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Michael Schmoller
Wisconsin Department of Natural Resources
South Central Region
3911 Fish Hatchery Road
Fitchburg, WI 53711

Subject:
Interior Manufacturing Modifications, Madison-Kipp Corporation, 201 Waubesa Street, Madison, Wisconsin. Facility ID No. 113125320, BRRTS No. 02-13-001569

Dear Mr. Schmoller:

On January 9, 2014, representatives of Madison-Kipp met with you regarding the interior manufacturing modifications required for installation of machines within the facility located at 201 Waubesa Street in Madison, Wisconsin. As part of the modifications, there is an area of concrete that will be removed and replaced, and limited soil removal that will be completed. This letter documents the initial sampling activities and the discussion on January 9 regarding sampling and material handling of the soil and concrete.

Three in-place concrete samples (Area 1, 2, 3) were collected by Madison-Kipp on December 18, 2013 and submitted to Test America for Protocol B analysis to characterize the materials for disposal. Based on these results, polychlorinated biphenyls (PCBs) from sample Area 2 (560 milligram per kilograms (mg/kg)) exceeded the Toxic Substance Control Act (TSCA) disposal limit of 50 mg/kg. These results are summarized in Table 1.

Following receipt of the analytical results, Madison-Kipp requested an on-Site meeting with you for January 9, 2014, to discuss sampling and material handling of the soil and concrete that was to be removed. During the meeting it was agreed to that Madison-Kipp would collect additional samples of the concrete and soil for profiling the materials for appropriate disposal.

Seven concrete samples (Area 4 through 10) and three soil samples (Pad 1, 2, and 3 Soil) were collected on January 15-16, 2014. The approximate locations of the samples are presented on the attached figure. Based on the results from the samples collected on December 18, 2013, the concrete samples were submitted to Test America for analysis of PCBs using United States Environmental Protection Agency (U.S. EPA) SW-846 Method 8082. Two of the soil samples were submitted for analysis of PCBs using U.S. EPA SW-846 Method 8082 and the third sample was submitted for Protocol B analysis.

The analytical results of the supplemental sampling indicated that concentrations of PCBs were not detected above the TSCA disposal limit in six of the seven concrete samples and the three soil samples. Concentrations of PCBs were detected at 480 mg/kg in sample

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Area 5. The PCB results are summarized in Table 1. Copies of the laboratory reports are attached for reference.

Based on the results, the concrete surrounding samples Area 2 and Area 5 will be profiled and disposed of by The Environmental Quality Company as TSCA-regulated hazardous waste as shown on the attached figure. The remaining concrete and soil will be profiled with Advanced Disposal for non-hazardous disposal.

Should manufacturing modifications be required within the Madison-Kipp building in the future, similar methods will be used for appropriate characterization and disposal of materials. Documentation will be provided to the WDNR.

We trust that this information meets your needs. Should you require additional information, please contact one of the undersigned.

Madison Kipp Corporation

Mark Meunier
Vice President of Human Resources

Copies:
David Crass - Michael, Best, & Frederic LLP
Jennine Trask – ARCADIS US-Inc.
Ken Zolnierczyk – US EPA

Attachments:
Table 1
Figure
Laboratory reports

Table 1. Summary of Concrete and Soil Analytical Results, Building Interior Modifications, Madison-Kipp Corporation, Madison, Wisconsin.

Well/Boring Sample Date	Industrial Direct Contact RCL	TSCA Disposal Limit	Area 1 12/18/2013	Area 2 12/18/2013	Area 3 12/18/2013	Area 4 1/15/2014	Area 5 1/15/2014	Area 6 1/15/2014	Area 7 1/15/2014
PCBs									
Aroclor-1242	0.744	NE	<0.0054	560	3.9	0.31	480	6.2	2.7
Aroclor-1248	0.744	NE	0.31	<13	<0.13	<0.0066	<13	<0.13	<0.13
Aroclor-1254	0.744	NE	<0.0036	<7.2	1.7	<0.0036	<7.2	1.4	0.8
Aroclor-1260	0.744	NE	<0.0081	<16	<0.16	<0.0082	<16	<0.16	<0.17
Total Detected PCBs	NE	50	0.31	560	5.6	0.31	480	7.6	3.5

Only detected constituents are noted. Constituent concentrations are reported as milligrams per kilogram (mg/kg).

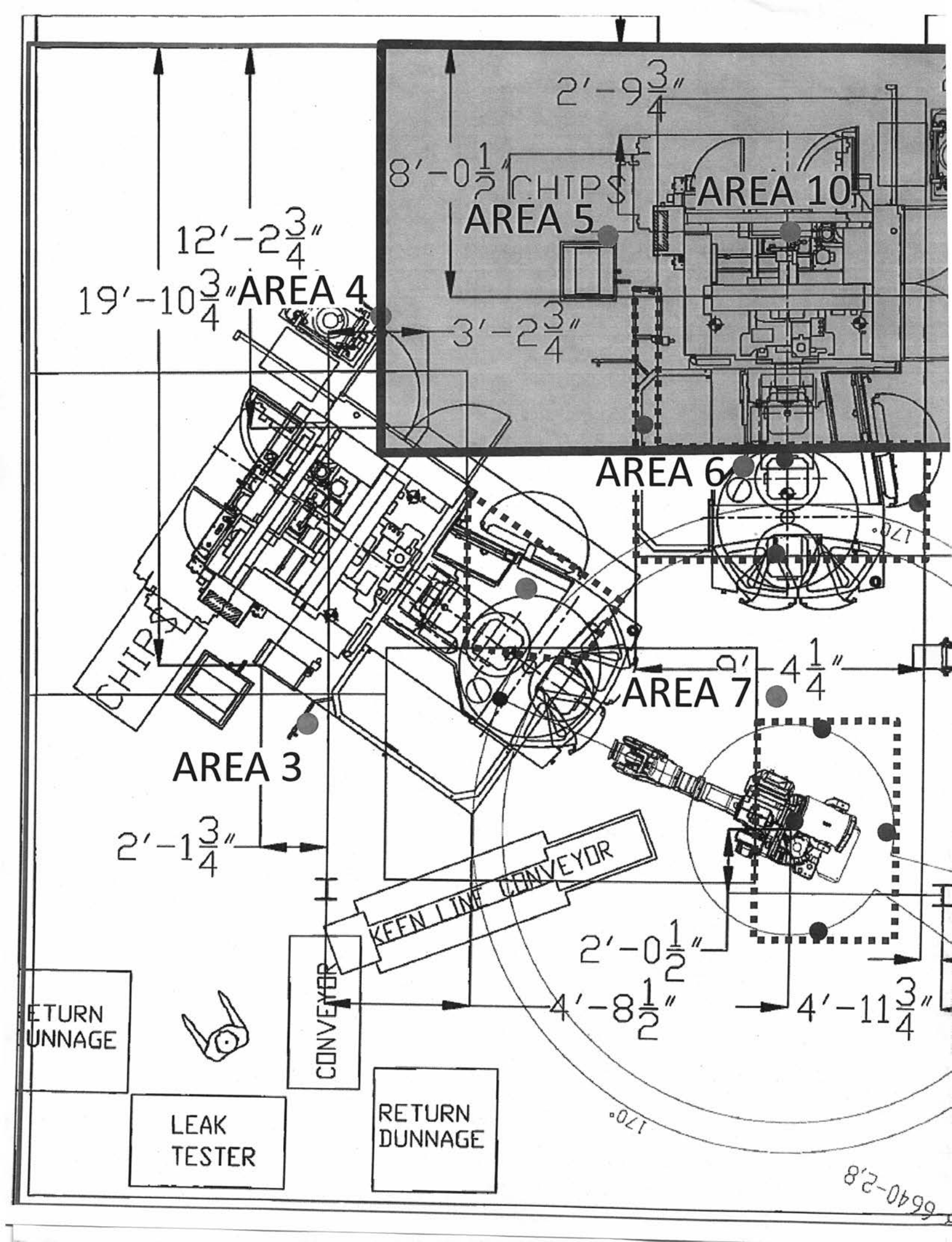
100	Exceeds the WDNR's industrial direct contact residual contaminant level.
100	Exceeds the Toxic Substances Control Act disposal limit.
<	Constituent not detected above noted laboratory detection limit.
EPA	United States Environmental Protection Agency
NE	Criteria not established.
ND	Total PCBs less than the laboratory detection limit.
PCBs	Polychlorinated biphenyls.
RCL	Residual contaminant level.
TSCA	Toxic Substance Control Act.

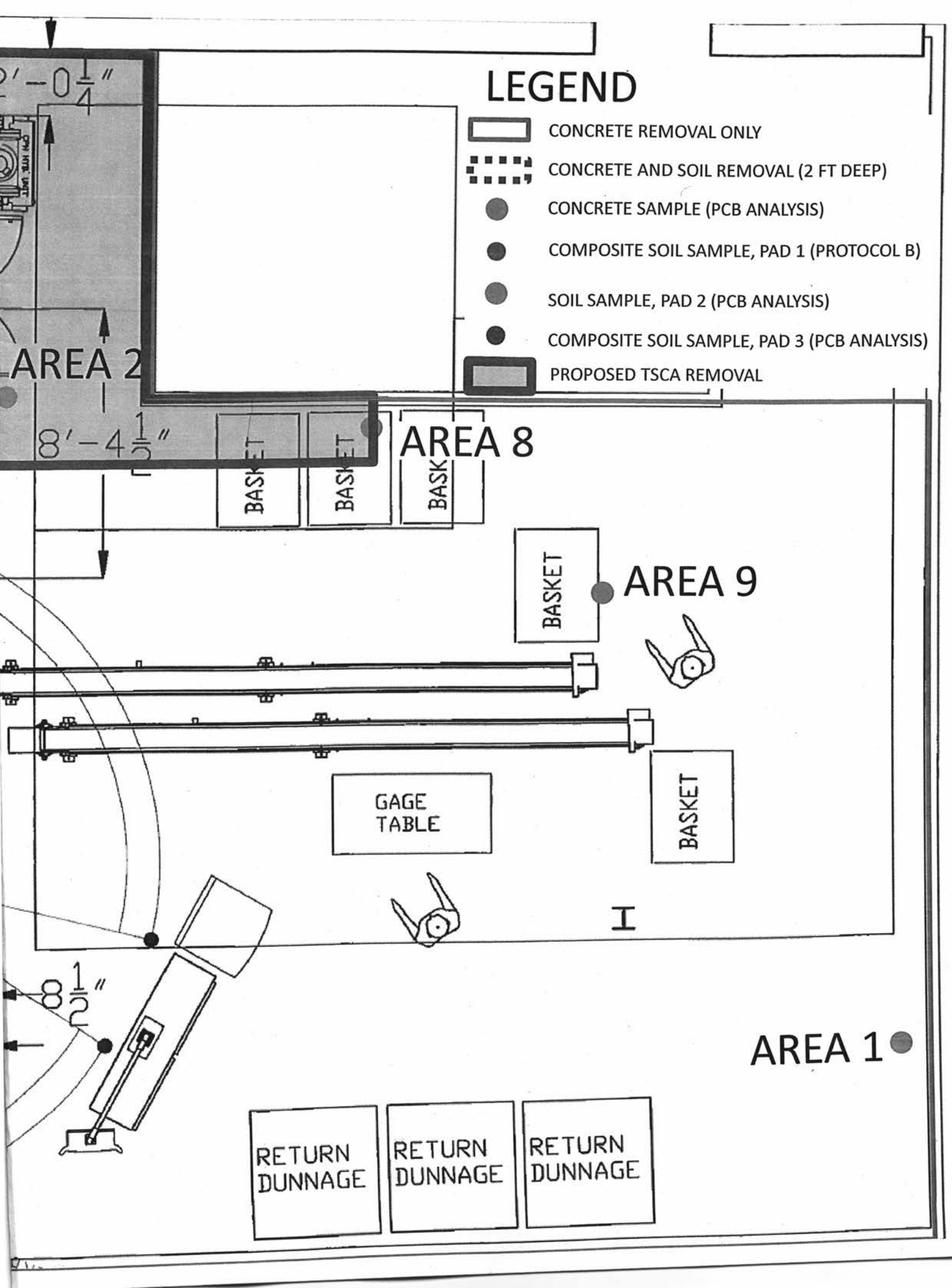
Table 1. Summary of Concrete and Soil Analytical Results, Building Interior Modifications, Madison-Kipp Corporation, Madison, Wisconsin.

Well/Boring Sample Date	Area 8 1/15/2014	Area 9 1/15/2014	Area 10 1/15/2014	Pad 1 soil 1/15/2014	Pad 2 soil 1/16/2014	Pad 3 soil 1/16/2014
PCBs						
Aroclor-1242	<0.0055	<0.0056	0.11	4.2	0.12	0.23
Aroclor-1248	<0.0067	<0.0067	<0.0067	<0.13	<0.0087	<0.0076
Aroclor-1254	<0.0036	<0.0037	<0.0037	0.55	0.048	0.13
Aroclor-1260	<0.0083	<0.0084	<0.0084	<0.16	<0.011	0.058
Total Detected PCBs	ND	ND	0.11	4.75	0.168	0.418

Only detected constituents are noted. Constituent concentrations are reported as milligrams per kilogram (mg/kg).

100	Exceeds the WDNR's industrial direct contact residual contaminant level.
100	Exceeds the Toxic Substances Control Act disposal limit.
<	Constituent not detected above noted laboratory detection limit.
EPA	United States Environmental Protection Agency
NE	Criteria not established.
ND	Total PCBs less than the laboratory detection limit.
PCBs	Polychlorinated biphenyls.
RCL	Residual contaminant level.
TSCA	Toxic Substance Control Act.


2′-9¾″
8′-0½″
CHIPS
AREA 5
AREA 10
12′-2¾″
19′-10¾″
AREA 4
3′-2¾″
AREA 6
CHIPS
9′-4¼″
AREA 7
AREA 3
2′-1¾″
KEEN LINE CONVEYOR
2′-0½″
4′-8½″
4′-11¾″
CONVEYOR
RETURN DUNNAGE
LEAK TESTER
RETURN DUNNAGE
170°
170°
6640-2.8


LEGEND
CONCRETE REMOVAL ONLY
CONCRETE AND SOIL REMOVAL (2 FT DEEP)
CONCRETE SAMPLE (PCB ANALYSIS)
COMPOSITE SOIL SAMPLE, PAD 1 (PROTOCOL B)
SOIL SAMPLE, PAD 2 (PCB ANALYSIS)
COMPOSITE SOIL SAMPLE, PAD 3 (PCB ANALYSIS)
PROPOSED TSCA REMOVAL
AREA 2
AREA 8
AREA 9
AREA 1
BASKET
BASKET
BASK
BASKET
BASKET
GAGE TABLE
RETURN DUNNAGE
RETURN DUNNAGE
RETURN DUNNAGE
8′-4 1/2″
2′-0 1/4″
8 1/2″