride	1.0
924-16-3	N-Nitrosodi-n-butylamine	0.1	1912-24-9	Atrazine	1.0
924-42-5	N-Methylolacrylamide	1.0		(6-Chloro-N-ethyl-N'-(1-methylethyl)-1,3,5-triazine-2,4-diamine)	
957-51-7	Diphenamid	1.0	1918-00-9	Dicamba	1.0
961-11-5	Tetrachlorvinphos	1.0		(3,6-Dichloro-2-methoxybenzoic acid)	
	[Phosphoric acid, 2-chloro-1-(2,4,5-trichlorophenyl)ethenyldimethyl ester]		1918-02-1	Picloram	1.0
989-38-8	C.I. Basic Red 1	1.0	1918-16-7	Propachlor	1.0
1114-71-2	Pebulate	1.0		[2-Chloro-N-(1-methylethyl)-N-phenylacetamide]	
	[Butylethylcarbamothioic acid S-propyl ester]		1928-43-4	2,4-D 2-ethylhexyl ester	0.1
1120-71-4	Propane sulfone	0.1	1929-73-3	2,4-D butoxycetyl ester	0.1
1134-23-2	Cycloate	1.0	1929-82-4	Nitrapyrin	1.0
1163-19-5	Decabromodiphenyl oxide	1.0		(2-Chloro-6-(trichloromethyl)pyridine)	
1313-27-5	Molybdenum trioxide	1.0	1937-37-7	C.I. Direct Black 38	0.1
1314-20-1	Thorium dioxide	1.0	1982-69-0	Sodium dicamba	1.0
1319-77-3	Cresol (mixed isomers)	1.0		[3,6-Dichloro-2-methoxybenzoic acid, sodium salt]	
1320-18-9	2,4-D propylene glycol butyl ether ester	0.1	1983-10-4	Tributyltin fluoride	1.0
1330-20-7	Xylene (mixed isomers)	1.0	2032-65-7	Methiocarb	1.0
1332-21-4	Asbestos (friable)	0.1	2155-70-6	Tributyltin methacrylate	1.0
			2164-07-0	Dipotassium endothall	1.0
				[7-Oxabicyclo(2.2.1)heptane-2,3-dicarboxylic acid, dipotassium salt]	

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
2164-17-2	Fluometuron [Urea, N,N-dimethyl-N'-{3-(trifluoromethyl)phenyl}-]	1.0	7287-19-6	Prometryn [N,N'-Bis(1-methylethyl)-6-methylthio-1,3,5-triazine-2,4-diamine]	1.0
2212-67-1	Molinate (1H-Azepine-1-carbothioic acid, hexahydro-S-ethyl ester)	1.0	7429-90-5	Aluminum (fume or dust)	1.0
2234-13-1	Octachloronaphthalene	1.0	7439-92-1	Lead	0.1
2300-66-5	Dimethylamine dicamba	1.0	7439-96-5	Manganese	1.0
2303-16-4	Diallate [Carbamothioic acid, bis(1-methylethyl)-S-(2,3-dichloro-2-propenyl) ester]	1.0	7439-97-6	Mercury	*
2303-17-5	Triallate	1.0	7440-02-0	Nickel	0.1
2312-35-8	Propargite	1.0	7440-22-4	Silver	1.0
2439-01-2	Chinomethionat [6-Methyl-1,3-dithiolo[4,5-b]quinoxalin-2-one]	1.0	7440-28-0	Thallium	1.0
2439-10-3	Dodine [Dodecylguanidine monooctate]	1.0	7440-36-0	Antimony	1.0
2524-03-0	Dimethyl chlorothiophosphate	1.0	7440-38-2	Arsenic	0.1
2602-46-2	C.I. Direct Blue 6	0.1	7440-39-3	Barium	1.0
2655-15-4	2,3,5-Trimethylphenyl methyl carbamate	1.0	7440-41-7	Beryllium	0.1
2699-79-8	Sulfuryl fluoride (Vikane)	1.0	7440-43-9	Cadmium	0.1
2702-72-9	2,4-D sodium salt	0.1	7440-47-3	Chromium	1.0
2832-40-8	C.I. Disperse Yellow 3	1.0	7440-48-4	Cobalt	0.1
2837-89-0	2-Chloro-1,1,1,2-tetrafluoroethane (HCFC-124)	1.0	7440-50-8	Copper	1.0
2971-38-2	2,4-D Chloroerol ester	0.1	7440-62-2	Vanadium (except when contained in an alloy)	1.0
3118-97-6	C.I. Solvent Orange 7	1.0	7440-66-6	Zinc (fume or dust)	1.0
3383-96-8	Temephos	1.0	7550-45-0	Titanium tetrachloride	1.0
3653-48-3	Methoxone sodium salt ((4-Chloro-2-methylphenoxy) acetate sodium salt)	0.1	7632-00-0	Sodium nitrite	1.0
3761-53-3	C.I. Food Red 5	0.1	7637-07-2	Boron trifluoride	1.0
4080-31-3	1-(3-Chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride	1.0	7647-01-0	Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	1.0
4170-30-3	Crotonaldehyde	1.0	7664-39-3	Hydrogen fluoride	1.0
4549-40-0	N-Nitrosomethylvinylamine	0.1	7664-41-7	Ammonia (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing)	1.0
4680-78-8	C.I. Acid Green 3	1.0	7664-93-9	Sulfuric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	1.0
5234-68-4	Carboxin (5,6-Dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide)	1.0	7696-12-0	Tetramethrin [2,2-Dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylic acid (1,3,4,5,6,7-hexahydro-1,3-dioxo-2H-isoindol-2-yl)methyl ester]	1.0
5598-13-0	Chlorpyrifos methyl [(O,O-Dimethyl-O-(3,5,6-trichloro-2-pyridyl)phosphorothioate]	1.0	7697-37-2	Nitric acid	1.0
5902-51-2	Terbacil [5-Chloro-3-(1,1-dimethylethyl)-6-methyl-2,4(1H,3H)-pyrimidinedione]	1.0	7723-14-0	Phosphorus (yellow or white)	1.0
6459-94-5	C.I. Acid Red 114	0.1	7726-95-6	Bromine	1.0
			7758-01-2	Potassium bromate	0.1
			7782-41-4	Fluorine	1.0
			7782-49-2	Selenium	1.0

Table II

<i>De Minimis</i>			<i>De Minimis</i>		
CAS Number	Chemical Name	Limit	CAS Number	Chemical Name	Limit
7782-50-5	Chlorine	1.0	20354-26-1	Methazole	1.0
7786-34-7	Mevinphos	1.0		[2-(3,4-Dichlorophenyl)-4-methyl-1,2,4-oxadiazolidine-3,5-dione]	
7803-51-2	Phosphine	1.0	20816-12-0	Osmium tetroxide	1.0
8001-35-2	Toxaphene	*	20859-73-8	Aluminum phosphide	1.0
8001-58-9	Creosote	0.1	21087-64-9	Metribuzin	1.0
9006-42-2	Metiram	1.0	21725-46-2	Cyanazine	1.0
10028-15-6	Ozone	1.0	22781-23-3	Bendiocarb	1.0
10034-93-2	Hydrazine sulfate	0.1		[2,2-Dimethyl-1,3-benzodioxol-4-olmethylcarbamate]	
10049-04-4	Chlorine dioxide	1.0	23564-05-8	Thiophanate methyl	1.0
10061-02-6	trans-1,3-Dichloropropene	0.1	23564-06-9	Thiophanate ethyl	1.0
10294-34-5	Boron trichloride	1.0		[[1,2-Phenylenebis(iminocarbonothioyl)]biscarbamic acid diethyl ester]	
10453-86-8	Resmethrin	1.0	23950-58-5	Pronamide	1.0
	[[5-(Phenylmethyl)-3-furanyl]methyl-2,2-dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylate]]		25311-71-1	Isofenphos	1.0
12122-67-7	Zineb	1.0		[2-[[[Ethoxyl[(1-methylethyl)-amino]phosphinothioyl]oxy]benzoic acid 1-methylethyl ester]	
	[Carbamodithioic acid, 1,2-ethanediylbis-, zinc complex]		25321-14-6	Dinitrotoluene (mixed isomers)	1.0
12427-38-2	Maneb	1.0	25321-22-6	Dichlorobenzene (mixed isomers)	0.1
	[Carbamodithioic acid, 1,2-ethanediylbis-, manganese complex]		25376-45-8	Diaminotoluene (mixed isomers)	0.1
13194-48-4	Ethoprop	1.0	26002-80-2	Phenothrin	1.0
	[Phosphorodithioic acid O-ethyl S,S-dipropyl ester]			[2,2-Dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylic acid (3-phenoxyphenyl)methyl ester]	
13356-08-6	Fenbutatin oxide	1.0	26471-62-5	Toluene diisocyanate	0.1
	(Hexakis(2-methyl-2-phenylpropyl)distannoxane)			(mixed isomers)	
13463-40-6	Iron pentacarbonyl	1.0	26628-22-8	Sodium azide	1.0
13474-88-9	1,1-Dichloro-1,2,2,3,3-pentafluoropropane (HFC-225cc)	1.0	26644-46-2	Triforine	1.0
13684-56-5	Desmedipham	1.0		[N,N'-(1,4-Piperazinediylbis(2,2,2-trichloroethylidene))bisformamide]	
14484-64-1	Perbam	1.0	27314-13-2	Norflurazon	1.0
	[Tris(dimethylcarbamodithioato-S,S')iron]			[4-Chloro-5-(methylamino)-2-[3-(trifluoromethyl)phenyl]-3(2H)-pyridazinone]	
15972-60-8	Alachlor	1.0	28057-48-9	d-trans-Allethrin	1.0
16071-86-6	C.I. Direct Brown 95	0.1		[d-trans-Chrysanthemic acid of d-allethrin]	
16543-55-8	N-Nitrosomornicotine	0.1	28249-77-6	Thiobencarb	1.0
17804-35-2	Benomyl	1.0		[Carbamic acid, diethylthio-, S-(p-chlorobenzyl)ester]	
19044-88-3	Oryzalin	1.0	28407-37-6	C.I. Direct Blue 218	1.0
	[4-(Dipropylamino)-3,5-dinitrobenzenesulfonamide]		29082-74-4	Octachlorostyrene	*
19666-30-9	Oxydiazon	1.0	29232-93-7	Pirimiphos methyl	1.0
	[3-[2,4-Dichloro-5-(1-methylethoxy)phenyl]-5-(1,1-dimethylethyl)-1,3,4-oxadiazol-2(3H)-one]			[O-(2-(Dichethylamino)-6-methyl-4-pyrimidinyl)-C,O-dimethylphosphorothioate]	
20325-40-0	3,3'-Dimethoxybenzidine dihydrochloride (o-Dianisidine dihydrochloride)	0.1			

Table II

CAS Number	Chemical Name	De Minimis Limit	CAS Number	Chemical Name	De Minimis Limit
30560-19-1	Accephate (Acetylphosphoramidothioic acid O,S-dimethyl ester)	1.0	51630-58-1	Fenvalerate [4-Chloro-alpha-(1-methylethyl)-benzenecetic acid cyano(3-phenoxyphenyl)methyl ester]	1.0
31218-83-4	Propetamphos [3-[(1-ethylamino)methoxyphosphinothioyl]oxy]-2-butenic acid, 1-methylethyl ester]	1.0	52645-53-1	Permethrin [3-(2,2-Dichloroethenyl)-2,2-dimethylcyclopropane carboxylic acid, (3-phenoxyphenyl)methyl ester]	1.0
33089-61-1	Amitraz	1.0	53404-19-6	Bromacil, lithium salt [2,4(1H,3H)-Pyrimidinedione, 5-bromo-6-methyl-3-(1-methylpropyl), lithium salt]	1.0
34014-18-1	Tebuthiuron [N-[5-(1,1-Dimethylethyl)-1,3,4-thiadiazol-2-yl]-N,N'-dimethylurea]	1.0	53404-37-8	2,4-D 2-ethyl-4-methylpentyl ester	0.1
34077-87-7	Dichlorotrifluoroethane	1.0	53404-60-7	Dazomet, sodium salt [Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione, ion(1-), sodium]	1.0
35367-38-5	Diiflubenuron	1.0	55290-64-7	Dimethipin [2,3-Dihydro-5,6-dimethyl-1,4-dithiin 1,1,4,4-tetraoxide]	1.0
35400-43-2	Sulprofos [O-Ethyl O-[4-(methylthio)phenyl]-phosphorodithioic acid S-propyl ester]	1.0	55406-53-6	3-Iodo-2-propynyl butyl carbamate	1.0
35554-44-0	Imazalil [1-[2-(2,4-Dichlorophenyl)-2-(2-propenyloxy)ethyl]-1H-imidazole]	1.0	57213-69-1	Triclopyr triethylammonium salt	1.0
35691-65-7	1-Bromo-1-(bromomethyl)-1,3-propanedicarbonitrile	1.0	59669-26-0	Thiodicarb	1.0
38727-55-8	Diethatyl ethyl	1.0	60168-88-9	Fenarimol [alpha-(2-Chlorophenyl)-alpha-4-chlorophenyl]-5-pyrimidinemethanol]	1.0
39156-41-7	2,4-Diaminoanisole sulfate	0.1	60207-90-1	Propiconazole [1-[2-(2,4-Dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl-1H-1,2,4-triazole]	1.0
39300-45-3	Dinocap	1.0	62476-59-9	Acifluorfen, sodium salt [5-(2-Chloro-4-(trifluoromethyl)phenoxy)-2-nitrobenzoic acid, sodium salt]	1.0
39515-41-8	Fenpropathrin [2,2,3,3-Tetramethylcyclopropane carboxylic acid cyano(3-phenoxyphenyl)methyl ester]	1.0	63938-10-3	Chlorotetrafluoroethane	1.0
40487-42-1	Pendimethalin [N-(1-Ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine]	*	64902-72-3	Chlorsulfuron [2-Chloro-N-[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino] carbonyl] benzenesulfonamide]	1.0
41198-08-7	Profenofos [O-(4-Bromo-2-chlorophenyl)-O-ethyl-S-propyl-phosphorothioate]	1.0	64969-34-2	3,3'-Dichlorobenzidine sulfate	0.1
41766-75-0	3,3'-Dimethylbenzidine dihydrofluoride (o-Tolidinedihydrofluoride)	0.1	66441-23-4	Fenoxaprop ethyl [2-(4-[(6-Chloro-2-benzoxazolylen)oxy]phenoxy)propanoic acid, ethyl ester]	1.0
42874-03-3	Oxyfluorfen	1.0	67485-29-4	Hydramethylnon [Tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone[3-[4-(trifluoromethyl)phenyl]-1-[2-[4-(trifluoromethyl)phenyl]ethyl]-2-propenyldene] hydrazonol]	1.0
43121-43-3	Triadimefon [1-(4-Chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone]	1.0			
50471-44-8	Vinclozolin [3-(3,5-Dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione]	1.0			
51235-04-2	Hexazinone	1.0			
51338-27-3	Diclofop methyl [2-[4-(2,4-Dichlorophenoxy)-phenoxy]propanoic acid, methyl ester]	1.0			





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



NOV 22 2000

Mr. Kevin M. Brunner  
City Administrator  
City of De Pere, Wisconsin  
335 South Broadway  
DePere, Wisconsin 54115

REPLY TO THE ATTENTION OF C-14J

Re: Better Brite Zinc/Chrome Superfund Site, 315 South Sixth Street and 519 Lande Street, De Pere, Wisconsin 54115 - Comfort Letter

Dear Mr. Brunner:

I am writing in response to your letter dated October 16, 2000 concerning the properties referenced above. My response is based upon the facts presently known to the United States Environmental Protection Agency ("EPA") and is provided solely for informational purposes. For the reasons stated below, EPA does not presently contemplate additional Superfund action for these properties.

In response to growing concern over health and environmental risks posed by hazardous waste sites, Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), establishing the Superfund program to clean up these sites. The Superfund program is implemented by EPA in cooperation with individual states and local and tribal governments. Sites are discovered by citizens, businesses, and local, state, or federal agencies. After a potential hazardous waste site is reported to EPA, the available information is recorded in the Comprehensive Environmental Response and Liability Information System ("CERCLIS"), EPA's data management system for Superfund. Sites are added to CERCLIS when EPA believes that there may be contamination that warrants action under Superfund.

EPA initially screens a potential hazardous waste site to determine what type of action, if any, is necessary. The Superfund program may then perform a preliminary assessment and site investigation to determine whether contamination at a property is likely to require a federal cleanup response, an evaluation to determine if a short term response action to eliminate or reduce contamination is needed, and add the site to EPA's list of high priority hazardous waste sites known as the National Priorities List ("NPL").

EPA investigated the Better Brite site, under the authority of CERCLA. A removal action was completed at the Better Brite site in 1993. The removal was a fund-lead and occurred between October 1989 and October 1993. The principal removal activities at the site resulted from a chrome and zinc plating operation involving spills, leaks and groundwater contamination. The removal consisted of identification, sampling and removal of 10,000 cubic yards of

chromium contaminated soil, drums, tanks, vats and plating solutions, concrete and other on-site materials, and their eventual disposal at CERCLA/RCRA compliant facilities. Further, EPA planned remedial action under a post-removal Record of Decision (ROD), including an on-going groundwater treatment operation considered by EPA to be operation and maintenance (O & M). EPA and the State of Wisconsin are currently negotiating for the State to take over O & M in 2001.

Better Brite, although composed of two site facilities (the zinc and the chrome plating areas) was originally considered one site for purposes of the Superfund Removal action that was performed between 1990 and 1993. EPA expended over \$4.4 million dollars in the removal and water treatment action. On June 30, 1998, EPA Region 5 determined that no further enforcement actions were required or justified at the Better Brite Site, and the costs incurred by EPA through October 22, 1993, were officially closed out.

The Superfund removal at the Better Brite site also included a pump-and-treat system installed originally at the chrome facility and operated there until Fall 1999. This was moved during the Remedial Action and is discussed further below. The operation costs of the pump-and-treat system to date are approximately \$3000/month.

The Better Brite site was proposed for the NPL on October 26, 1989, and was finalized on August 30, 1990. The State-lead Remedial Investigation and Feasibility Study (RI/FS) for the Better Brite site was finalized in September 1995. The RI concluded that releases of contaminants occurred resulting in impacts to soil, groundwater, and possibly air and surface water. Contaminants relating to the plating operation, including metal plating solutions and solvents, were discharged primarily from leaking underground plating tanks, drum and roll-off box storage areas, and surface spills. As a result, both inorganic and VOC contaminants are present at the sites.

Chromium is the primary contaminant of concern in groundwater at both the Zinc Shop and the Chrome Shop. A large percentage is present in the form of hexavalent chromium, which is the most mobile and most dangerous form of chromium. Antimony, arsenic, beryllium, cadmium, cyanide, iron, lead, nickel, silver, and thallium were also detected in groundwater at one or more locations at concentrations in exceedance of Wisconsin Administrative Code NR 140 regulatory limits.

Contaminants at both sites are limited to the upper portion (top 25 feet) of the unconsolidated deposits. Groundwater is the primary migration pathway of concern. Contaminants are present in groundwater at levels that exceed regulatory limits for safe drinking water.

On September 24, 1996, the WDNR and EPA issued a Record of Decision (ROD) for a final remedial action at the site. The major components of the remedy included:

- Extraction of groundwater at the Zinc Shop from the existing groundwater extraction sump;
- Relocation of the treatment plant, which was located at the Chrome Shop, to the Zinc Shop;
- Stabilization of hexavalent chromium (change to trivalent) in soil/groundwater at the Chrome shop by addition of an iron sulfate compound to the soil to prevent further migration of chrome contamination;
- Construction of new exterior foundation drains at two properties near the Zinc Shop site with collected water pumped to the pretreatment facility at the Zinc Shop portion of the Better Brite site;
- Continued groundwater monitoring at the Chrome Shop and the Zinc Shop to evaluate the effectiveness of the remedial action. Groundwater monitoring will include the replacement of select monitoring wells at the Chrome Shop that were removed during soil stabilization activities.

Remedial construction activities began at the Chrome Shop on August 23, 1999. Approximately 15,000 cubic yards of chromium contaminated soil and groundwater were stabilized by physically mixing a proprietary iron sulfate compound in 18-inch lifts with a rototiller backhoe attachment to approximately 20-feet below grade.

The soil stabilization area was divided into four quadrants. The soil was treated in place and removed and stockpiled pending confirmation soil sample results. Soil samples were collected from the treated soil and analyzed by SPLP for total chrome. Soil was treated until the SPLP total chrome results were below 10  $\mu\text{g/l}$ . Soil stabilization at the Chrome Shop was completed on October 29, 1999.

The foundation drains were installed at the Zinc Shop site during the week of September 13, 1999. One drain was installed at the Progressive Farmers Coop building southeast of the Zinc Shop. The second drain was installed along the north and east side of the residence south of the Zinc Shop property. Both drains were installed to approximately 10-feet below grade. A sump was installed at the corner of each drain. The bottom 1-foot of each drain is filled with gravel and a 4-inch drain tile terminating at the sump. A submersible pump is installed at the bottom of each sump and will pump collected water to the treatment system.

The treatment building and system was relocated and reinstalled at the Zinc Shop portion of the Better Brite site beginning on October 20, 1999. The two mixing vats, filter press, and associated treatment system equipment was removed from the building. The building was raised onto dollies and moved to a new foundation constructed at the Zinc Shop property. The vats and equipment were subsequently moved to the Zinc Shop portion of the Better Brite site and

installed in the relocated building.

On November 8, 1999, the WDNR, HSI Geotrans, Inc, RMT, Inc., and the City of De Pere conducted a pre-final inspection of the construction conducted during the remedial action. Work was completed at the Chrome Shop at the time of the inspection. The final grade, seeding and mulching of the site was adequate. No further work is necessary at the Chrome Shop. Replacement of the monitoring wells removed during the remedial action was conducted under a separate contract during the winter of 1999-2000. The treatment system building and the water treatment equipment installation was completed at the Zinc Shop at the time of the inspection. The foundation drains were installed and the majority of the utility installation was completed. The groundwater recovery and treatment system was restarted at the end of 1999 and EPA currently continues to fund O&M of this system. EPA estimates that approximately \$1 million dollars has been spent on Remedial site activities, including the soil stabilization.

Because hazardous substances will remain on-site above levels allowing for unlimited use and unrestricted exposure, a statutory five-year review will be conducted in November 2004 pursuant to OSWER directive 9355.7-02, "Structure and Components of Five Year Reviews" (May 23, 1991) by the U.S. EPA.

Currently, EPA believes that no further federal response is necessary at the Better Brite site. At present, there are no CERCLA Section 107(I), 42 USC 9607(I) liens placed on the Better Brite site properties, nor is there any plan to place any liens upon the site properties.

EPA, therefore, anticipates no need to take additional Superfund investigatory or cleanup action at this site unless new information warranting further Superfund consideration or conditions not previously known to EPA regarding the site are discovered. You may want to contact Mr. Keld Lauridsen, State Project Manager, the Wisconsin Department of Natural Resources, 1125 North Military Avenue, Post Office Box 10448, Green Bay, Wisconsin 54307 (or by telephone at 920/492-5921) for further information on State-lead activities at the Better Brite site.

EPA has compiled an administrative record for the Better Brite Site which provides information on the nature and extent of the contamination found at the site. This record is available at EPA Region 5 and at the Brown County Public Library - De Pere Branch, 380 Main Avenue, De Pere, WI 54115 (contact: Ms. Caroline Haskin, 920/448-4407).

In addition, the City of DePere may not be a potential responsible party under CERCLA. Under CERCLA Section 101(20)(D), 42 USC § 9601(20)(D), an exception to Superfund liability is designated for States and/or local governments when they become an owner of the property comprising a Superfund site, under certain conditions.

The term "owner or operator" does not include a State or local government which acquired ownership or control involuntarily through bankruptcy, tax delinquency,

abandonment, or other circumstances in which the government involuntarily acquires title by virtue of its function as sovereign. The exclusion provided under this paragraph shall not apply to any State or local government which has caused or contributed to the release or threatened release of a hazardous substance from the facility, and such a State or local government shall be subject to the provisions of this chapter in the same manner and to the same extent, both procedurally and substantively, as any nongovernmental entity, including liability under section 9607 of this title.

The CERCLA statute also provides for an exception to liability under Section 107, 42 USC § 9607, where the governmental entity can show by a preponderance of the evidence that it has "[a]cquired the facility by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain authority by purchase or condemnation." See, 42 USC 9601(35)(A)(ii). Thus, the City of De Pere may not be a Potentially Responsible Party at the Better Brite site for any remaining CERCLA costs, as long as the above referenced conditions are met.

If you have any additional questions, or wish to discuss this information, please feel free to contact me at 312/886-6613.

Sincerely yours,



Tom Turner  
Associate Regional Counsel

cc: K. Lauridsen, WDNR  
Michael Prager, WDNR  
Jane Neumann, U.S. EPA, Region 5

## **Lauridsen, Keld B**

---

**From:** Prager, Michael A  
**Sent:** Thursday, December 07, 2000 9:03 AM  
**To:** Lauridsen, Keld B  
**Cc:** Thomas, Anna B; Erdmann, Kathryn M; Rackey, Carolyn J; Urben, Bruce G; Kolberg, Dan F.  
**Subject:** RE: better brite

I am glad they were ok with their letter from EPA.

Here are my thoughts on the fee/letter issue....

I don't see how we could issue them another general liability clarification letter on the chrome shop with out charging them another \$500 fee. We have already issued the letter, cashed the check, logged it into BRRTS, etc. I don't think this would be a good precedent because there are many sites where we issue a general liability clarification letter and then someone wants some more information/ clarification or something and we have said no to people in those cases.

The city doesn't need a letter from us if they want to take the property to qualify for the exemption. Perhaps we could tell them that and then they could just move ahead with their plans without a letter. If they need for you to review the redevelopment plans for the site I think it would be necessary to charge the fee. When we review sites for the reuse for the Local Government Exemption, you should be following the guidance on that which I attached in case you don't have it. I realize that the review for the zinc shop was pretty easy but this type of review can involve a lot of time. If they do want a letter, you should send it to Dan Kolberg for review before you send it out.

thanks!



LGU Guidance.doc

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**From:** Lauridsen, Keld B  
**Sent:** Wednesday, December 06, 2000 11:18 AM  
**To:** Prager, Michael A  
**Cc:** Thomas, Anna B; Erdmann, Kathryn M; Rackey, Carolyn J; Urben, Bruce G  
**Subject:** RE: better brite

Michael,

I have talked to the City of De Pere and they are comfortable with the letter from EPA. The content was pretty much what they expected.

Brown County is currently going through the tax foreclosure process for both the properties (Zinc & Chrome Shop sites) and will properly transfer title to the City of De Pere some time in February 2001. At that time the City would probably like a meeting to discuss the development plans in order to make sure the environmental concerns are addressed properly.

The City initially paid the required fee and received a liability clarification letter from us for the Zinc Shop property only. It now appears that they want a similar letter to cover the Chrome Shop property also. Is there any way around them paying another fee? I guess the reasoning would be that both the properties always have been considered one site under Superfund. Let me know what you think.

Keld B. Lauridsen  
Hydrogeologist  
Wisconsin Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448  
Green Bay, WI 54307-0448

Phone (920) 492-5921  
Fax (920) 492-5859  
E-mail [laurik@dnr.state.wi.us](mailto:laurik@dnr.state.wi.us)  
Visit us on the web -----> [www.dnr.state.wi.us/org/aw/rr](http://www.dnr.state.wi.us/org/aw/rr)

-----  
**From:** Prager, Michael A  
**Sent:** Monday, December 04, 2000 4:19 PM  
**To:** Lauridsen, Keld B; Rackey, Carolyn J  
**Cc:** Thomas, Anna B; Erdmann, Kathryn M  
**Subject:** better brite

I got a copy of the letter sent from EPA to the City of De Pere. To be honest, I don't think this is as strong as it should have been. I don't know why they have such weak language in there about the Local Government exemption from Superfund. They say the City "may not be a potentially responsible party". They should have said that the city is exempt. Do you know what the City's reaction to this letter was? Were they happy with this or did they have the same reaction that I did?

I could go on and on and the letter is already out but I don't know how much "comfort" this really give them. Let me know if there is anything else they want regarding this issue or if they are going to go ahead and acquire the properties. I will talk to Darsi about talking to EPA about this type of thing for future similar sites.

- Michael

# CITY OF DE PERE

335 South Broadway  
De Pere, WI 54115  
Fax No.: 920/339-4049  
e-mail: depere@netnet.net



October 16, 2000

Post-it® Fax Note 7671		Date 10/18/00	# of pages 10
To MICHAEL DRAGEN		From KELD LAURIDSEN	
Co./Dept. WDNZ		Co. R & R	
Phone # (608) 261-4927		Phone # (920) 492-5921	
Fax # (608) 267-7646		Fax #	

Mr. Joseph Dufficy  
U. S. EPA Region 5  
77 West Jackson Street  
Chicago, IL 60604-3590

Re: Brownfields Action Request for Better Brite Superfund Site, De Pere, Wisconsin

Dear Mr. Dufficy:

Please find enclosed a request for a CERCLA Comfort Letter for the EPA Superfund sites located at 315 S. Sixth Street and 511 Lande Street in the City of De Pere, Wisconsin. Even though the two sites are geographically separated, these two former Better Brite, Inc. sites are treated as one site under Superfund. As such, the requested CERCLA Comfort Letter is being requested for both sites.

The Better Brite zinc and chrome shops have been abandoned for over 10 years. When these facilities were in operation, they primarily dealt with chrome and zinc plating of industrial equipment. The property is on the EPA's National Priorities List (NPL) and the State-led cleanup is being coordinated by the Wisconsin Department of Natural Resources. These two properties make up what is officially designated as the "Better Brite Plating, Chrome and Zinc Shops" NPL site. Currently, a pump and treat system and continued monitoring are addressing groundwater contamination at the zinc shop (315 S. Sixth Street) site. At the chrome shop (511 Lande Street) site, remediation (in place soil and groundwater stabilization) was implemented during the fall of 1999, and the effectiveness is being evaluated through groundwater monitoring.

The City of De Pere requests the CERCLA Comfort Letter in order to go forward with the acquisition of these properties which are currently being held for delinquent taxes by Brown County. The City intends to reuse the zinc shop site on S. Sixth Street for public parking purposes and the chrome shop site on Lande Street as a new neighborhood park. With regard to the zinc shop site on S. Sixth Street, we believe that its intended reuse as a paved parking lot will actually prevent future direct contact threats as well as reduce the potential for the remaining soil contaminants to leach into groundwater. The chrome shop site, we believe, will be an excellent neighborhood park since constructing any buildings on this site would not be possible given the remediation that has occurred on site.



Mr. Joseph Dufficy

October 16, 2000

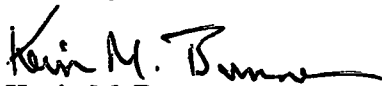
Page Two

Specifically, the City of De Pere wants an opinion from the U. S. EPA on whether acquisition of these sites by the City would qualify as an involuntary acquisition under CERCLA. I request that you clarify not only the City's future cleanup liability, but also the liability for past costs, as well as the EPA's opinion on whether liens would be placed on these properties in the future.

It is my understanding that Wisconsin DNR officials have been in touch with U. S. EPA staff regarding the City of De Pere's interest in the future acquisition of the Better Brite sites. As such, I hope that U. S. EPA staff is familiar with the sites in question and had been gathering the necessary information to process the City's request in an expeditious manner.

Thank you in advance for your review of this Brownfields Action Request. If you desire any additional information, please feel free to call me at 920-339-4044 or E-mail [dpgovt@netnet.net](mailto:dpgovt@netnet.net).

Sincerely,



Kevin M. Brunner  
City Administrator

KMB/ja

Enclosures

c: Keld B. Lauridsen, Hydrogeologist, WDNR  
Carrie Rackey, Brownfields Specialist, WDNR  
Bill Patzke, Director of Planning and Economic Development  
Judith Schmidt-Lehman, City Attorney  
Rick Nell, Attorney

## U.S. EPA REGION 5 BROWNFIELDS ACTION REQUEST FORM

**Instructions:** To request any action or assistance under U.S. EPA's Brownfields policies or programs, please have a duly designated representative provide the information requested below as instructed in this form, sign the form and send it to: Joseph Dufficy (S-4J), U.S. EPA Region 5, 77 W. Jackson, Chicago, IL 60604-3590, and to any EPA Region 5 employees already assigned to the matter. If additional space is required to provide the information requested, please attach additional sheets as necessary, clearly identifying the item to which the information corresponds. The purpose of this form is to ensure that U.S. EPA has all of the information necessary to process any request appropriately, expeditiously and efficiently. This form may be downloaded from U.S. EPA Region 5's Web Page, or an electronic or hard copy of this form may be obtained by sending an e-mail request to [odufficy.joseph@epa.gov](mailto:odufficy.joseph@epa.gov) or to another appropriate EPA Region 5 employee, or by mailing a written request to Mr. Dufficy or another appropriate EPA Region 5 employee at the above-referenced address. This form is not a rule, it does not create any rights, claims or defenses, legal or other, in any entity, and the United States reserves all rights and claims under all laws.

1) Action requested. Please check only one box. If you are requesting more than one action, you must complete a separate request for each action.

- ☐ Request for Prospective Purchaser Agreement (See *Guidance on Agreements with Prospective Purchasers of Contaminated Property*, May 24, 1995, 60 Fed. Reg. 34792 (July 3, 1995)). All information requested below must be provided by the requestor.
- ☒ Request for CERCLA Comfort Letter (See *Policy on the Issuance of Comfort/Status Letters*, November 8, 1996). The information requested in items 3.g and 3.h, 4.e, 4.g, 4.h and 4.i, 5 and 6 does not need to be provided by the requestor. However, EPA respectfully asks that the requestor consider providing such information to the extent the requestor is willing and able to do so.
- ☐ Request for RCRA Comfort Letter. The information requested in items 3.g and 3.h, 4.e, 4.g, 4.h and 4.i, 5 and 6 does not need to be provided by the requestor. However EPA respectfully asks that the requestor consider providing such information to the extent the requestor is willing and able to do so.
- ☐ Request for Comfort Letter opinion on whether an acquisition by a governmental entity would qualify as an involuntary acquisition under CERCLA Section 101(20)(D) and CERCLA Section 101(35)(A). (See *Policy on Interpreting CERCLA Provisions Addressing Lenders and Involuntary Acquisitions by Government Entities*, June 1997; Asset Conservation, Lender Liability, and Deposit Insurance Protection Act of 1996, 110 Stat. 3009-462 (1996); 42 U.S.C. §9601(20)(D) and 9601(35)(A)) This may only be requested by a governmental entity. The information requested in items 3.g and 3.h, 4.e, 4.g, 4.h and 4.i, 5 and 6 does not need to be provided by the requestor. However EPA respectfully asks that the requestor consider providing such information to the extent the requestor is willing and able to do so.
- ☐ Request for release or termination of CERCLA lien in accordance with Region 5 CERCLA lien policy. (See *Region 5 Guidance Concerning Liens Under Section 107(l) of CERCLA*, September 8, 1998.) All information requested below must be provided by the requestor.
- ☐ Request to refrain from filing CERCLA lien in accordance with Region 5 CERCLA lien policy. (See *Region 5 Guidance Concerning Liens Under Section 107(l) of CERCLA*, September 8, 1998.) All information requested below must be provided by the requestor.
- ☐ Request for technical assistance ( describe):

☐ Request for other Action ( describe):

- 2) Requestor Information. The requestor is the entity or person on whose behalf this request is being made. If there is more than one entity or person on whose behalf this request is being made, please provide the requested information for all such entities or persons.
- a) Full Legal Name of Requestor: City of De Pere
- b) Address of Requestor
- i) Street Address: 335 S. Broadway
- ii) City: De Pere State: WI Zip: 54115
- c) Contact Person (all correspondence will be addressed to this person)
- i) Name: Kevin M. Brunner
- ii) Title: City Administrator
- iii) Mailing Address
- (1) Company: City of De Pere
- (2) Street Address/P.O. Box: 335 S. Broadway
- (3) City: De Pere State: WI Zip: 54115
- (4) Telephone: 920-339-4044 Fax: 920-339-4049 Email:
- 3) Current Brownfield Property Information. The Brownfield Property is that portion of property which the Requester wishes to acquire, redevelop or reuse, or for which action or information is sought. It may not necessarily encompass an entire site or facility that may be the subject of a federal or state environmental action. The information requested below in this item 3 pertains only to the Brownfield Property.
- a) Address of Brownfield Property:
- i) Street Address: 315 S. Sixth Street/511 Lande Street
- ii) City: De Pere State: WI Zip: 54115
- b) Current Owner of Brownfield Property
- i) Full Legal Name of Current Owner: Abandoned tax delinquent property
- ii) Street Address:
- iii) City: State: Zip:
- c) List the size of the Brownfield property in acreage: .691 Acres-Sixth Street/2.63 Acres-Lande Street
- d) List the current zoning of the Brownfield Property (check all that apply): ☒ residential; ☐ industrial;  
☐ light industrial; ☐ commercial; ☐ other (describe):
- e) Describe the current status of the Brownfield Property (check all that apply): ☒ abandoned; ☒ idle;  
☒ tax delinquent; ☒ underutilized; ☐ currently in-use; ☐ other (describe):
- f) Describe the current or most recent uses of the Brownfield Property (check all that apply and include a brief description of activities conducted at the property):
- ☐ residential (describe):
- ☒ industrial/manufacturing (describe): Chrome and zinc plating facilities-Better Brite, Inc.
- ☐ commercial/retail (describe):
- ☐ distribution (describe):
- ☐ public/recreational (describe):
- ☐ other (describe):
- g) List the current market value of the Brownfield Property, taking into account reusable improvements on the property, but excluding factors such as the costs necessary to bring the property up to minimum applicable federal, state and local health and safety standards (e.g., exclude planned and/or necessary cleanup costs, costs to demolish condemned structures, etc.) and liens/encumbrances on the property. This figure should be based on a certified independent appraisal, which should be included in its entirety with this request. However, if the requestor is working on a redevelopment project in cooperation with a governmental entity, a good faith estimate by a governmental official whose responsibilities and experiences include

making such estimates may be used. This good faith estimate may be in the form of a letter signed by the governmental official, and must be in writing and included with this request. At a minimum, however, the most recent tax assessment appraisal of the property must be included with this request.

Current market value: \$ -0-

- h) List the current estimated costs necessary to bring the property up to minimum applicable federal, state and local health and safety standards (e.g., estimated necessary federal cleanup costs, state voluntary cleanup costs, costs to demolish condemned structures, etc.) and the lienholders and values of liens and other outstanding encumbrances on the property. If an estimated cost pertains to an applicable federal, state or local health and safety standard(s), please provide citations to the standard(s). Detailed studies need not be included, unless they are available at the time of this request. These estimates must be based on good faith estimates prepared by a registered professional engineer whose estimates must be in writing and included with this request. However, if the requestor is working on a redevelopment project in cooperation with a governmental entity, the estimates may be based on good faith estimates prepared by a governmental official whose responsibilities and experiences include making such estimates. These estimates may be in the form of a letter signed by the governmental official, and must be in writing and included with this request. If an estimated cost pertains to a planned or ongoing federal, state, or local cleanup or other relevant action, and the costs are documented by the appropriate governmental entity (e.g., EPA Removal Action Memorandum, Record of Decision, etc.), the estimates from the governmental documentation may be used, and the documentation must be referenced or included with this request.

Cost (type and amount): ROD dated 9/96 \$ 2,601,400

Cost (type and amount): \_\_\_\_\_ \$

Cost (type and amount): \_\_\_\_\_ \$

Cost (type and amount): \_\_\_\_\_ \$

Cost (type and amount): \_\_\_\_\_ \$

Cost (type and amount): \_\_\_\_\_ \$

Lien (type, holder and value): \_\_\_\_\_ \$

Lien (type, holder and value): \_\_\_\_\_ \$

Lien (type, holder and value): \_\_\_\_\_ \$

- 4) Future Brownfield Property Use and Transaction Information. The Brownfield Property is that portion of property which the requestor wishes to acquire, redevelop or reuse, or for which information is sought. It may not necessarily encompass an entire site or facility that may be the subject of a federal or state environmental action. The information requested below in this item 4 pertains only to the Brownfield Property.

a) List the size of the Brownfield Property to be redeveloped/reused in acres: .691 Acres - Sixth Street  
2.63 Acres - Lande Street

b) List any anticipated future zoning of the Brownfield Property (check all that apply): ☐ residential;

☐ industrial; ☐ light industrial; ☒ commercial; ☒ other (describe): Recreational

c) Describe the proposed uses of the Brownfield Property (check all that apply and provide a brief written description of the uses and/or other activities that will be conducted on the property):

☐ residential (describe);

☐ industrial/manufacturing (describe): \_\_\_\_\_ ☐

(X) commercial/retail (describe): Public parking lot - Sixth Street ☐

distribution (describe):

☒ public/recreational (describe): Park - Lande Street

☐ other (describe):

- d) List the number of jobs that will be created by the redevelopment/reuse of the Brownfield Property: 200+ New jobs will be created through the redevelopment of adjacent properties that will utilize the property for employee parking. The City of De Pere created a tax incremental financing district in 1996 in order to redevelop an approximate six square block area east of the proposed parking lot
- e) List the estimated tax revenues that will be generated by the redevelopment/reuse of the Brownfield Property.
- |                                   |               |    |
|-----------------------------------|---------------|----|
| Property Taxes (type and amount): | None expected | \$ |
| Sales Taxes (type and amount):    | None expected | \$ |
| Other Taxes (type and amount):    |               | \$ |
| Other Taxes (type and amount):    |               | \$ |
| Other Taxes (type and amount):    |               | \$ |
| Other Taxes (type and amount):    |               | \$ |
- f) Describe all other benefits to the public that will arise from the planned redevelopment/reuse of the Brownfield Property: South Sixth Street property will be used for a public parking lot to support a planned \$10.2 million City redevelopment project and the municipally-owned Community Center located directly across the street. Additional parking is critically needed to support these new planned commercial and office buildings. The Lande Street property will be reused as a new neighborhood public park by the City of De Pere. There is a critical need for a neighborhood park in this area. Plans call for a playground and an athletic field (soccer or baseball) to serve the youth in the immediate neighborhood surrounding the site.
- g) Briefly list the amounts the requestor plans to invest in the Brownfield Property to purchase, redevelop and reuse the property, including any expense necessary to investigate and clean the property, and any amount of planned capital improvements to the property.

Purchase Price (identify the form of payment, e.g., cash, stock, etc., the name(s) of the party(ies) to whom the payment will be made and the amount of the payments):

	-0-	\$	City is taking over tax delinquent property
Cost (type and amount):	Parking lot	\$	25,000
Cost (type and amount):	Park development	\$	15,000
Cost (type and amount):		\$	

- h) Describe any anticipated risks to public or human health, welfare or the environment that would be created

by the anticipated reuse/redevelopment of the Brownfield Property: None. The planned reuse of the S. Sixth Street site as a paved parking lot will actually prevent future direct contact threats as well as reduce the potential for remaining soil contaminants to leach into groundwater. The proposed park site on Lande Street does not present any health risks to future users. In fact, neighborhood health will be improved through the availability of playground and athletic facilities.

- i) If this request is for a Prospective Purchaser Agreement, please describe the nature and value of the consideration (e.g., payment, agreement to perform site cleanup activities, public benefits, etc.) that is being offered to the United States:

N/A

- 5) Federal Involvement with the Brownfield Property. The information request below should be provided by the requestor to the extent known by the requestor, and must be verified and/or supplemented by regional staff.

- a) Describe any current federal environmental involvement, activities or planned activities associated with the property (check all that apply and also provide a brief written description of the involvement or planned activities and the name of the action or activity, if any):

☒ CERCLIS listed site

☐ CERCLIS archived site

☒ CERCLA listed NPL site

☐ CERCLA proposed NPL site

☒ CERCLA remedial action site (describe): Groundwater extraction and treatment for S. Sixth Street site is under current remediation - federal and state funding used. At the chrome shop (511 Lande Street) site, remediation in place, soil and groundwater stabilization was implemented during the fall of 1999, in conjunction with ongoing groundwater monitoring - federal and state funding used.

☐ CERCLA removal action site (actions):

☐ RCRA permitted facility (list all permit I.D.s): WID006132088 - 315 S. Sixth St. (zinc shop)  
WIT560010118 - 511 Lande Street (chrome shop)

☐ RCRA interim status facility

☐ RCRA corrective action (describe):

☐ RCRA closure (describe):

☐ TSCA (describe and cite sections of applicable law):

☐ CWA (describe and cite sections of applicable law):

☐ OPA (describe and cite sections of applicable law):

☐ CAA (describe actions and cite sections of applicable law):

☐ Other (identify statute, cite sections of applicable law and describe):

b) Describe any prior federal environmental involvement, activities or planned activities associated with the Brownfield Property (check all that apply and also provide a brief written description of the involvement or planned activities and the name of the action or activity):

☐ CERCLIS listed site

☐ CERCLIS archived site

☐ CERCLA listed NPL site

☐ CERCLA proposed NPL site

☐ CERCLA remedial action site (describe):

☒ CERCLA removal action site (actions): Disposal of hazardous material at zinc shop (315 S. Sixth Street) was completed by EPA EERB in early 1990. This disposal included plating solutions and sludge stored in drums, vats, and tanks. Another removal occurred in November of 1992 to clear the foundation of the zinc shop after a fire had destroyed the building. Source removal of contaminated soil was

☐ RCRA permitted facility (list all permit I.D.s): completed in January 1993. Removal of four (4) subsurface tanks at the chrome shop (511 Lande Street) was completed in April 1986. Phase 1 removal of all on-site contaminants took place between September 1986 and April 1987. Phase 2 removal of contaminated soil and groundwater commenced in 1993. Remedial action at this site was implemented during the fall of 1999.

☐ RCRA interim status facility

☐ RCRA corrective action (describe):

☐ RCRA closure (describe):

☐ TSCA (describe and cite sections of applicable law):

☐ CWA (describe and cite sections of applicable law):

☐ OPA (describe and cite sections of applicable law):

☐ CAA (describe actions and cite sections of applicable law):

☐ Other (identify statute, cite sections of applicable law and describe):

- c) If the Brownfield Property is part of a federally identified site or facility, list all federal site and facility name(s) and all identification and permits number(s) such as CERCLA site I.D. numbers, RCRA permit numbers, administrative docket numbers, etc.

RCRA - WID006132088 - 315 S. Sixth Street (zinc shop)

RCRA - WIT560010118 - 511 Lande Street (chrome shop)

- d) If the property is part of a larger federally identified site or facility, list the size in acreage of the site or facility:

6) Miscellaneous

- a) Briefly describe why you believe this request is necessary: Federal waiver of past costs, liens, and future liability associated with these two sites will allow the City of De Pere to go forward with property acquisition to meet public purposes to further downtown redevelopment efforts as well as the creation of an additional park and open space.
- b) Briefly describe the type and amount of any other federal assistance you may be receiving in connection with your plans to acquire and redevelop/reuse the property: No federal assistance anticipated.

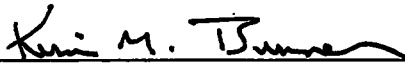
- c) Briefly describe the type and amount of any state assistance you may be receiving in connection with your plans to acquire and redevelop/reuse the property: No State assistance anticipated.



d) Briefly describe the type and amount of any local governmental assistance you may be receiving in connection with your plans to acquire and redevelop/reuse the property:

Approximately \$15,000 would be appropriated by the City in the future to reuse the Lande Street site as a public park.

I certify that the information provided in this request and attached hereto is true, accurate and complete to the best of my knowledge and ability.

  
Signature

Date October 10, 2000

Name and Address of Signatory (printed) Kevin M. Brunner, 335 S. Broadway, De Pere, WI 54115

Relationship of Signatory to Requestor: City Administrator

**FOR EPA USE ONLY:**

Date request received by EPA:

Date request forwarded to DOJ (PPA only):

Date draft PPA issued to requestor (PPA only):

Date final proposed PPA issued to requestor for signature (PPA only):

Date signed PPA received by EPA (PPA only):

Date PPA signed by EPA (PPA only):

Date PPA signed by DOJ (PPA only):

Date PPA comment period completed (PPA only):

Date EPA action is complete/PPA is final:

**FAX TRANSMISSION**

City Hall  
City of De Pere  
335 South Broadway  
De Pere, WI 54115  
Fax: (920) 339-4049

To: Keld Lauridsen

Date: 10/10/00

Fax Number: 492-5859

Pages: 11, including this cover sheet.

From: Kevin Brunner, City Administrator

RE: \_\_\_\_\_

**Comments:**

Please review and comment on the attached letter and Action

Request Form before I forward it on to the EPA.

Phone: 339-4044

If you do not receive all pages or there is a problem with this transmission, please call

GAVI COMMENTS ON 10/13/00  
@ 14:30 KBL

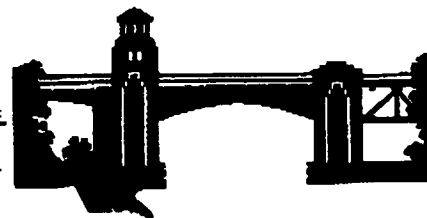
Jan (339-4044)

**Notice of Confidentiality:** The statements upon, and any documents included, with, this facsimile transmittal sheet contain information from the City of De Pere that is confidential, privileged, and exempt from disclosure under applicable laws. This information is intended to be for the exclusive use of the named addressee. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this transmittal is prohibited. If you have received this facsimile in error, please notify us at (920) 339-4044 (collect) so that we can arrange for the retrieval of the original documents at no cost to you.

CHROME SHOP LOCATED @ 519, LANDE ST. ?  
 SIZES: 3.7 ACRES ? WILL CHECK KBL

# CITY OF DE PERE

335 South Broadway  
 De Pere, WI 54115  
 Fax No.: 920/339-4049  
 e-mail: depere@netnet.net



October 10, 2000

Mr. Joseph Dufficy  
 U. S. EPA Region 5  
 77 West Jackson Street  
 Chicago, IL 60604-3590

Re: Brownfields Action Request FOR BETTER BRITE SUPERFUND SITES, DE PERE, WI KBL

Dear Mr. Dufficy:

Please find enclosed a request for a CERCLA Comfort Letter for the EPA Superfund sites located at 315 S. Sixth Street and 501 Lande Street in the City of De Pere, Wisconsin. Even though the two sites are geographically separated, these two former Better Brite, Inc. sites are treated as one site under Superfund. As such, the requested CERCLA Comfort Letter is being requested for both sites.

The Better Brite zinc and chrome shops have been abandoned for over 10 years. When these facilities were in operation, they primarily dealt with chrome and zinc plating of industrial equipment. The property is on the EPA's National Priorities List (NPL) and the State-led cleanup is being coordinated by the Wisconsin Department of Natural Resources. These two properties make up what is officially designated as the "Better Brite Plating, Chrome and Zinc Shops" NPL site. ~~In 1990, U. S. EPA conducted an emergency removal action which included shipping 350 cubic yards of hazardous and solid waste off site.~~ Currently, a pump and treat system and continued monitoring are addressing groundwater contamination on the zinc shop (315 S. Sixth Street) site, while the chrome shop (501 Lande Street) site was totally cleaned and remediated in 1999. ~~IMPLANTED DURING THE FALL OF 1999 AND THE EFFECTIVENESS IS BEING EVALUATED THROUGH GROUNDWATER MONITORING.~~ KBL

The City of De Pere requests the CERCLA Comfort Letter in order to go forward with the acquisition of these properties which are currently being held for delinquent taxes by Brown County. The City intends to reuse the zinc shop site on S. Sixth Street for public parking purposes and the chrome shop site on Lande Street as a new neighborhood park. With regard to the zinc shop site on S. Sixth Street, we believe that its intended reuse for a paved parking lot will actually prevent future direct contact threats as well as reduce the potential for the remaining soil contaminants to leach into groundwater. The chrome shop site, we believe, will be an excellent neighborhood park since constructing any buildings on this site would not be possible given the remediation that has occurred on site.

Mr. Joseph Dufficy  
October 10, 2000  
Page Two

Specifically, the City of De Pere wants an opinion from the U. S. EPA on whether acquisition of these <sup>KML</sup> site by the City would qualify as an involuntary acquisition under CERCLA. I request that you clarify not only the City's future cleanup liability, but also the liability for past costs, as well as the EPA's opinion on whether liens would be placed on these properties in the future.

It is my understanding that Wisconsin DNR officials have been in touch with U. S. EPA staff regarding the City of De Pere's interest in the future acquisition of the Better Brite sites. As such, I hope that U. S. EPA staff is familiar with the sites in question and had been gathering the necessary information to process the City's request in an expeditious manner.

Thank you in advance for your review of this Brownfields Action Request. If you desire any additional information, please feel free to call me at 920-339-4044 or E-mail [dpgovt@netnet.net](mailto:dpgovt@netnet.net).

Sincerely,

Kevin M. Brunner  
City Administrator

KMB/ja

Enclosures

Cc: Keld B. Lauridsen, Hydrogeologist, WDNR <sup>D</sup> KBL  
Carrie Rackey, Brownfields Specialist, WDNR  
Bill Patzke, Director of Planning and Economic Development  
Judith Schmidt-Lehman, City Attorney  
Attorney Rick Nell

## U.S. EPA REGION 5 BROWNFIELDS ACTION REQUEST FORM

*Instructions: To request any action or assistance under U.S. EPA's Brownfields policies or programs, please have a duly designated representative provide the information requested below as instructed in this form, sign the form and send it to: Joseph Dufficy (S-4J), U.S. EPA Region 5, 77 W. Jackson, Chicago, IL 60604-3590, and to any EPA Region 5 employees already assigned to the matter. If additional space is required to provide the information requested, please attach additional sheets as necessary, clearly identifying the item to which the information corresponds. The purpose of this form is to ensure that U.S. EPA has all of the information necessary to process any request appropriately, expeditiously and efficiently. This form may be downloaded from U.S. EPA Region 5's Web Page, or an electronic or hard copy of this form may be obtained by sending an e-mail request to [odufficy.joseph@epa.gov](mailto:odufficy.joseph@epa.gov) or to another appropriate EPA Region 5 employee, or by mailing a written request to Mr. Dufficy or another appropriate EPA Region 5 employee at the above-referenced address. This form is not a rule, it does not create any rights, claims or defenses, legal or other, in any entity, and the United States reserves all rights and claims under all laws.*

1) Action requested. Please check only one box. If you are requesting more than one action, you must complete a separate request for each action.

- ☐ Request for Prospective Purchaser Agreement (See *Guidance on Agreements with Prospective Purchasers of Contaminated Property*, May 24, 1995, 60 Fed. Reg. 34792 (July 3, 1995)). All information requested below must be provided by the requestor.
- ☒ Request for CERCLA Comfort Letter (See *Policy on the Issuance of Comfort/Status Letters*, November 8, 1996). The information requested in items 3.g and 3.h, 4.e, 4.g, 4.h and 4.i, 5 and 6 does not need to be provided by the requestor. However, EPA respectfully asks that the requestor consider providing such information to the extent the requestor is willing and able to do so.
- ☐ Request for RCRA Comfort Letter. The information requested in items 3.g and 3.h, 4.e, 4.g, 4.h and 4.i, 5 and 6 does not need to be provided by the requestor. However EPA respectfully asks that the requestor consider providing such information to the extent the requestor is willing and able to do so.
- ☐ Request for Comfort Letter opinion on whether an acquisition by a governmental entity would qualify as an involuntary acquisition under CERCLA Section 101(20)(D) and CERCLA Section 101(35)(A). (See *Policy on Interpreting CERCLA Provisions Addressing Lenders and Involuntary Acquisitions by Government Entities*, June 1997; Asset Conservation, Lender Liability, and Deposit Insurance Protection Act of 1996, 110 Stat. 3009-462 (1996); 42 U.S.C. §9601(20)(D) and 9601(35)(A)) This may only be requested by a governmental entity. The information requested in items 3.g and 3.h, 4.e, 4.g, 4.h and 4.i, 5 and 6 does not need to be provided by the requestor. However EPA respectfully asks that the requestor consider providing such information to the extent the requestor is willing and able to do so.
- ☐ Request for release or termination of CERCLA lien in accordance with Region 5 CERCLA lien policy. (See *Region 5 Guidance Concerning Liens Under Section 107(l) of CERCLA*, September 8, 1998.) All information requested below must be provided by the requestor.
- ☐ Request to refrain from filing CERCLA lien in accordance with Region 5 CERCLA lien policy. (See *Region 5 Guidance Concerning Liens Under Section 107(l) of CERCLA*, September 8, 1998.) All information requested below must be provided by the requestor.
- ☐ Request for technical assistance (describe):

☐ Request for other Action (describe):

- 2) Requestor Information. The requestor is the entity or person on whose behalf this request is being made. If there is more than one entity or person on whose behalf this request is being made, please provide the requested information for all such entities or persons.

a) Full Legal Name of Requestor: City of De Pere

b) Address of Requestor

i) Street Address: 335 S. Broadway

ii) City: De Pere

State: WI

Zip: 54115

c) Contact Person (all correspondence will be addressed to this person)

i) Name: Kevin M. Brunner

ii) Title: City Administrator

iii) Mailing Address

(1) Company: City of De Pere

(2) Street Address/P.O. Box: 335 S. Broadway

(3) City: De Pere

State: WI

Zip: 54115

(4) Telephone: 920-339-4044 Fax: 920-339-4049 Email: dpgovt@netnet.net

- 3) Current Brownfield Property Information. The Brownfield Property is that portion of property which the Requester wishes to acquire, redevelop or reuse, or for which action or information is sought. It may not necessarily encompass an entire site or facility that may be the subject of a federal or state environmental action. The information requested below in this item 3 pertains only to the Brownfield Property.

a) Address of Brownfield Property: 315 S. Sixth Street/501 Lande Street KBC

i) Street Address:

ii) City: De Pere

State: WI

Zip: 54115 N

b) Current Owner of Brownfield Property

i) Full Legal Name of Current Owner:

ii) Street Address:

iii) City:

State: WI

Zip: ★

c) List the size of the Brownfield property in acreage: .691 acres-Sixth Street/2.63 acres-Lande Street

d) List the current zoning of the Brownfield Property (check all that apply): ☒ residential; ☒ industrial;

☐ light industrial; ☐ commercial; ☐ other (describe):

e) Describe the current status of the Brownfield Property (check all that apply): ☒ abandoned; ☒ idle;

☐ tax delinquent; ☒ underutilized; ☐ currently in-use; ☐ other (describe):

f) Describe the current or most recent uses of the Brownfield Property (check all that apply and include a brief description of activities conducted at the property):

☐ residential (describe):

☒ industrial/manufacturing (describe): Chrome and zinc facilities - Better Brite, Inc.

☐ commercial/retail (describe):

☐ distribution (describe):

☐ public/recreational (describe):

☐ other (describe):

- g) List the current market value of the Brownfield Property, taking into account reusable improvements on the property, but excluding factors such as the costs necessary to bring the property up to minimum applicable federal, state and local health and safety standards (e.g., exclude planned and/or necessary cleanup costs, costs to demolish condemned structures, etc.) and liens/encumbrances on the property. This figure should be based on a certified independent appraisal, which should be included in its entirety with this request. However, if the requestor is working on a redevelopment project in cooperation with a governmental entity, a good faith estimate by a governmental official whose responsibilities and experiences include

making such estimates may be used. This good faith estimate may be in the form of a letter signed by the governmental official, and must be in writing and included with this request. At a minimum, however, the most recent tax assessment appraisal of the property must be included with this request.

Current market value: \$ -0-

- h) List the current estimated costs necessary to bring the property up to minimum applicable federal, state and local health and safety standards (e.g., estimated necessary federal cleanup costs, state voluntary cleanup costs, costs to demolish condemned structures, etc.) and the lienholders and values of liens and other outstanding encumbrances on the property. If an estimated cost pertains to an applicable federal, state or local health and safety standard(s), please provide citations to the standard(s). Detailed studies need not be included, unless they are available at the time of this request. These estimates must be based on good faith estimates prepared by a registered professional engineer whose estimates must be in writing and included with this request. However, if the requestor is working on a redevelopment project in cooperation with a governmental entity, the estimates may be based on good faith estimates prepared by a governmental official whose responsibilities and experiences include making such estimates. These estimates may be in the form of a letter signed by the governmental official, and must be in writing and included with this request. If an estimated cost pertains to a planned or ongoing federal, state, or local cleanup or other relevant action, and the costs are documented by the appropriate governmental entity (e.g., EPA Removal Action Memorandum, Record of Decision, etc.), the estimates from the governmental documentation may be used, and the documentation must be referenced or included with this request.

Cost (type and amount): ROD dated 9/96 \$ 2,601,400 ?  
 Cost (type and amount): \_\_\_\_\_ \$  
 Cost (type and amount): \_\_\_\_\_ \$  
 Cost (type and amount): \_\_\_\_\_ \$  
 Cost (type and amount): \_\_\_\_\_ \$  
 Cost (type and amount): \_\_\_\_\_ \$  
 Cost (type and amount): \_\_\_\_\_ \$  
 Lien (type, holder and value): \_\_\_\_\_ \$  
 Lien (type, holder and value): \_\_\_\_\_ \$  
 Lien (type, holder and value): \_\_\_\_\_ \$

- 4) Future Brownfield Property Use and Transaction Information. The Brownfield Property is that portion of property which the requestor wishes to acquire, redevelop or reuse, or for which information is sought. It may not necessarily encompass an entire site or facility that may be the subject of a federal or state environmental action. The information requested below in this item 4 pertains only to the Brownfield Property.

a) List the size of the Brownfield Property to be redeveloped/reused in acres. .691 Acres - Sixth Street  
2.63 Acres - Lande Street

b) List any anticipated future zoning of the Brownfield Property (check all that apply): ☐ residential;

☐ industrial; ☐ light industrial; ☒ commercial; ☐ other (describe): stop - recreational/public use

c) Describe the proposed uses of the Brownfield Property (check all that apply and provide a brief written description of the uses and/or other activities that will be conducted on the property):

☐ residential (describe);

☐ industrial/manufacturing (describe): \_\_\_\_\_ ☐

☒ commercial/retail (describe): \_\_\_\_\_ ☐

distribution (describe):

☒ public/recreational (describe): Public parking lot-Sixth Street/Park-Lande Street

☐ other (describe):

2 KSL  
d) List the number of jobs that will be created by the redevelopment/reuse of the Brownfield Property:

e) List the estimated tax revenues that will be generated by the redevelopment/reuse of the Brownfield Property.

Property Taxes (type and amount): None expected \$

Sales Taxes (type and amount): None expected \$

Other Taxes (type and amount): \_\_\_\_\_ \$

Other Taxes (type and amount): \_\_\_\_\_ \$

Other Taxes (type and amount): \_\_\_\_\_ \$

Other Taxes (type and amount): \_\_\_\_\_ \$

f) Describe all other benefits to the public that will arise from the planned redevelopment/reuse of the Brownfield Property: South Sixth Street property will be used for a public parking lot to support a planned \$10.2 milling City redevelopment project and the municipally-owned Community Center located directly across the street. The Lande Street property will be reused as a new neighborhood public park by the City of De Pere.

NOTE: Will this be the only park in this area? Is this a residential area where a park would be used a lot? Needed greenspace provided? More description?

g) Briefly list the amounts the requestor plans to invest in the Brownfield Property to purchase, redevelop and reuse the property, including any expense necessary to investigate and clean the property, and any amount of planned capital improvements to the property.

Purchase Price (identify the form of payment, e.g., cash, stock, etc., the name(s) of the party(ies) to whom the payment will be made and the amount of the payments):

3 → HBC \$

Cost (type and amount): Parking lot \$ 25,000

Cost (type and amount): Park development \$ 15,000

Cost (type and amount): \_\_\_\_\_ \$

h) Describe any anticipated risks to public or human health, welfare or the environment that would be created by the anticipated reuse/redevelopment of the Brownfield Property: None. The planned reuse of the S. Sixth Street site as a paved parking lot will actually prevent future direct contact threats, as well as reduce the potential for remaining soil contaminants to leach into groundwater.

Need to address Lande St use?  
EDC



- i) If this request is for a Prospective Purchaser Agreement, please describe the nature and value of the consideration (e.g., payment, agreement to perform site cleanup activities, public benefits, etc.) that is being offered to the United States: N/A

5) Federal Involvement with the Brownfield Property. The information request below should be provided by the requestor to the extent known by the requestor, and must be verified and/or supplemented by regional staff.

- a) Describe any current federal environmental involvement, activities or planned activities associated with the property (check all that apply and also provide a brief written description of the involvement or planned activities and the name of the action or activity, if any):

☒ CERCLIS listed site

☐ CERCLIS archived site

☒ CERCLA listed NPL site

☐ CERCLA proposed NPL site

☒ CERCLA remedial action site (describe): Groundwater extraction and treatment for S. Sixth Street site is under current remediation - federally funded and State site cleanup. Subsurface tank removal, contaminated soil, groundwater extraction and treatment (site completed remediation in 1999) - federally funded and State led cleanup.

☐ CERCLA removal action site (actions):

☐ RCRA permitted facility (list all permit I.D.s): WID006132088 - 315 S. Sixth St. (zinc shop)  
WIT560010118 - 501 Lande St. (chrome shop)

☐ RCRA interim status facility

☐ RCRA corrective action (describe):

☐ RCRA closure (describe):

☐ TSCA (describe and cite sections of applicable law):

*Does this description encompass both properties?*

*Revised?*  
*HSC*

☐ CWA (describe and cite sections of applicable law):

☐ OPA (describe and cite sections of applicable law):

☐ CAA (describe actions and cite sections of applicable law):

☐ Other (identify statute, cite sections of applicable law and describe):

- b) Describe any prior federal environmental involvement, activities or planned activities associated with the Brownfield Property (check all that apply and also provide a brief written description of the involvement or planned activities and the name of the action or activity):

☐ CERCLIS listed site

☐ CERCLIS archived site

☐ CERCLA listed NPL site

☐ CERCLA proposed NPL site

☐ CERCLA remedial action site (describe):

☒ CERCLA removal action site (actions): Disposal of hazardous material at zinc shop (315 S. Sixth Street) was completed by EPA EERB in early 1990. This disposal included plating solutions and sludge stored in drums, vats and tanks. Another removal occurred in November of 1992 to clear the foundation of the zinc shop

☐ RCRA permitted facility (list all permit I.D.s):

☐ RCRA interim status facility

☐ RCRA corrective action (describe):

☐ RCRA closure (describe):

SOURCE REMOVAL OF  
CONTAMINATED SOIL  
WAS COMPLETED  
IN JANUARY 1993. KBC

after a fire had destroyed the building. Removal of four (4) subsurface tanks at the chrome shop (501 Lande Street) was completed in April 1986 and April 1987. Phase 2 removal of contaminated soil and groundwater commenced in 1993. Final remedial action at this site was completed in the fall of 1999.

IMPLEMENTED DURING KBC

☐ TSCA (describe and cite sections of applicable law):

☐ CWA (describe and cite sections of applicable law):

☐ OPA (describe and cite sections of applicable law):

☐ CAA (describe actions and cite sections of applicable law):

☐ Other (identify statute, cite sections of applicable law and describe):

- c) If the Brownfield Property is part of a federally identified site or facility, list all federal site and facility name(s) and all identification and permits number(s) such as CERCLA site I.D. numbers, RCRA permit numbers, administrative docket numbers, etc.

RCRA - WID006132088 - 315 S. Sixth Street (zinc shop)

RCRA - WIT560010118 - 501 Lande Street (chrome shop)

- d) If the property is part of a larger federally identified site or facility, list the size in acreage of the site or facility:

6) Miscellaneous

- a) Briefly describe why you believe this request is necessary: *past costs, liens, and* Federal waiver of future liability associated with these two sites will allow the City of De Pere to go forward with property acquisition to meet public purposes to further downtown redevelopment efforts as well as the creation of an additional park and open space.
- b) Briefly describe the type and amount of any other federal assistance you may be receiving in connection with your plans to acquire and redevelop/reuse the property: No federal assistance anticipated.

- c) Briefly describe the type and amount of any state assistance you may be receiving in connection with your plans to acquire and redevelop/reuse the property: No State assistance anticipated.

d) Briefly describe the type and amount of any local governmental assistance you may be receiving in connection with your plans to acquire and redevelop/reuse the property:

Approximately \$15,000 would be appropriated by the City in the future to reuse the Lande Street site as a public park.

I certify that the information provided in this request and attached hereto is true, accurate and complete to the best of my knowledge and ability.

Signature

Date October 10, 2000

Name and Address of Signatory (printed) Kevin M. Brunner, 335 S. Broadway, De Pere, WI 54115

Relationship of Signatory to Requestor: City Administrator

**FOR EPA USE ONLY:**

Date request received by EPA:

Date request forwarded to DOJ (PPA only):

Date draft PPA issued to requestor (PPA only):

Date final proposed PPA issued to requestor for signature (PPA only):

Date signed PPA received by EPA (PPA only):

Date PPA signed by EPA (PPA only):

Date PPA signed by DOJ (PPA only):

Date PPA comment period completed (PPA only):

Date EPA action is complete/PPA is final:

## **Rackey, Carolyn J**

---

**From:** Rackey, Carolyn J  
**Sent:** Tuesday, August 22, 2000 5:14 PM  
**To:** 'kevindep@netnet.net'  
**Cc:** Lauridsen, Keld B; Erdmann, Kathryn M  
**Subject:** RE: Better Brite

Hi Kevin-

This information should allow you to complete the Brownfields Action Request Form:

- the RCRA permitted facility ID for the Zinc Shop is WID006132088
- to describe the removal actions, we'd advise writing something like *"Disposal of hazardous material at Zinc shop was completed by EPA EERB in early 1990. The Disposal included plating solutions and sludge stored in drums, vats and tanks. Another removal occurred in November of 1992. This was to remove the foundation of the zinc shop after a fire had destroyed the building."*
- section 5.c. - because EPA treats the chrome and zinc shops as one site, you'll want to list the EPA # for the chrome shop as well - its RCRA ID is WIT560010118.

When you write the cover letter to accompany this form, I suggest that you mention that the two Better Brite sites (chrome shop on Lande St. and zinc shop on 6th St.) are treated as one site under Superfund. In the cover letter you'll also want to give a narrative of the status and planned use of the site and note that you'd like clarification regarding past costs as well as future liability.

Again, please contact us for assistance in drafting the letter if you'd like.

Thanks.

**Carrie Rackey**  
Waste Management Specialist  
Wisconsin DNR  
Bureau for Remediation and Redevelopment  
(920) 492-5842

-----  
**From:** Rackey, Carolyn J  
**Sent:** Friday, August 18, 2000 5:21 PM  
**To:** 'Kevin Brunner'  
**Subject:** RE: Better Brite

I have some of the answers you were looking for, I'll give you those now and get back to you with any missing info:

- Your EPA contacts for this form will be **Joe Dufficy and Jane Newman** - please send a copy of the cover letter and Action Request Form to each of them
- Section 3h - Keld and I discussed this and think you would enter the cost from the ROD for this section - the ROD estimate was for **\$2,601,400** - I would put a note on the line stating that the amount is **"per the ROD dated 9/96"**
- Section 5a - check the boxes for **"CERCLIS Listed Site"**, **"CERCLA Listed NPL site"** and **"CERCLA remedial action site"** - we are still checking on whether this is a RCRA permitted facility
- Section 5b - check the box for **"CERCLA removal action site"**. We will have to get back to you regarding how to "describe" the removal actions.

Our central office staff seems to think that the EPA response time should be about a month - we've been in contact with them about this site, so they should be gathering information even before they get a formal request from us. It would be a good idea for us to look over the form and cover letter once you have it completed - please just let us know.

Thanks!

**Carrie Rackey**

Waste Management Specialist  
Wisconsin DNR  
Bureau for Remediation and Redevelopment  
(920) 492-5842

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From: Kevin Brunner[SMTP:kevindep@netnet.net]  
Sent: Friday, August 18, 2000 3:28 PM  
To: Rackey, Carolyn J  
Subject: RE: Better Brite

Carolyn-Thanks for meeting with us earlier this week about the Better Brite site. When will you and Keld be able to get back to me regarding the EPA comfort letter information so that I can submit the EPA on behalf of the City?

Thanks for your assistance regarding this matter.

Kevin Brunner  
City of De Pere

-----  
From: Rackey, Carolyn J[SMTP:RackeC@mail01.dnr.state.wi.us]  
Sent: Friday, August 11, 2000 10:18 AM  
To: 'kevindep@netnet.net'  
Cc: Lauridsen, Keld B  
Subject: Better Brite

<<File: bfaction\_.doc>>  
Hello Kevin:

I've attached a document you can fill out to obtain a "comfort letter" from EPA regarding federal liability issues at the Better Brite Zinc Shop site.

I believe you would want to check the fourth item on this form entitled "Request for Comfort Letter opinion on whether an acquisition by a governmental entity would qualify as an involuntary acquisition under CERCLA . . ." You should probably include a letter or attachment asking them to clarify not only the City's future cleanup liability, but also the liability for past costs or the EPA's opinion on whether a lien would be placed on this property.

EPA doesn't charge fees for these letters, and I'm not sure what their response time would be. Please contact me at (920) 492-5842 or Keld Lauridsen at (920) 492-5921 with any questions.

<<bfaction\_.doc>>

**Lauridsen, Keld B**

---

**From:** Sager, John E  
**Sent:** Monday, August 28, 2000 10:06 AM  
**To:** Lauridsen, Keld B  
**Subject:** Better Brite Fall sampling

Keld,

I talked to Dick Kalnicky at 10:00 today. Dick and I were originally going to use the existing contract and a change order to complete the fall sampling. That contract is now closed. Dick had a better idea. Dick suggests using a service contract through a NER purchase order to complete the fall sampling since the cost is under \$25,000. And since it is a service contract you do not have to bid the work out. You can just hire HSI. Dick said the sampling should still be eligible for the federal grant so you should continue to use RRQY for the fall sampling. Dick also suggested contacting Judy to make sure the costs in the original spreadsheet are correct before you obtain a purchase order.

Let me know if you need anything else.

John Sager  
Wisconsin Department of Natural Resources  
Remediation and Redevelopment Program  
Antigo Service Center  
223 East Steinfest Road  
P.O. Box 310  
Antigo, WI 54409-0310  
(715)623-4190 ext. 3125  
(715)623-6773 fax  
sagerj@dnr.state.wi.us

Table 7-2 POST INSTALLATION SAMPLING SCHEDULE

	Spring 2000	Fall 2000	Spring 2001	Fall 2001	Spring 2002	Spring 2003	Spring 2004
<b>Zinc Shop</b>							
Hex. Chromium	16	16	16*	16*	16*	16*	16*
Total Chromium	16	16	16*	16*	16*	16*	16*
Field Parameters	16	16	16*	16*	16*	16*	16*
VOCs	2	1	1*	1*	1*	1*	1*
Elevation	16	16	16	16	16	16	16
<b>Chrome Shop</b>							
Hex. Chromium	14				14*		14*
Total Chromium	14				14*		14*
Field Parameters	14				14*		14*
VOCs	1				1*		1*
Elevation	14				14*		14*

\*Indicates number of sample points may change depending on previous sampling results.

For Each Sampling Event:

One duplicate sample will be collected for each 10 or fewer investigative samples.

One field blank will be collected for each 20 or fewer investigative samples.

One trip blank will accompany each cooler containing samples for VOC analysis.



## **Lauridsen, Keld B**

---

**From:** Sager, John E  
**Sent:** Monday, August 28, 2000 8:26 AM  
**To:** Lauridsen, Keld B; Kalnicky, Richard A  
**Subject:** FW: Better Brite Final Oversight and Fall Sampling Estimates

Here is a copy of the message I sent out on July 11th.

-----  
**From:** Sager, John E  
**Sent:** Tuesday, July 11, 2000 9:57 AM  
**To:** Kalnicky, Richard A  
**Cc:** 'Wayne & Judy Fassbender'; Lauridsen, Keld B  
**Subject:** FW: Better Brite Final Oversight and Fall Sampling Estimates

Hi Dick,

Attached is a file containing the additional costs for oversight of the regrading effort at Better Brite. RMT is providing the labor under warranty. Also, attached is a cost estimate for the fall round of groundwater sampling. The monitoring plan has changed a little to obtain additional information from the wells at the Chrome Shop. Both of the cost estimates look good to me.

-----  
**From:** Wayne & Judy Fassbender[SMTP:gofish@globaldialog.com]  
**Sent:** Tuesday, July 11, 2000 8:09 AM  
**To:** Sager, John E  
**Cc:** Dan Morgan  
**Subject:** Better Brite Final Oversight and Fall Sampling Estimates



regrade.xls



fall2000.xls

John,

Here are the cost estimates for 1) the final oversight activities and resampling of MW-116 for total and hexavalent chromium (regrade.xls), and 2) the fall sampling event as detailed in the monitoring plan with the addition of collecting a sample from MW-116 (fall2000.xls). The monitoring plan indicates that the sampling at the Chrome Shop will occur once every two years following the initial sampling event, however the elevated chromium concentrations noted at MW-116 warrant semi-annual sampling.

Please call if you have questions, need better documentation for scope, or need any other information. I will call you tomorrow afternoon with a regrading update.

Thanks,

Judy

TASK NUMBER →	1	4	5	
TASK DESCRIPTION →	Remedial Action Oversight Additions	Remedial Action Regrading Oversight	MW-116 Resampling	TOTAL
<b>PERSONNEL/LABOR</b>				
Senior Engine Hrs.	5	2	0	7
\$103.00/Hr. \$	550	220	0	770
Senior HydrogHrs.	20	2	1	23
\$88.83/Hr. \$	1,777	178	89	2,043
Staff Engineer Hrs.	4	10	3	17
\$39.69/Hr. \$	159	397	119	675
Word Process Hrs.	2	1	1	4
\$43.64/Hr. \$	87	44	44	175
Hrs.	31	15	5	51
SUBTOTAL P \$	2,573	838	252	3,662
<b>EQUIPMENT (\$)</b>				
Computers - Word Processing	20	10	10	40
Safety	0	25	0	25
Field Equipment	0	50	50	100
Vehicles	0	170	0	170
Subsistence	0	125	0	125
SUBTOTAL EQUIPMENT	20	380	60	460
<b>OUTSIDE SERVICES (\$)</b>				
Analytical Laboratory	0	0	60	60
SUBTOTAL OUTSIDE SERVICES	0	0	60	60
SUBTOTAL ESTIMATED COSTS	2,593	1,218	372	4,181
FIXED FEE PROFIT (15%)	389	183	56	627
TOTAL ESTIMATED COSTS	2,982	1,401	427	4,809

\*\*\*\*\*

TASK NUMBER →		1	2	
TASK DESCRIPTION →		Fall 2000 Sampling	Fall 2000 Reporting	TOTAL
<b>PERSONNEL/LABOR</b>				
Senior Engine Hrs.		2	2	4 Hrs.
\$105.00/Hr.	\$	210	210	420 \$
Senior Hydrog Hrs.		4	12	16 Hrs.
\$88.83/Hr.	\$	355	1,066	1,421 \$
Staff Engineer Hrs.		52	5	57 Hrs.
\$39.69/Hr.	\$	2,064	198	2,262 \$
CAD Designer Hrs.		0	4	4 Hrs.
\$41.64/Hr.	\$	0	167	167 \$
Word Process Hrs.		2	6	8 Hrs.
\$43.64/Hr.	\$	87	262	349 \$
	Hrs.	60	29	89 Hrs.
SUBTOTAL P	\$	2,716	1,903	4,619 \$

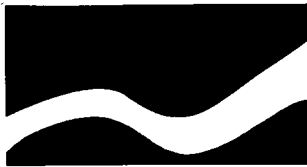
**EQUIPMENT (\$)**

Computers - CAD	0	80	80
Computers - Word Processing	20	60	80
Safety	50	0	50
Field Equipment	200	0	200
Vehicles	318	0	318
Subsistence	500	0	500
SUBTOTAL EQUIPMENT	1,088	140	1,228

**OUTSIDE SERVICES (\$)**

Analytical Laboratory	800	0	800
SUBTOTAL OUTSIDE SERVICES	800	0	800

SUBTOTAL ESTIMATED COSTS	4,604	2,043	6,646
FIXED FEE PROFIT (15%)	691	306	997
TOTAL ESTIMATED COSTS	5,295	2,349	7,643



# HSI GEOTRANS

A TETRA TECH COMPANY

175 North Corporate Drive  
Suite 100  
Brookfield, Wisconsin  
53045

262-792-1282

FAX 262-792-1310

July 27, 2000  
(F119)

Mr. John Sagar  
Wisconsin Department of Natural Resources  
Antigo Service Center  
223 East Steinfest Road  
P.O. Box 310  
Antigo, WI 54409-0310

RE: Oversight of the regrading of the Better Brite stabilization area.

Dear John:

I arrived on site on July 12, 2000 at 9:20 and met with Bob Endres from RMT. Superior had stripped the topsoil the day before and piled it on the northern and southern edges of the stabilization area. I took photos #1 through #3 around 10:00. Bob showed me MW-116 and B-104A and explained that they would either cut them off to match grade or create mounds around them. I talked to Judy and she preferred to not cut them off, which would require them to be resurveyed and adding more cost. I relayed this to Bob, and emphasized that the mounds should be gradual enough to not interfere with mowing.

At 11:00, I went to check the Zinc Shop site to see how the grass was coming in. The grass was doing fine. I also checked the SW corner of the Farmer's Coop where Judy had filled in a hole with gravel. There was a slight indentation where the gravel had settled, but it was solid. The black-topped area in the Farmer's Coop lot has a fairly deep 'dent' in the center, but there is no major cracking.

At 12:20 I took a water level measurement in MW-116. It was 8.06 ft. below top of casing. At 13:30 I took photos #4 and #5, and then bailed 7.5 gallons out of MW-116. I emptied the purge water at the Zinc Shop. At 14:00, I took photos #6 and #7. I took photo #8 around 15:00. At 15:25 I sampled MW-116. At 15:30 Superior started to spread the topsoil.

Keld Lauridsen from the WDNR arrived on site at 16:00 to talk to the Konrath's. He assured them that the topsoil will be smoothed out as much as possible, but that it may not ever be perfect. I took photo #9 and #10 at 16:15. Photo #10 is supposed to show the extent of mounding around MW-116, but it is hard to see in the picture. The mound is about 10 in diameter and about one foot above grade. Keld left at around 16:45, Bob Endres and I left at 17:00.

If you have any questions, please don't hesitate to call me.

Sincerely,  
HIS GEOTRANS, INC.

A handwritten signature in cursive script that reads "Kathryn M. Schoephoester".

Kathryn M. Schoephoester  
Staff Environmental Engineer

Attachment



1. Photo taken around 10:00 a.m. facing west towards Konrath's house. The pile in the back is the topsoil.



2. Photo taken at same time as #1 facing south.



3. Photo taken at same time at #1 & 2, facing southwest



4. Photo taken around 13:30, facing northwest



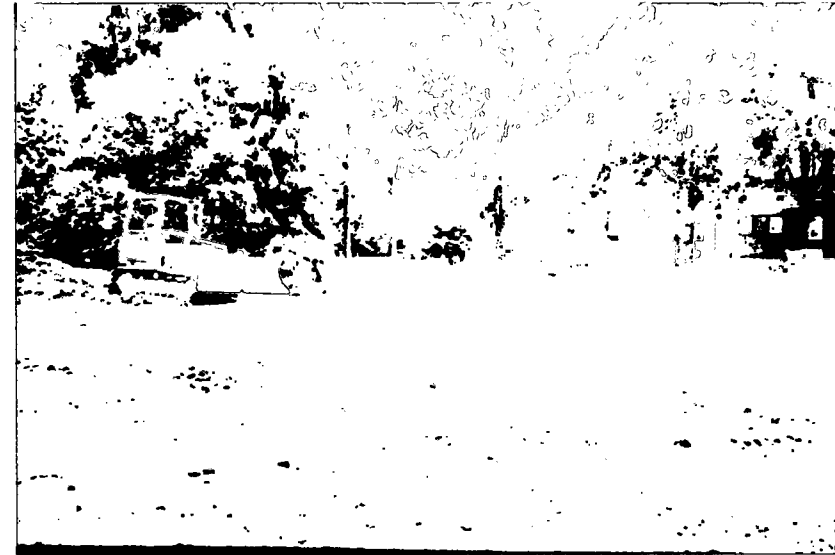
5. This photo is trying to show the extent of grading.



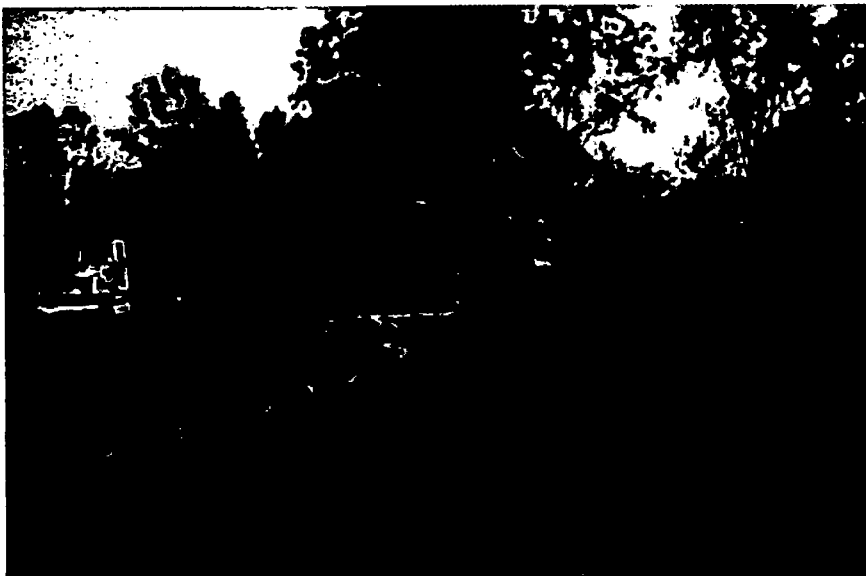
6. Photo taken around 14:00, after a few more passes with the Caterpillar.



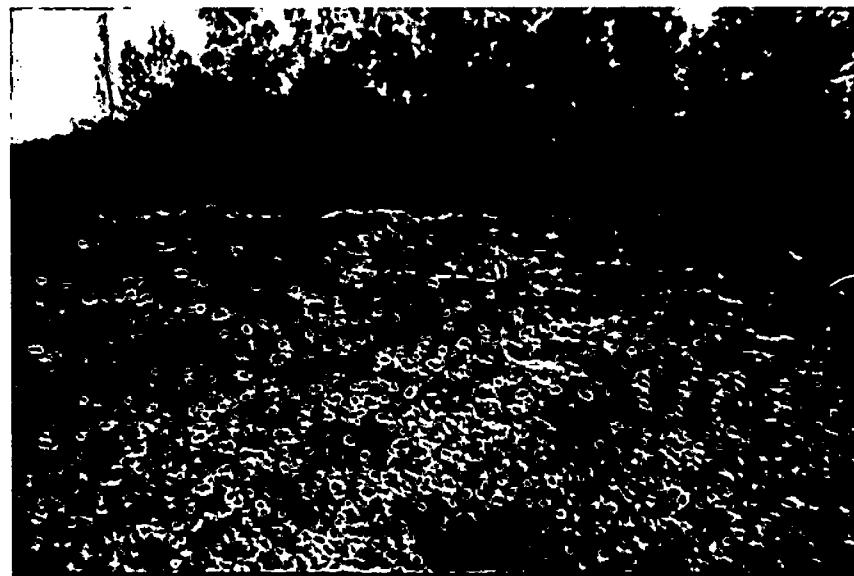
7. This is the edge of Konrath's yard after the initial grading.



8. This is the edge of Konrath's yard just before the topsoil was put on.



9. This is Konrath's yard after the application of topsoil. Further smoothing/raking was done the next day.



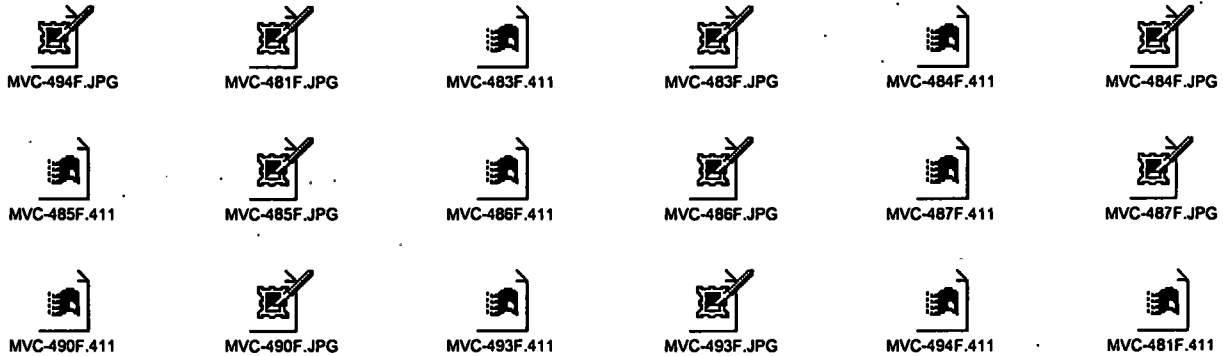
10. This is the "mound" around MW-116, although it's hard to tell in this picture. It is about one foot above grade and about 10 feet in diameter.



## Sager, John E

---

**From:** Wayne & Judy Fassbender[SMTP:gofish@globaldialog.com]  
**Sent:** Friday, May 12, 2000 9:50 AM  
**To:** Sager, John E; Dan Morgan; kbecker@hsigeotrans.com  
**Subject:** Fw: Better Brite Update



-----Original Message-----

**From:** Crowley, Jim <Jim.Crowley@rmtinc.com>  
**To:** gofish@globaldialog.com <gofish@globaldialog.com>  
**Date:** Friday, May 12, 2000 7:49 AM  
**Subject:** Re: Better Brite Update

>Judy -

>

>Sorry for the delay in getting back to you. The work at the Zinc Shop was  
>completed on the 26th following our last discussions. The Chrome Shop  
>regrading is scheduled for mid-May, dependent on weather conditions. I have  
>attached several pictures of the completed Zinc Shop work for your use.  
>Please note no additional straw mulch was applied to the Garcia's yard,  
which

>will make it difficult for grass to grow.

>

>I also wanted to address the survey corners and the tire ruts the Konrath's  
>were concerned about (from your last e-mail). I was at the site on April  
>17th, and there were no tire ruts visible at this time. RMT will repair  
the

>tire ruts as part of the regrading work, but please note without site  
access

>controls, RMT will not be responsible for vandalism to the site. In  
regards

>to the survey corners, RMT does not anticipate placing fill near the corner  
>(NE) I believe is in question. Survey corners would need to be readjusted  
by

>a RLS, but I do not think this will be necessary.

>

>If you have any questions please call me at (608) 662 -5322.

>

>>>> Wayne (038) Judy Fassbender 05/02/00 12:39PM >>>

>

>Better Brite Update

>

>April 25, 2000 - Jim Crowley indicated that the repairs to the surface of  
the

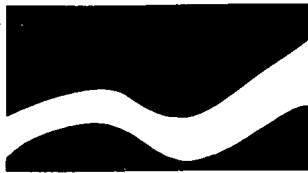
>foundation drain at the Progressive Farmer's Coop had not been made on  
Friday

>April 21 because of a dispute with RMT's subcontractor, but RMT would

address

- >the settling fill as soon as possible and would update us with progress.
- >Also, Jim indicated that an RMT representative would visit both the Chrome and Zinc Shop areas during the week of April 24th to determine what would be required to implement more permanent action to address the areas of significant settling and the concerns of the property owners. We are in agreement that all previous remedies implemented this spring were strictly stop gap measures. The measures, primarily adding more top soil to areas of subsidence at the Zinc Shop, were undertaken to address property owner concerns until the frost came out of the ground and the majority of anticipated settling occurred. RMT is now evaluating the best course of action and timing for this action so as to remedy the settling noted at the Shops.
- >
- >At the Chrome Shop stabilization area, RMT will evaluate whether to bring in more fill/topsoil to level out the Konrath's back yard or to regrade the stabilized material to achieve the desired leveling at the Konrath's. For either option, RMT would prefer to wait until the ground dries out a bit more, which will also allow more time should further subsidence occur following the spring thaw and spring rains. The goal is to address the subsidence in the Konrath's yard only once, thus a short delay in action is beneficial.
- >
- >At the Zinc Shop, there are three areas of concern. These include the Progressive Farmer's property, the Garcia's property and the Zinc Shop property itself. At the Progressive Farmer's Coop, Jim concurred that RMT will compact the surficial gravel overlying the foundation drain prior to placing additional gravel, then compact the added gravel to provide optimum conditions for access to the Coop building. At the Garcia's, additional settling has occurred and the Garcia's have expressed concern related to the high spots as well as the low spots resulting from the previous stop gap measures taken to address the subsidence over the foundation drains on the property. RMT's representatives were to visit the site and propose action to address the Garcia's yard. At the Zinc Shop, final landscaping has yet to be completed. Additional settling has also likely occurred in the areas of trenching here and these need to be addressed. HSI GeoTrans has contacted Willems Landscaping for placement boulders in a line running north from the north side of the treatment building to eliminate vehicle traffic across the property. Willems has indicated they will place the boulders in conjunction with final landscaping. Costs for boulder placement will be billed through HSI GeoTrans.
- >
- >April 26 - Jim Crowley left a message indicating that the gravel required at the Progressive Farmer's Coop would be placed today.
- >
- >Since the 26th, several other requests from the property owners have been made. As detailed in the voice mail I left for Jim, the following items are noted and requested to be addressed by RMT:
- >
- >The Garcia's request that no additional straw mulch be placed on their lawn during the final landscaping activities. They have experienced some difficulties related to the mulch and request that seed alone be placed, without the use of the mulch material.
- >





# HSI GEOTRANS

A TETRA TECH COMPANY

175 North Corporate Drive  
Suite 100  
Brookfield, Wisconsin  
53045

262-792-1282

FAX 262-792-1310

*Sent to Dick via  
interoffice mail  
5/15/00*

May 9, 2000  
(F119-9)

Mr. John Sager  
Wisconsin Department of Natural Resources  
Antigo Service Center  
223 East Steinfest Road  
P.O. Box 310  
Antigo, WI 54409-0310

RE: Progress Report and Statement for Consulting Services Provided during April 3 through April 30, 2000, Better Brite Construction Oversight

Dear John:

Enclosed please find our progress report and statement for services provided during April 3 through April 30, 2000 on the Better Brite Construction Oversight Project.

## Accomplishments

During this reporting period, HSI GeoTrans worked with RMT and property owners to address post treatment settling areas at both the former Zinc and Chrome Shops. Several communications have passed between the parties and we are proceeding with activities to repair the settled areas.

Favorable weather finally allowed installation of the two additional monitor table wells and one piezometer at the Chrome Shop site. These well were installed, developed and sampled during May 1-5, 2000. Other completed work includes conversion of all wells to flush mounts, sampling and water levels at all existing wells when sufficient well volumes present, and negotiation, hydraulic conductivity testing, and sampling of the Progressive Farmer's Coop well near the Zinc Shop.

A row of large boulders was in place at the landscaped area at the Zinc Shop during the May 1-5 sampling event.

Data validation was arranged with submittal of the laboratory analytical samples.

## Problems and Proposed Solutions

No problems are anticipated at this time.

Mr. John Sager  
WDNR - Oshkosh  
Page 2

Documents Submitted

None.

Personnel

The personnel currently involved in the Better Brite Remedial Action include:

- ◆ Judy Fassbender, Senior Hydrogeologist,
- ◆ Dan Morgan, Senior Engineer, and
- ◆ Keith Becker, Staff Scientist.

Planned Activities

Surveying of all new wells and existing wells with new flush mount tops will be completed by May 17, 2000.

A brief letter report summarizing the Spring, 2000 site activities will be completed upon receipt of survey and laboratory analytical results.

We will continue working with RMT to schedule repairs to settled areas over the next 30 days. With the completion of the new well installations and existing well head modifications, only sampling activities will take place in the short term, which will minimize site disruption. This will make the site repairs final once they are in place.

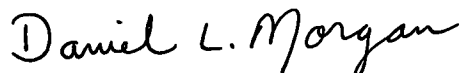
We will arrange to provide oversight at the properties during repairs.

Schedule and Financial Status

Additional well installation and ground water sampling has been proposed for completion using the previously authorized oversight funds. Upon completion of the oversight for repairs due to settlement, the remaining budget will be redistributed to the near term scope of work.

I trust this information meets your needs. If you have any questions, please do not hesitate to call.

Sincerely,  
HSI GEOTRANS



Daniel L. Morgan  
Senior Engineer

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
Box 7921  
Madison, Wisconsin 53707

INVOICE FOR PROFESSIONAL SERVICES

PROJECT Better Brite Remedial Design  
HSI GEOTRANS, INC.  
LOCATION DePere, Wisconsin

REQUEST NO. 9  
PROJECT NO. \_\_\_\_\_  
HSI #: F119  
DOCID. \_\_\_\_\_

	Total Fee Due to Date	Previously Submitted	Payment Due This Invoice
For Professional Service Contract:			
Original Contract Sum (NOT TO EXCEED) <u>\$ 70,707</u>	\$ 54,363.30	\$ 53,212.41	\$ 1,150.89
Change Orders (List Separately) _____			
Total Contract to Date <u>\$ 70,707</u>			
Note: Change Orders 1 (+\$ 2,587) and 2 (+\$ 276) not included.			
Other Charges to contract:			
Additional Services: Fixed Fee Profit (attach itemized listing) <u>\$ 14,085</u>	\$11,733.27	\$11,679.98	\$ 53.29
Reimbursable Expenses: Subcontractor/Other Direct Costs (attach itemized listing) <u>\$ 23,195</u>	\$25,945.79	\$25,590.49	\$ 355.30
Total Contract Amount w/COs = \$110,850			
TOTALS	\$ 92,042.36	\$90,482.88	\$ 1,559.48

THIS IS TO CERTIFY THAT the Firm named herein is entitled  
to a payment of \$ 1,559.48

HSI GeoTrans, Inc.  
Firm Name  
175 N. Corporate Dr., Suite 100  
Address  
Brookfield, WI 53045  
City, State, Zip

John Ryan  
Project Manager Approval

5/15/00  
Date

By: Daniel L. Morgan 5/9/00  
Daniel L. Morgan / Date

\_\_\_\_\_  
Program Coordinator Approval

\_\_\_\_\_  
Date

☐ Please check if this is a FINAL invoice.  
(Submit original plus two copies w/supporting invoices)

payreq61.fm 7/96

# INVOICE

PAYMENT TERMS: NET 30

Please include your account number on all remittances to ensure proper credit to your account.

Milwaukee/Morgan

APRIL 30, 2000

INVOICE NO. 109-F119-XXX

Wisconsin Dept Natural Resource  
1125 N. Military Avenue  
Green Bay, WI 54307-0448

INVOICE... for services rendered and related expenses  
for the period: 04/03/00-04/30/00

DIRECT LABOR	HOURS	RATE	COST	CURRENT
(See individual task vouchers for detail)				
TOTAL DIRECT LABOR				\$1,150.89
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$0.00
COMPUTER				\$0.00
SUBCONTRACTS				\$355.30
FIXED FEE (15%)				\$53.29
TOTAL AMOUNT CLAIMED				\$1,559.48
TOTAL AMOUNT DUE				\$1,559.48

**PAY THIS AMOUNT →**

Due Date: MAY 30, 2000

Remit to: HSI GeoTrans, Inc.  
46050 Manekin Plaza  
Suite 100  
Sterling, Virginia 20166  
Attn: Accounts Receivable



**HSI  
GEOTRANS**

A TETRA TECH COMPANY

46050 Manekin Plaza ■ Suite 100 ■ Sterling, Virginia 20166 ■ 703-444-7000

## Task Detail in Support of Invoice

APRIL 30, 2000

TASK 103

REPORTING & DOC MGMNT

DIRECT LABOR	HOURS	RATE	COST	CURRENT
Morgan/Senior 2	0.0	\$101.12	\$0.00	
Fassbender/Senior 1	0.0	\$92.54	\$0.00	
Chang/Project 2	0.0	\$63.72	\$0.00	
Thomson Todd	0.0	\$44.52	\$0.00	
Becker, Keith	0.0	\$35.69	\$0.00	
Robert Golata	0.0	\$41.64	\$0.00	
Preslik/Admin Assist	9.5	\$34.76	\$330.22	
Guth, Roseanne	0.0	\$43.64	\$0.00	
Florence/Admin Assist	0.0	\$43.64	\$0.00	
TOTAL DIRECT LABOR				\$330.22
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$0.00
o Repro			\$0.00	
o Communication			\$0.00	
o Outside Reproduction			\$0.00	
o Outside Other			\$0.00	
o Outside Supplies			\$0.00	
o Temporary Labor			\$0.00	
COMPUTER				\$0.00
SUBCONTRACTS				\$0.00
SUBTOTAL				\$330.22



## Task Detail in Support of Invoice

APRIL 30, 2000

TASK 105

CHANGE ORDER

DIRECT LABOR	HOURS	RATE	COST	CURRENT
Morgan/Senior 2	7.5	\$101.12	\$758.40	
Fassbender/Senior 1	0.0	\$92.54	\$0.00	
Comerford Tom	1.0	\$62.27	\$62.27	
Thomson Todd	0.0	\$44.52	\$0.00	
Robert Golata	0.0	\$41.64	\$0.00	
Roseanne Guth	0.0	\$43.64	\$0.00	
Preslik/Admin Assist	0.0	\$34.76	\$0.00	
Kath Schoephoester	0.0	\$37.70	\$0.00	
Florence/Admin Assist	0.0	\$43.64	\$0.00	
TOTAL DIRECT LABOR				\$820.67
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$0.00
o Repro			\$0.00	
o Communication			\$0.00	
o Outside Reproduction			\$0.00	
o Outside Other			\$0.00	
o Outside Supplies			\$0.00	
o Temporary Labor			\$0.00	
COMPUTER				\$0.00
SUBCONTRACTS				\$355.30
SUBTOTAL				\$1,175.97

REPORT DATE: 05/01/00 10:23

HSI GEOTRANS

PAGE 0009

PERIOD ENDING: 04/30/00

JOB STATUS REPORT

PROJECT MGR: DAN MORGAN

CLIENT: WI DEPT OF NTL RESOURCES

CURRENT PERIOD ODC DETAIL REPORT

DIVISION #: 53

PRIME CONTRACT ID: AGREE 7/29/99

WITH TRANSACTION CODE BREAKDOWNS

CONTRACT VALUE: 24,578.00

CONTRACT NUMBER: F119-105

AS OF 01/30/00

JOB TYPE: T&M

CONTRACT NAME: CHANGE ORDER

RATE TYPE: N/A

PERIOD OF PERFORMANCE: 11/01/99 TO 01/01/00

STATUS: ACTIVE

ODC	DESCRIPTION	PD	SOURCE	NUMBER	VENDOR NAME	P.O.	TRANSACTION	NUMBER	DESCRIPTION	AMOUNT
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45 CONTRACTED SERVICES

01 SUBCONTRACTOR

07 AP-001 048038 APPLIED ENVIRONMENTAL SOL

SUBCONTRACTOR 355.30

TRANS CODE TOTAL 355.30

CURRENT PERIOD BALANCE 355.30

355.30+  
355.30\*+

U.\*

**APPLIED ENVIRONMENTAL SOLUTIONS, INC.**

FEIN NUMBER 39-1966983

22-Mar-00

**INVOICE NUMBER 1008**

For Services Provided February 23 Through March 21, 2000

HSIGeoTrans Project Name and Number			Hours	Rate	Labor Total	4.50% Supply Fee	Task Total
<b><u>Labor Summary</u></b>							
WDNR Better Brite	F119	105	4.00	\$85.00	\$340.00	\$15.30	\$355.30
Wisconsin Chromium	F135	101	6.00	\$85.00	\$510.00	\$22.95	\$532.95
Wisconsin Chromium	F135	102	4.00	\$85.00	\$340.00	\$15.30	\$355.30
Wisconsin Chromium	F135	104	4.00	\$85.00	\$340.00	\$15.30	\$355.30
Wisconsin Chromium	F135	103	5.50	\$85.00	\$467.50	\$21.04	\$488.54
Kraft Churny	P245	101	6.50	\$85.00	\$552.50	\$24.86	\$577.36
<b>Total Labor Charges</b>			<b>30.00</b>		<b>\$2,550.00</b>	<b>\$114.75</b>	<b>\$2,664.75</b>

**Other Charges**

Wisconsin Chromium	F135	105	Mileage	\$62.00
--------------------	------	-----	---------	---------

Please Pay This Amount **\$2,726.75**

Applied Environmental Solutions, Inc.  
N62W37644 Parkview Drive  
Oconomowoc, WI 53066

(414)507-5571 or (262)569-8816

7119-105-45-01	355.30
----------------	--------

DLM	3-24-2000
TPC	3-30-2000

**Sager, John E**

---

**From:** Kalnicky, Richard A  
**Sent:** Thursday, May 04, 2000 6:44 AM  
**To:** Sager, John E  
**Cc:** Kalnicky, Richard A  
**Subject:** RE: Better Brite Treatment system repair

Go ahead as you have suggested. Have the city take care of the repairs under the contract and then have them include the cost in their next quarterly bill. Thanks.

**From:** Sager, John E  
**Sent:** Wednesday, May 03, 2000 3:38 PM  
**To:** Kalnicky, Richard A  
**Subject:** Better Brite Treatment system repair

Howdy Dick,

There may be a problem with the treatment system at Better Brite where a repair is necessary. If I need to have a pump replaced and the cost will be say \$2,000 do I just have the City of De Pere take care of the repairs under their contract to operate the system or do I have to do something else. I was just going to have them fix it and then the pump replacement or repair would just show up on their quarterly invoice. Is that OK.

I am not sure what is necessary in dollars to fix the system yet. The \$2,000 is just a guess at this point.

John Sager  
Wisconsin Department of Natural Resources  
Remediation and Redevelopment Program  
Antigo Service Center  
223 East Steinfest Road  
P.O. Box 310  
Antigo, WI 54409-0310  
(715)623-4190 ext. 3125  
(715)623-6773 fax  
sagerj@dnr.state.wi.us

## **Sager, John E**

---

**From:** Sager, John E  
**Sent:** Wednesday, May 03, 2000 9:17 AM  
**To:** Urben, Bruce G; Chronert, Roxanne L  
**Subject:** RE: Better Brite Zinc Shop / Progressive Farmers Coop

Sounds good to me.

-----  
**From:** Chronert, Roxanne L  
**Sent:** Wednesday, May 03, 2000 9:10 AM  
**To:** Urben, Bruce G; Sager, John E  
**Subject:** RE: Better Brite Zinc Shop / Progressive Farmers Coop

The Progressive Farmers Cooperative was recently closed by the DNR with a GW Use Restriction. I just received the deed back from Renville last week and sent a copy to the RP for filing (Fortunately they did not like one line in the restriction so it was not filed). The consultants for the BB Zinc Shop requested that Progressive Farmers COOP MW-2 not be abandoned and the well be maintained by the DNR/the consultant for use in defining the extent of the chrome plume. Sager sent Progressive Farmers a letter requesting this and Progressive Farmers agreed.

Keith Becker, HSI, was collecting GW samples on 5-2-00 at BB and Progressive Farmers. Becker was not sure which well was MW-2 (Several wells and sumps are in very close proximity). So Becker accidentally opened Sump-2. He noted a strong diesel odor when he opened the sump. Becker left the bailer hanging in the Sump as he found it. Becker observed what he interpreted as free product on Sump-2 in a hanging bailer. Becker then opened Sump-1 and noted a sheen on the GW surface.

I meet Bob Mottl, STS, and Becker on site last night. Becker opened Sump-1. I did not observe a diesel odor. I smelled sewage. There appeared to be organics on the water in the bailer not free product. I have requested that STS speak with the RP Progressive Farmers and have the well sampled for PVOCs and PAHs. I explained that the closure would be held up until the groundwater results from Sump-2 were received and reviewed by the Department. I will be sending Progressive Farmers a letter this a.m.

Sager and Urben do you have any other recommendations or concerns?

-----  
**From:** Sager, John E  
**Sent:** Tuesday, May 02, 2000 1:31 PM  
**To:** Chronert, Roxanne L  
**Subject:** Better Brite Zinc Shop / Progressive Farmers Coop

Howdy Roxanne,

Judy Fassbender, HSI called me today with an update of sampling at BB. HSI is sampling groundwater at the Zinc Shop today. HSI is borrowing one of the monitoring wells from the Progressive Farmers Coop LUST site to monitor the Zinc Shop. HSI opened a well that was labeled Sump #2. It is 4" PVC well. There was a bailer hanging in the well with 1" of product in it. He then opened a well labeled Sump #1. The groundwater in Sump #1 has a sheen on the surface. I told Judy that I would notify you about the situation since you were the project manager for the site.

## **Sager, John E**

---

**From:** Wayne & Judy Fassbender[SMTP:gofish@globaldialog.com]  
**Sent:** Tuesday, May 02, 2000 12:39 PM  
**To:** Sager, John E; bob.endres@rmtinc.com; jim.crowley@rmtinc.com  
**Cc:** dmorgan@hsigeotrans.com; kbecker@hsigeotrans.com  
**Subject:** Better Brite Update

### **Better Brite Update**

April 25, 2000 - Jim Crowley indicated that the repairs to the surface of the foundation drain at the Progressive Farmer's Coop had not been made on Friday April 21 because of a dispute with RMT's subcontractor, but RMT would address the settling fill as soon as possible and would update us with progress. Also, Jim indicated that an RMT representative would visit both the Chrome and Zinc Shop areas during the week of April 24th to determine what would be required to implement more permanent action to address the areas of significant settling and the concerns of the property owners. We are in agreement that all previous remedies implemented this spring were strictly stop gap measures. The measures, primarily adding more top soil to areas of subsidence at the Zinc Shop, were undertaken to address property owner concerns until the frost came out of the ground and the majority of anticipated settling occurred. RMT is now evaluating the best course of action and timing for this action so as to remedy the settling noted at the Shops.

At the Chrome Shop stabilization area, RMT will evaluate whether to bring in more fill/topsoil to level out the Konrath's back yard or to regrade the stabilized material to achieve the desired leveling at the Konrath's. For either option, RMT would prefer to wait until the ground dries out a bit more, which will also allow more time should further subsidence occur following the spring thaw and spring rains. The goal is to address the subsidence in the Konrath's yard only once, thus a short delay in action is beneficial.

At the Zinc Shop, there are three areas of concern: These include the Progressive Farmer's property, the Garcia's property and the Zinc Shop property itself. At the Progressive Farmer's Coop, Jim concurred that RMT will compact the surficial gravel overlying the foundation drain prior to placing additional gravel, then compact the added gravel to provide optimum conditions for access to the Coop building. At the Garcia's, additional settling has occurred and the Garcia's have expressed concern related to the high spots as well as the low spots resulting from the previous stop gap measures taken to address the subsidence over the foundation drains on the property. RMT's representatives were to visit the site and propose action to address the Garcia's yard. At the Zinc Shop, final landscaping has yet to be completed. Additional settling has also likely occurred in the areas of trenching here and these need to be addressed. HSI GeoTrans has contacted Willems Landscaping for placement boulders in a line running north from the north side of the treatment building to eliminate vehicle traffic across the property. Willems has indicated they will place the boulders in conjunction with final landscaping. Costs for boulder placement will be billed through HSI GeoTrans.

April 26 - Jim Crowley left a message indicating that the gravel required at the Progressive Farmer's Coop would be placed today.

Since the 26th, several other requests from the property owners have been made. As detailed in the voice mail I left for Jim, the following items are noted and requested to be addressed by RMT:

The Garcia's request that no additional straw mulch be placed on their lawn during the final landscaping activities. They have experienced some difficulties related to the mulch and request that seed alone be placed, without the use of the mulch material.

The Konrath's and the adjacent neighbor request that the survey markers placed at their property corners be maintained throughout the work done to address the stabilized soil subsidence area. This will likely require that the survey markers are raised as the work progresses or extensions are added so the corner markers are visible when the regrading or topsoil addition is complete.

If you have any questions or concerns related to anything presented in this message, please e-mail me or call me at (414) 507-5571. I will forward an informational/confirmational message as soon as I am notified of RMT's plan to address the remaining issues at Better Brite and their proposed schedule to complete the work.

As always, It is a pleasure working with each of you on this project.

Judy

Also, the Konrath's have indicated that ruts are present in their lawn east of the stabilized area. They believe the ruts are a result of support truck traffic during the stabilization activities. The ruts are significant enough to cause difficulties for lawn mowing and present a tripping hazard. Addition of top soil and seed will likely be required to return the Konrath lawn to pre-remedial conditions.

## **Sager, John E**

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**From:** Sager, John E  
**Sent:** Tuesday, May 02, 2000 9:38 AM  
**To:** Urban, Bruce G  
**Subject:** Better Brite update

Howdy Bruce,

I just thought I give you a little update on Better Brite. HSI is on site this week installing the new monitoring wells to replace the wells that were removed during the remedial action last fall. HSI is also sampling all of the wells. Everything is going good so far.

RMT is still trying to figure out when and how to correct the settling that has occurred in the Konrath's yard. The settling will be fixed as soon as possible. I have talked to the Konrath's and they are OK with everything. I believe the settling in the trenches at the Zinc shop has been fixed.

That is all for now. If you get any questions about the sampling or work that is going on there this week you can pass them on to me.





# HSI GEOTRANS

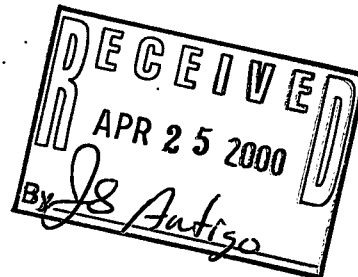
A TETRA TECH COMPANY

175 North Corporate Drive  
Suite 100  
Brookfield, Wisconsin  
53045

262-792-1282

FAX 262-792-1310

April 19, 2000  
(F119-8)



**R + R - OSH  
RECEIVED**

APR 21 2000

**TRACKED ☐  
REVIEWED ☐**

Mr. John Sager  
Wisconsin Department of Natural Resources  
625 E. County Road Y, Ste. 700  
Oshkosh, WI 54901-9731

RE: Progress Report and Statement for Consulting Services Provided during February 28 through April 2, 2000, Better Brite Construction Oversight

Dear John:

Enclosed please find our progress report and statement for services provided during February 28 through April 2, 2000 on the Better Brite Construction Oversight Project.

## Accomplishments

During this reporting period, HSI GeoTrans posted revised laboratory analyses invoices to the project. Table 4-2 is attached, which was included in the Remedial Action Documentation Report, with three additional columns showing old lab invoice number, new invoice number, and cost. Due to two prior payments by the WDNR as noted on the far right of Table 4-2, the amount due this month for lab work is \$1,209. This is shown on the invoice and included in the WDNR INVOICE FOR PROFESSIONAL SERVICES. It has taken some time to correct billing errors by the laboratory, and I hope the table presents the costs in an understandable manner.

Coordination continues on the installation of three new monitoring wells and other work and access to a well on the Progressive Farmer's Coop property.

## Problems and Proposed Solutions

No problems are anticipated at this time.

Mr. John Sager  
WDNR - Oshkosh  
Page 2

Documents Submitted

None.

Personnel

The personnel currently involved in the Better Brite Remedial Action include:

- ◆ Judy Fassbender, Senior Hydrogeologist,
- ◆ Dan Morgan, Senior Engineer, and
- ◆ Keith Becker, Staff Scientist.

Planned Activities

We will schedule placement of boulders at the Zinc Shop, installation of three new monitor wells at the Chrome Shop and completion of the monitoring required for spring 2000 as soon as weather conditions are favorable.

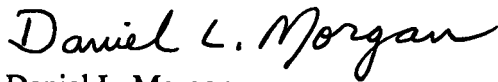
Schedule and Financial Status

Additional well installation and ground water sampling has been proposed for completion using the previously authorized oversight funds. Due to the \$1,209 lab charge this month, the scope of subsequent work may need to be reduced.

I trust this information meets your needs. If you have any questions, please do not hesitate to call.

Sincerely,

HSI GEOTRANS



Daniel L. Morgan  
Senior Engineer

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
Box 7921  
Madison, Wisconsin 53707

INVOICE FOR PROFESSIONAL SERVICES

PROJECT Better Brite Remedial Design  
HSI GEOTRANS, INC.  
LOCATION DePere, Wisconsin

REQUEST NO. 8  
PROJECT NO. \_\_\_\_\_  
HSI #: F119  
DOCID. \_\_\_\_\_

	Total Fee Due to Date	Previously Submitted	Payment Due This Invoice
For Professional Service Contract:			
Original Contract Sum (NOT TO EXCEED) <u>\$ 70,707</u>			
Change Orders (List Separately) _____	\$ 53,212.41	\$ 53,070.62	\$ 141.79
Total Contract to Date <u>\$ 70,707</u>			
Note: Change Orders 1 (+\$ 2,587) and 2 (+\$ 276) not included.			
Other Charges to contract:			
Additional Services: Fixed Fee Profit (attach itemized listing) <u>\$ 14,085</u>	\$11,679.98	\$11,326.17	\$ 353.81
Reimbursable Expenses: Subcontractor/Other Direct Costs (attach itemized listing) <u>\$ 23,195</u>	\$25,590.49	\$23,231.75	\$ 2,358.74
Total Contract Amount w/COs = \$110,850			
<b>TOTALS</b>	<b>\$ 90,482.88</b>	<b>\$87,628.54</b>	<b>\$ 2,854.34</b>

THIS IS TO CERTIFY THAT the Firm named herein is entitled to a payment of \$ 2854.34

HSI GeoTrans, Inc.  
Firm Name  
175 N. Corporate Dr., Suite 100  
Address  
Brookfield, WI 53045  
City, State, Zip

John L. Gu  
Project Manager Approval

4/25/00  
Date

By: Daniel L. Morgan 4/19/00  
Daniel L. Morgan / Date

Program Coordinator Approval

Date

☐ Please check if this is a FINAL invoice.  
(Submit original plus two copies w/supporting invoices)

payreq61.fm 7/96

**MONTHLY PROGRESS REPORT, February 28 through April 2, 2000**  
**Better Brite - Remedial Construction Oversight**  
**Project #F119, Invoice #8**

<b>Task Description</b>	<b>Total Invoiced This Month</b>	<b>Total Reallocated Budget</b>	<b>Total Billed To Date</b>	<b>Amount Remaining</b>	<b>Estimated Percent Complete</b>
101. Pre-Construction Conference	\$0.00	\$1,670.59	\$1,670.59	\$0.00	100%
102. Construction Oversight	0.00	46,144.04	46,144.04	0.00	100%
201. Reporting & Document Management	0.00	13,395.24	13,395.24	0.00	100%
301. Project Management	0.00	13,809.71	13,809.71	0.00	100%
501. 2000 Monitoring and Reporting	2,500.53	21,372.12	3,783.27	17,588.85	18%
701. Fixed Fee Profit	353.81	14,458.30	11,679.98	2,778.32	81%
901. Unauthorized Contingency	0.00	0.00	0.00	0.00	
<b>Total</b>	<b>\$2,854.34</b>	<b>\$110,850.00</b>	<b>\$90,482.83</b>	<b>\$20,367.17</b>	<b>82%</b>

Table 4-2  
CHRONOLOGICAL ORDER OF CHAIN OF CUSTODY

Sample #	Date	Sample Description	Units	Results	Old Invoice #	New Invoice #	Cost
B909002-01	08/31/1999	Quad. 1 & 2 0 - 2'	mg/L	N. D.	46628	47795	\$161.00
B909050-01	09/01/1999	Quad. 3 & 4 0 - 2'	mg/L	N. D.	46628	47795	\$161.00
B909062-01	09/02/1999	Quad. 1 & 2 2 - 4'	mg/L	N. D.	46613	47797	\$119.00
B909127-01	09/08/1999	TS 1 0 - 3'	mg/kg	13	46625	47805	\$42.00
B909127-02	09/08/1999	TS 1 3 - 6'	mg/kg	1.4	46625	47805	\$42.00
B909127-03	09/08/1999	TS 1 6 - 9'	mg/kg	34	46625	47805	\$42.00
B909127-04	09/08/1999	TS 1 9 - 12'	mg/kg	8.8	46625	47805	\$42.00
B909156-01	09/09/1999	SD Quad. 2	mg/kg	6.8	46615	47796	\$42.00
B909156-02	09/09/1999	SD Quad. 3	mg/kg	N.D.	46615	47796	\$42.00
B909156-03	09/09/1999	Quad. 3 & 4 2 - 4'	mg/L	0.057	46615	47796	\$119.00
B909157-01	09/09/1999	Quad. 1 & 2 4 - 6'	mg/L	0.015	46614	47798	\$119.00
B909157-02	09/09/1999	Quad. 3 & 4 4 - 6'	mg/L	N.D.	46614	47798	\$119.00
B909198-01	09/13/1999	Quad. 1 & 2 6-8'	mg/L	0.12	46583	47803	\$119.00
B909198-02	09/13/1999	Gravel from Quad. 1 & 2	mg/kg	N.D.	46583	47803	\$42.00
B909219-01	09/14/1999	Quad. 1 & 2 8-10'	mg/L	N.D.	46626	47604	\$89.25
B909244-01	09/15/1999	Quad. 1 10-12' & 12-14'	mg/L	N.D.	46627	47801	\$119.00
B909244-02	09/15/1999	Quad. 1 & 2 4 - 6'	mg/L	N.D.	46627	47801	\$119.00
B909244-03	09/15/1999	Quad. 3 & 4 2 - 4'	mg/L	N.D.	46627	47801	\$119.00
B909270-01	09/16/1999	Quad. 1 14-16' & 14-16'A	mg/L	0.062	46582	47800	\$119.00
B909324-01	09/20/1999	Quad. 1 16-18' & 18-20'	mg/L	0.016	46593	47802	\$119.00
B909399-01	09/22/1999	Quad. 1 14-16' & 14-16'A	mg/L	0.12			\$119.00
B909399-02	09/22/1999	Quad. 2 10-12' & 12-14'	mg/L	N.D.			\$119.00
B909399-03	09/22/1999	Quad. 3 6-8' & 8-10'	mg/L	0.071			\$119.00
B910002-01	09/30/1999	Quad. 1 & 2 6-8'	mg/L	N.D.	46862	47792	\$119.00
B910002-02	09/30/1999	Quad. 3 6-8' & 8-10'	mg/L	0.015	46862	47792	\$119.00
B910002-03	09/30/1999	Quad. 1 14-16' & 14-16'A	mg/L	N.D.	46862	47792	\$119.00
B910002-04	09/30/1999	Quad. 1 16-18' & 18-20'	mg/L	N.D.	46862	47792	\$119.00
B910060-01	10/04/1999	Quad. 2 14-20'	mg/L	N.D.	46861	47793	\$119.00
B910133-01	10/07/1999	Quad. 3 10-14'	mg/L	N.D.	46956	47794	\$119.00
B910133-02	10/07/1999	Quad. 3 14-20'	mg/L	N.D.	46956	47794	\$119.00
B910133-03	10/07/1999	Quad. 4 6-10'	mg/L	N.D.	46956	47794	\$119.00
B910234-01	10/13/1999	Quad. 4 10-20'	mg/L	0.037	none	47014	\$119.00
B910261-01	10/14/1999	Quad. 3 6-8' & 8-10'	mg/L	N.D.	47103	47791	\$119.00
B910261-02	10/14/1999	Zinc shop	mg/L	N.D.	47103	47791	\$119.00
B910328-01	10/18/1999	Quad. 4 10-20'	mg/L	N.D.	none	47200	\$104.00
					Total Lab		\$3,665.25
					3665.25 - 2337.25 - 119 = \$1,209 Due		

Units = mg/L for SPLP total chromium and mg/kg for soil hexavalent chromium

Detection Limit for SPLP total chromium = 0.01 mg/L (10 parts per billion)

Detection Limit for soil hexavalent chromium = 1.0 kg/mg (1 part per million)

N.D. = non-detect

TS = Soil sampled in test trench

SD = Soil sampled under storm drain

\* All analysis completed by Great Lakes Analytical

# INVOICE

PAYMENT TERMS: NET 30

Please include your **account number** on all remittances to ensure proper credit to your account.

Milwaukee/Morgan

APRIL 2, 2000

INVOICE NO. 108-F119-XXX

Wisconsin Dept Natural Resource  
1125 N. Military Avenue  
Green Bay, WI 54307-0448

INVOICE... for services rendered and related expenses  
for the period: 02/28/00-04/02/00

DIRECT LABOR	HOURS	RATE	COST	CURRENT
(See individual task vouchers for detail)				
TOTAL DIRECT LABOR				\$141.79
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$261.49
COMPUTER				\$0.00
SUBCONTRACTS			<del>\$3,973.50</del>	2,097.25
FIXED FEE (15%)			<del>\$635.25</del>	353.81
TOTAL AMOUNT CLAIMED				\$5,012.03
TOTAL AMOUNT DUE				<del>\$5,012.03</del>

**PAY THIS AMOUNT** →

~~\$5,012.03~~

2,854.34

DLM  
4-19-00

DLM  
4-19-00

Due Date: MAY 2, 2000

Remit to: HSI GeoTrans, Inc.  
46050 Manekin Plaza  
Suite 100  
Sterling, Virginia 20166  
Attn: Accounts Receivable



**HSI  
GEOTRANS**

A TETRA TECH COMPANY

46050 Manekin Plaza ■ Suite 100 ■ Sterling, Virginia 20166 ■ 703-444-7000

# Task Detail in Support of Invoice

FEBRUARY 27, 2000

TASK 102

CONSTRUCTION OVERSIGHT

DIRECT LABOR	HOURS	RATE	COST	CURRENT
Morgan/Senior 2	0.0	\$101.12	\$0.00	
Waddell, Richard	0.0	\$152.70	\$0.00	
Hunt, Robert	0.0	\$48.12	\$0.00	
Cave, Deborah	0.0	\$74.36	\$0.00	
Fassbender/Senior 1	0.0	\$92.54	\$0.00	
Bohman, David	0.0	\$37.70	\$0.00	
Becker, Keith	0.0	\$35.69	\$0.00	
Comerford, Tom	0.0	\$62.27	\$0.00	
Guth, Roseanne	0.0	\$43.64	\$0.00	
Demers, Gerald	0.0	\$120.14	\$0.00	
Chang/Project 2	0.0	\$63.72	\$0.00	
Thomson Todd	0.0	\$44.52	\$0.00	
Robert Golata	0.0	\$41.64	\$0.00	
Preslik/Admin Assist	0.0	\$34.76	\$0.00	
Florence/Admin Assist	0.0	\$43.64	\$0.00	
<hr/>				
TOTAL DIRECT LABOR				\$0.00
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$0.00
o Repro			\$0.00	
o Communication			\$0.00	
o Outside Reproduction			\$0.00	
o Outside Other			\$0.00	
o Outside Supplies			\$0.00	
o Temporary Labor			\$0.00	
COMPUTER				\$0.00
SUBCONTRACTS				\$3,085.25
SUBTOTAL				<u>\$3,085.25</u>

\$3,085.25

→ changed  
to \$1,209

REPORT DATE: 04/03/00 09:53  
PERIOD ENDING: 04/02/00

HSI GEOTRANS

PAGE 0006

JOB STATUS REPORT

CLIENT: WI DEPT OF NTL RESOURCES  
PRIME CONTRACT ID: AGREE 7/29/99  
CONTRACT NUMBER: F119-102  
CONTRACT NAME: CONSTRUCTION OVERSIGHT  
PERIOD OF PERFORMANCE: 08/01/99 TO 08/31/00

CURRENT PERIOD ODC DETAIL REPORT  
WITH TRANSACTION CODE BREAKDOWNS  
AS OF 01/30/00

PROJECT MGR: DAN MORGAN  
DIVISION #: 53  
CONTRACT VALUE: 53,066.00  
JOB TYPE: T&M  
RATE TYPE: N/A  
STATUS: ACTIVE

ODC	DESCRIPTION	PD	SOURCE	VOUCHER NUMBER	VENDOR NAME	P.O. NUMBER	TRANSACTION DESCRIPTION	AMOUNT
45	CONTRACTED SERVICES							
	03 LABORATORY							
		06	AP-005	047490	GREAT LAKES ANALYTICAL		LABORATORY	357.00
		06	AP-005	047491	GREAT LAKES ANALYTICAL		LABORATORY	238.00
		06	AP-005	047492	GREAT LAKES ANALYTICAL		LABORATORY	119.00
		06	AP-005	047493	GREAT LAKES ANALYTICAL		LABORATORY	119.00
		06	AP-005	047494	GREAT LAKES ANALYTICAL		LABORATORY	203.00
		06	AP-005	047495	GREAT LAKES ANALYTICAL		LABORATORY	322.00
		06	AP-005	047496	GREAT LAKES ANALYTICAL		LABORATORY	357.00
		06	AP-005	047497	GREAT LAKES ANALYTICAL		LABORATORY	119.00
		06	AP-005	047498	GREAT LAKES ANALYTICAL		LABORATORY	238.00
		06	AP-005	047499	GREAT LAKES ANALYTICAL		LABORATORY	476.00
		06	AP-005	047500	GREAT LAKES ANALYTICAL		LABORATORY	161.00
		06	AP-005	047501	GREAT LAKES ANALYTICAL		LABORATORY	119.00
		06	AP-005	047502	GREAT LAKES ANALYTICAL		LABORATORY	89.25
		06	AP-005	047503	GREAT LAKES ANALYTICAL		LABORATORY	168.00

TRANS CODE TOTAL 3,085.25

CURRENT PERIOD BALANCE

3,085.25

Adjusted to  
\$1,209 due  
per table  
based on  
previous  
payments

357.00+  
238.00+  
119.00+  
119.00+  
203.00+  
322.00+  
357.00+  
119.00+  
238.00+  
476.00+  
161.00+  
119.00+  
89.25+  
168.00+  
3,085.25+  
0.\*



**INVOICE FOR ANALYTICAL SERVICES**

Hsi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47801  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119 102  
Sample #: b909244-01-03  
Date Sample Received: 9/16/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46627		
3	SPLP Chromiun- 2 Day Svc	119.000	357.00

FROM NO / ACCOUNT NO.	AMOUNT
9119-102-4503	357.00
Bal: -513.75	
PAID 11-22-99	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 357.00

TOTAL DUE: 357.00

**INVOICE FOR ANALYTICAL SERVICES**

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47798  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119 102  
Sample #: b909157-01-02  
Date Sample Received: 9/10/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46614		
2	SPLP Chromiun- 2 Day Svc	119.000	238.00

PROJ. NO. / ACCOUNT NO.	AMOUNT
F119-102 4503	238.00
Bal: 1654.50	
APPROVED BY: PRC 11-29-99	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 238.00  
TOTAL DUE: 238.00

**INVOICE FOR ANALYTICAL SERVICES**

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47800  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: BETTER BRITE F1  
Sample #: b909270-01  
Date Sample Received: 9/17/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46582		
1	SPLP Chromiun- 2 Day Svc	119.000	119.00

PROJ. NO. / ACCOUNT NO.	AMOUNT
7119-102 4503	119.00
Bal: (156.75)	
APR 11-29-99	

47492

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 119.00  
TOTAL DUE: 119.00



Email: [info@glalabs.com](mailto:info@glalabs.com)  
(847) 808-7766 FAX (847) 808-7772

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47797  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119 102  
Sample #: b909062-01  
Date Sample Received: 09/03/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46613		
1	SPLP Chromiun- 2 Day Svc	119.000	119.00

PROJ. NO. / ACCOUNT NO.	AMOUNT
7119-102 4503	119.00
Bal.:- (632.75)	
APPROVED BY: PDC 11-28-94	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 119.00

**TOTAL DUE: 119.00**

## INVOICE FOR ANALYTICAL SERVICES

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045Page No. 1  
Invoice No. 47796  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119-102  
Sample #: b909156-01-03  
Date Sample Received: 09/10/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
-----			
	REPLMT Of 46615		
1	SPLP Chromiun- 2 Day Svc	119.000	119.00
2	Hexavalent Chromium - 2 Day Svc	42.000	84.00

PROJ. NO. / ACCOUNT NO.	AMOUNT
F119-102 - 45-03	203. <sup>00</sup>
Bull: 1892.50	
APPROVED BY: POC 11-29-99	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 203.00

TOTAL DUE: 203.00



**GREAT  
LAKES  
ANALYTICAL**

1380 Busch Parkway  
Buffalo Grove, Illinois 60089

Email: info@glalabs.com  
(847) 808-7766 FAX (847) 808-7772

INVOICE FOR ANALYTICAL SERVICES

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47795  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119-102  
Sample #: b909002-01-02  
Date Sample Received: 9/1/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46628		
2	Hexavalent Chromium - 2 Day Svc	42.000	84.00
2	SPLP Chromiun- 2 Day Svc	119.000	238.00

PROJ. NO. / ACCOUNT NO.	AMOUNT
3119-102-4503	322.00
BILL: 499.50	
APPROVED BY: PRL 11-29-99	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 322.00

TOTAL DUE: 322.00

**INVOICE FOR ANALYTICAL SERVICES**

Hsi. Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47794  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: BETTER BRITE  
Sample #: b910133-01-03  
Date Sample Received: 10/07/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT OF 46956		
3	SPLP Chromiun- 2 Day Svc	119.000	357.00

PROJ. NO. / ACCOUNT NO.	AMOUNT
3119-102-45-03	357.00
Bal. 821.50	
POL 11-28-99	

47496

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 357.00  
  
TOTAL DUE: 357.00

# INVOICE FOR ANALYTICAL SERVICES

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47793  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: BETTER BRITE  
Sample #: b910060-01  
Date Sample Received: 10/05/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46861		
1	SPLP Chromiun- 2 Day Svc	119.000	119.00

FROM NO. / ACCOUNT NO.		AMOUNT
3119-102-45-03		119. <sup>00</sup>
Bal: { 989.75 }		
APPROVED BY: <u>PRC</u>		11-25-99

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 119.00

**TOTAL DUE: 119.00**



# INVOICE FOR ANALYTICAL SERVICES

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No.	1
Invoice No.	47791
Invoice Date	November 19, 1999
Due Date	December 19, 1999

Terms: 1% 10/Net 30

Project #: BETTER BRITE F1  
Sample #: B910261-01-02  
Date Sample Received: 10/15/99.

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 47103		
2	SPLP Chromiun- 2 Day Svc	119.000	238.00

FORM NO. / ACCOUNT NO.		AMOUNT
3119-102	45-03	238. <sup>00</sup>
Bal: {870.75}		
APPROVED	REC	11-29-99

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 238.00

**TOTAL DUE: 238.00**

**INVOICE FOR ANALYTICAL SERVICES**

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47792  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: BETTER BRITE F1  
Sample #: b910002-01-04  
Date Sample Received: 10/01/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46862		
4	SPLP Chromiun- 2 Day Svc	119.000	476.00

ACCOUNT NO.	AMOUNT
9119-102-45-03	476.00
Bal: 1178.50	
APPROVED BY: PRC	11-29-99

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 476.00

TOTAL DUE: 476.00

**INVOICE FOR ANALYTICAL SERVICES**

Hsi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47803  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119 102  
Sample #: b909198-01-02  
Date Sample Received: 9/14/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46583		
1	Hexavalent Chromium - 2 Day Svc	42.000	42.00
1	SPLP Chromiun- 2 Day Svc	119.000	119.00

PROJ. NO./ACCOUNT NO.	AMOUNT
419-102-45-63	161.00
Balance: - <37.75>	
APPROVED BY: FDC 11-29-99	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 161.00

TOTAL DUE: 161.00

**INVOICE FOR ANALYTICAL SERVICES**

Hsi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47802  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119 102  
Sample #: b909324-01  
Date Sample Received: 9/20/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46593		
1	SPLP Chromiun- 2 Day Svc	119.000	119.00

REF. NO. / ACCOUNT NO.	AMOUNT
F119-102-45-03	119.00
Bal: 242.85 123.25	
APPROVED BY: FRC 11-29-99	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 119.00

TOTAL DUE: 119.00



# INVOICE FOR ANALYTICAL SERVICES

HSi Geotrans  
175 N Corporate Dr  
STE 100  
Brookfield, WI 43045

Page No. 1  
Invoice No. 47805  
Invoice Date November 19, 1999  
Due Date December 19, 1999

Terms: 1% 10/Net 30

Project #: F119 102  
Sample #: b909127-01-04.  
Date Sample Received: 9/9/99

QTY	SAMPLE DESCRIPTION	UNIT PRICE	AMOUNT
	REPLMT Of 46625		
4	Hexavalent Chromium - 2 Day Svc	42.000	168.00

	PAY NO / ACCOUNT NO	DATE PAID
FIA- 102 - 45-03		1168. <sup>00</sup>
Bal: 242.25		
APPROVED BY:	DRC 11/9/99	

PRICES SHOWN INCLUDE ALL DISCOUNTS  
APPLICABLE. SHOULD LEGAL ACTION BE  
REQUIRED FOR COLLECTION PURPOSES, DEBTOR  
IS RESPONSIBLE FOR ALL LEGAL FEES.

SUB TOTAL: 168.00

**TOTAL DUE: 168.00**

## Task Detail in Support of Invoice

FEBRUARY 27, 2000

TASK 105

CHANGE ORDER

DIRECT LABOR	HOURS	RATE	COST	CURRENT
Morgan/Senior 2	1.0	\$101.12	\$101.12	
Fassbender/Senior 1	0.0	\$92.54	\$0.00	
Chang/Project 2	0.0	\$63.72	\$0.00	
Thomson Todd	0.0	\$44.52	\$0.00	
Robert Golata	0.0	\$41.64	\$0.00	
Roseanne Guth	0.5	\$43.64	\$21.82	
Preslik/Admin Assist	0.0	\$34.76	\$0.00	
Kath Schoephoester	0.5	\$37.70	\$18.85	
Florence/Admin Assist	0.0	\$43.64	\$0.00	
<hr/>				
TOTAL DIRECT LABOR				\$141.79
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$261.49
o Repro			\$0.00	
o Communication			\$25.29	
o Outside Reproduction			\$0.00	
o Outside Other			\$236.20	
o Outside Supplies			\$0.00	
o Temporary Labor			\$0.00	
COMPUTER				\$0.00
SUBCONTRACTS				<hr/> \$888.25
SUBTOTAL				\$1,291.53

REPORT DATE: 04/04/00 09:17

HSI GEOTRANS

PAGE 0004

PERIOD ENDING: 04/02/00

JOB STATUS REPORT

PROJECT MGR: DAN MORGAN

CLIENT: WI DEPT OF NTL RESOURCES

CURRENT PERIOD ODC DETAIL REPORT

DIVISION #: 53

PRIME CONTRACT ID: AGREE 7/29/99

WITH TRANSACTION CODE BREAKDOWNS

CONTRACT VALUE: 24,578.00

CONTRACT NUMBER: F119-105

AS OF 04/02/00

JOB TYPE: T&M

CONTRACT NAME: CHANGE ORDER

RATE TYPE: N/A

PERIOD OF PERFORMANCE: 11/01/99 TO 01/01/00

STATUS: ACTIVE

ODC	DESCRIPTION	PD	SOURCE	VOUCHER NUMBER	VENDOR NAME	P.O. NUMBER	TRANSACTION DESCRIPTION	AMOUNT
-----	-------------	----	--------	-------------------	-------------	----------------	----------------------------	--------

45 CONTRACTED SERVICES

01 SUBCONTRACTOR

06 AP-001 046246 APPLIED ENVIRONMENTAL SOL

SUBCONTRACTOR 888.25

TRANS CODE TOTAL 888.25

CURRENT PERIOD BALANCE 888.25

47 COMMUNICATION

01 EXPRESS MAIL

06 AJ-155

FED EX 25.29

TRANS CODE TOTAL 25.29

CURRENT PERIOD BALANCE 25.29

49 OUTSIDE OTHER

01 OTHER

06 AJ-155

FED-EX KINKO'S 11.45

06 AP-001 046240 KINKO'S - ATLANTA

OTHER 224.75

TRANS CODE TOTAL 236.20

CURRENT PERIOD BALANCE 236.20

888.25+  
888.25\*+  
0.\*  
10.66+  
7.06+  
7.57+  
25.29\*+  
0.\*  
11.45+  
224.75+  
236.20\*+  
0.\*



# APPLIED ENVIRONMENTAL SOLUTIONS, INC.

FEIN NUMBER 39-1966983

February 24, 2000

**INVOICE NUMBER 1007**

For Services Provided January 31 Through February 23, 2000

HSIGeoTrans Project Name and Number	Hours	Rate	Labor Total	4.50% Supply Fee	Task Total
<u>Labor Summary</u>					
WDNR Better Brite F119 105	10.00	\$85.00	\$850.00	\$38.25	\$888.25
Wisconsin Chromium F135 101	6.00	\$85.00	\$510.00	\$22.95	\$532.95
Wisconsin Chromium F135 102	12.00	\$85.00	\$1,020.00	\$45.90	\$1,065.90
Wisconsin Chromium F135 104	6.00	\$85.00	\$510.00	\$22.95	\$532.95
Wisconsin Chromium F135 105	6.00	\$85.00	\$510.00	\$22.95	\$532.95

<b>Total Labor Charges</b>	<b>40.00</b>		<b>\$3,400.00</b>	<b>\$153.00</b>	<b>\$3,553.00</b>
----------------------------	--------------	--	-------------------	-----------------	-------------------

Other Charges

Wisconsin Chromium F135 105	Mileage	\$74.40
-----------------------------	---------	---------

Please Pay This Amount

**\$3,627.40**

Applied Environmental Solutions, Inc.  
 N62W37644 Parkview Drive  
 Oconomowoc, WI 53066

(414)507-5571 or (262)569-8816

PRJ. NO. / ACCOUNT NO.

AMOUNT

F119-105/45-01	888.25
----------------	--------

# HSI GeoTrans, Inc.

## ODC TRANSFER FORM

DATE: 4/03/00	REQUESTED BY: JLFassbender for DL Morgan
TRANSFER REFERENCE (COMPLETE ONE) MID-MONTH JSR DATED _____ OR MONTH-END JSR DATED 3/30/00	

CREDIT (FROM)

Project #: F119-101 Tran. Code: 47-01 Amount \$: 25.<sup>29</sup> P.M. Initial: JLF for DLM  
 Description: Federal Express Reference (PD/Source): 06 AP-003  
 Vendor Name: Federal Express

17.72 + 7.57

Project #: F119-103 Tran. Code: 49-01 Amount \$: 11.<sup>45</sup> P.M. Initial: JLF for DLM  
 Description: Outside Other Reference (PD/Source): 06 AP-004  
 Vendor Name: Kinkos - Atlanta

DEBIT (TO)

Project #: F119-105 Tran. Code: 47-01 Amount \$: 25.<sup>29</sup> P.M. Initial: JLF for DLM  
 Description: Express Mail Reference (PD/Source): 06 AP-003  
 Vendor Name: Federal Express

Project #: F119-105 Tran. Code: 49-01 Amount \$: 11.<sup>45</sup> P.M. Initial: JLF for DLM  
 Description: Outside Others Reference (PD/Source): 06 - AP-004  
 Vendor Name: Kinkos - Atlanta

REASON FOR TRANSFER: (MUST BE COMPLETED)

Billed to wrong task

FEDERAL EXPRESS  
POWERSHIP 3 RECEIPT

FEDERAL EXPRESS  
POWERSHIP 3 RECEIPT

SENDER:  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100

Brookfield  
WT 530455802

RECIPIENT:  
GREG BEYKE  
CURRENT ENVIRONMENTAL SOLUTIONS  
1100 LAUREL CREST WAY

MARTETTA  
RA 300643978

SENDER:  
Angela Preslik  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100

Brookfield  
WT 530455802

RECIPIENT:  
JO ANN REYNOLDS

FEDERAL EXPRESS  
POWERSHIP 3 RECEIPT

SENDER:  
Judy L. Fasshender  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100

Brookfield  
WT 530455802

RECIPIENT:  
MR. JOHN PETERSON  
SUPERFUND DIVISION  
77W. JACKSON

CHICAGO  
TI 40004

TRACKING #: 272 6134 354  
DATE: 01/04/00

SERVICE: PRIORITY OVERNIGHT  
PAYMENT: RTII SENDER  
WEIGHT: 6 LBS

CHARGE: \$ 10.66  
REFERENCE:  
F119-101

FEDERAL EXPRESS  
POWERSHIP 3 RECEIPT

SENDER:  
Judy L. Fasshender  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100

Brookfield  
WT 530455802

RECIPIENT:  
JOHN SAGER  
WMNR  
425 EAST COUNTY ROAD STE. 700

OSHKOSH  
WT 549019731

TRACKING #: 273 5857 722  
DATE: 01/04/00

SERVICE: PRIORITY PAK  
PAYMENT: RTII SENDER  
WEIGHT: 1 LBS

CHARGE: \$ 7.06  
REFERENCE:  
F119-101

GENERAL EXPRESS  
MEMBERSHIP & RECEIPT

SENDER:

Don Morgan  
HSI Gentlemen, Inc.  
175 N. Corporate Drive, Suite 100

Brookfield  
WI 530455802

RECIPIENT:

GARY A. FINESTEIN  
EDMR  
101 S. WEBSTER ST.

MANTON  
WI 53703

TRACKING #: 276 0125 785  
DATE: 01/21/00

SERVICE: PRIORITY BOX  
PAYMENT: BILL SENDER  
WEIGHT: 3.1 LB

CHARGE: \$ 7.57  
REFERENCE:  
=119-101

\*\*\*\*\*  
GENERAL EXPRESS MEMBERSHIP & TWENTY  
PAYMENT DUE IN 15 DAYS

TWENTY 978755420 DATE 01/21/2000  
ACCOUNT 119480464

SENDER:

ANGELA PRESTON  
HSI-GENTLEMEN  
175 N CORPORATE DR STE 100  
BROOKFIELD WI 530455802

WEIGHTED PACKAGES	2
INVOICED PACKAGES	2
PACKAGE CHARGES	15.14
DISCOUNTS RECEIVED	0.00
SPECIAL FEES	0.00
REF. VAL. CHARGE	0.00
FUEL CHARGE	0.00
NET CHARGE =====>	15.14

MAIL PAYMENT TO:

Federal Express Corporation  
P.O. Box 1140  
Memphis, TN 38101-1140

BILLING QUESTIONS? 800-622-1147

3119-103-4901	1145
APPROVED BY: DLM	3-14-2000

# kinko's

For the appropriate  
Payment Processing Center,  
please refer to map on reverse.

Questions? Please call:  
**1-800-488-3705**  
24 hours/7 days a week

Job ordered by:
Phone Number/Ext. ( )
<b>For Delivery Orders Only</b>
Deliver to:
Delivery Address:
City State ZIP
Delivered By:
<b>Person Accepting Delivery</b>
Name:
Position/Dept:

I, an authorized agent of the company and my signature authorizes the company to pay for all items reflected on this invoice. I will provide all necessary documentation to my company for them to process payment. I acknowledge that the company has received the items as indicated.

Authorized Signature

*R. GUTH*

Print Name

( )

Phone Number/Ext.

Visit the Kinko's Website at  
[www.kinkos.com](http://www.kinkos.com)

CUSTOMER COPY

## INVOICE

Official Bill of Sale  
Terms Net 30 Days  
Please Reference Invoice # Below

Invoice#: 046600094135

Receipt #: 579490 Reg: 2 Page: 1  
Account #: 9950061526 0000  
Customer : HSI GEOTRANS INC  
Auth. User: HSI GEOTRANS INC  
Reference :  
F119-103

Date: 02/22/00 10:08 AM Co-Workers: 70  
Qty/List Disc. Price Amount

48	FS COLOR S/S LTR, LGL			
1.49	0.50	0.99	47.52	T
24	FS COLOR S/S 11 X 17			
2.96	1.00	1.96	166.32	T

SUBTOTAL	213.84
TAX	10.91
TOTAL	224.75

Thank you for choosing Kinko's

Kinko's (262) 792-1800  
18000 W BLUEMOUND  
UNIT D  
BROOKFIELD, WI 53045

PROJ. NO. /

AMOUNT

5119-105-49-01	224.75
APPROVED BY: <i>DLm</i>	2-24-2000

46240

## **Sager, John E**

---

**From:** Wayne & Judy Fassbender[SMTP:gofish@globaldialog.com]  
**Sent:** Monday, April 24, 2000 4:39 PM  
**To:** bob.endris@rmtinc.com; james.crowley@rmtinc.com  
**Cc:** Sager, John E; dmorgan@hsigeotrans.com

Bob and Jim,

I am forwarding this memo to you to confirm our earlier discussions pertaining to the ground settling noted at Better Brite in De Pere.

Jim, you and I discussed the settling noted along the extraction trench at the Progressive Farmer's Coop last Thursday (April 20). John Sager of WDNR had received a phone call from the Coop owner indicating that a truck had gotten stuck in the trench as a result of the significant settling. You indicated that your subcontractor was having difficulty getting a truck and the required gravel because of the rain that morning but confirmed that if the equipment and materials were not available on Thursday afternoon, the problem would be addressed on Friday morning. You agreed to have the contractor compact the material currently at the surface prior to placing additional gravel, then compact the new gravel once it was put in place. John Sager received an angry message this morning (Monday 4/24) because apparently nothing has been done to address the settling as of yet. At about 3:15 this afternoon, I asked Bob Endris to follow up on this as I understood you to be out of the office until at least 4 p.m.

John Sager had additional concerns related to the settling at the stabilization area. The stabilized area of the Konrath's backyard and also the property to the south has settled about a foot from the original grade. The settling is substantial enough to result in slumping of the adjacent area of the Konrath's back yard. This needs to be addressed. There are other small areas of differential settling in the stabilized area resulting in some low pockets but John did not feel that these were substantial at this point. The primary concern is the resident's backyards. We anticipate that regrading will be required in this area to address the settling. I have asked Bob to call me back with a proposed plan and schedule. Consideration of the likelihood for significant additional settling should be made in determining the best timing for regrading as waiting for a short while would be preferable to revisiting the resident's backyards on multiple occasions. Bob and I discussed how this work would be funded and we agreed that the timing of the stabilization and the nature of the mixing activities resulted in the excessive settling and both were easily foreseeable. Therefore we anticipate that the work will be addressed under RMT's existing contract with the State.

An additional item which has been brought to my attention following my discussion with Bob this afternoon, is the fact that Mrs. Garcia's yard also continues to settle over the extraction trenches. She contacted John Sager this afternoon to request that a more permanent remedy be made. Previously, only minor amounts of soil were spread in the low spots and no compacting or attempt to level the trench areas of her yard have been made. This will also require some additional work by RMT or your subcontractors.

I look forward to hearing from you related to these issues. These concerns are of highest priority to the residents involved. We require a plan and a schedule to address these issues. Please call me tomorrow morning (414) 507-5571 to discuss what you propose. John Sager needs to respond to the residents concerns as soon as possible. John has been to the site recently and has had all direct contact with the residents. Should you need to reach him, his new number is (715) 623-4190 ext. 3125.

Thanks for your help with this.

Judy Fassbender

# CORRESPONDENCE/MEMORANDUM

State of Wisconsin

DATE: March 2, 2000

FILE REF:

TO: File: Better Brite

FROM:  John Sager

SUBJECT: Telephone calls with Pam Garcia and Judy Fassbender

Pam Garcia called me at approximately 3:45pm. Pam said a contractor was at her house today to fill in the holes near the trench and sump. Pam said that she walked out after the holes were filled and the dirt was not packed down. Pam said she sunk into one of the holes.

I told Pam that I could have the contractor come back tomorrow to refill the holes. Pam said she did not want anyone back out to her property. Pam said that she would fill the last hole herself. I told Pam that the contractor would be back on site in a couple of weeks to complete the grading and seeding. The contractor was on site today to fill the holes enough so they are not dangerous. I told Pam again that the contractor would be on site again to make the grade final. Pam said she understood.

I called Judy Fassbender and left a message. I told Judy that I was not happy with the job that was done and to call RMT and let them know. Judy called me back on 3/2. She said that she had contacted RMT and told them the situation. RMT will be back on site in a couple weeks to complete the job.



**Sager, John E**

---

**From:** Sager, John E  
**Sent:** Tuesday, February 29, 2000 11:53 AM  
**To:** 'Judy Fassbender'  
**Subject:** Better brite Zinc Shop

Judy,

Attached is a memo with the photographs and a site map from my site visit yesterday.



022800site visit  
memo.doc

John Sager  
Hydrogeologist  
Bureau for Remediation and Redevelopment  
625 E. County Road Y, Suite 700  
Oshkosh, WI 54901-9731  
920.424.3839  
920.424.4404 fax  
sagerj@mail01.dnr.state.wi.us

# CORRESPONDENCE/MEMORANDUM

State of Wisconsin

DATE: February 29, 2000

FILE REF: [Click here and type file ref.]

TDATE: February 29, 2000

FILE REF: Better Brite

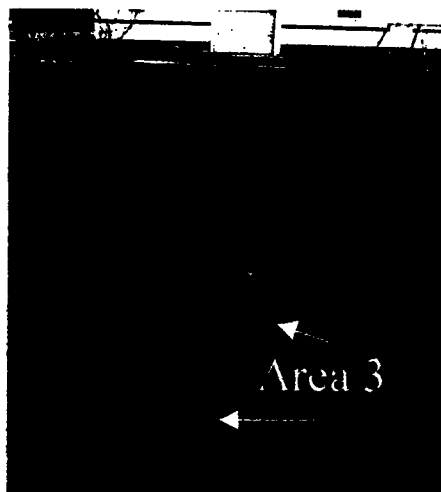
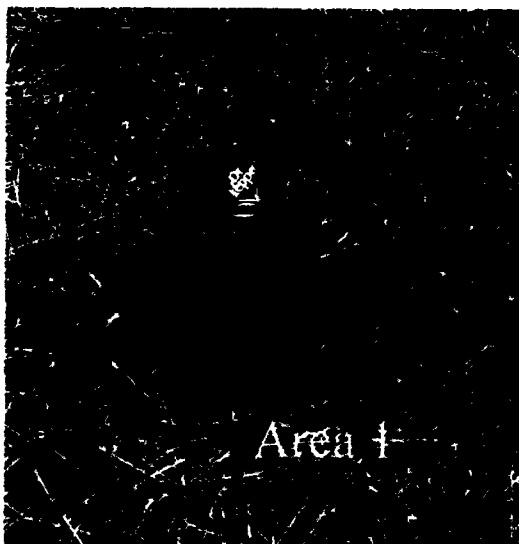
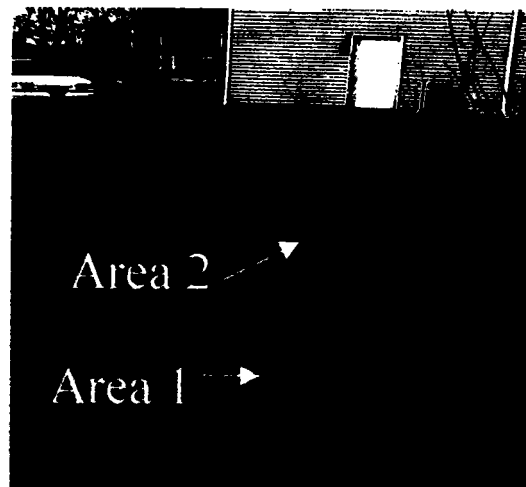
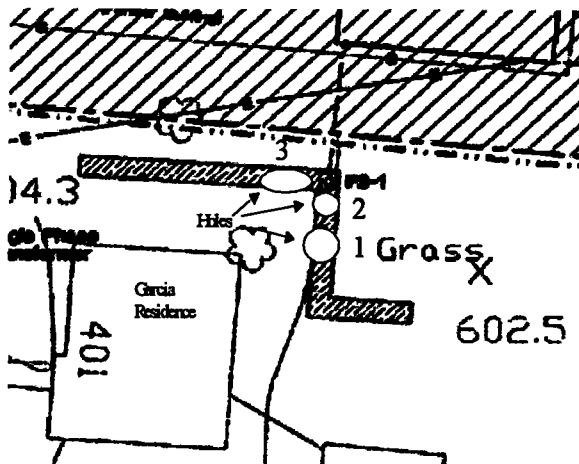
TO: Judy Fassbender

FROM: John Sager

SUBJECT: Zinc Shop site visit 02/28/99

Judy,

Attached are the photographs and a map showing the locations of the holes near the sump manhole and trenches at the Garcia residence. I understand from our phone calls that RMT is going to have the holes repaired as soon as possible. Please let me know when RMT intends to have the holes repaired.



**Sager, John E**

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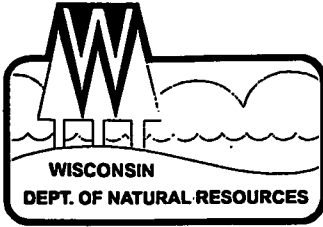
**From:** Kalnicky, Richard A  
**Sent:** Monday, February 14, 2000 12:12 PM  
**To:** Sager, John E  
**Cc:** Kalnicky, Richard A  
**Subject:** RE: Better Brite Change order

Thanks, I received it. I've reviewed it and asked Judy to send me the revised cost breakdown by tasks so I know where the rebudget portion is coming from. Once I get this, I'll process the change order. It will only need signatures from Judy, myself, and Renee Sanford, as it is a within contingency change order. So, this should only take a matter of several days. Thanks for your followup.

-----  
**From:** Sager, John E  
**Sent:** Monday, February 14, 2000 11:55 AM  
**To:** Kalnicky, Richard A  
**Subject:** Better Brite Change order

Hi Dick, I just wanted to check to see if you received the scope of work for the monitoring well replacement at Better Brite? I sent it ou to you last Tues or Wed...

John Sager  
Hydrogeologist  
Bureau for Remediation and Redevelopment  
625 E. County Road Y, Suite 700  
Oshkosh, WI 54901-9731  
920.424.3839  
920.424.4404 fax  
sagerj@mail01.dnr.state.wi.us



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

Tommy G. Thompson, Governor  
George E. Meyer, Secretary  
Ron Kazmierczak, Regional Director

Northeast Region Headquarters  
1125 N. Military Ave., P.O. Box 10448  
Green Bay, Wisconsin 54307-0448  
Telephone 920-492-5800  
FAX 920-492-5913  
TDD 920-492-5912

February 10, 2000

Mr. John Schmidt  
Progressive Farmers Coop  
1221 Grant Street  
De Pere, WI 54115

Subject: Use of monitoring well MW-2 from Progressive Farmers Coop LUST site, 548 Butler Street, De Pere  
BRRts #03-05-002209

Dear Mr. Schmidt:

As discussed between you and Judy Fassbender, HSI Geotrans, the Wisconsin Department of Natural Resources (WDNR) will assume responsibility for upkeep, maintenance, and abandonment of monitoring well MW-2 from the Progressive Farmers Cooperative. The monitoring well was constructed as part of the Progressive Farmers Cooperative's leaking underground storage tank (LUST) site investigation, BRRts #03-05-002209, and referenced as monitoring well MW-2. The monitoring wells will be used as a groundwater monitoring point for the Better Brite Superfund site.

I appreciate your assistance and cooperation. Please contact me at 920-424-3839 if you have any questions concerning this correspondence.

Sincerely,

  
John Sager  
Hydrogeologist  
Remediation and Redevelopment Program

C: Roxanne Nelezen-Chronert, Remediation and Redevelopment Program  
Ms. Judy Fassbender, HSI Geotrans, Inc.

**Sager, John E**

---

**From:** Sager, John E  
**Sent:** Thursday, February 10, 2000 11:01 AM  
**To:** Chronert, Roxanne L  
**Subject:** Progressive Farmers Cooperative LUST site 03-05-002209

I am sending a letter to John Schmidt at the Progressive Farmers Cooperative informing him that the DNR is going to assume responsibility for monitoring well MW-2 constructed during the LUST site investigation. The well will be used for groundwater monitoring activities at Better Brite. I will get a copy of the letter to you for the LUST file. Let me know if there is anything else that you need.

John Sager  
Hydrogeologist  
Bureau for Remediation and Redevelopment  
625 E. County Road Y, Suite 700  
Oshkosh, WI 54901-9731  
920.424.3839  
920.424.4404 fax  
sagerj@mail01.dnr.state.wi.us

## **Sager, John E**

---

**From:** Sager, John E  
**Sent:** Tuesday, February 08, 2000 4:00 PM  
**To:** 'Judy Fassbender'  
**Subject:** Comments on the Documentation Report

Gary's comments are below. My comments are in the attached file.



2800 comments on  
documentation report.doc

John,

Here are my comments on the as-built report. Got to it between some other work. Keep in mind I've only seen this and the design report. If there were changes to the project that you or Keld approved during construction, I wasn't informed of them.

Section 3.3 - This section should describe how the sump gravel was managed. The design report had it stabilized with the soil.

Section 3.7.1 - A final grade plan sheet for the Chrome shop should be prepared, showing the final site conditions and well locations. Per the 10/25-29/99 and 11/1-5/99 construction status reports, a final site topo survey was done. We need to know the slopes of the site to see if they are excessive. The photos I saw seem to indicate there are no excessive slopes, but the views were limited. If the stabilized soil was excavated and replaced in the original excavation only, then what about expansion due to air mixing from excavation and the stabilization process? Is there a mound at the site? If not, why not?

Sections 3.7.2 and 5.8 - Part 02138, Section 3.2 of the specifications included in the design report on file here state that 6" of topsoil will be applied to the site. They only applied 4". Why? If we paid for or expected 6", then they should apply 2 more inches and reseed at no cost to us or we should work something else out.

Sections 3.7.3 and 5.8 - Given the work was completed late in the year, if we agree to accept the 4" of topsoil, then the sites should be inspected this spring and checked for vegetation establishment and erosion, which, for this spring, I would view as part of construction, not O&M. However, if you saw that they got good vegetation established in the fall, then you could deal with it as part of O&M.

John Sager  
Wisconsin Department of Natural Resources  
Remediation and Redevelopment Program  
625 East County Road Y  
Suite 700  
Oshkosh, WI 54901-9731  
920-424-3839

DATE: February 8, 2000

FILE REF:

TO: Judy Fassbender

FROM: John Sager

SUBJECT: Comments on the Better Brite Remedial Action Documentation Report

Judy,

Here are my comments on the Remedial Action Documentation Report. Gary Edelstein's comments are in a separate e-mail.

Section 2.1, 1<sup>st</sup> Paragraph:

I think that both the Chrome Shop and the Zinc Shop are zoned for residential/ light industrial. You may want to check this out.

Section 2.2, last paragraph:

Second sentence is confusing. Possibly change to "Surface drainage is to the..."

Section 3.7.2, third sentence:

End sentence at ".....to address the entire site."  
Take out... "and create a more park-like setting"

Section 3.5, 4<sup>th</sup> bullet:

Although it may be technically the correct term, I would suggest avoiding the use of the term "UST" it can easily be confused with petroleum USTs. The tanks were two of the plating tanks that were inside the former building. The EPA installed the initial recovery wells through one of the tanks. The tanks were not removed during one of the earlier remedial action because the EPA did not want to abandon the recovery well.

Section 3.6:

Same comment, I would avoid the use of the term "UST"

Section 4.1, 3<sup>rd</sup> paragraph, 3<sup>rd</sup> sentence

The treatment building is not "metal face" building.

Section 6.1, 5<sup>th</sup> paragraph:

Aerosol monitoring results are in Appendix K not Appendix I.

Judy Fassbender  
February 8, 2000  
Page 2

Figure 3.2:

Figure does not show the correct locations of staging areas.

Figure 3.5, cross section:

The cross section labels are confusing. I assume the dashed line is the surface prior to soil treatment. The solid line appears to be the proposed final grade. Clarify and correct as necessary.

General:

I agree with Gary's comment that a final grade plan should be provided in the report.





# United States Department of the Interior

U.S. GEOLOGICAL SURVEY

Water Resources Division  
8505 Research Way  
Middleton, Wisconsin 53562-3586  
phone: (608) 828-9901  
fax: (608) 821-3817

February 1, 2000

The Wisconsin District of the U.S. Geological Survey, Water Resources Division, is pleased to send you a copy of the report, "Hydrogeologic Properties of the Ordovician Sinnipee Group at Test Well BN-483, Better Brite Superfund Site, De Pere, Wisconsin," by W.G. Batten, D.J. Yeskis, and C.P. Dunning, Water-Resources Investigations Report 99-4199. This report was prepared in cooperation with the U.S. Environmental Protection Agency, Region 5.

This report describes the construction of test well BN-483, and the field methods used in collecting lithologic and hydraulic data from the well. Descriptions of continuous core and geophysical-log data, and the results of laboratory tests on selected core samples provide detailed physical information on the rock units of the Sinnipee Group. The vertical distribution of horizontal hydraulic conductivity of the rock units as determined from displacement/recovery (slug) tests over isolated depth intervals is discussed. The vertical distribution of hydraulic head in the open borehole as determined from static water levels measured over isolated depth intervals is discussed. Results of water analysis for common inorganic constituents, trace metals, and organic compounds are presented.

Comments on the enclosed report are encouraged and should be sent to the above address. Additional copies of this and other USGS reports may be purchased for \$4.00 from the U.S. Geological Survey, Branch of Information Services, Box 25286, Denver, CO 80225-0286, telephone: 1-888-ASK-USGS. Orders must include check or money order payable to the U.S. Department of the Interior – U.S. Geological Survey, and must specify report number WRIR 99-4199. Other reports and abstracts are available on the Wisconsin District home page at: <http://wi.water.usgs.gov/>.

Warren A. Gebert  
District Chief

## **Sager, John E**

---

**From:** Edelstein, Gary A  
**Sent:** Wednesday, January 26, 2000 3:37 PM  
**To:** Sager, John E  
**Subject:** Better Brite Construction (RA) Documentation Report Comments

John,

Here are my comments on the as-built report. Got to it between some other work. Keep in mind I've only seen this and the design report. If there were changes to the project that you or Keld approved during construction, I wasn't informed of them.

Section 3.3 - This section should describe how the sump gravel was managed. The design report had it stabilized with the soil.

Section 3.7.1 - A final grade plan sheet for the Chrome shop should be prepared, showing the final site conditions and well locations. Per the 10/25-29/99 and 11/1-5/99 construction status reports, a final site topo survey was done. We need to know the slopes of the site to see if they are excessive. The photos I saw seem to indicate there are no excessive slopes, but the views were limited. If the stabilized soil was excavated and replaced in the original excavation only, then what about expansion due to air mixing from excavation and the stabilization process? Is there a mound at the site? If not, why not?

Sections 3.7.2 and 5.8 - Part 02138, Section 3.2 of the specifications included in the design report on file here state that 6" of topsoil will be applied to the site. They only applied 4". Why? If we paid for or expected 6", then they should apply 2 more inches and reseed at no cost to us or we should work something else out.

Sections 3.7.3 and 5.8 - Given the work was completed late in the year, if we agree to accept the 4" of topsoil, then the sites should be inspected this spring and checked for vegetation establishment and erosion, which, for this spring, I would view as part of construction, not O&M. However, if you saw that they got good vegetation established in the fall, then you could deal with it as part of O&M.

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/3  
P.O. Box 7921  
Madison, WI 53707  
(608)267-7563  
Internet E-Mail => edelsg@dnr.state.wi.us

-----  
**From:** Sager, John E  
**Sent:** Wednesday, January 19, 2000 3:24 PM  
**To:** Edelstein, Gary A  
**Subject:** RE: Better Brite

How about February 7th  
John Sager  
Wisconsin Department of Natural Resources  
Remediation and Redevelopment Program  
625 East County Road Y  
Suite 700  
Oshkosh, WI 54901-9731  
920-424-3839

-----  
**From:** Edelstein, Gary A  
**Sent:** Wednesday, January 19, 2000 3:24 PM  
**To:** Sager, John E  
**Subject:** RE: Better Brite

No problem. Let me know a specific deadline so I can plan appropriately. Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/3  
P.O. Box 7921  
Madison, WI 53707  
(608)267-7563  
Internet E-Mail => edelsg@dnr.state.wi.us

-----  
**From:** Sager, John E  
**Sent:** Wednesday, January 19, 2000 3:17 PM  
**To:** Edelstein, Gary A  
**Subject:** RE: Better Brite

I think I would like you to take a quick look at it. Like I said, I am making comments but I was very close to the activities out there. It may be beneficial to have you take a look at it having not been involved as closely with the remedial action. I am having Judy Fassbender send you a copy of the report directly. You should have a copy by early next week.

I don't want this to seem like a big rush or anything. If you do not have the time someone else can take a look at it.

Thank you  
John Sager  
Wisconsin Department of Natural Resources  
Remediation and Redevelopment Program  
625 East County Road Y  
Suite 700  
Oshkosh, WI 54901-9731  
920-424-3839

-----  
**From:** Edelstein, Gary A  
**Sent:** Wednesday, January 19, 2000 3:10 PM  
**To:** Sager, John E  
**Subject:** RE: Better Brite

Hey John,

It's entirely up to you whether you want me or someone here to look at these sorts of reports. There's no requirement that they be reviewed here. Keld had the same option, and chose to get my input. Thanks, Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/3  
P.O. Box 7921  
Madison, WI 53707  
(608)267-7563  
Internet E-Mail => edelsg@dnr.state.wi.us

-----  
**From:** Sager, John E  
**Sent:** Wednesday, January 19, 2000 11:29 AM  
**To:** Edelstein, Gary A  
**Subject:** Better Brite

Hi Gary,

We have completed the construction at Better Brite and HSI Geotrans has issued a draft Remedial Action Documentation Report. I am reviewing it and providing comments to HSI Geotrans. HSI has also provided a copy to EPA for their comments. What is the procedure for review of these documents? I am happy to review the report and provide my comments. Is it customary for Madison staff to also review these reports. I know when Keld Lauredsen reviewed the design report there were also comments provided by Madison.

Let me know

Thank You

John Sager  
Wisconsin Department of Natural Resources  
Remediation and Redevelopment Program  
625 East County Road Y  
Suite 700  
Oshkosh, WI 54901-9731  
920-424-3839



# HSI GEOTRANS

A TETRA TECH COMPANY

175 N. Corporate Drive  
Suite 100  
Brookfield, Wisconsin  
53045

414-792-1242 FAX 414-792-1310

January 7, 2000  
(F119-5)

R + R - OSH  
RECEIVED

JAN 19 2000

TRACKED ☐  
REVIEWED ☐

Mr. John Sager  
Wisconsin Department of Natural Resources  
625 E. County Road Y, Ste. 700  
Oshkosh, WI 54901-9731

RE: Progress Report and Statement for Consulting Services Provided during November 29, 1999 through January 2, 2000, Better Brite Construction Oversight

Dear John:

Enclosed please find our progress report and statement for services provided during November 29, 1999 through January 2, 2000 on the Better Brite Construction Oversight Project.

## Accomplishments

HSI GeoTrans provided oversight and coordination for the remedial activities at the Better Brite Superfund Site. During this reporting period, the pH probe was replaced and the autodialer and moisture sensor were installed. The final inspection was completed on December 21, 1999. RMT has completed all required site work and has requested payment for all work with the exception of \$5000 retainage to cover cost of reseedling should that be necessary next spring. A draft of the Remedial Action Documentation Report was delivered to the WDNR on December 23, 1999 and forwarded to U.S. EPA on January 5, 2000 (when final figures were available).

## Problems and Proposed Solutions

Traffic through the newly landscaped area north of the treatment building at the Zinc Shop has created ruts through the landscaped area. Placement of a row of approximately 12 boulders, 30 to 36 inches in diameter is proposed to restrict traffic. The cost for placing the boulders is estimated at \$600 and will be included in the change order with the monitor well installation costs. No other problems are anticipated at this time.

## Documents Submitted

December 6, 1999 Final Punch List  
December 23, 1999 Draft Remedial Action Documentation Report

Mr. John Sager  
WDNR - Oshkosh  
Page 2

### Personnel

The personnel currently involved in the Better Brite Remedial Action include:

- ◆ Judy Fassbender, Senior Hydrogeologist and Project Manager,
- ◆ Paula Chang, Engineer/Hydrogeologist,
- ◆ Keith Becker, Staff Scientist, and
- ◆ Dan Morgan, Senior Engineer.

### Planned Activities

The table of contents for the O & M manual will be forwarded for your files. The original O&M manual will be forwarded to Robert Kennedy for use in the treatment building and a copy of the complete document will be kept on file at HSI GeoTrans. We will incorporate WDNR and U.S. EPA comments into the Remedial Action Documentation Report as soon as they are received. We have prepared a proposal and cost estimate for placing boulders at the Zinc Shop, installing three new monitor wells at the Chrome Shop and completing the monitoring required for 2000. We will be forwarding this information to you for your review. All work included in the original scope of work except finalizing the report and forwarding the O & M manual have been completed.

### Schedule and Financial Status

All work is proceeding according to schedule and at costs less than originally estimated and approved per the current authorized budget. Additional well installation and ground water sampling will be proposed for completion using the previously authorized oversight funds.

I trust this information meets your needs. If you have any questions, please do not hesitate to call.

Sincerely,

HSI GEOTRANS

  
Paula R. Chang  
Project Engineer/Geologist

JLF/gf

enc.

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
Box 7921  
Madison, Wisconsin 53707

INVOICE FOR PROFESSIONAL SERVICES

PROJECT Better Brite Remedial Design  
HSI GEOTRANS, INC.  
LOCATION DePere, Wisconsin

REQUEST NO. 5  
PROJECT NO. \_\_\_\_\_  
HSI #: F119  
DOCID. \_\_\_\_\_

	Total Fee Due to Date	Previously Submitted	Payment Due This Invoice
For Professional Service Contract:			
Original Contract Sum (NOT TO EXCEED) <u>\$ 70,707</u>			
Change Orders (List Separately) _____	\$ 51,224.98	\$ 47,116.24	\$ 4,108.74
Total Contract to Date <u>\$ 70,707</u>			
Other Charges to contract:			
Additional Services: Fixed Fee Profit (attach itemized listing) <u>\$ 14,085</u>	\$10,686.68	\$ 9,169.34	\$ 1,517.34
Reimbursable Expenses: Subcontractor/Other Direct Costs (attach itemized listing) <u>\$ 23,195</u>	\$20,378.84	\$14,012.66	\$ 6,366.18
TOTALS	\$ 82,345.20	\$70,298.24	\$12,046.96

THIS IS TO CERTIFY THAT the Firm named herein is entitled  
to a payment of \$ 12046.96

HSI GeoTrans, Inc.  
Firm Name  
175 N. Corporate Dr., Suite 100  
Address  
Brookfield, WI 53045  
City, State, Zip

  
Project Manager Approval

1/19/00  
Date

By:  1/7/00  
Paula R. Chang / Date

Program Coordinator Approval

Date

☐ Please check if this is a FINAL invoice.  
(Submit original plus two copies w/supporting invoices)

payreq61.fm 7/96

MONTHLY PROGRESS REPORT, November 28, 1999 through January 2, 2000  
 Better Brite - Remedial Construction Oversight  
 Project #F119, Invoice #5

Task Description	Total Invoiced This Month	Total Authorized Budget	Total Billed To Date	Amount Remaining	Estimated Percent Complete
101. Pre-Construction Conference	\$0.00	\$1,679.00	\$1,670.59	\$8.41	100%
102. Construction Oversight	2,055.94	60,944.00	44,768.44	16,175.56	73%
201. Reporting & Document Management	5,635.10	13,534.00	12,333.82	1,200.18	91%
301. Project Management	2,784.58	17,745.00	12,831.67	4,913.33	72%
701. Fixed Fee Profit	1,571.34	14,085.00	10,740.63	3,344.37	76%
<b>Total</b>	<b>\$12,046.96</b>	<b>\$107,987.00</b>	<b>\$82,345.15</b>	<b>\$25,641.85</b>	<b>76%</b>



# INVOICE

PAYMENT TERMS: NET 30

Please include your **account number** on all remittances to ensure proper credit to your account.

Milwaukee/Chang

JANUARY 2, 2000

INVOICE NO. 105-F119-XXX

Wisconsin Dept Natural Resource  
1125 N. Military Avenue  
Green Bay, WI 54307-0448

INVOICE... for services rendered and related expenses  
for the period: 11/29/99 - 1/2/00

DIRECT LABOR	HOURS	RATE	COST	CURRENT
(See individual task vouchers for detail)				
TOTAL DIRECT LABOR				\$4,108.74
TRAVEL				\$121.04
OTHER DIRECT COSTS				\$472.21
COMPUTER				\$0.00
SUBCONTRACTS				\$5,773.63
FIXED FEE (15%)				\$1,571.34
TOTAL AMOUNT CLAIMED				\$12,046.96
TOTAL AMOUNT DUE				<b>\$12,046.96</b>

**PAY THIS AMOUNT →**

Due Date: FEBRUARY 2, 2000

Remit to: HSI GeoTrans, Inc.  
46050 Manekin Plaza  
Suite 100  
Sterling, Virginia 20166  
Attn: Accounts Receivable



**HSI  
GEOTRANS**

A TETRA TECH COMPANY

46050 Manekin Plaza ■ Suite 100 ■ Sterling, Virginia 20166 ■ 703-444-7000

## Task Detail in Support of Invoice

JANUARY 2, 2000

### TASK 102

#### CONSTRUCTION OVERSIGHT

DIRECT LABOR	HOURS	RATE	COST	CURRENT
Morgan/Senior 2	0.0	\$101.12	\$0.00	
Waddell, Richard	0.0	\$152.70	\$0.00	
Hunt, Robert	4.0	\$48.12	\$192.48	
Cave, Deborah	0.0	\$74.36	\$0.00	
Fassbender/Senior 1	0.0	\$92.54	\$0.00	
Bohman, David	0.0	\$37.70	\$0.00	
Becker, Keith	7.0	\$35.69	\$249.83	
Comerford, Tom	0.0	\$62.27	\$0.00	
Guth, Roseanne	0.0	\$43.64	\$0.00	
Demers, Gerald	0.0	\$120.14	\$0.00	
Chang/Project 2	16.5	\$63.72	\$1,051.38	
Thomson Todd	0.0	\$44.52	\$0.00	
Robert Golata	0.0	\$41.64	\$0.00	
Preslik/Admin Assist	0.0	\$34.76	\$0.00	
Florence/Admin Assist	0.0	\$43.64	\$0.00	
TOTAL DIRECT LABOR				\$1,493.69
TRAVEL				\$121.04
OTHER DIRECT COSTS				\$441.21
o Repro			\$0.00	
o Communication			\$15.21	
o Outside Reproduction			\$0.00	
o Outside Other			\$0.00	
o Outside Supplies			\$426.00	
o Temporary Labor			\$0.00	
COMPUTER				\$0.00
SUBCONTRACTS				\$0.00
SUBTOTAL				\$2,055.94

# HSI GEOTRANS, INC.- EXPENSE REPORT

Name: KEITH BECKER

Employee Number: 636

Date: 12/21/99

Project Number/Task: F119 102

Business Purpose/Reason for Expenditures: Better Brite Expense

Date	City, State	Air / Rail		Lodging	Per diem / Business meals*				Rental car, limo, etc.	Mileage**	Parking, subway, tolls, taxi	Telephone		Supplies***
		Paid by Employee	Paid by Company		Breakfast	Lunch	Dinner	Incl- dentals				Business, fax	Personal	
12/21/99	De Pere, WI				7.24	7	18	2		86.80				
Totals:			XXXXXX		7.24	7	18	2		86.80				
		43-01		43-02	43-03				43-04					

Please attach original receipts for all expenses submitted.

Please provide detail for items marked with \*\*s.

Total: \$ 121.04

Less Advance: \$ 0

Total to be Reimbursed: \$ 121.04

** Mileage				
From	To	# of Miles	Rate	Total \$
OFFICE	Site	140	0.310	43.40
Site	Office	140	0.310	43.40
			0.310	
			0.310	

*** Description of Supplies and/or Other Travel Expense		
Date	Items	Amount

* Business Meals			
Date	Name of Person and Co.	Nature & Purpose of Meal	Amount
12/21/99	Judy Fasskender Applied Environmental	Inspection meeting	7.24

Vendor Code

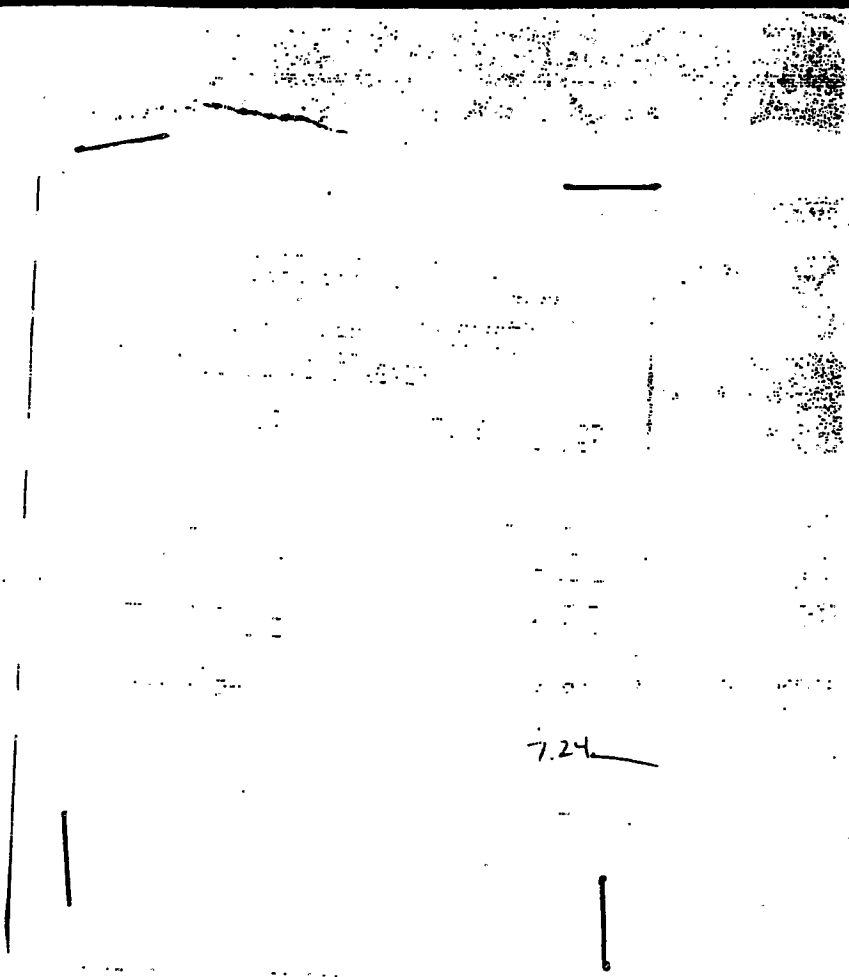
Voucher #

Date Entered

43415

Employee Signature: Keith Becker

Supervisor Approval: R-Snel



FEDERAL EXPRESS  
POWERSHIP RECEIPT

SENDER:

Mark A. Anthony  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100  
Brankfield  
WI 53045

Brankfield

WI 53045

RECIPIENT:

Ray Krueger  
Michael, Robert A. Friedrich  
James W. Wiersma, Aupm  
Milwaukee

Brankfield

WI 53045

FEDERAL EXPRESS  
POWERSHIP RECEIPT

Ray Krueger  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100  
Brankfield  
WI 53045

Brankfield  
WI 53045

FEDERAL EXPRESS  
POWERSHIP RECEIPT

SENDER:

Mark A. Anthony  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100  
Brankfield  
WI 53045

Brankfield  
WI 53045

RECIPIENT:

Bob Endres  
RMT, Inc.  
744 Heartland Trail  
Madison  
WI 53717

Madison  
WI 53717

TRACKING #: 268 2940 522  
DATE: 11/30/99

SERVICE: STANDARD BOX  
PAYMENT: RTII SENDER  
WEIGHT: 2 LBS

CHARGE: \$ 5.66  
VAL IIF DECIAREN: \$ 50.00  
REFERENCE: F119-102

\*\*\*\*\*  
FEDERAL EXPRESS POWERSHIP RECEIPT  
PAYMENT DUE IN 15 DAYS

INVOICE 978755443 DATE 11/30/1999  
ACCOUNT 119A04004

SENDER:

ANGELA PRESSIK  
HST GenTrans, Inc.  
175 N. Corporate Drive, Suite 100  
Brankfield WI 53045

METERED PACKAGES	3
INVOICED PACKAGES	3
PACKAGE CHARGES	30.96
DISCOUNTS RECEIVED	0.00
SPECIAL FEES	0.00
DEC. VAL. CHARGE	0.00
FUEL CHARGE	0.00
NET CHARGE =====>	30.96

MATI PAYMENT TO:  
Federal Express Corporation  
P.O. Box 1140  
Memphis, TN 38101-1140

RTIIING QUESTIONS? 800-622-1147  
7 AM-6 PM (CST)

Return Above Portion With Payment

CONFERENCE: APC3675  
 HOST NAME: PAULA CHANG  
 HOST NUMBER: 414-792-1282

RESERVED MINUTES: 60  
 RESERVED CONNECTIONS: 3 DIAL-OUT

1. PAULA CHANG	414-792-1282	OPER DO	10/14/1999	08:59am	2	1.20
2. KEITH BECKER	920-983-1726	OPER DO	10/14/1999	08:59am	2	1.20
3. SETUP CHARGE						8.00
SUBTOTAL						10.40
DISCOUNT						1.52CR
UNIVERSAL CONNECTIVITY CHARGE						0.59
TAXES						0.08

F119-101

TOTAL FOR CONFERENCE ID: APC3675

4 \$9.55

# TeleConference Services



Page 2 of 9

ACCOUNT ID: 00104876-00001  
 BILL DATE: NOV 01 1999  
 PAYMENT DUE DATE: PAYABLE UPON RECEIPT  
 CUSTOMER: ATTN: ACCOUNTS PAYABLE  
 HSI GEOTRANS

BILLING INQUIRIES: (800) 722-3481  
 (412) 804-5264  
 FOR OTHER QUESTIONS: Please contact  
 your AT&T sales  
 representative.

## BALANCE BROUGHT FORWARD:

PRIOR BALANCE 4,275.96  
 PAYMENTS 623.34CR

BALANCE FORWARD **\$3,652.62**

## NEW CHARGES:

CONFERENCE CHARGES 536.60  
 OTHER CHARGES & CREDITS 35.41  
 TAXES 14.11  
 SURCHARGES 0.66

TOTAL NEW CHARGES **\$586.78**

NEW BALANCE **\$4,239.40**

THANK YOU FOR USING AT&T TELECONFERENCE SERVICES!

*ATTTEL*

TO ENSURE PROPER CREDIT, PLEASE DETACH AND RETURN WITH REMITTANCE  
 (PLEASE WRITE YOUR ACCOUNT ID NUMBER ON YOUR CHECK)

# AT&T TeleConference Services



Account Id: 00104876-00001  
 Invoice Date: NOV 01 1999

AMOUNT DUE: **\$4,239.40**

MAKE CHECKS PAYABLE TO:  
 AT&T TeleConference Services  
 Dept. 0830  
 P.O. Box 55000  
 Detroit, MI 48255-0830

ATTN: ACCOUNTS PAYABLE  
 HSI GEOTRANS  
 46050 MANEKIN PLAZA  
 SUITE 100  
 STERLING VA 20166

0000010487600001110119990004239400

PHONE NUMBER  
847-549-7600  
FAX #  
847-247-2929



FoodTech  
SOURCE

FEDERAL I.D. #36-2360953  
TERMS: NET 30 DAYS

Corporate Office: 625 E. Bunker Ct.  
Vernon Hills, IL 60061

Bill To: 054518-01

Remit To: Dept. 77-6391  
Chicago, IL 60678-6391

Ship To:

128080-01

12/10/1999 99 3906114

Your Order Number <b>F119</b>		Reference # <b>3116312-00</b>	
Shipped Via <b>UPS GROUND</b>		Ship Date <b>12/10/1999</b>	
Cartons <b>1</b>	Weight <b>4</b>	F.O.B. <b>02</b>	

HSI GEOTRANS  
PAULA CHANG  
SUITE 100  
175 NORTH CORPORATE DRIVE  
BROOKFIELD WI 53045

DE PERE WASTEWATER TREATMENT PLANT  
BOB KENNEDY  
315 LEONARD STREET  
DE PERE WI 54115

LINE	QUANTITY ORDERED	UNIT SIZE	CATALOG NO.	DESCRIPTION	SHIPPED	BACK ORDER	UNIT PRICE	TOTAL
01	1	EA	P -05993-81	ELECTRODE, PH, SUBMERSIBLE W/ATC	1		129.000	129.00
02	1	EA	P -05994-80	CABLE, EXTENSION, 10FT	1		43.000	43.00
03	1	EA	P -05656-00	CONTROLLER, PH/ORP 115/230V	1		249.000	249.00
SUB-TOTAL ---->								421.00
TAX AMOUNT ---->								
TRANSPORTATION AMOUNT ---->								5.00
PLEASE PAY THIS TOTAL AMOUNT ---->								426.00
THANKS FOR THE ORDER								
PROJ. NO. / ACCOUNT NO. AMOUNT								
F119 - 102 - 48-04 426.00								
PCC 12/17/99								

PLEASE TEAR HERE

REMIT Cole-Parmer Instrument Company  
TO: Dept. 77-6391 Chicago, IL 60678-6391

Your Order Number <b>F119</b>	Reference No. <b>3116312-00</b>	Invoice No. <b>3906114</b>	AMOUNT DUE <b>426.00</b>
Ship To: <b>DE PERE WASTEWATER TREATMENT PLANT</b>	Ship To #: <b>128080-01</b>	Invoice Date <b>12/10/1999</b>	

PLEASE RETURN THIS STUB WITH YOUR PAYMENT TO ENSURE PROPER APPLICATION TO YOUR ACCOUNT - PLEASE DO NOT STAPLE

Acceptance of your order is expressly made conditional on your assent to Cole-Parmer's conditions of sale as stated on the reverse side, and Cole-Parmer agrees to furnish the material described in your order only upon these conditions.



## Task Detail in Support of Invoice

JANUARY,2, 2000

### TASK 103.

#### REPORTING AND DOCUMENTING MANAGEMENT

DIRECT LABOR	HOURS	RATE	COST	CURRENT
Morgan/Senior 2	0.0	\$101.12	\$0.00	
Fassbender/Senior 1	0.0	\$92.54	\$0.00	
Chang/Project 2	2.0	\$63.72	\$127.44	
Thomson Todd	0.0	\$44.52	\$0.00	
Becker, Keith	16.5	\$35.69	\$588.89	
Robert Golata	25.5	\$41.64	\$1,061.82	
Preslik/Admin Assist	6.5	\$34.76	\$225.94	
Guth, Roseanne	14.0	\$43.64	\$610.96	
Florence/Admin Assist	0.0	\$43.64	\$0.00	
<hr/>				
TOTAL DIRECT LABOR				\$2,615.05
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$0.00
o Repro			\$0.00	
o Communication			\$0.00	
o Outside Reproduction			\$0.00	
o Outside Other			\$0.00	
o Outside Supplies			\$0.00	
o Temporary Labor			\$0.00	
COMPUTER				\$0.00
SUBCONTRACTS				<hr/> \$3,020.05
SUBTOTAL				<hr/> \$5,635.10

REPORT DATE: 01/03/00 08:58

HSI GEOTRANS

PAGE 0031

PERIOD ENDING: 01/02/00

JOB STATUS REPORT

PROJECT MGR: PAULA CHANG

CLIENT: WI DEPT OF NTL RESOURCES

CURRENT PERIOD ODC DETAIL REPORT

DIVISION #: 53

PRIME CONTRACT ID: AGREE 7/29/99

WITH TRANSACTION CODE BREAKDOWNS

CONTRACT VALUE: 15,564.00

CONTRACT NUMBER: F119-103

AS OF 01/02/00

JOB TYPE: T&M

CONTRACT NAME: REPORTING & DOC MGMNT

RATE TYPE: N/A

PERIOD OF PERFORMANCE: 08/01/99 TO 08/31/00

STATUS: ACTIVE

ODC	DESCRIPTION	PD	SOURCE	VOUCHER NUMBER	VENDOR NAME	P.O. NUMBER	TRANSACTION DESCRIPTION	AMOUNT
-----	-------------	----	--------	-------------------	-------------	----------------	----------------------------	--------

45 CONTRACTED SERVICES

01 SUBCONTRACTOR

03	AP-005	043159	APPLIED ENVIRONMENTAL SOL	SUBCONTRACTOR	888.25
03	AP-009	043529	APPLIED ENVIRONMENTAL SOL	SUBCONTRACTOR	2,131.80

TRANS CODE TOTAL 3,020.05

CURRENT PERIOD BALANCE 3,020.05

888.25+  
2,131.80+  
3,020.05\*+

0.\*

## Task Detail in Support of Invoice

JANUARY 2, 2000

TASK 104

PROJECT MANAGEMENT

DIRECT LABOR	HOURS	RATE	COST	CURRENT
Morgan/Senior 2	0.0	\$101.12	\$0.00	
Fassbender/Senior 1	0.0	\$92.54	\$0.00	
Chang/Project 2	0.0	\$63.72	\$0.00	
Thomson Todd	0.0	\$44.52	\$0.00	
Robert Golata	0.0	\$41.64	\$0.00	
Preslik/Admin Assist	0.0	\$34.76	\$0.00	
Florence/Admin Assist	0.0	\$43.64	\$0.00	
<hr/>				
TOTAL DIRECT LABOR				\$0.00
TRAVEL				\$0.00
OTHER DIRECT COSTS				\$31.00
o Repro			\$0.00	
o Communication			\$0.00	
o Outside Reproduction			\$0.00	
o Outside Other			\$31.00	
o Outside Supplies			\$0.00	
o Temporary Labor			\$0.00	
COMPUTER				\$0.00
SUBCONTRACTS				<hr/> \$2,753.58
SUBTOTAL				\$2,784.58

CLIENT: WI DEPT OF NTL RESOURCES

PRIME CONTRACT ID: AGREE 7/29/99

CONTRACT NUMBER: F119-104

CONTRACT NAME: PROJECT MANAGEMENT

PERIOD OF PERFORMANCE: 08/01/99 TO 08/31/00

JOB STATUS REPORT

CURRENT PERIOD ODC DETAIL REPORT

WITH TRANSACTION CODE BREAKDOWNS

AS OF 01/02/00

PROJECT MGR: PAULA CHANG

DIVISION #: 53

CONTRACT VALUE: 20,407.00

JOB TYPE: T&M

RATE TYPE: N/A

STATUS: ACTIVE

		VOUCHER		P.O.	TRANSACTION	
ODC	DESCRIPTION	PD	SOURCE	NUMBER	VENDOR NAME	NUMBER
						DESCRIPTION
						AMOUNT

45 CONTRACTED SERVICES

01 SUBCONTRACTOR						
03	AP-005	043159	APPLIED ENVIRONMENTAL SOL	SUBCONTRACTOR	1,776.50	
03	AP-009	043529	APPLIED ENVIRONMENTAL SOL	SUBCONTRACTOR	977.08	
					-----	
TRANS CODE TOTAL					2,753.58	
					=====	
CURRENT PERIOD BALANCE					2,753.58	

49 OUTSIDE OTHER

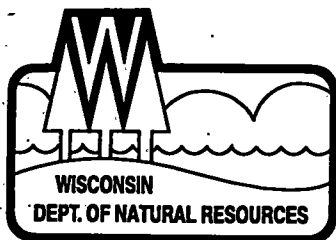
01 OTHER					
03	AP-009	043529	APPLIED ENVIRONMENTAL SOL	OTHER	31.00
				-----	
				TRANS CODE TOTAL	31.00
				=====	
				CURRENT PERIOD BALANCE	31.00

1,776.50+  
977.08+  
2,753.58\*

0.\*

31.00+  
31.00\*

0.\*



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor  
George E. Meyer, Secretary  
Ronald W. Kazmierczak, Regional Director

Oshkosh Service Center  
625 E. County Rd. Y, Suite 700  
Oshkosh, Wisconsin 54901  
TELEPHONE 920-424-3050  
FAX 920-424-4404

January 11, 2000

Mr. Roy Simonson  
City of De Pere  
925 South Sixth Street  
De Pere, WI 54115-1199

**SUBJECT:** Local Government Unit Exemption Information

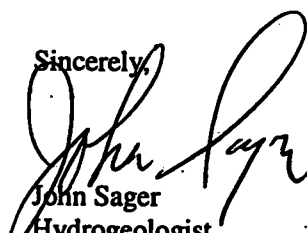
Dear Mr. Simonson:

Enclosed is some information on the local government unit (LGU) exemption provisions in the Wisconsin Statutes. I have also included some information from an EPA guidance document on managing superfund liability risks.

As we discussed, the City of De Pere would be exempt from certain provisions of the remedial action statute if they acquire the Chrome Shop property. However, the City would not be exempt from third party lawsuits while the City owned the property.

I look forward to working with you to redevelop the Chrome Shop property. Please contact me at (920)424-3839 if you have any questions, need more information, or would like to arrange a meeting to discuss the future of the Chrome Shop site.

Sincerely,

  
John Sager  
Hydrogeologist  
Remediation and Redevelopment Program

Enc





*Integrated  
Environmental  
Solutions*

744 Heartland Trail 53717-1934  
P.O. Box 8923 53708-8923  
Madison, WI  
Telephone: 608-831-4444  
Fax: 608-831-3334

January 5, 2000

Mr. George Meyer  
Secretary  
Wisconsin Department of Natural Resources  
PO Box 7921  
Madison, Wisconsin 53707

Subject: Better Brite Remedial Action  
RMT Project # 5317.01

Dear Mr. Meyer:

This letter is to recognize your staff for the success of the Better Brite Remedial Action project in De Pere. RMT bid on and was awarded this project at a price considerably lower than the other bidders. With the cooperative, win-win attitude of the parties involved, RMT was able to complete the Better Brite project with no accidents, on time, and on budget. Completion of the project eliminated a significant groundwater and surface water threat in a residential neighborhood.

Numerous people contributed to the success of this project. They include John Sager and Dave Behn from the WDNR, Judy Fassbender and her staff at HSI Geotrans, and Jerry Raeder and his staff at Superior Special Services.

The Better Brite project is an example of the excellent working relationship between RMT and the Wisconsin Department of Natural Resources (WDNR), and an excellent example of the overall project success that can be achieved when all parties on a project commit to cooperation.

Please extend our thanks to your people for their partnership and efforts to make Better Brite a successful project.

Sincerely,

RMT, Inc.

Stephen D. Johannsen  
President

cc: John Sager - WDNR Oshkosh  
Dave Behn - WDNR Madison  
Judy Fassbender - HSI Geotrans  
Jerry Raeder - Superior Special Services  
Mick Warner - RMT

**Sager, John E**

---

**From:** Mould.Kevin@epamail.epa.gov[SMTP:Mould.Kevin@epamail.epa.gov]  
**Sent:** Tuesday, January 04, 2000 4:35 PM  
**To:** PETERSON.JON@EPAMAIL.EPA.GOV  
**Subject:** Better Brite

**Comments on Better Brite PCOR:**

In the CERCLIS database, this site shows two RODS (OU1 on 9/24/96, and OU2 on 6/28/91). The PCOR only discusses the OU1 ROD. It should include a discussion of the components of the earlier ROD and the construction activities.

What are the cleanup goals (or containment goal) for the groundwater? How long do we expect to pump/treat and monitor the groundwater at the two sites?

Are there institutional controls restricting site use or groundwater use?

?Activities and Schedule for Site Completion? needs to include the dates of milestones to get to site deletion: such as Final RA report, approval of O&M plan, FCOR, achievement of cleanup goals, deletion date. And who (EPA, state or prp) is responsible for each milestone.

The 5 year review should be scheduled for 5 years after the beginning of on-site remedial work. If the earlier ROD included remedial construction, then the first 5 year review is probably already overdue.