PHASE I ENVIRONMENTAL SITE ASSESSMENT

KRAFT HEINZ FOODS COMPANY
910 MAYER STREET
MADISON, WISCONSIN

Prepared for:
Nijman Franzetti LLP

On Behalf of:
Kraft Heinz Foods Company

Prepared by:
Ramboll Environ US Corporation
Chicago, Illinois

Date
June 2016

Project Number
21-39925A

RAMBOLL ENVIRON

SIGNATURE AND ENVIRONMENTAL PROFESSIONAL STATEMENT

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR part 312.

Andrea Kleinaitis
Senior Associate

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Principal

CONTENTS

FIGURES

APPENDICES

1. SUMMARY OF CONCLUSIONS

Ramboll Environ US Corporation (Ramboll Environ) was retained by Nijman Franzetti LLP on behalf of the Kraft Heinz Foods Company to perform a Phase I Environmental Site Assessment (ESA) of the Kraft Heinz Foods Company (Kraft Heinz or the "Company) site commonly known as 910 Mayer Street in Madison, Wisconsin (herein referred to as the "facility," the "property," or the "site"). Ramboll Environ's assessment was conducted in connection with a potential sale of the site. The objective of the Phase I ESA, which was conducted in conformance with the scope and limitations of ASTM International's *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* E1527-13 (the "ASTM Standard"), was to identify Recognized Environmental Conditions (RECs), as defined in the ASTM Standard (see Section 2.1).

1.1 Site Summary

Kraft Heinz owns and operates a food preparation and packaging facility in Madison, Wisconsin. The approximately 70-acre site is divided into three main parts, herein referred to as the "East Property," the "Central Property," and the "West Property." Kraft Heinz operations are conducted on the approximately 54-acre Central Property, which is improved with several process-related buildings that comprise a total of approximately 567,000 square feet. These structures include a processing plant, a maintenance shop, a power plant, a cooling building, and wastewater treatment/sludge dewatering buildings (the Wastewater Treatment Plant [WWTP]). The approximately 8.86-acre East Property is developed with baseball fields, a concession stand structure, and a lawn maintenance equipment storage structure, with an attached batting cage. The East Property is currently leased by the City of Madison. The approximately 6.55-acre West Property is developed with a commuter parking lot and a Metro Bus Station (this area is leased to the City of Madison) and a gravel-covered storage yard (leased to Decker Supply Co. [Decker], a construction supply company).

As early as 1892, the site was undeveloped and contained marshy areas. Based on the complex history and size of the site, the remaining historical discussion is divided into three sections, one for each part of the site.

Central Property: By 1915, the Central Property was developed with a meat packing company that was purchased by Oscar Mayer in 1919; the processing facility was continually expanded and upgraded through the 2010s. The facility was operated by Oscar Mayer until 1981, at which time Oscar Mayer was purchased by General Foods, which was later acquired by Philip Morris in 1985. In 1989, Phillip Morris merged General Foods with the newly acquired Kraft Foods, Inc. resulting in the companies being renamed Kraft General Foods, Inc. In 1995, the company was renamed Kraft Foods, Inc. (later Kraft Foods Group). In 2015, H.J. Heinz Co. purchased Kraft Foods Group and began operations as Kraft Heinz. The facility currently operates as a meat processing/packaging operation but is expected to be decommissioned.

Features not associated with the processing facility located on the Central Property by the 1930s included dwellings (north-northeast), undeveloped and agricultural land (east-center; identified as a US Government Reservation), and potential coal storage areas (southern portion). By the late 1940s, the northern dwellings were razed and a coal mound was present in this area, as well as a concrete block facility; part of an ice skating rink was present on the northeast corner and a gasoline station was present on the east-central portion. According to city directories, it appears that three gasoline filling/service stations may have been located on the eastern portion of the Central Property between 1958 and 1967. By 1968, the east adjacent Packers Avenue was expanded and reconfigured and

several structures formerly located on the Central Property (including the gasoline station(s) and skating rink) were razed; these areas were paved and used for parking purposes.

East Property: The majority of the East Property was farmed by 1937; however, the northern portion was located within the borders of a former north adjacent landfill/wastewater treatment facility (now partially developed with a shopping center on the eastern portion). By 1955, two dwellings were developed on its southwestern corner. In 1999, the dwellings were razed and this area was improved with baseball fields, concessions and maintenance structures, and a parking lot. It is unknown when Oscar Mayer acquired this portion of the site; however, it is currently leased to the City of Madison and used as a community park.

West Property: By at least 1937, this area was developed with dwellings and coal and fuel facilities, with coal storage areas and multiple fuel oil tanks; a manufacturing structure was added to the coal and fuel facility in 1960 and by the late 1960s, the dwellings were razed. By 1976, a warehouse used to house building materials and later spices and a structure of unknown occupancy were constructed to the south of the coal and fuel / manufacturing facility. The areas of the parcel where fuel oil tanks were located were remediated and used for parking purposes by 1980 (see below). In the early 2000, the Metro Bus Station and commuter parking lot were located on its northeastern area and the northwestern portion was used for storage purposes by an adjacent construction supply company. By 2008, the structures on the southeastern portion of the West Property were razed and these areas were grass covered by 2010. It is unknown when Oscar Mayer originally acquired this portion of the site; however, the northeastern and northwestern portions are currently leased to the City of Madison (Metro bus station and commuter parking lot) and Decker, respectively.

1.2 Recognized Environmental Conditions

Ramboll Environ performed a Phase I ESA of the site commonly identified as 910 Mayer Avenue in Madison, Wisconsin in conformance with the scope and limitations of the ASTM Standard. Any exceptions to, or deletions from, this practice are described in Section 6.2 of this report. This assessment has revealed the following REC in connection with the site:

- **Potential Impacts from the Historical Industrial Operations.** The Central Property portion of the site has been operated as a meat processing and packaging facility since at least 1915. Related operations have historically involved (and currently involve) equipment and machinery which required the use of chemicals, including solvents, petroleum products, acids, and maintenance-related products. Soil and groundwater sampling activities were performed on site between 1986 and 2006 in specific portions of the site and were tailored to address releases from tanks or other spills. The site is not currently the subject of regulatory scrutiny related to contamination matters. Specific operations associated with the historical industrial use of the Central Property include: 1) tank rooms of unknown use identified on historical Sanborn maps; 2) gasoline filling and repair stations in the 1950s and 1960s; 3) past manufacturing of insecticides in the late 1960s; 4) reported historical use of chlorinated solvents on portions of the site that were not sampled as part of the chlorinated volatile organic compound (VOC) Environmental Repair Program (ERP) closure (discussed further below); 5) below-grade/above-grade features of unknown status, including a zinc chloride tank, five gasoline tanks, and a below-ground automobile lift; and 6) former coal storage areas. In addition, the northern portion of the East Property may have been included within the boundaries of a former north adjacent landfill/ wastewater treatment facility; and the West Property was previously used as a former coal and

fuel manufacturing facility, and the northeastern portion where the ASTs were previously located was remediated (as discussed below).

1.3 Controlled RECs

The following Controlled RECs (CRECs), as defined by the ASTM standard, were identified with regulatory closure and do not appear to represent a current environmental concern, assuming the buildings, structures and other institutional controls or engineered barriers remain in place.

- **Chlorinated VOCs in Groundwater.** The Central Property of the site was assigned ERP #02-13-000895 following the discovery of chlorinated compounds in four on-site groundwater wells in 1986. The chlorinated compounds detected in groundwater included trichloroethylene (TCE); cis-1,2-dichloroethylene; vinyl chloride; xylene; ethyl benzene; toluene; methylene chloride; chlorobenzene; and acetone. In 1994, the Wisconsin Department of Natural Resources (WDNR) was notified that the concentrations of chlorinated compounds in the wells were detected above state Preventative Action Levels (PALs). Between July 2001 and April 2005, semi-annual groundwater monitoring was performed at the site. Based on the results of the sampling activities, the WDNR approved final closure of this ERP listing on December 7, 2006, which was listed on their GIS Registry to document residual groundwater impacts on site. A review of the WDNR Geographic Information System (GIS) Registry file for this ERP listing indicates that vinyl chloride impacts above enforcement standards are limited to the area beneath and immediately north of the processing plant. Although residual groundwater contamination may remain, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.
- **Removed Petroleum Underground Storage Tanks (USTs)**. Three USTs, a 10,000-gallon gasoline UST (removed 1986), and 9,500-gallon gasoline and 10,000-gallon diesel fuel USTs (removed 1996), were located outside the maintenance shop's west exterior wall, at the southern portion of the shop. An investigation was conducted to evaluate the extent of potential soil and groundwater impacts associated with releases from the USTs in 1997. As petroleum impacts were discovered, Leaking UST (LUST) #03-13-114831 was assigned to the site. Groundwater monitoring activities continued to be performed in this area until 2005. The WDNR approved final closure on May 25, 2006 and listed this LUST on their GIS Registry to document residual soil and groundwater impacts, including residual soil contamination (gasoline range organics [GROs], diesel range organics [DROs], and benzene, toluene, ethylbenzene, and xylenes [BTEX]) and petroleum-impacted groundwater beneath the maintenance shop and outside the shop, near its west-central portion. The maintenance of an asphalt barrier near the documented residual soil impacts was assigned as part of the LUST closure. Although residual contamination remains on site, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.
- **West Property Aboveground Storage Tanks (ASTs).** On March 19, 2004, KL Engineering identified petroleum impacts in soil during parking lot construction activities on the northeast corner of the West Property and reported a release to the WDNR. Subsequently, a Leaking AST (LAST) incident and ERP #02-13-524010 were assigned to the site. The West Property was formerly operated by a coal and fuel facility and contained twelve 10,000-gallon fuel oil ASTs that were removed between 1975 and 1985; the release was identified in the area of these former ASTs. Initial response activities included excavating 489 tons of petroleum-impacted soils and removing approximately 9,000 gallons of petroleum-impacted groundwater from the excavation. Following additional sampling activities, the WDNR approved final closure of the ERP on February 8, 2006 and listed this ERP on their GIS Registry to document residual soil and groundwater

impacts. Although residual contamination remains on-site, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.

- **2014 UST Closure**. A 12,000-gallon diesel fuel UST was excavated and removed from an area outside the west wall of the maintenance shop in 2015. Water was observed in the excavation; however, no sheens were visible on the water. A total of four confirmatory soil samples were collected from sidewalls of the excavation and analyzed for petroleum VOCs; soil samples were not collected from the base of the excavation, due to the presence of water, or the east sidewall of the excavation, due to the presence of the maintenance shop's foundation. VOC concentrations ranged between <0.025 ppm to 0.041 parts per million (ppm), but all detections were below the Wisconsin Administrative Code (WAC) NR 720 Residual Contaminant Levels (RCLs) Protective of Groundwater Quality values. As the petroleum VOCs concentrations were below reportable levels, Ramboll Environ considers this matter to represent a CREC.

1.4 Significant Data Gaps

Ramboll Environ identified significant data gaps associated with the following finding. These significant data gaps affect Ramboll Environ's ability to assess whether the findings are CRECs or Historical RECs (HRECs):

- **1999 ERP and 1992 LUST Listings.** Ramboll Environ has insufficient information regarding two incidents that have been closed by the WDNR: a 1999 ERP and a 1992 LUST report. The site (Oscar Mayer Lift) was enrolled into the ERP on March 4, 1999 (ERP #02-13-221826); an end date of May 13, 1999 was assigned to its closure. A LUST (#03-13-001744) was reported by Oscar Mayer Foods in November 1992 in association with a release of petroleum and was granted closure in August 1993. Although both incidents are listed as closed, facility personnel had no information pertaining to these listings and no documentation was available online. Information was requested from the WDNR; however, a response has not yet been received. This lack of information represents a significant data gap. Absent further information, Ramboll Environ cannot confirm whether these issues would be classified as CRECs or HRECs.

1.5 Other Findings

Although not considered a REC based on currently available information, Ramboll Environ identified the following other findings. The term "other finding" is not defined by ASTM; rather, Ramboll Environ uses the term to connote areas of contingent risk that are not clearly defined by the ASTM Standard.

- **West Adjacent Property Fuel Oil Release.** In February 1989, Oscar Mayer notified the WDNR of a release of approximately 14,000 gallons of #2 fuel oil from buried underground piping that serviced current (and historical) fuel oil ASTs located on a leased property adjacent to the west of the processing plant. Three monitoring wells were advanced on the site (i.e., Central Property) adjacent to the railroad tracks for the collection of groundwater samples. The results did not identify groundwater contamination in these wells. Although contamination remains on the west adjacent property, closure was granted by the WDNR.
- **Fill Materials.** Before site development in the early 1900s, the site and surrounding areas consisted of marshy areas that were subsequently filled during development. Water well logs for the Central Property that date back to the 1930s documented drift, fill, and muck in site soils. Following adjacent roadway construction activities in the 1960s, the entire East Property appeared graded/disturbed. In addition, a former fly ash disposal area was present on the northeast corner of the Central Property, beneath the current parking lot; dates of use of this disposal area were

not provided. No further information regarding the source(s) of fill used to grade the site was available.

- **Potential Migration of Contamination from Off-site Properties.** The site is located adjacent to and in the presumed downgradient direction from two off-site properties listed on databases indicative of potential soil or groundwater contamination. The former Burke WWTP and former Truax Landfill located adjacent to the north-northeast of the site are listed with an open ERP listing and as a SHWS and a portion of the landfill/wastewater treatment facility may have extended onto the East Property; a portion of the Burke WWTP / Truax Landfill has been redeveloped as a shopping center. The database stated that the presence of chlorinated solvents on the northeastern portion of the Central Property may have been the result of the operation of the landfill. Based on the available information, there is no indication as to whether contamination at these adjacent properties represents a significant contamination risk to the site; however, consistent with ASTM requirements, Ramboll Environ has attempted to undertake a further review of the listings through submission of a FOIA request to the WDNR. At the time of this report, Ramboll Environ was still awaiting a reply and this is, therefore, considered a data gap. Also, one property located potentially upgradient of (but not adjacent to) the site is listed on a database indicative of potential soil and groundwater contamination. Specifically, ShopKo Store No. 034 (approximately 0.7 miles northeast of the site) is listed as a Brownfields. If contamination associated with off-site properties is found to have migrated onto the site, it is expected that any remedial activities would be the responsibility of the entity(ies) named in the listing or other designated responsible party and not Kraft Heinz.

A discussion of *de minimis* conditions identified during this review is presented in Section 6.

2. INTRODUCTION

2.1 Purpose

Ramboll Environ was retained by Nijman Franzetti LLP on behalf of Kraft Heinz to conduct a Phase I ESA of the Kraft Heinz site located in Madison, Wisconsin. Ramboll Environ's assessment was conducted in connection with a potential sale of the site. The purpose of the assessment was to identify RECs, which are defined in the ASTM Standard as:

> "The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions."

2.2 Scope of the Assessment

Ramboll Environ completed the following tasks, consistent with the ASTM Standard, during its Phase I ESA of the site:

- A visit to the site by Andrea Kleinaitis and Natalie Buyarski of Ramboll Environ on May 10, 2016 to observe the exterior and interior features of the site and to identify the uses and conditions specified in the ASTM Standard. In addition, Ramboll Environ observed the adjoining properties from the site or adjacent public thoroughfares. Photographs taken during the site visit are presented in Appendix A.
- An interview during the site visit with the following individuals (year of initial hire at the site indicated in parentheses): Susan Howley, Safety & Environmental Program Manager (2002); Oscar Garcia, Project Engineer (2015); and Nicholas Habeck, Engineering and Maintenance Manager (2008). The aforementioned individuals are referred to herein as "facility personnel". The facility personnel interviewed by Ramboll Environ were identified by the Company as having good knowledge of the uses and physical characteristics of the site.
- A review of information contained in federal and state environmental databases, as obtained from the sources noted below:
  - A radius report prepared by EDR, Inc. (EDR, see Appendix B), which presents the results of searches of federal and state databases for the site, as well as properties near the site. The radius searched for each database, as well as the databases themselves, was selected in accordance with the ASTM Standard.
  - The United States Environmental Protection Agency's (USEPA's) Envirofacts database, which provides site information contained in multiple USEPA regulatory databases.
  - The WDNR Bureau of Remediation and Redevelopment Tracking System (BRRTS), Waste Generation Information, Air Permit Search Tool, and Storage Tank databases.
  - The Wisconsin and Natural History Survey (WGNHS) Water Well Log database.

- A review of standard historical sources (included as Appendix C) and local agency inquiries, as defined in the ASTM Standard. The following resources were reviewed:
  - Readily available historical sources, including (where available) historical topographic maps and aerial photographs, city directories, and Sanborn maps, to develop a history of the previous uses of the site and surrounding area.
  - Historical and site-specific information obtained from the following local agencies: Madison and Dane County Assessor's Office (Assessor's Office).
  - An information request to the Madison and Dane County Environmental Health Department, and the Madison Building and Fire Departments. A response had not been received at the time this report was completed.
  - Ramboll Environ reviewed information available online with WDNR for information related to the site and for an adjoining property that are listed databases noted in Section 8.2.1 of the ASTM Standard. Documentation available for the site included several GIS Registry Packets, which are discussed further throughout the report. Ramboll Environ also submitted a FOIA request to the WDNR for listings that did not have GIS Registry Packets; as of the date of this report, a response has not been received from the WDNR.
- A review of physical setting sources, as defined in the ASTM Standard, including:
  - The current United States Geological Survey (USGS) 7.5-minute topographic map that shows the area on which the site is located.
  - Geologic, hydrogeologic, or hydrologic sources as provided in the EDR radius report, in water well logs, in the WDNR GIS Registry Packets, and in the previous environmental reports for the site, as listed below.
- A review of documents provided to Ramboll Environ by facility personnel, including environmental permits, correspondence with regulatory agencies, facility-prepared plans and procedures, and chemical use information. In addition, Ramboll Environ was provided with the following previous environmental assessment reports:
  - *Phase I Hydrogeologic Investigation Report for Oscar Mayer Foods Corporation in Madison, Wisconsin*, prepared by Conestoga-Rovers & Associates (CRA), dated July 1994 (the "1994 Hydrogeologic report");
  - *Site Investigation Report and Remedial Action Plan for the Oscar Mayer UST Site at 910 Mayer Avenue in Madison, WI*, prepared by BT^2, Inc. (BT^2), dated January 1998 (the "1998 SIR/RAP report"; and
  - *Closure Request for the Oscar Mayer Foods Facility at 910 Mayer Avenue in Madison, WI*, prepared by BT^2, dated December 1999 (the "1999 Closure Request");
  - *Closure Request for the Oscar Mayer Foods Petroleum UST Site at 910 Mayer Avenue in Madison, Wisconsin*, prepared by BT^2, dated September 2005 (the "2005 Closure Request);
  - *Final Closure Request for the Oscar Mayer Foods Madison Metro North Transfer Point (Kraft Roth Property) at 1201 Huxley Street in Madison, Wisconsin,* prepared by BT^2, dated January 2006 (the "2006 Final Closure Request);*Closure Request for the Oscar Mayer Foods Groundwater Project at 910 Mayer Avenue in Madison, Wisconsin,* prepared by BT^2, dated July 2006 (the "2006 Groundwater Closure Request);

- *Closure Request for the Oscar Mayer Foods Hartmeyer AST Area at 2007 Roth Street in Madison, Wisconsin,* prepared by BT^2, dated October 2006 (the "2006 Hartmeyer AST Closure Request);
- *Final Case Closure Documentation for the Oscar Mayer Foods Hartmeyer AST Area at 2007 Roth Street in Madison, Wisconsin,* prepared by BT^2, dated July 2006 (the "2006 Final Closure Request); and
- *UST Site Assessment of Kraft Foods of Madison, 910 Mayer Avenue, in Madison, WI*, prepared by General Engineering Company (GEC), dated January 2015 (the "2015 UST Closure report").

This assessment was conducted in accordance with the methodology specified in ASTM Standard E1527-13, as agreed upon by Ramboll Environ and The Kraft Heinz Company in May 2016.

2.3 Reliance and General Limitations

This report has been prepared for the exclusive use of Kraft Heinz and may not be relied upon by any other person or entity without Ramboll Environ's written permission. If requested, Ramboll Environ can provide third parties with permission to rely on this report, in writing and pursuant to agreed upon terms and conditions.

Under the ASTM Standard, this report is considered current only for a period of 180 days from the date of the site inspection. The conclusions presented in this report represent Ramboll Environ's best professional judgment based upon the information available and conditions existing as of the date of this report. In performing its assignment, Ramboll Environ must rely upon publicly available information, information provided by the client, and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll Environ was accurate and complete. This review is not intended as legal advice, nor is it an exhaustive review of site conditions or facility compliance. Ramboll Environ makes no representations or warranties, expressed or implied, about the conditions of the site.

Ramboll Environ's scope of work for this assignment did not include collecting samples of any environmental media. As such, this review cannot rule out the existence of latent conditions including contamination not identified and defined by the data and information available for Ramboll Environ's review; however, this report is intended, consistent with normal standards of practice and care, to assist the client in identifying the risks of such latent conditions.

Other issues considered outside the scope of the ASTM Standard and this review include asbestos-containing materials, regulatory compliance review, radon, lead-based paint, lead in drinking water, wetlands, polychlorinated biphenyls (PCBs) in building materials, cultural and historic resources, ecological resources, endangered species, and high voltage power lines.

3. SITE DESCRIPTION

3.1 Site Setting

Kraft Heinz owns and operates a food preparation and packaging facility commonly identified as 910 Mayer Street in Madison, Dane County, Wisconsin (the "site," the "property," or the "facility"). Additional addresses for the site are identified as 1126 and 1201 Huxley Street, 2150 Commercial Avenue, 1910 Roth Street, and 1010 North Street. The approximately 70-acre site is located 75 miles west of Milwaukee, Wisconsin (Figure 1) and is divided into three main parts, herein referred to as the "East Property," the "Central Property," and the "West Property" (Figure 2).

Central Property: This portion of the site is divided into two parcels identified as 910 Mayer Street and 2150 Commercial Avenue. According to the Assessor's Office, the Parcel Index Numbers (PINs) for the Central Property are 251/0810-313-0101-3 and 251/0810-313-0108-9, respectively. The Central Property is approximately 54 acres in size and is developed with five main structures, including the following:

- Processing Plant: The processing plant is approximately 455,000 square feet. The partial eight-story building houses production, storage, and office operations.
- Maintenance Shop: The maintenance shop is approximately 60,000 square feet and is located southeast of the processing plant. The one-story shop houses storage and repair operations.
- Power Plant: The power plant is approximately 30,000 square feet and is located southwest of the processing plant. The three-story building houses power production (boilers), storage, and repair operations.
- Cooling Building: The cooling building is approximately 13,000 square feet and is located south of the processing plant, directly east of the power plant. The one-story building houses ammonia tanks and relay supply equipment.
- Wastewater Treatment Building/Sludge Dewatering Building (the WWTP): These buildings are located on the south-central portion of the Central Property and encompass approximately 7,000 and 2,200 square feet, respectively. The one-story buildings house wastewater processing and dewatering operations.

Other smaller structures on the Central Property include a well house (northwest corner), a guard shack (east-central portion), an employee entrance building with associated overhead tunnel (west-central portion), a pump house (southwestern portion), an evaporation building (west of the power plant), and a trash compactor building (south of the WWTP). In addition, a water tank and cooling towers are present west of the power plant and a chimney is present to its east, and process ASTs and associated equipment sheds are present on the exterior north-central portion of the processing plant.

Access roads are surfaced with asphalt and lead to asphalt-paved parking areas present in the northeastern and eastern portions of the parcel and asphalt-paved semi-truck parking and storage areas in the northwestern and southern portions of the parcel, which are connected by an asphalt-paved roadway located west of the processing plant. An out-of-use rail spur extends north across the central portion of the Central Property. Isolated areas of the Central Property, including the southern, northern, and western borders, the areas east of the processing and power plants, and the areas east and west of the maintenance shop, are landscaped with grass and other vegetation.

East Property: This portion of the site is identified as 1010 North Street. According to the Assessor's Office, the PIN for the East Property is 251/0810-314-0121-09. The East Property is approximately 8.86 acres and is developed with two approximately 1,100-square foot buildings. One building appears to be a concession stand and is located on the center of the parcel and the other building appears to be used as a lawn maintenance equipment storage structure, with an attached batting cage, and is located on the southwest corner of this parcel. No access was provided to the interior of these structures, which are currently leased by the City of Madison. Access roads are surfaced with asphalt and lead to asphalt-paved parking areas present on the eastern portion of the East Property and at the southwest corner.

West Property: This portion of the site is divided into three parcels identified as 1201 Huxley Street, 1910 Roth Street, and 1126 Huxley Street. According to the Assessor's Office, the PINs for the West Property are 251/0810-313-0403-3, 251/0810-313-0404-1, and 251/0810-313-0084-1, respectively. The West Property is approximately 6.55 acres and is developed with a commuter parking lot and a Metro Bus Station with canopies (leased to the City of Madison), and a gravel-covered storage yard (leased to Decker, a construction supply company). No access was provided to the interior of the Decker gravel-covered storage yard. Access roads are surfaced with asphalt and lead to an asphalt-paved parking area present on the northeastern portion of the parcel (commuter parking area/bus stop) and a gravel-covered area on the northwestern portion (Decker yard). The remainder of the West Property is covered in grass.

Table 1 provides an overview of physical setting and utility information for the site.

Table 1: Physical Setting and Utility Information

Conditions	Source	Description
Topography		
Elevation (above mean sea level)	USGS topographic map (Madison, WI); Google Earth	Ranges from approximately 849 feet near the eastern end of the site to 858 feet near the southwest portion of the site.
Topographic Gradient	USGS topographic map; visual observations	Relatively flat on site. Regional topography slopes gently downward to the west-southwest toward Lake Mendota, which is located approximately 0.6 miles west of the site.
Hydrology		
Surface Water Runoff	Visual observations	Percolates into the ground surface at unpaved areas or enters catch basins that discharge to the municipal storm sewer system.
Nearest Surface Water Body to the Site	USGS topographic map; Visual observations	There are no surface water bodies on the site. A pond is present approximately 550 feet west of the site, and Lake Mendota is located approximately 0.6 miles west of the site.
Flood Plain	FEMA*; Facility personnel	The site is not located within a 500-year flood zone. Facility personnel reported no known occurrences of flooding at the site.

Table 1: Physical Setting and Utility Information		
Conditions	**Source**	**Description**
Wetlands	NWI*; Visual observations	There are no federally designated wetlands on site. Ramboll Environ did not observe any obvious suspected wetlands on site during the visit. As discussed in Section 4.2, the site historically contained marshy areas until it was developed in the early 1990s.
Geology and Hydrogeology		
Presumed Direction of Shallow Groundwater Flow	USGS topographic map	Based on the topographic gradient, shallow groundwater likely flows to the west/southwest.
Depth to Groundwater	WDNR GIS Registry Packets; Soil Sampling Reports	Groundwater was encountered between 4 and 15 feet below ground surface (bgs) during groundwater sampling activities conducted on site between 1986 and 2006.
On-Site Wells	Facility personnel; Well Logs	Facility personnel stated that there are no currently used production, monitoring, or injection wells on site. Documentation pertaining to the installation of several wells on site is discussed further in Sections 4.4. (monitoring wells) and 5.2.10 (production/potable wells).
Nearest Groundwater Supply Wells	EDR radius report	There are 11 federally registered wells present within one-eighth and one mile of the site; none are registered as public supply wells. An additional two private or municipal wells that may be used for water supply are located between one-half and one mile north and west of the site, respectively.
Geologic Conditions	Water Well Logs (1939 to 2000); WDNR GIS Registry Packets; Soil Sampling Reports; NCSS	Soils are described as being variable and consist of drift, fill, muck, gravel, clay, sand, hard pane, and sand rock, with sandstone and/or shale detected between 207 and 730 feet bgs; granite was encountered at 720 feet bgs during the installation of the well on the southeastern corner of the Central Property. Regional soils are described as somewhat poorly drained silt loams with moderate infiltration rates.
Site Utility Information		
Heating and Cooling Equipment	Facility personnel	Natural gas-fired heating units supply building heat. The buildings are cooled with air conditioning units.
Electricity Supplier	Facility personnel	Madison Gas & Electric
Natural Gas Supplier	Facility personnel	Madison Gas & Electric

Table 1: Physical Setting and Utility Information

Conditions	Source	Description
Use of Fuel Oil for Building Heat	Facility personnel	No current use of fuel oil reported. However, fuel oil was historically stored on site in USTs and ASTs and was historically pumped via underground (and later aboveground) piping from ASTs located on a property leased by Kraft Heinz located to the west of the Central Property. By 2010, fuel oil was no longer used to power the site's boilers.
Water Supplier	Facility personnel; City website	Madison Water Utility, which obtains groundwater from 22 active wells that are 500 to 1,100 feet bgs
Sanitary Sewer	Facility personnel	Madison Metropolitan Sewerage District
Septic Systems	Facility personnel	No current or former septic systems reported.

Notes:

FEMA = Federal Emergency Management Agency; NCSS = National Cooperative Soil Survey; NWI = National Wetlands Inventory

* - Source was provided in the EDR radius report.

3.2 Current Use of Site

3.2.1 Current Operations

A summary of the current use for each site areas (Central Property, East Property and West Property) is provided below.

Central Property: Kraft Heinz employs approximately 600 individuals in the processing and packaging of meat products on the Central Property; the facility is also used as the company's Midwest headquarters. Based on the operations conducted and information provided by the facility, it appears that the most appropriate primary Standard Industrial Classification (SIC) code is 2013, *Meats and Meat Products*; the corresponding North American Industry Classification System (NAICS) code is 311612, *Process Meats Manufacturing/Meat Processed from Carcasses*.[1] Operations at the site are conducted in three shifts (two processing shifts and one sanitation shift), five days per week. The major operations conducted at the facility are described in more detail below. It is our understanding that meat processing/packaging operations will cease at this site, and the site will be decommissioned.

- *Receiving* – Various meats (i.e., turkey, pork, beef), fat, casings, additives (i.e., flavorings, colorings, liquid smoke), condiments (i.e., cheese, jalapenos, pimentos), spices, and sodium lactate are brought to various areas of the processing plant for storage in room temperature areas, refrigerators/coolers, or freezers. Other raw materials (i.e., corn syrup, potassium lactate, and brine/salt) are brought to the site and stored in exterior ASTs located north of the processing plant.

[1] A formal determination of the most appropriate SIC/NAICS code for the site was beyond the scope of Ramboll Environ's review.

- *Main Processing* – Raw materials are brought to dedicated areas of the building, which have been designed for the processing or packaging of specific meat products. The meat products processed on site include hot dogs, Lunchables (stick meat), cold cuts (i.e., liver cheese, bologna), saran tubes (i.e., liverwurst), sausages, and salami. The processing of meat products begins by sorting and selecting specific types of meat, spices, additives, and/or condiments that are ground, mixed, and extruded into pre-manufactured casings; the majority of the mixing/grinding activities are conducted on the ground floor of the processing plant. In addition, a large meat macerator (tenderizer) is present on the ground floor.
    - In addition to the meat/additive mixture, ice is added to the hot dog meat mixture before it is extruded into casings that are twisted into links and sent through smokers, which use sawdust and various types of wood chips, for cooking. Once cooked, the hot dogs are aligned and the casings are steamed off; discarded casings are directed to the first floor for compaction and disposal. The hot dogs are sent through a brine solution for cooling purposes and are then packaged into individual four packs before being stacked and housed within a paper wrapper. The plastic hot dog wrapper is extruded on site (discussed below).
    - Stick meat is extruded into a casing that creates a long skinny stick (log). The logs are sent through smokers for cooking (similar to the hot dog smokers). Once cooked, the logs are packaged with intact casings to be cut and further processed off-site.
    - Cold cuts and saran tube products are made by taking mixed, ground, and extruded meat and packing it into a loaf that is placed within a metal mold or extruding it into pre-manufactured casings that are later aligned on metal molds. The metal molds are stacked into 1 of 16 cooking tanks located on the ground floor of the processing plant. Once a cooking tank is full, boiling water is added to the tank to cook the product, which is then chilled using a warm water bath, followed by a brine solution bath. The cold cuts are sliced, placed in rigid plastic containers, and sealed; saran tube products are labeled and sent for packaging.
    - Sausage and salami products, once mixed and extruded into pre-manufactured casings, are brought to humidity-controlled smokehouses to cure for at least 30 days. Once cured, the products are sliced, placed in rigid plastic containers, and sealed.
- *Spice Manufacturing* - Spices are manufactured on the first floor of the processing plant using a variety of dry spices and wet products (i.e., oils, liquid smokes) that are blended in three mixers. The spices are packaged and used on site or shipped to other Kraft Heinz locations for use.
- *Extruding*- A plastic extrusion line is located on the ground floor of the processing building and uses three types of resin (polyvinyl chloride, vinyl acetate, and a barrier resin) to create a three-layered, food-grade plastic wrap that is used to package hot dogs.
- *Packaging* – Finished meat products are weighed, scanned, sent through a metal detector, labeled, and placed in cardboard boxes for storage or shipping. Warehouse/storage areas located on site house meat products manufactured on site, as well as other Kraft Heinz products that were manufactured off-site (i.e., cream cheese, sauerkraut).
- *Wastewater Treatment* – The facility conducts on-site wastewater treatment prior to discharging process wastewater to the municipal sewer. Facility personnel stated that all process water used in the meat production and/or packaging operations, as well as floor drains in the buildings and the linear drain in the maintenance shop and truck washing area, are directed to the on-site WWTP, using a system of floor drains, sumps, and pipes. The wastewater is screened, and solids are removed, collected in sludge tanks, and shipped off-site. Pretreatment chemicals used in the

process include liquid polymers, flocculants, and coagulants for the removal of suspended solids, and sodium hydroxide and hydrochloric acid for pH control.

- *Ancillary Operations* – The facility performs packaging, shipping, and administrative operations, none of which involve the use of significant quantities of chemicals. In addition, Kraft Heinz conducts the following activities in support of the major operations:
  - Operation of regenerative and standard thermal oxidizers (RTOs and STOs) for air emissions controls and multiple air compressors.
  - Operation of three natural gas-powered boilers for steam generation in the power plant; this building also contains a water softening system to treat the water used in the boilers.
  - Operation of various room temperature areas, refrigerators/coolers, and freezers that comprise eight floors of the western portions of the processing plant, as well as dedicated rooms within actual processing areas that use an anhydrous ammonia refrigeration system.
  - Operation of a metal mold washing line and a central detergent system in the processing plant for sanitation activities.
  - Operation of several quality control laboratories in the processing plant, in which physical tests are conducted.
  - Operation of a Research & Development Department in the processing plant, which maintains its own small-scale production equipment (i.e., smokehouses, grinders, mixers).
  - Operation of a company store in the processing plant wherein employees can purchase Kraft Heinz products.
  - Operation of several natural gas-powered backup generators and water deionizing units.
  - Operation of laser printers to print expiration dates and stock keeping unit (SKU) numbers on meat products.
  - Operation of 19 elevators at the site (3 are hydraulic-powered and the remaining 16 are cable-operated).
  - General building and machinery/equipment maintenance, including several maintenance rooms located throughout all of the site buildings; each maintenance shop is equipped with grinders, lathes, cutting, and/or welding machines with acetylene and oxygen gases. A central machine shop is located on the ground floor of the processing plant and a machine shop is present in the maintenance shop. In addition to various grinders, lathes, cutting, and welding machines, a blade shop is present in the central machine shop and additional metal machining equipment (i.e., presses, grinders, bead blasters) are located in the maintenance shop.
  - Operation of 17 parts washers, containing a petroleum-based degreaser (naphthalene), in the maintenance areas located in various buildings on the Central Property. Spent degreaser is taken off site, as discussed below.
  - Transfer of raw materials and finished products using over 50 battery-operated pallet jacks, forklifts, or scissor lifts. Forklift repair is conducted by employees in a “jeep” shop, which is located on the ground floor of the processing plant.
  - Operation of a truck washing area south of the WWTP where the interiors of trailers are cleaned on an infrequent basis. Facility personnel indicated that the linear trench drain in this area is directed into the WWTP; however, these activities are no longer regularly conducted.

- Refueling of yard trucks, lawn care equipment, and refrigerated semi-trucks using on-site petroleum ASTs located south of the WWTP (near the truck washing area). The equipment is serviced on site by maintenance staff in the maintenance shop.

The primary raw materials used at the site include ammonia, meats/fats, casings, additives, condiments, spices, sodium lactate, corn syrup, and salt. In addition, Kraft Heinz uses sawdust/wood chips and maintenance-related materials, such as fuels, oils, lubricants, greases, non-chlorinated degreasers, welding gases, boiler/cooling tower/wastewater treatment chemicals, refrigerants, sanitizers, and detergents.

According to facility personnel, several changes have occurred in operations during the history of the facility. Specifically, stock pens were used to house hogs and cattle on the southwestern portion of the Central Property; the hogs were slaughtered on site until 1978/1979, and cattle were slaughtered until 1982. In addition, coal and fuel/heating oil were historically used to power process boilers. According to facility personnel, residual coal may be buried on the southwestern portion of the Central Property (in the former area of the stock pens). The maintenance shop was historically used for metal fabrication activities, specifically for meat processing equipment and supply (i.e., pans) manufacturing. Since the 1980s, the maintenance shop has been used for vehicle and lawn/snow removal maintenance activities and for the storage of obsolete and lawn/snow removal equipment.

As a result of the planned closure of the plant, several services formerly provided to employees have been closed, including a bank (credit union), a nurse's office, and a cafeteria kitchen. Areas no longer used in the processing plant include a hot dog line on eighth floor and the offices on the fifth floor. According to facility personnel, no chlorinated solvents are currently used at the facility; however, chlorinated solvents may have been used on site for cleaning after the slaughtering process and during spice extraction activities. This matter is discussed further in Section 4.4.

East Property: The East Property is leased to the City of Madison for recreational purposes (i.e., community park and baseball fields).

West Property: The West Property is leased to the City of Madison for use as a Metro Bus Station and commuter parking lot and to Decker for storage the of construction equipment. Activities conducted at the bus station include passenger loading and unloading beneath canopies; no structures are associated with the bus station.

3.2.2 Waste Management

Hazardous wastes regularly generated at the Central Property include spent parts washer solvent, routine paint-related wastes, a waste sodium nitrite mixture, combustible liquids (i.e., sage, marjoram oil), spent potassium hydroxide, waste printing ink, and unused aerosol cans. In addition, as cleaning activities are ongoing at the facility in anticipation of its closure, obsolete chemicals are being catalogued and disposed. As such, facility personnel stated that Kraft Heinz recently amended its status from a small quantity generator (SQG) to a large quantity generator (LQG; generator number WID006105266) under the Resource Conservation and Recovery Act (RCRA). Spent parts washer solvent is periodically changed by Safety-Kleen, which removes the facility's remaining hazardous wastes on an as-needed basis. Safety-Kleen also removes universal wastes, including fluorescent light bulbs and ballasts, mercury switches and thermometers, and batteries, from the site. During the site visit, no evidence of hazardous waste generated or stored at the East and West Properties were observed.

Nonhazardous waste generated at the Central Property consists of general trash (including depressurized aerosol cans), recyclable materials (i.e., office paper, cardboard, plastic), used oil, scrap metal, waste food products, WWTP sludge/filter cakes, and liquid wastes. General facility trash and recyclable materials are collected in on-site compactors, a bailer, and covered dumpsters for removal by Advanced Disposal or Sonoco Recycling, respectively. Used oil is collected in 55-gallon drums stored in the processing and power plants and the dewatering building for off-site management by Rock Oil Refining, Inc. Scrap metal is collected in covered dumpsters until off-site shipment for recycling by a local firm. Waste food products are stored in containers throughout the processing plant and removed by Darling International. WWTP sludge/cake is collected in dumpsters and stored under roof in an area along the side of the sludge dewatering building for regular removal by United Liquid Waste Recycling. Water Town collects liquid processing wastes, which are stored in containers throughout the processing plant and in the wastewater treatment building. According to facility personnel, rags and uniforms are laundered by Cintas. Nonhazardous waste generated at the West and East Property is limited to general trash.

3.2.3 Wastewater and Storm Water

Sanitary wastewater, which includes wastewater from bathroom and kitchen areas, is discharged to the on-site WWTP. As discussed in Section 3.2., process wastewater and water that enters floor/linear drains, including air compressor condensate, boiler blowdown, and floor wash water, are discharged to the on-site WWTP. Several capped metal sumps, used to direct the process wastewater to the WWTP, were observed in the processing plant; no staining or other signs of potential impact were noted near the sumps. Storm water at the site infiltrates into small landscaped areas or enters storm drains in paved areas of the site. These storm drains discharge storm water to the municipal storm sewer system.

3.2.4 Air Emissions

Air emissions at the facility consist primarily of particulate matter (PM) and VOCs from the process boilers and the smoke houses; PM from spice mixing/packaging activities; VOCs and PM from the hot dog packaging extrusion line; VOCs from the ammonia refrigeration system and ethylene glycol concentrator; and combustion products from the facility's natural gas-fired backup generators. Hazardous Air Pollutants (HAPs), specifically formaldehyde, are also generated on site. Process emissions are controlled via regenerative and standard thermal oxidizers (RTOs and STOs), and PM from sawdust/wood chip smokehouse loading activities and spice mixing/packaging are managed through baghouses. Ammonia at the site is monitored under a Risk Management Program (RMP).

3.3 Current Uses of Adjoining Properties

The property is located in a mixed industrial, residential, and commercial land use area. The nearest residential areas are located adjacent to the south and east of the East Property. Based on discussions with facility personnel, Ramboll Environ's visual observations from the site boundary and public rights-of-way, and a limited review of publicly available information, a general determination of the current use of adjacent properties was developed, as described Table 2.

Table 2: Current Use of Adjacent Properties

Direction	Property / Land Use	Ramboll Environ's Observations
North	**East Property**: Aberg Avenue/Route 30 , followed by an undeveloped wooded parcel and a shopping center **Central Property**: Aberg Avenue, followed by an auto repair facility, a residential area, a storage facility, and a Packers Avenue/Route 113 on-ramp **West Property**: A storage facility, a credit union, and a law office, followed by Aberg Avenue	With the except of the unused AST noted to the west of the Central Property, no apparent exterior manufacturing or chemical storage operations were observed. Residential areas consist of single-family homes. No concerns were noted; however, several adjacent properties were listed on databases of potential environmental impact. These properties are discussed further in Section 4.1.2.
East	**East Property**: A residential area **Central Property**: A union office, a tavern, a dwelling, and Packers Avenue, followed by the East Property, a residential area, and a car rental facility **West Property**: Railroad tracks, followed by the Central Property	
South	**East Property**: A residential area **Central Property**: Commercial Avenue, followed by the Madison Area Technical College and a storage facility **West Property**: Roth Avenue, followed by a parking lot and undeveloped land	
West	**East Property**: A dwelling, followed by Packers Avenue and parking lots associated with the Central Property **Central Property**: Railroad tracks, followed by a parking area, an AST (formerly used by Kraft Heinz and discussed further in Section 4.4.), undeveloped land, and an ice skating rink, followed by several unlabeled industrial structures and undeveloped land **West Property**: Decker Supply Company, followed by O'Neill Avenue	

Notes:

During the site visit, Ramboll Environ walked or drove by the borders of these properties that are shared with the site. Ramboll Environ did not enter the neighboring properties.

4. REVIEW OF PUBLIC RECORDS AND OTHER INFORMATION SOURCES

4.1 Environmental Regulatory Database Review

Ramboll Environ contracted with EDR in May 2016 to prepare of summary of listings in federal and state agency databases for the site and facilities within applicable radii of the property, as specified by the ASTM standard.[2] A copy of the EDR radius report is presented in Appendix B.

4.1.1 Database Review for Site

Ramboll Environ reviewed the results of the state and federal environmental database searches performed by EDR (see Appendix B) and also reviewed information available in the WDNR online databases. The site is listed on several environmental databases, as discussed in Table 3.

Table 3: Summary of Environmental Database Listings for the Site

Summary of Information Contained in Database	Ramboll Environ's Comments
Kraft Foods Group, Inc. (Kraft)/Oscar Mayer, Inc. is listed in the ERP database as being enrolled into the ERP on February 22, 1984 (ERP #02-13-000895). An end date of December 7, 2006 was assigned to the closure of this ERP listing. An activity and use limitation (AUL) was assigned to the site in association with the ERP listing's closure, as well as a Closed Remediation Site (CRS) listing. The site (Oscar Mayer Lift) was enrolled into the ERP a second time on March 4, 1999 (ERP #02-13-221826). An end date of May 13, 1999 was assigned to the closure of the second ERP listing. Kraft is listed on the Wisconsin Remedial Response Site Evaluation Report (WRRSER) database with a begin date of February 22, 1984. No additional information is provided in the listing; however, based on the begin date of the listing, it is likely associated with the 1984 ERP listing.	Ramboll Environ reviewed documentation provided by facility personnel and on file with the WDNR. The documentation review is discussed further in Section 4.4. The WDNR and facility personnel did not have information pertaining to one ERP listing (#02-13-221826) and one LUST listing (#03-13-001744). As such, Ramboll Environ submitted a FOIA request to the WDNR and is awaiting a reply.
The West Property (Madison Metro North Transfer Point) is listed in the ERP database as being enrolled into the ERP on March 19, 2004 (ERP #02-13-524010). An end date of February 8, 2006 was assigned to the closure of the ERP listing. An AUL was assigned in association with the ERP listing's closure, as well as a CRS.	
Kraft is listed on the Leaking UST (LUST)/Recovered Government Archive (RGA) LUST database with three releases. The first release (#03-13-000053) was reported in February 1989 and granted closure in January 2008. The second release (#03-13-001744) was a petroleum release reported in November 1992 and granted closure in August 1993. The third release (#03-13-114831) was reported in December 1996 and granted closure in May 2006. A CRS listing was assigned to the first and third LUST incidents.	

[2] EDR uses the term "radii" to refer to the ASTM terminology "approximate minimum search distance" in the environmental database report.

Table 3: Summary of Environmental Database Listings for the Site

Summary of Information Contained in Database	Ramboll Environ's Comments
Madison Metro North Transfer Point on the West Property is listed in the LAST database for releases of diesel fuel and petroleum products that were reported in March 2004. The LAST was granted closure in July 2013.	This listing appears to be associated with releases addressed under ERP #02-13-524010 discussed further in Section 4.4.
Kraft and/or Oscar Mayer are listed with multiple SPILLS listings that occurred between 1984 and 2014. All of the SPILLS listings have been granted closure and include releases of mineral oil, antifreeze, hydraulic oil, petroleum products, Freon, waste oil, acids, base, bleach, sodium hydroxide cleaning solution, or salt. In addition, wastewater releases were reported in 1986, 2006, 2007, and ammonia releases were reported in 1993, 1998, 1999, 2000, 2001, 2002, 2006, 2008, 2011, and 2012.	As these SPILL listings are reported with a closed status, they are not expected to represent a current environmental concern. Ramboll Environ reviewed available information pertaining to releases of materials that could suggest a potential that is summarized further in Section 4.3.
Kraft/Oscar Mayer is also identified with 18 Emergency Response Notification System (ERNS) listings. Several of these listings are associated with ammonia releases that occurred in 1993, 1999, 2000, 2001, 2002, 2004, 2006, 2008, 2011, and 2012. One ERNS listing documents a sewage release into a storm drain in 2000. In addition, two ethylene glycol releases were reported in 1993; one spill went into a storm drain (eventually to the Ohio River), but the second was contained and the product was removed.	Facility personnel had no information pertaining to these releases and no information was available with the WDNR. Based on the information indicating the released amounts were minimal and did not appear to impact soil or groundwater, these listings do not appear to suggest a concern to the site.
Oscar Mayer is listed on the Hazardous Materials Inventory Release System (HMIRS) with a release of two gallons of sulfuric acid. No additional information (i.e., date of spill) was provided.	
Kraft is listed on the UST and AST databases. The facility is registered with five USTs containing fuel oil, gasoline, or diesel fuel that ranged from 250 to 10,000 gallons and were removed between 1986 and 2014. The facility is registered with five ASTs. Two ASTs, a 250,000-gallon fuel oil AST and a 500-gallon waste oil AST, were removed in 2001 and 2004, respectively. The remaining three ASTs, a 550-gallon gasoline AST, a 2,000-gallon diesel fuel AST, and a 150,000-gallon fuel oil AST are identified as "in use."	These listings by themselves do not suggest a contamination concern to the site. It appears that the 150,000-gallon fuel oil AST is located on the adjacent leased property. These USTs and ASTs are further discussed in Section 5.2.
The West Property, under the entity name Kraft, was also registered with four 10,000-gallon fuel oil ASTs that were removed in 1975 and eight 10,000-gallon fuel oil ASTs that were removed in 1985.	
Oscar Mayer at 900 Packers Avenue (the southeastern portion of the Central Property) is listed in the AST database with six 820-gallon diesel fuel AST that were associated with back-up generators and removed between 2006 and 2008.	

Table 3: Summary of Environmental Database Listings for the Site

Summary of Information Contained in Database	Ramboll Environ's Comments
Kraft Foods Group is listed as a SQG of hazardous waste. Kraft registered as a LQG in 1990, as an SQG in 2001, as an LQG in 2002, and as a SQG 2003. No current or historical violations or issues of noncompliance are listed.	The listing does not suggest a contamination concern to the site. Wastes generated at the site are further discussed in Section 3.2.2.

Notes:

* The site is also listed on the following other databases related to regulatory compliance: Solid & Hazardous Waste Information Management System (SHWIMS), RMP, Aerometric Information System (AIRS), US AIRS, Toxics Release Inventory System (TRIS), New York (NY) and Wisconsin (WI) Manifests, WI National Pollutant Discharge Elimination System (NPDES), WI Tier 2, ECHO, Integrated Compliance System (ICIS), and Facility Index System/Facility Registration System (FINDS). Listings on these databases, by themselves, are not necessarily indicative of contamination and are, therefore, not discussed further herein.

4.1.2 Database Review for Surrounding Properties

There are several listings in the EDR report for off-site facilities within applicable ASTM search radii. Several of these listings (i.e., RCRA hazardous waste generators, USTs, ASTs, compliance listings), by themselves, are not necessarily indicative of a contamination concern and, therefore, are not discussed herein and were not further evaluated for purposes of this assessment. A number of facilities appear on databases indicating potential contamination concerns (i.e., ERP, SHWS, Solid Waste Facilities/Landfill Sites [SWF/LF], Registry of Solid or Hazardous Waste Deposition Sites [WDS], LAST, LUST, CRS, AUL, Brownfields, SPILLS). Of the sites representing a potential environmental concern, Ramboll Environ has discussed in Table 4 below only 1) facilities that are located adjoining to the site; and 2) facilities that are located potentially upgradient of the site and have not been issued regulatory closure for all listings of concern.

Table 4: Summary of Pertinent Database Listings for Off-Site Properties

Listing Name or Address and Location Relative to the Site	Summary of Information Contained in Database	Ramboll Environ's Comments
Listings for Adjoining Sites [1]		
Reynolds Property 1401 Packers Avenue (Adjoining to the north)	This facility (Burke WWTP) is listed as being enrolled into the ERP on June 11, 2002. The ERP listing has not been granted closure.	The facility is located upgradient and either maintain an open status or have no available information. Ramboll Environ has submitted a FOIA request to the WDNR and is awaiting a reply. This matter is further discussed in Section 6 of this report.
Madison 1948-72 (Truax Landfill) Aberg Avenue (Adjoining to the north/northeast)	The facility is listed on the SHWS and was added to the Hazardous Ranking System List in 1994. No further information is listed. The eastern portion of this property has been redeveloped with a shopping center.	

Table 4: Summary of Pertinent Database Listings for Off-Site Properties

Listing Name or Address and Location Relative to the Site	Summary of Information Contained in Database	Ramboll Environ's Comments
Penmlo, Inc. 2301 Commercial Avenue (Adjoining to the south)	The facility is listed in the LUST database for a release that was reported in 1996 and granted closure in May 2003. A CRS and AUL were assigned to the site in association with closure activities. A SPILLS listing was assigned to the site in October 1978 for a historical release of fuel oil; the listing has been granted closure.	Because the matters have been granted regulatory closure by the WDNR, it is reasonable to assume that they were appropriately evaluated in accordance with regulations in place at the time, and that remaining contamination, if any, is localized and unlikely to migrate at significant levels onto the site. Additionally, these properties are located in the presumed downgradient direction from the site. Thus, these closed off-site listings do not appear to represent a significant concern to the site.
Millvander Property 2530 Pennsylvania Avenue (Adjoining to the south)	This facility is listed as being enrolled into the ERP on June 9, 2001. An end date of January 22, 2006 was assigned to the closure of the ERP listing.	
Listings for Non-Adjoining Sites [2]		
Shopko Store No. 034 2602 Shopko Drive (approximately 0.7 miles to the northeast)	The property is identified with a Brownfields listing. With the exception of a start date of October 30, 2006, no further details are listed for the Brownfields listing.	The listing does not indicate the extent (if any) of contamination and is further discussed in Section 6.

Notes:

[1] Ramboll Environ's analysis of adjoining sites was based on observations made during the site reconnaissance (as discussed in Table 2) and location information for off-site listings as presented in the EDR report. The discussion of adjoining and non-adjoining sites does not include (if applicable) listings for certain databases that are (by themselves) not necessarily indicative of a contamination concern (e.g., compliance listings without indication of a release or chemical mishandling, such as RCRA hazardous waste generators or registered storage tanks). Also, for purposes of this analysis, Ramboll Environ considers as "adjoining" properties that are immediately adjacent, even if separated by a road or other physical barrier.

[2] As noted in Table 1, shallow groundwater beneath the site likely flows to the west-southwest. Within this section, Ramboll Environ did not discuss herein any off-site non-adjoining property that is listed on a database indicative of a contamination concern, but for which regulatory closure has been issued, as the issuance of regulatory closure suggests that impacts to the subject site from the noted off-site property are unlikely. Finally, Ramboll Environ did not discuss herein any off-site non-adjoining property that is presumed to be downgradient or crossgradient of the subject site. This analysis was based on the assumption that a hazardous material released to the subsurface generally does not migrate laterally within the unsaturated soil for a significant distance, but a hazardous material can migrate in the groundwater in a generally downgradient direction; however, the direction of groundwater flow may be affected by localized topographic, hydraulic, and hydrogeologic conditions.

The EDR radius report indicates that poor or inadequate address information was available for one facility located in the vicinity of the site; therefore, this facility could not be readily mapped by EDR. Because the location of this facility with respect to the site could not be evaluated, Ramboll Environ is limited in its ability to express an opinion regarding the potential for impact to the subject site from this facility. It was beyond the scope of this review to accurately locate this facility identified by EDR;

however, Ramboll Environ reviewed the list of unmapped sites and verified that none appeared to be adjacent to the site.

4.2 Historical Uses of the Site and Adjacent Sites

4.2.1 Past Uses of the Site

By 1892, the entire site was undeveloped and covered in marshy areas; railroad tracks were present on the western portion of the Central Property. Based on the complex history and size of the site, the remaining historical discussion is divided into three sections, one for each part of the site.

Central Property: By 1915, the Central Property was developed with a meat packing company that was vacant when it was purchased by Oscar Mayer in 1919; at that time, the site included stockyards, livestock pens, and the original portions of the processing and power plants and WWTP. By 1932, roadways and railroad spurs extended across the site, as facility operations expanded. Other features on site by the 1930s included dwellings (north-northeast), undeveloped and agricultural land (east-center) that was identified as a US Government Reservation, and potential coal storage areas southeast and south of the power and processing plants. By 1942, the processing plant had "tank rooms" and a laundry room, a zinc chloride tank (no capacity or designation of above or below ground were listed) was present near the power plant, and the original portion of the maintenance shop was constructed as a garage.

By the late 1940s, the northern dwellings were razed and a coal mound was present in this area, which also now contained a concrete block facility; part of an ice skating rink was present northeast of the processing plant and a gasoline station was present to its east. According to city directories, it appears that three gasoline filling/service stations may have been located on the eastern portion of the Central Property between 1958 and 1967. Documentation available online with the USEPA indicated that Oscar Mayer historically manufactured insecticides (space spray, pyrethrum, and lethane) at the site in the late 1960s. By 1968, the east adjacent Packers Avenue was expanded and reconfigured and several structures formerly located on the Central Property (including the gasoline station(s) and skating rink) were razed; these areas were paved and used for parking purposes. By 1986, several processing structures, including stock pens, were razed. In 2010, a former structure located east of the power plant was razed and replaced with the current cooling building.

The facility was operated by Oscar Mayer until 1981, at which time Oscar Mayer was purchased by General Foods, which was later acquired by Philip Morris in 1985. In 1989, Phillip Morris merged General Foods with the newly acquired Kraft Foods, Inc. resulting in the companies being renamed Kraft General Foods, Inc. In 1995, the company was renamed Kraft Foods, Inc. (later Kraft Foods Group). In 2015, H.J. Heinz Co. purchased Kraft Foods Group and began operations as Kraft Heinz.

East Property: The majority of the East Property was farmed by 1937; however, its northern portion was located within the borders of a former north adjacent landfill/wastewater treatment facility (a portion of which is now a shopping center). By 1955, two dwellings were developed on its southwestern corner. By 1968, the west adjacent Packers Avenue was expanded/reconfigured and the East Property was graded/disturbed, with the exception of the residential area on its southwestern corner. In 1999, the dwellings were razed and this area was improved with baseball fields, concessions and maintenance structures, and a parking lot. It is unknown when Oscar Mayer acquired this portion of the site; however, it is currently leased to the City of Madison and used as a community park.

West Property: By at least 1937, this area was developed with dwellings and coal and fuel facilities, with coal storage areas and multiple fuel oil tanks; a manufacturing structure was added to the coal and fuel facility in 1960 and by the late 1960s, the dwellings were razed. By 1976, a warehouse used to house building materials and later spices and a structure of unknown occupancy were constructed to the south of the coal and fuel / manufacturing facility. The areas of the parcel where fuel oil tanks were located were remediated and used for parking purposes by 1980 (see below). In the early 2000, the Metro Bus Station and commuter parking lot were located on its northeastern area and the northwestern portion was used for storage purposes by an adjacent construction supply company. By 2008, the structures on the southeastern portion of the West Property were razed and these areas were grass covered by 2010. It is unknown when Oscar Mayer originally acquired this portion of the site; however, the northeastern and northwestern portions are currently leased to the City of Madison (Metro bus station and commuter parking lot) and Decker, respectively.

A summary of Ramboll Environ's key observations from the available historical sources is presented in Table 5.

Table 5: Summary of Key Observations from Historical Sources for the Site

Historical Source	Key Observations Regarding Site History
Sanborn Maps (1942, 1950, 1986)	**East Property**: Primarily not included within the mapped areas; however, the western portion is vacant land on all of the Sanborn maps reviewed. **West Property**: Developed with dwellings and a coal and fuel facility in 1942 that contained coal storage areas and six fuel oil tanks (no capacity or designation listed); a manufacturing structure was added to the coal and fuel facility in 1960. By 1986, the dwellings are razed and a warehouse and commercial structure are developed south of the manufacturing facility. **Central Property**: By 1942, the original portion of the facility is developed and occupied by Oscar Mayer; the facility is denoted as being constructed between 1915 and 1942. Features inside the processing plant include "tank rooms" (southeast) and a laundry (east-center). The power plant is connected to the southwestern corner of the processing plant at this time. The power plant contains a boiler house, as well as repair, black smith, carpenter, and paint storage areas; a zinc chloride tank (no capacity or designation) is depicted to its south. The original (central) portion of the maintenance shop is present on the southeastern portion of the Central Property by 1942 and is identified as a garage with a capacity of 50 trucks; two exterior gasoline tanks (no capacity or designation) are identified outside at its northeast corner and west-central portion. The original portion of the WWTP is present south of the processing plant, with sewage and sludge tanks (no capacity or designation). Also by 1942, stock pens are present southwest of the processing plant, along with railroad spurs that extend across the Central Property from the north and south towards the processing plant, and Roth Road that extends east across the northern portion of the parcel. A gasoline station with three gasoline tanks (no capacity or designation), an office, and a dwelling are denoted on the southeast corner of the Central Property, and the northern and eastern portions of the parcel are developed with an "old and vacant structure" or are labeled as a "US Government Reservation," respectively. An incinerator is located west of the maintenance shop in 1948. By 1950, curing coolers are constructed onto the northern portion of the processing plant, a welding addition is constructed onto the southern portion of the maintenance shop, and a well (No. 3) is located near the WWTP sludge/sewage tanks. Also by this time, a concrete block factory and part of a skating rink are denoted on the northern portion of the Central Property.

Table 5: Summary of Key Observations from Historical Sources for the Site

Historical Source	Key Observations Regarding Site History
	According to the 1986 Sanborn map, warehouses are constructed onto the northern portion of the processing plant in 1970 and 1971. Also by 1986, additions are constructed onto the northern end of the maintenance shop and the southern end of the WWTP. Stock pens are no longer present on the southwestern portion of the Central Property; however, a cooling tower is constructed southwest of the power plant. In addition, a fuel oil tank (no capacity or designation listed) is present at the southwest corner of the processing plant. By 1986, the gasoline station, restaurant, and dwellings are no longer identified on the southeastern portion of the Central Property.
Aerial Photographs (1937, 1949, 1955, 1962, 1968, 1976, 1980, 1986[3], 1993, 2000, 2005, 2006, 2008, 2010) Satellite Imagery[1] (1932, 1941, 1942, 1950, 1958, 2000, 2004, 2005, 2006, 2008, 2010, 2012, 2013, 2014)	**East Property**: Actively farmed by 1937; however, the northern portion is located within the borders of a former north adjacent landfill/wastewater treatment facility. By 1955, two dwellings are visible on the southwestern corner of the parcel. By 1968, the west adjacent Packers Avenue is expanded/reconfigured and the entire parcel appears graded/disturbed, with the exception of the residential area on its southwestern corner. By 2000, the dwellings are razed and this area is improved with baseball fields, concessions and maintenance structures, and a parking lot. **West Property**: By 1932, coal and fuel company structures and tanks are developed, along with dwellings. By 1949, large areas of this parcel are disturbed. By 1955, the dwellings are razed. By 1976, additional commercial and industrial structures are constructed and Huxley Street extends north between the western portion of the West Property. Large areas of the parcel appear to be used for parking purposes by 1980. By 2000, the Metro Bus Station is present on the northeastern portion of the parcel, and by 2004, the area east of the bus station is paved and used for parking purposes; the northwestern portion of the West Property appears to be used for storage purposes by the adjacent construction supply company. By 2008, the former structures on the southeastern portion of the parcel are razed and the southern portions of the West Property appear to be grass covered by 2010. **Central Property**: By 1932, Roth Street extends east across the central portion of the parcel and Packers Avenue extends north across its eastern portion. Only the processing facility is included in this aerial photograph and indicates that the southern portion of the Central Property is primarily developed with original portions of the facility; darker color disturbed areas are visible on the southeastern and south-central portions of the parcel, along with stock pens on its west-central portion. Railroad spurs extend north across the southern portion of the Central Property towards the processing plant. By 1937, dwellings, undeveloped land, and agricultural land are present on the northern, northeastern, and east-central portions of the Central Property. By 1949, the former northerly-located dwellings are razed and a coal mound is visible in this area; rail spurs extend south across the northern portion of the Central Property. Roth Street is reconfigured to allow additions to be constructed onto the northern portion of the processing plant. The original portion of the maintenance shop is present on the southeastern portion by this time. In addition, a structure similar to a gasoline filling station is located on the east-central portion, a concrete block factory and part of a skating rink are visible on the northeastern portion, and an incinerator is visible on its south-central portion. By 1955, additions are developed onto the processing plant and maintenance shop, and the area east of the maintenance shop appears paved for parking purposes. By 1962, the northeastern portion of the Central Property is paved and used as a parking lot. Although the concrete block facility is no longer visible, the northern portion of the parcel is

[3] The 1980 and 1986 aerial photographs were of poor copy quality and were difficult to interpret.

Table 5: Summary of Key Observations from Historical Sources for the Site

Historical Source	Key Observations Regarding Site History
	disturbed and contains mounded coal, which is also visible east of the power plant and stock pens. By 1968, the east adjacent Packers Avenue is expanded/reconfigured and the structures located on the eastern portion of the Central Property (including the gasoline station and skating rink) are no longer present. Packers Avenue Service Road now extends east of the processing plant, with facility parking areas farther east. By 1976, additions are constructed onto the northern portion of the processing plant, and Roth Street is removed. By 2000, several structures, including the former stock pens, are demolished, and by 2004, the current water tank is present in this area, as well as several cooling towers. In 2010, a former structure located east of the power plant is razed and replaced with the current cooling building, bringing this portion of the site into its general present-day configuration.
Topographic Maps (1892, 1906, 1959, 1969, 1974, 1983)	In 1892 and 1906, the entire site is identified as undeveloped land covered in marshy areas; a roadway extends east through the southern portion of the Central Property. **East Property**: By 1969, the East Property is identified with one dwelling, which is no longer present by 1983. **West Property**: By 1959, several small structures (dwellings and the coal/fuel facility) are located on the West Property. By 1983, the dwellings are razed. **Central Property**: By 1959, the ice skating rink, the original (central portion) of the processing and power plants, and the maintenance shop are denoted; Roth Street extends east across the northern portion of the Central Property and railroad spurs extend north and south towards the processing plant. Also by1959, circular tanks (former wastewater sludge tanks) are denoted on its southern portion, as well the former stock pens and several residential/commercial structures on its southeastern corner. By 1969, Packers Avenue is reconfigured/expanded, resulting in the demolition of the structures formerly present on the southeast corner of the Central Property. In 1974, additions are developed onto the northern portion of the processing plant, atop the former Roth Street, and by 1983, the circular tanks are no longer depicted on the southern part.
City Directory Abstracts (1958, 1962, 1967, 1972, 1977, 1982, 1987, 1992, 1995, 1999, 2003, 2008, 2013)	**East Property**: East Madison Little League is identified as the occupant in 2013; the site address was not listed in the remaining directories reviewed. **West Property**: The occupants are listed as: Roth CE & PA, Inc. Coal Dealers and residential tenants (1958); Roth CE & PA, Inc. Building Materials and residential tenants (1962 and 1967); Roth CE & PA, Inc. Building Materials and residential tenants (1972); Quality Control Spice Co., Inc. (1977); OM Ingredients Wholesale (1982); OM Ingredients Spices Wholesale (1987); and OM Ingredients, Inc. (1992). **Central Property**: The occupants are listed as: J&W D-X Gas station, Larry's Shell Service Station, B&B Texaco Station, Paramount Roller Rink, and Oscar Mayer (1958); B&BDX Service Station, Bob & Jerry's Shell Station, Fina Service Station, Mom & Pop's Roller Rink, and Oscar Mayer (1962); B&BDX Service Station and Oscar Mayer (1967); Oscar Mayer (1972, 1977, 1987, 1995, 2003, 2008); General Foods (1982); Oscar Mayer and Louis Rich Co. (1992); Kraft Foods, Louis Rich Co., and Oscar Mayer (1999); and Oscar Mayer, Louis Rich Co., Back to Nature Foods, and Boca Foods (2013).

Table 5: Summary of Key Observations from Historical Sources for the Site

Historical Source	Key Observations Regarding Site History
Previous Environmental Reports	**West Property**: This area was operated by the Roth Coal and Fuel Company and contained twelve 10,000-gallon fuel oil ASTs. Four of the ASTs were removed in 1975 and the remaining eight were removed in 1985. **Central Property**: As part of manufacturing operations, Oscar Mayer used a variety of chlorinated solvents (e.g., TCE; 1,1-dichloroethylene [1,1-DCE]; methylene chloride; and tetrachloroethylene [PCE]) in a spice extraction process and for cleaning activities. Specifically, TCE, 1,1-DCE, and methylene chloride were used for spice extraction and PCE was used to clean glue pots. In addition, a former fly ash disposal area was present on the northeast corner of the parcel, beneath the current parking lot; dates of use of this disposal area were not provided.
Facility Personnel and Historical Resources	Oscar Mayer originally purchased the facility in 1919 when it was developed with a bankrupt farmer's cooperative meat packing company; the site had stockyards and a livestock pen at that time, ideal for meat processing. In 1947, four stories were added atop the processing plant. In 1955, the site became the location for the Oscar Mayer corporate offices. In 1981, Oscar Mayer was purchased by General Foods, which was later acquired by Philip Morris in 1985. In 1989, Phillip Morris merged General Foods with the newly acquired Kraft Foods, Inc. resulting in the companies being renamed Kraft General Foods, Inc. In 1995, the company was renamed Kraft Foods, Inc. and later Kraft Foods Group; Oscar Mayer became one of the operating divisions of this entity. In 2015, H.J. Heinz Co. purchased Kraft Foods Group and began operations as Kraft Heinz.

[1] In addition to aerial photographs provided by EDR, Ramboll Environ viewed historical satellite imagery provided via Google Earth and the Madison Historical Society. Printed copies were not obtained, and imagery dates were not independently verified.

4.2.2 Past Uses of Adjacent Properties

Railroad tracks bordered the site to the west by 1892. By the late 1930s, a disturbed area, later identified as containing a former municipal landfill/wastewater treatment plant (the “Truax Landfill”) was present north-northeast of the site. The remaining surrounding areas appeared to be developed with dwellings (north and east), agricultural land (east, south, and west), or commercial and industrial properties (west), including a feed warehouse with a gasoline tank (circa 1942). By the late 1940s, industrial structures were present south of the site and dwellings were present west of the site. By 1951, the adjacent union building, a dwelling, and a tavern were present east of the processing plant. By 1968, Packers Avenue was reconfigured/expanded, the technical college was developed south of the site, and portions of the construction supply company were developed to the west. By the mid-1970s, the adjacent bank was developed northwest of the site, the former feed lot was demolished and replaced with a parking lot, and aboveground ASTs were installed on the area adjacent to the west of the power plant. By the early 1990s, the landfill/wastewater treatment plant was razed from the area north/northeast of the site and by 2000, this eastern area was redeveloped with current shopping center.

4.3 Review of Local and State Agency Information

Ramboll Environ visited or otherwise contacted local governmental agencies and regulatory bodies for information relating to the site. An overview of the findings of this review is presented in Table 6.

Table 6: Local Agency Information for the Site

Agency Contacted / Document Reviewed	Information Obtained
WDNR	As discussed in Section 4, the site is listed with three closed ERP and three closed LUST listings. The WNDR had GIS Registry Packets available for four of the listings, which are further discussed in Section 4.5. The WDNR BRRTS was also searched for information regarding the closed SPILLS reported at the site. Based on the nature of the ammonia releases (to the air) and the salt and sewage/wastewater releases (into sewer/storm systems), these releases do not appear to suggest a potential for impact to the site. As such, these releases are not further discussed. The following provides a discussion of information available online for the site's reported petroleum, industrial chemical, or acid product releases. June 1984: 50 gallons of mineral oil containing PCBs (over 50 parts per million [ppm]) was spilled during transformer replacement activities; the material was recovered with absorbent. March 1993: 30 gallons of antifreeze was released by a broken pipe under a sidewalk; the material was recovered using absorbents. January 1994: 3 gallons of hydraulic oil were released when a tank froze; the material was recovered using absorbents and oil-impacted snow was removed. July 1995: 1 gallon of petroleum was released and 30 gallons of antifreeze (ethylene glycol) were spilled on two occasions; the petroleum reached the storm sewer but the antifreeze was captured in the facility's WWTP. October 1993: 40 gallons of antifreeze was released from a failed heat exchanger and reached the storm sewer. October 1995: 15 gallons of petroleum was spilled from a broken line on a spotter truck; the material was recovered with absorbent and disposed. August 1996: 22 pounds of Freon was spilled on the second floor of the processing plant. May 1995: an unreported amount of engine waste oil was spilled and may have reached the storm sewer system. October 1998: 75 gallons of hydraulic oil were released onto soil when a cylinder on an elevator broke; the spilled oil/impacted soil was removed. July 1999: 12 gallons of sulfuric acid were spilled; no further details listed. December 1999: 12 gallons of a petroleum product was spilled due to backpressure from filling a UST; they spill was cleaned with absorbent pads. December 2000: 35 gallons of base (sodium hydroxide) was released from a broken flange on a cleaning pipe; no further details are listed. July 2004: 8,000 gallons of bleach (chlorinated water) was released when a gasket failed on a reservoir that was being cleaned; none of the material was recovered. August 2007: 5 gallons of antifreeze and 5 gallons of ethylene glycol were spilled and may have reached the storm sewer, but did not appear to reach the Yahara River. January 2010: 1,500 gallons of sodium hydroxide cleaning solution were release by the delivery service; the spill was cleaned.

Table 6: Local Agency Information for the Site	
Agency Contacted / Document Reviewed	**Information Obtained**
	April 2013: 3,100 pounds of antifreeze (ethylene glycol) was release from a system overheat; the spill was cleaned by a hazmat team. Based on a review of the available information and the closed status, these spills are not considered a current environmental concern.
USEPA	Documentation available online with the USEPA indicated that Oscar Mayer historically manufactured insecticides (space spray, pyrethrum, and lethane) at the site in the late 1960s. These compounds were registered with the US government by Oscar Mayer.

4.4 Previous Environmental Assessments and Activities

Based on a review of historical site documents and interviews with facility personnel, the following prior environmental assessment, sampling, or remediation activities have been conducted at the site:

- **Central Property - Chlorinated VOCs in Groundwater/ERP Listing #02-13-000895**

  The Central Property was enrolled into the ERP with respect to groundwater impacts on February 22, 1984, and the presence of chlorinated compounds detected in four on-site groundwater monitoring wells was reported to the WDNR in 1986. Chemicals detected in groundwater included TCE; cis-1,2-dichloroethylene; vinyl chloride; xylene; ethyl benzene; toluene; methylene chloride; chlorobenzene; and acetone. In 1994, the WDNR was notified that the concentrations of chlorinated compounds in the wells were detected above state PALs. Oscar Mayer subsequently had the 1994 Hydrogeologic report prepared to determine the extent and possible source(s) of the impacts. Although the specific source(s) of the chlorinated compounds in groundwater were not identified, several potential sources were proposed, including historical operations and the nearby Truax and Demetral landfills. Between July 2001 and April 2005, semi-annual groundwater monitoring was performed at the site. In December 2004, Oscar Mayer switched to municipal wells for its supply of production water. Two of the production wells were abandoned and two were maintained for backup fire control. Based on the results of the groundwater monitoring and the closure of the production wells, Oscar Mayer requested closure of this incident on July 27, 2006. After the submittal of additional documentation, the WDNR approved final closure on December 7, 2006 and listed the site on their GIS Registry to document residual groundwater impacts.

  A review of the WDNR GIS Registry file for this ERP listing indicated that impacts of vinyl chloride above the enforcement standards were limited to the area beneath and immediately north of the processing plant. A closure letter was issued by the WDNR, which determined that the impacts left in place were investigated and remediated to the extent practicable under site conditions. Although residual contamination remains on site, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.

- **Central Property - Petroleum USTs/LUST Listing #03-13-114831**

  Three USTs that were used for the storage of gasoline or diesel fuel were removed by 1997. Subsequently, an investigation was conducted to evaluate the extent of soil and groundwater impacts associated with releases from the USTs. The resulting 1998 SIR/RAP report was submitted to the WDNR in January. The WDNR approved a plan for limited soil excavation and the natural attenuation of groundwater impacts. After the case was transferred by the WDNR to the Wisconsin Department of Commerce (WDC), the newly assigned agency approved closure of this issue in March 2000, contingent upon the proper abandonment of monitoring wells, obtainment of a deed notification, and the publication of a public notice. Subsequently, the WDC rescinded its closure approval and transferred the case back to the WDNR. Additional groundwater monitoring was performed until 2005. Based on the results of the groundwater monitoring activities and the closure of the wells, Oscar Mayer requested closure of this issue on September 9, 2005. After the submittal of additional documentation, the WDNR approved final closure on May 25, 2006 and listed the Oscar Mayer site on their GIS Registry to document residual soil and groundwater impacts.

  A review of the WDNR GIS Registry file for this LUST listing indicates that USTs were located outside the maintenance shop's west exterior wall, at the southern portion of the shop. According to a Site Plan, a 10,000-gallon gasoline UST (removed 1986), and 9,500-gallon gasoline and 10,000-gallon diesel fuel USTs (removed 1996) were located in this area; a new diesel fuel UST (capacity not reported) was installed in the former location of the 10,000-gallon UST in 1996. Although 1,141 tons of impacted soils were removed, residual soil contamination (described as gasoline and GROs and DROs) and BTEX was left in place. Groundwater impacts were delineated and identified in a limited area beneath the maintenance shop and outside the shop, near its west-central portion. The maintenance of an asphalt barrier near the documented residual impacts was assigned as part of the LUST closure. Although residual groundwater contamination may remain, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.

- **West Property – ASTs / ERP #02-13-524010**

  On March 19, 2004, KL Engineering identified petroleum impacts during a soil boring investigation performed during parking lot construction activities on the West Property and reported a release to the WDNR. As described in Section 4.2, this area was formerly operated by a coal and fuel company and contained twelve 10,000-gallon fuel oil ASTs that were removed between 1975 and 1985. Initial response activities included excavating 489 tons of petroleum-impacted soils and removing approximately 9,000 gallons of petroleum-impacted groundwater from the excavation. After further investigation, Oscar Mayer requested closure of the release on October 5, 2005. After the submittal of additional documentation, the WDNR approved final closure on February 8, 2006 and listed the Metro Bus Station/Oscar Mayer site on their GIS Registry to document residual soil and groundwater impacts.

  A review of the GIS Registry file for this ERP listing did not provide additional information regarding closure activities, with the exception that petroleum impacts were identified on the northern portion of the West Property, at the southern end of the commuter parking area, in the vicinity of the former fuel oil ASTs. Although residual contamination remains on-site, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.

- **West Adjacent Property - Fuel Oil ASTs / LUST #03-13-000053**

  In February 1989, Oscar Mayer notified the WDNR of a release of approximately 14,000 gallons of #2 fuel oil from buried underground piping that serviced current (and historical) fuel oil ASTs

located on a leased property adjacent to the west of the processing plant (a.k.a. Hartmeyer property). Initial spill response activities included the recovery of approximately 8,000 gallons of fuel oil from the ground surface and in trenches at the Hartmeyer property. Dames and Moore submitted a report describing the removal efforts to the WDNR in 1989. An investigation was then conducted to evaluate the extent of soil and groundwater impacts associated with releases of fuel oil from the belowground piping. According to the 2006 Hartmeyer AST Closure Request and the 2007 Final Closure Request, a *Fuel Oil Spill Site Investigation and Remedial Options Report* was submitted to the WDNR in October 1991 and recommended remediation by natural attenuation for groundwater impacts. After additional groundwater monitoring, D&M requested closure of the fuel oil release in February 1996. The WDNR denied the closure request as the full extent of soil and groundwater impacts had not been adequately delineated.

In 1999, BT^2, Inc. took over the investigation and monitoring of this incident. Additional soil sampling and monitoring well installation were performed in 2001. Quarterly groundwater monitoring was performed in 2002 and 2003, and semi-annual sampling was conducted from 2004 through March 2006. Three monitoring wells were advanced on the Central Property, adjacent to the railroad tracks for the collection of groundwater samples. The results did not identify groundwater contamination in these wells. Based on the results of the groundwater monitoring and the closure of the production wells, Oscar Mayer requested closure of the fuel oil release on October 24, 2006. The WDNR requested additional delineation of residual free product before closure could be granted. After performing additional free product delineation and the submittal of additional documentation, the WDNR approved final closure on January 23, 2008 and listed the Oscar Mayer/Hartmeyer AST site on their GIS Registry to document soil and groundwater impacts.

- **2015 UST Closure Report**. A 12,000-gallon diesel fuel UST was excavated and removed from an area outside the west wall of the maintenance shop in 2014. According to the 2015 UST Closure report, water was observed in the excavation; however, no sheens were visible on the water. A total of four confirmatory soil samples were collected from sidewalls of the excavation and analyzed for petroleum VOCs; soil samples were not collected from the base of the excavation, due to the presence of water, or the east sidewall of the excavation, due to the presence of the maintenance shop's foundation. VOC concentrations ranged between <0.025 ppm to 0.041 ppm, but all detections were below the WAC NR 720 RCLs Protective of Groundwater Quality values. As the petroleum VOCs concentrations were below reportable levels, Ramboll Environ considers this matter to represent a CREC.

4.5 User-Provided Information

Ramboll Environ provided Kraft Heinz with a User Questionnaire (consistent with Appendix X3 of the ASTM Standard) that requested information relating to environmental liens, AULs, specialized knowledge of the property, property value diminution, chain-of-title, or any other commonly known or obvious indications of site contamination, that was not otherwise provided to Ramboll Environ. Information obtained confirmed that an AUL has been established for the West Property. The user did not provide any other information that was not otherwise obtained and reviewed by Ramboll Environ.

5. SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

Ramboll Environ conducted a visit to the site on May 10, 2016. During the site visit, observations of the interior of the majority of the buildings and the majority of the exterior portions of the site were made to evaluate if any RECs, as defined in Chapter 2, are present. Ramboll Environ did not observe the roof of the buildings, locked ancillary structures (i.e., water well house, equipment sheds), locked and/or inaccessible areas of the buildings (i.e., raw meat processing areas, substations), or structures on the East Property, and the gravel storage yard on the West Property, as these areas are leased to other entities.

5.2 General Site Setting and Observations

Ramboll Environ made observations concerning all of the interior and exterior issues specified in Sections 9.4.2 through 9.4.4 of the ASTM E1527-13 Standard. The presence or absence of each issue of environmental interest or concern is noted in Table 7. Additional information regarding observed and historical items is provided in the sections following the table.

Table 7: Summary of Site Reconnaissance Observations

Issue	ASTM Section	Observation
Interior and Exterior Issues		
Current use(s) of the property	9.4.2.1	See Section 3.2
Past use(s) of the property	9.4.2.2	See Section 4.2
Hazardous substances and petroleum products used, treated, stored, disposed of, or generated on the property in connection with identified present or past uses	9.4.2.3	See Section 5.2.1
Storage tanks: USTs (fill ports, vent pipes, manholes) ASTs	9.4.2.4	See Sections 5.2.2 and 5.2.3
Odors (strong, pungent, or noxious)	9.4.2.5	See Section 5.2.4
Pools of liquid, standing surface water, or sumps	9.4.2.6	See Section 3.2.3
Drums of hazardous substances or petroleum products (5-gallon, 55-gallon, or totes)	9.4.2.7	See Section 5.2.1
Hazardous substance and petroleum product containers (not necessarily in connection with identified uses)	9.4.2.8	See Section 5.2.1
Unidentified substance containers suspected of containing hazardous substances or petroleum products	9.4.2.9	Absent

Table 7: Summary of Site Reconnaissance Observations

Issue	ASTM Section	Observation
PCBs Electrical equipment on site (e.g., transformers, capacitors) Electrical equipment known or likely to contain PCBs Hydraulic equipment on site (e.g., elevators, truck dock lifts) Hydraulic equipment known or likely to contain PCBs	9.4.2.10	See Section 5.2.5
Interior Issues		
Heating/cooling systems	9.4.3.1	See Table 1
Stains or corrosion on interior floors, walls, or ceilings (except for staining from water)	9.4.3.2	See Section 5.2.6
Floor drains and interior sumps	9.4.3.3	See Section 3.2
Exterior Issues		
Pits, ponds, or lagoons on site or adjacent properties	9.4.4.1	Absent
Stained soil or pavement	9.4.4.2	See Section 5.2.7
Stressed vegetation (from other than insufficient water)	9.4.4.3	Absent
On-site solid waste disposal; areas apparently filled or graded by non-natural causes; or mounds or depressions suggesting solid waste disposal	9.4.4.4	See Section 5.2.8
Wastewater or other liquid (including storm water) or any discharge into a drain, ditch, underground injection system or stream on or adjacent to the property	9.4.4.5	Absent
Wells (including dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	9.4.4.6	See Section 5.2.9
Septic systems or cesspools	9.4.4.7	Absent

Notes:

Observations noted in this table and discussed further below are based on information obtained during the site visit and from a review of the sources summarized in Section 4.

See the ASTM Standard for a detailed description of the issues included in each referenced ASTM section.

Per the ASTM Standard, fluorescent light ballasts likely to contain PCBs do not need to be noted.

N/A – Not applicable

5.2.1 Hazardous Substances and Petroleum Products

The primary chemicals used at the site include primarily WWTP chemicals (i.e., flocculants, polymers, coagulants), a variety of acids, and ammonia. In addition, Kraft Heinz uses maintenance-related materials, such as fuels, oils, lubricants, greases, non-chlorinated degreasers, welding gases, boiler/cooling tower/wastewater treatment chemicals, refrigerants, sanitizers, and detergents. Several dedicated drum and other storage areas are maintained at the site. These areas are used for the storage of raw materials, ancillary chemicals, and wastes. Ramboll Environ's observations pertaining to the main drum, container (e.g., totes, roll-offs, etc.), and other storage areas at the facility are summarized in the table below.

Table 8: Major Chemical and Waste Storage Areas

Storage Location*	Description	Secondary Containment	Notes / Observations
Raw Materials and Ancillary Chemicals			
Machine shops throughout the processing plant and in the basement and first floor of the power plant	Each machine shop contains smaller volume (retail-sized) containers of maintenance chemicals, in addition to 35- to 55-gallon naphthalene drums (in parts washers). A total of 16 smaller parts washers are located throughout the smaller machine shops in the processing and power plants.	The majority of lower-volume chemicals are stored in flammable cabinets. Approximately five of the parts washers are located atop secondary containment.	No evidence of significant releases; two solvent drums showed evidence of minor past leakage. There was no staining near floor drains; flooring appears in good condition.
Spice mixing/ packaging area	Storage and production areas containing over 75 55-gallon drums of various oils, acids, and liquid smokes	No; stored atop plastic pallets	Minor evidence of releases, with some staining near a floor drain that discharges into the on-site WWTP; flooring appears in good condition
Meat storage area in the processing plant	Over 50 approximately 330-gallon sodium lactate totes	No	No evidence of a release.
Throughout the processing plant	Several 55-gallon drums and 330-gallon totes of various food-grade detergents and cleaning compounds are stored in the processing plant, with the majority of the chemicals stored on its ground floor	No; the majority of the containers are stored atop plastic boxes	Areas of incidental spillage noted, but based on their nature (food-grade cleaning compounds), the spills do not suggest a potential for impact.

Table 8: Major Chemical and Waste Storage Areas

Storage Location*	Description	Secondary Containment	Notes / Observations
Waste Storage Areas			
Inside the used oil storage room, attached to the wastewater treatment building	Between 50–70 drums of used oil	No	One drum showed evidence of leakage and was located by a drain. The drain discharges to the on-site WWTP; flooring appears in good condition.
Inside the wastewater treatment building	Two 55-gallon drums of waste oil	No; stored atop concrete	Oily staining was noted at the base of the drums; flooring appears in good condition.
Outside the wastewater treatment building	Six 55-gallon drums of used oil at the northeast corner of the building, which are likely empty	No; stored in the concrete dock	No evidence of a release.
Combined Storage Areas (Raw Material, Ancillary Chemical, and Waste)			
Inside the central machine shop on the ground floor of the processing plant	A larger 55-gallon parts washer, 25-gallon drums of used oil, 33 55-gallon drums of oil, and 16 60-gallon oil containers	Used oil drums and the in-use oil containers are stored atop or within a secondary containment; the remaining containers are stored atop wooden pallets or the brick and concrete floor	Oil staining was observed inside and outside the concrete secondary containment unit housing in-use oils; stains did not appear to reach floor drains and the flooring appears in good condition.
Inside on the ground and first floors of the power plant	Approximately 15 55-gallon drums of oil, used oil, or coolant	No; stored atop wooden pallets or the concrete floor	Isolated areas of oil staining were observed in the power plant, but do not appear to reach floor drains. Isolated staining in the machine shop has reached a linear drain that to discharges into the on-site WWTP; flooring appears in good condition.
Inside the maintenance shop	Approximately 25 to 30 55-gallon drums of oil, used oil, and antifreeze, an approximately 55-gallon parts washer, and a large salt mound (snow removal/deicing)		
Inside and outside of the sludge dewatering building	Various totes of polymers were observed inside the building and outside at its southeast corner	No; stored atop concrete inside or outside of the building	No evidence of a release.

Table 8: Major Chemical and Waste Storage Areas

Storage Location*	Description	Secondary Containment	Notes / Observations
Interior and exterior refuse containers	Approximately 45 dumpsters, 2 compactors, and 1 cardboard bailer are located inside the facility and on the Central Property	No	No evidence of a release.

* Only major, designated storage locations included. Other storage takes place on an ad hoc basis near points of use/generation throughout the facility. Unless otherwise mentioned, this table does not include storage of retail-sized containers of household-type maintenance or cleaning chemicals, or compressed gases; the storage of these materials is not expected to pose a significant contamination concern.

A caged storage area in the maintenance shop was empty of drums containing hazardous waste at the time of the inspection; however, universal wastes (bulbs and batteries) were observed stored in this area in cardboard boxes and 5-gallon plastic pails.

5.2.2 Underground Storage Tanks

According to facility personnel, there are no currently active USTs at the site. According to the WDNR, the facility is registered with five removed USTs containing fuel oil, gasoline, or diesel fuel that ranged from 250- to 10,000-gallons and were removed between 1986 and 2014.

A LUST incident (#03-13-114831) was reported at the Central Property in 1996 in the vicinity of three of these USTs. The USTs included a 10,000-gallon gasoline UST (removed 1986), and 9,500-gallon gasoline and 10,000-gallon diesel fuel USTs (removed 1996) that were located along the west wall of the maintenance shop. A discussion of the LUST incident and sampling/remedial activities conducted on site in the area of these USTs was provided in Section 4.4. According to maps provided in the WDNR GIS Registry Packet associated with this LUST incident, another diesel fuel UST was installed in the excavation formerly containing the 10,000-gallon diesel fuel UST. This was a 12,000-gallon diesel fuel UST that was removed in 2014. Soil sampling activities conducted following the removal of the UST at that time is discussed further in Section 4.4.

Two other LUSTs were reported relating to the site and included a release (#03-13-000053) that was reported in February 1989 and granted closure in January 2008 (west adjacent property) and a release (#03-13-001744) that was reported in November 1992 and granted closure in August 1993. The release reported in February 1989 was associated with a release of fuel oil from below grade piping connected to west adjacent fuel oil ASTs (Hartmeyer property) that was assigned ERP/LAST listings and is discussed further in Section 4.4. Facility personnel had no information pertaining to the LUST reported in 1992, which is likely associated with a 250-gallon fuel oil UST that was removed at that time. Additionally, there was no information available online with the WDNR regarding this release. The absence of information related to this UST/LUST is considered a significant data gap, as discussed further in Section 6.

Historical documentation revealed that, in 1942, a zinc chloride tank was located south of the power plant, two gasoline tanks were identified outside at the northeast corner and west-central portion of the maintenance shop, and three gasoline tanks were denoted on the southeast corner of the Central Property, near a former gasoline station. However, based on the available information, it is not known

if these tanks were aboveground or underground, if they were removed, or if the gasoline UST removed near the maintenance shop in 1986 correlates to the documented tank system. As a note, although no information pertaining to tanks was provided, two additional gasoline stations were documented on the Central Property of the site between 1958 and 1967. Further, an inoperable belowground automobile lift is present in the maintenance shop of the building. Belowground lifts typically utilize approximately 35-gallon below-ground oil reservoirs.

5.2.3 Aboveground Storage Tanks

Several ASTs are maintained at the site, as summarized in Table 9. Facility personnel reported that there are no current underground transfer lines used to convey the materials from the ASTs. As discussed in Section 4.4., fuel oil ASTs were historically located on the Hartmeyer property located adjacent to the west of the Central Property. Fuel oil from these ASTs was historically pumped, via underground piping, to provide fuel for the boilers in the power plant.

Table 9: Summary of Aboveground Storage Tanks

Number and Size (gal.)	Contents	Location	Secondary Containment	Notes / Observations
In Use				
1 x 550	Gasoline	Outside, near the truck washing area located south of the WWTP	Yes (concrete dike)	No evidence of a release
1 x 2,000	Diesel fuel			
1 x 850	Flocculant	Inside the wastewater treatment plant building	No	Some staining and corrosion was observed at the base of the ASTs on the concrete floor surface. Although the concrete appeared pocked, there are no drains in the area of the ASTs.
1 x 850	Coagulant			
1 x 900	Sulfuric acid	Inside the power plant	No	Some staining and corrosion was observed at the base of the AST. Although the concrete appeared pocked, there are no drains in the area of the ASTs.
1 x 150,000	Fuel oil	Unknown (registered to the Central Property's address)	N/A	The WNDR indicates this AST is in-use. This is likely one of the two ASTs that were / are located on the west adjacent Hartmeyer property. The AST currently located on the Hartmeyer property is empty.[4]

[4] Facility personnel indicated that although the AST continues to be connected to the site via aboveground piping, it is no longer used by Kraft Heinz.

Table 9: Summary of Aboveground Storage Tanks

Number and Size (gal.)	Contents	Location	Secondary Containment	Notes / Observations
Former				
1 x 500	Waste oil	Unknown (registered to the Central Property's address)	N/A	The WNDR indicates these ASTs were removed in 2001 or 2004; as noted above, the larger 250,000-gallon tank may be the former AST removed from the Hartmeyer property or the empty AST currently located on the Hartmeyer property.
1 x 250,000	Fuel oil[5]			
6 x 820	Diesel fuel			The WDNR indicates the ASTs were associated with back-up generators and removed in 2006 and 2008.
4 x 10,000	Fuel oil	Unknown (registered to the West Property's address)		The WNDR indicates these ASTs were removed in 1975 or 1985. A LAST incident and ERP #02-13-524010 were reported in 2004, as further discussed in Section 4.4.
8 x 10,000				

Several process tanks containing non-petroleum products are present on site and within the buildings. A total of 250,000 pounds of ammonia are present in various vessels, storage tanks, accumulators, and condensers; ammonia storage containers are present primarily in and near the cooling building. As part of the cooking process that uses hot water, there is a chilled water tank (28,000 gallons), a hot water tank (28,000 gallons), and two brine tanks (19,060 and 18,637 gallons) located on the ground floor of the processing plant. Several gaseous tanks, containing carbon dioxide and nitrogen, are located north of the processing plant near potassium lactate, liquid salt, corn syrup, and brine ASTs. Further, there are there several 400- to 800-gallon cleaning chemical ASTs located in the central cleaning area in the processing plant.

In addition, a large water tank is present southwest of the power plant. Facility personnel indicated the tank was historically used to hold process water; however, it now contains water for fire suppression purposes. Three ASTs are also located at the southeast corner of the power plant; facility personnel stated that these ASTs never contained product and have never been used.

5.2.4 Odors

Ramboll Environ noticed strong odors within the building from the cooking of meat products and mixing/packaging of spices. According to facility personnel, no complaints have ever been received from neighboring facilities or residents regarding odors emanating from the site, nor has the site received correspondence from regulatory agencies regarding noise or odors.

[5] It is unclear if this fuel oil AST correlates to the fuel oil tank depicted on the 1986 Sanborn map

5.2.5 Polychlorinated Biphenyls

Facility personnel were not aware of on-site equipment that is known to contain PCBs. Several pad- and pole-mounted transformers are present throughout the site and are owned by Kraft Heinz or Madison Gas & Electric. According to facility personnel, there are 46 facility-owned transformers on site; however, their contents (PCB or non-PCB) is not known. The units that were inspected by Ramboll Environ were labeled as non-PCB. Ramboll Environ saw no indication of leaks or releases from electrical equipment observed during the site visit. Because all of the units were not inspected and some of the units were likely installed before the 1979 federal ban on the manufacture of PCBs, it is not known whether some of the transformer oils contain PCBs.

Because the majority of the buildings on the Central Property were constructed prior to the 1979 federal ban on the manufacture of PCBs, it is not known whether hydraulic oils in elevator systems, lifts, hoists, dock leveling systems, or other types of electrical equipment, such as capacitors, contain PCBs.

5.2.6 Stains or Corrosion on Interior Floors, Walls, or Ceilings

As noted in Sections 5.2.1 and 5.2.3, areas of solvent, oil, and acid staining were noted throughout the buildings. The staining did not appear to be indicative of widespread releases or losses and flooring surfaces in the vicinity of the staining appeared to be in good condition, with no evidence of cracking. Floor drains are directed into the on-site WWTP.

5.2.7 Stained Soil or Pavement

Ramboll Environ observed evidence of pavement staining in the paved parking and storage areas on site; facility personnel believe the staining likely resulted from minor drips from vehicles and trucks parked in these areas. Pavement in the vicinity of the observed staining appeared to be in good condition, with no evidence of cracking.

5.2.8 Solid Waste Disposal Areas or Areas Filled by Non-Natural Causes

Prior to development of the site in the early 1900s, the site consisted of marshy land and as such, it appears that fill material was placed on site during development. Water well logs dating back to the 1930s documented drift, fill, and muck in site soils; no buried materials of concern (i.e., construction debris, drums, etc.) were noted on the well logs.

By the late 1930s, the northern portion of the East Property appeared to be located within the borders of a former north adjacent landfill/wastewater treatment facility. This landfill (Truax) was later identified as a potential source of chlorinated solvent groundwater impacts identified north of the processing plant during ERP assessment activities conducted on the Central Property of the site between 1984 to 2006. The eastern portion of the landfill / wastewater treatment facility was redeveloped as a shopping center. Additionally, following adjacent roadway construction activities in the 1960s, the entire parcel appeared graded/disturbed. The West Property contained a coal and fuel company by as early as 1932; large areas of this parcel were disturbed by the 1940s. The areas of the parcel where fuel oil tanks were located were remediated and used for parking purposes by 1980 (see Section 4.4).

The Central Property of the site has undergone significant changes since the 1900s. By the early 1930s, areas of coal deposition are visible on the southeastern and south-central portions of the parcel. Between the late 1940s and early 1960s, a coal mound was located on the northern portion of

the parcel. Facility personnel indicated that residual coal been buried on the southwestern portion of the site (in the former area of the stock pens).

5.2.9 Wells

According to facility personnel, several wells were advanced on site during the facility's history for potable and process water purposes. No wells are currently used, as all water used by Kraft Heinz has been supplied by Madison Water Utility since 2004.

Ramboll Environ obtained records from the WGNHS documenting the installation of seven wells at the site; no additional records for the site were available online. One well was installed on the East Property in 1938 and appears to have been associated with a former residential structure located in this area. According to information provided by the WGNHS and facility personnel, there appear to have been at least six wells on the Central Property. Specifically, Well 2 was installed south of the power plant in 1939 and was abandoned in 2004. Well 3 was originally installed southeast of the WWTP in 1946, with replacement wells advanced in 1998 and 2000 (no abandonment documentation provided). Well 4 was installed southwest of the maintenance shop in 1963 and was abandoned in 2007. Well 5 was installed on the northwestern corner of the Central Property in 1975 and was abandoned in 2004; a well house that was not accessible at the time of the site visit continues to be located on the northwestern corner of the Central Property. Well 6 was installed on the south-central portion of the Central Property in 1965 and appears to have been replaced with another well in 1999; this well was abandoned in 2007.

No additional well abandonment documentation was provided for review.

6. FINDINGS, OPINION, AND CONCLUSIONS

Ramboll Environ performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-13 of the Kraft Heinz site located at 910 Mayer Street, 1126 and 1201 Huxley Street, 2150 Commercial Avenue, 1910 Roth Street, and 1010 North Street in Madison, Wisconsin in May 2016. The objective of the ESA was to identify RECs, as defined in the ASTM Standard. A list of key definitions presented in the ASTM Standard is provided in Chapter 8 at the end of this report. Any exceptions to, or deletions from, this practice are described in Section 6.2.

6.1 Findings, Opinions, and Conclusions

6.1.1 Recognized Environmental Conditions

Ramboll Environ has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-13 of the Kraft Heinz site commonly identified as 910 Mayer Street in Madison, Wisconsin. Any exceptions to, or deletions from, this practice are described in Section 6.2 of this report. This assessment has revealed no evidence of RECs in connection with the site, except for the following:

- **Potential Impacts from the Historical Industrial Operations.** Specific operations associated with the historical industrial use of the site include:
  - Central Property Operations: The Central Property has been operated as a meat processing and packaging facility, as well as other purposes, since at least 1915. Related operations have historically involved (and currently involve) equipment and machinery which required the use of chemicals, including solvents, petroleum products, acids, and maintenance-related products. By 1942, features inside the processing plant included “tank rooms”; no additional information concerning the tank room was available. Three gasoline filling and repair stations were documented on the Central Property between 1958 and 1967, and documentation available online with the USEPA indicated that Oscar Mayer historically manufactured insecticides (space spray, pyrethrum, and lethane) at the facility in the late 1960s; no further information regarding these operations was available. As part of manufacturing operations, Oscar Mayer reportedly used chlorinated solvents (e.g., TCE; 1,1-DCE; methylene chloride; and PCE) in a spice extraction process and for cleaning activities. Soil and groundwater sampling activities were performed on site between 1986 and 2006 in specific portions of the site and were tailored to address releases from tanks or other spills. Although sampling activities identified chlorinated solvent impacts on the northern portion of the site, it was suggested that the impacts may have been the result of historical on-site operations and/or off-site sources, including nearby landfills (as discussed in the CREC discussion below, this issue has been granted closure). Historical cleaning and fabrication activities were reported to have occurred near the former stock pens and maintenance shop.
  - Central Property Below-Grade/Above-Grade Features. Historical documentation revealed that, in 1942, a zinc chloride tank was located south of the power plant, two gasoline tanks were located outside at the northeast corner and west-central portion of the maintenance shop, and three gasoline tanks were located on the southeast corner of the Central Property, near a former gasoline station. Based on the available information, it is not known if these tanks were aboveground or underground, if they were removed, or if the gasoline UST removed near the maintenance shop in 1986 correlates to one of the above documented tank systems. Further, a belowground automobile lift is present in the maintenance shop of the building.

- Central Property Coal Storage Areas: By the early 1930s, areas of coal deposition were present on the southeastern and south-central portions of the Central Property. Between the late 1940s and early 1960s, a coal mound was located on the northern portion of the Central Property. Facility personnel indicated that residual coal may have been buried on the southwestern portion of the site (in the former area of the stock pens).
- East Property Operations: Between the late 1930s and mid-1950s, the northern portion of the East Property appeared to be located within the borders of a former north adjacent landfill/wastewater treatment facility. The eastern portion of this off-site landfill/wastewater treatment area was redeveloped with a shopping center by 2000; however, the western portion of the landfill has not been redeveloped. Based on limited available information, remedial activities planned for the landfill included a clay cap, expansion of the gas extraction system, and continued groundwater monitoring for 30 years (as of the 1990s). The current status of the landfill is not available through WDNR's website, and Ramboll Environ has requested information from the WDNR.
- West Property Operations: The West Property was developed with coal and fuel facilities, including coal storage areas and multiple fuel oil tanks, from 1937 to approximately 1985. The northeastern portion of the West Property where former fuel tanks were located was remediated and has been used for parking purposes since the early 2000s.

6.1.2 Controlled RECs

The following CRECs were identified related with regulatory closure and do not appear to represent a current environmental concern, assuming the buildings, structures, and other institutional controls or engineered barriers remain in place.

- **Chlorinated VOCs in Groundwater.** The Central Property of the site was assigned ERP #02-13-000895 following the discovery of chlorinated compounds in four on-site groundwater wells in 1986. The chlorinated compounds detected in groundwater included TCE; cis-1,2-dichloroethylene; vinyl chloride; xylene; ethyl benzene; toluene; methylene chloride; chlorobenzene; and acetone. In 1994, the WDNR was notified that the concentrations of chlorinated compounds in the wells were detected above state PALs. Between July 2001 and April 2005, semi-annual groundwater monitoring was performed at the site. Based on the results of the sampling activities, the WDNR approved final closure of this ERP listing on December 7, 2006, which was listed on their GIS Registry to document residual groundwater impacts on site. A review of the WDNR GIS Registry file for this ERP listing indicates that vinyl chloride impacts above enforcement standards are limited to the area beneath and immediately north of the processing plant. Although residual groundwater contamination may remain, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.
- **Removed Petroleum USTs**. Three USTs, a 10,000-gallon gasoline UST (removed 1986), and 9,500-gallon gasoline and 10,000-gallon diesel fuel USTs (removed 1996), were located outside the maintenance shop's west exterior wall, at the southern portion of the shop. An investigation was conducted to evaluate the extent of potential soil and groundwater impacts associated with releases from the USTs in 1997. As petroleum impacts were discovered, LUST #03-13-114831 was assigned to the site. Groundwater monitoring activities continued to be performed in this area until 2005. The WDNR approved final closure on May 25, 2006 and listed this LUST on their GIS Registry to document residual soil and groundwater impacts, including residual soil contamination (GROs, DROs, and BTEX) and petroleum-impacted groundwater beneath the maintenance shop and outside the shop, near its west-central portion. The maintenance of an

asphalt barrier near the documented residual soil impacts was assigned as part of the LUST closure. Although residual contamination remains on site, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.

- **West Property ASTs.** On March 19, 2004, KL Engineering identified petroleum impacts in soil during parking lot construction activities on the northeast corner of the West Property and reported a release to the WDNR. Subsequently, a LAST incident and ERP #02-13-524010 were assigned to the site. The West Property was formerly operated by a coal and fuel facility and contained twelve 10,000-gallon fuel oil ASTs that were removed between 1975 and 1985; the release was identified in the area of these former ASTs. Initial response activities included excavating 489 tons of petroleum-impacted soils and removing approximately 9,000 gallons of petroleum-impacted groundwater from the excavation. Following additional sampling activities, the WDNR approved final closure of the ERP on February 8, 2006 and listed this ERP on their GIS Registry to document residual soil and groundwater impacts. Although residual contamination remains on-site, because closure has been granted, Ramboll Environ considers this matter to represent a CREC.
- **2014 UST Closure**. A 12,000-gallon diesel fuel UST was excavated and removed from an area outside the west wall of the maintenance shop in 2015. Water was observed in the excavation; however, no sheens were visible on the water. A total of four confirmatory soil samples were collected from sidewalls of the excavation and analyzed for petroleum VOCs; soil samples were not collected from the base of the excavation, due to the presence of water, or the east sidewall of the excavation, due to the presence of the maintenance shop's foundation. VOC concentrations ranged between <0.025 ppm to 0.041 ppm, but all detections were below the WAC NR 720 RCLs Protective of Groundwater Quality values. As the petroleum VOCs concentrations were below reportable levels, Ramboll Environ considers this matter to represent a CREC.

6.1.3 Significant Data Gap Issues

Ramboll Environ identified significant data gaps associated with the following issue. These significant data gaps affect Ramboll Environ's ability to assess whether the issues are CRECs or HRECs:

- **1999 ERP and 1992 LUST Listings.** Ramboll Environ has insufficient information regarding two incidents that have been closed by the WDNR: a 1999 ERP and a 1992 LUST report. The site (Oscar Mayer Lift) was enrolled into the ERP on March 4, 1999 (ERP #02-13-221826); an end date of May 13, 1999 was assigned to its closure. A LUST (#03-13-001744) was reported Oscar Mayer Foods in November 1992 in association with a release of petroleum and was granted closure in August 1993. Although both incidents are listed as closed, facility personnel had no information pertaining to these listings and no documentation was available online. Information was requested from the WDNR; however, a response has not yet been received. This lack of information represents a significant data gap. Absent further information, Ramboll Environ cannot confirm whether these issues would be classified as CRECs or HRECs.

6.1.4 Other Findings

In addition to RECs, CRECs, and findings associated with significant data gaps discussed above, the following additional findings related to potential contamination concerns were identified:

- **West Adjacent Property Fuel Oil Release.** In February 1989, Oscar Mayer notified the WDNR of a release of approximately 14,000 gallons of #2 fuel oil from buried underground piping that serviced current (and historical) fuel oil ASTs located on a leased property adjacent to the west of

the processing plant. Three monitoring wells were advanced on the site (i.e., Central Property) adjacent to the railroad tracks for the collection of groundwater samples. The results did not identify groundwater contamination in these wells. Although contamination remains on the west adjacent property, closure was granted by the WDNR.

- **Fill Materials.** Before site development in the early 1900s, the site and surrounding areas consisted of marshy areas that were subsequently filled during development. Water well logs for the Central Property that date back to the 1930s documented drift, fill, and muck in site soils. Following adjacent roadway construction activities in the 1960s, the entire East Property appeared graded/disturbed. In addition, a former fly ash disposal area was present on the northeast corner of the Central Property, beneath the current parking lot; dates of use of this disposal area were not provided. No further information regarding the source(s) of fill used to grade the site was available.
- **Potential Migration of Contamination from Off-site Properties.** The site is located adjacent to and in the presumed downgradient direction from two off-site properties listed on databases indicative of potential soil or groundwater contamination. The former Burke WWTP and former Truax Landfill located adjacent to the north-northeast of the site are listed with an open ERP listing and as a SHWS and a portion of the landfill/wastewater treatment facility may have extended onto the East Property. The database stated that the presence of chlorinated solvents on the northeastern portion of the Central Property may have been the result of the operation of the landfill. Based on the available information, there is no indication as to whether contamination at these adjacent properties represents a significant contamination risk to the site; however, consistent with ASTM requirements, Ramboll Environ has attempted to undertake a further review of the listings through submission of a FOIA request to the WDNR. At the time of this report, Ramboll Environ was still awaiting a reply and this is, therefore, considered a data gap. Also, one property located potentially upgradient of (but not adjacent to) the site is listed on a database indicative of potential soil and groundwater contamination. Specifically, ShopKo Store No. 034 (approximately 0.7 miles northeast of the site) is listed as a Brownfields. If contamination associated with off-site properties is found to have migrated onto the site, it is expected that any remedial activities would be the responsibility of the entity(ies) named in the listing or other designated responsible party and not Kraft Heinz.

6.1.5 *De Minimis* Conditions

De minimis conditions are those that do not represent a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. Ramboll Environ identified the following *de minimis* conditions related to the site:

- **Pavement and Floor Staining.** Ramboll Environ observed areas of exterior pavement and interior flooring where oil stains were apparent. The stains were limited in areal extent, the underlying pavement/flooring appeared to be intact, and no stains appeared to reach storm water drains. As such, Ramboll Environ considers this matter to represent a *de minimis* condition.
- **Historical Agricultural, Residential, or Commercial Use of the Site.** Based on Ramboll Environ's review of historical information sources, portions of the site may historically have been used for agricultural purposes from 1932 to 1955. Additionally, areas of the site were previously improved with an ice rink, a warehouse, a commercial structure (of unknown use), and residences and associated outbuildings between the 1930s and 1999. Ramboll Environ was not provided with any specific information regarding these historical uses. It is unlikely that any

residual impact from these uses would be the subject of regulatory scrutiny in the context of a non-residential land use scenario. As such, Ramboll Environ characterizes this finding as a *de minimis* condition, provided the site use remains industrial.

6.2 Analysis of Data Gaps

The ASTM Standard defines a data gap as "a lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information." A data gap is only significant if other information obtained during the ESA, or professional experience, raises reasonable concerns and affects the ability of the environmental professional to identify whether a given issue is a REC. The ASTM Standard requires that the ESA report identify and comment on significant data gaps.

Limiting conditions and deviations to the ASTM Standard for the assessment are discussed below.

- Due to extended age of the site, it was not possible to interview representatives dating back to the site's first developed industrial, commercial, or residential use in the mid-1910s. However, Ramboll Environ conducted interviews with representatives of Kraft Heinz with tenure at the site dating back to 2002 and reviewed other historical sources regarding former uses of the site.
- During the site visit, Ramboll Environ did not observe the roof of the buildings due to access and safety constraints. Ramboll Environ also did not observe inside locked ancillary structures (i.e., water well house, equipment sheds), locked and/or inaccessible areas of the buildings (i.e., raw meat processing areas, substations), or structures on the East Property, and the gravel storage yard on the West Property, as these areas are leased to other entities.
- Ramboll Environ has requested site-related information, but not yet received a response, from the Madison and Dane County Environmental Health Department, and the Madison Building and Fire Departments.
- Facility personnel did not have copies of certain past site investigation reports and the reports were not otherwise available from the WDNR's website. As such, Ramboll Environ submitted a FOIA request to the WDNR; as of the date of this report, no response has been received.
- The user indicated that an AUL is associated with the West Property. As it is a user requirement, Ramboll Environ did not conduct a review of records to identify whether any additional environmental liens or AULs have been imposed on the site.

None of the exceptions, deletions, deviations, or site reconnaissance limitations noted above are considered to represent significant data gaps, with the exception of the previous site investigation reports related to ERP listing #02-13-221826 and LUST listing #03-13-001744 that were not available for Ramboll Environ's review. The effect of this significant data gap on Ramboll Environ's conclusions with respect to conditions at the site is discussed in Section 6.1.

7. REFERENCES

7.1 Documents

BT^2, Inc. 1998. "Site Investigation Report and Remedial Action Plan for the Oscar Mayer UST Site at 910 Mayer Avenue in Madison, Wisconsin." January.

BT^2, Inc. 1999. Closure Request for the Oscar Mayer Foods Facility at 910 Mayer Avenue in Madison, Wisconsin. December.

BT^2, Inc. 2005. Closure Request for the Oscar Mayer Foods Petroleum UST Site at 910 Mayer Avenue in Madison, Wisconsin. September.

BT^2, Inc. 2006. Final Closure Request for the Oscar Mayer Foods Madison Metro North Transfer Point (Kraft Roth Property) at 1201 Huxley Street in Madison, Wisconsin. January.

BT^2, Inc. 2006. Closure Request for the Oscar Mayer Foods Hartmeyer AST Area at 2007 Roth Street in Madison, Wisconsin. October.

BT^2, Inc. 2006. Final Case Closure Documentation for the Oscar Mayer Foods Hartmeyer AST Area at 2007 Roth Street. July.

Conestoga-Rovers & Associates. 1994. "Phase I Hydrogeologic Investigation Report for Oscar Mayer Foods Corporation in Madison, Wisconsin." July.

EDR. 2015. "Aerial Photography Print Service: Inquiry Number 4397239.9." August 31.

EDR. 2015. "City Directory, Abstract, Inquiry Number 4421568.1." September 28.

EDR. 2016. "City Directory, Abstract, Inquiry Number 4628017.1 and 4628029.1." May 25.

EDR. 2015. "Historical Topographic Map Report, Inquiry Number 4397239.4." August 31.

EDR. 2016. "Radius Map, Inquiry Number: 4617929.2s." May 13.

EDR. 2015. "Sanborn® Map Report, Inquiry Number 4397239.3." September 2.

General Engineering Company. 2015. "UST Site Assessment of Kraft Foods of Madison, 910 Mayer Avenue, in Madison, WI." January.

7.2 Interviews

Oscar Garcia. The Kraft Heinz Company Project Engineer. 2016. Personal interview. May 10.

Nicholas Habeck. The Kraft Heinz Company Engineering and Maintenance Manager. 2016. Personal interview. May 10.

Susan Howley. The Kraft Heinz Company Safety & Environmental Program Manager. 2016. Personal interview. May 10.

8. ASTM DEFINITIONS

The following definitions are presented in the ASTM Standard:

REC - Recognized Environmental Condition:

The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.

CREC - Controlled Recognized Environmental Condition:

A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

HREC - Historical Recognized Environmental Condition:

A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

***De minimis* Condition:**

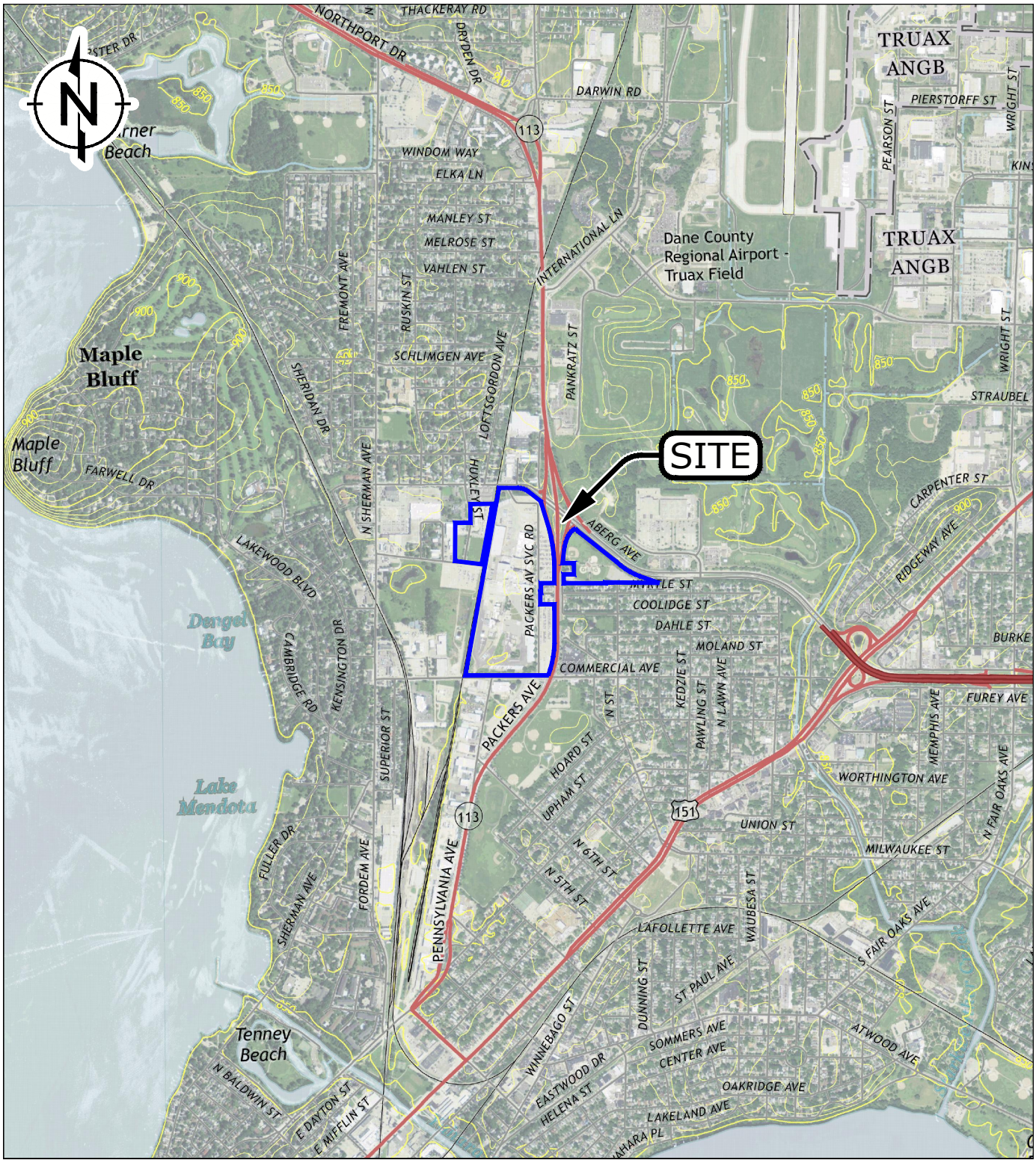
A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

Data Gap / Significant Data Gap:

A lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information. A data gap is significant if other information and/or professional experience raises concerns involving the data gap.

Please note that the term "other finding" is not defined by ASTM; rather, Ramboll Environ uses the term to connote areas of contingent risk that are not clearly defined by the ASTM Standard.

FIGURES



CONTOUR INTERVAL 10 FEET

0 1/2 1 MILE

0 2000 4000 FEET

LEGEND:

PROPERTY BOUNDARY (APPROXIMATE)

SOURCE:
2015 USGS 7.5 MINUTE SERIES MADISON EAST, MADISON WEST, WAUNAKEE, AND DE FOREST WI TOPOGRAPHIC QUADRANGLE.
SITE LOCATION; N: 43.110286° W: 89.356623° WGS84

QUADRANGLE LOCATION

RAMBOLL ENVIRON

DRAFTED BY: APR | DATE: 5/25/16

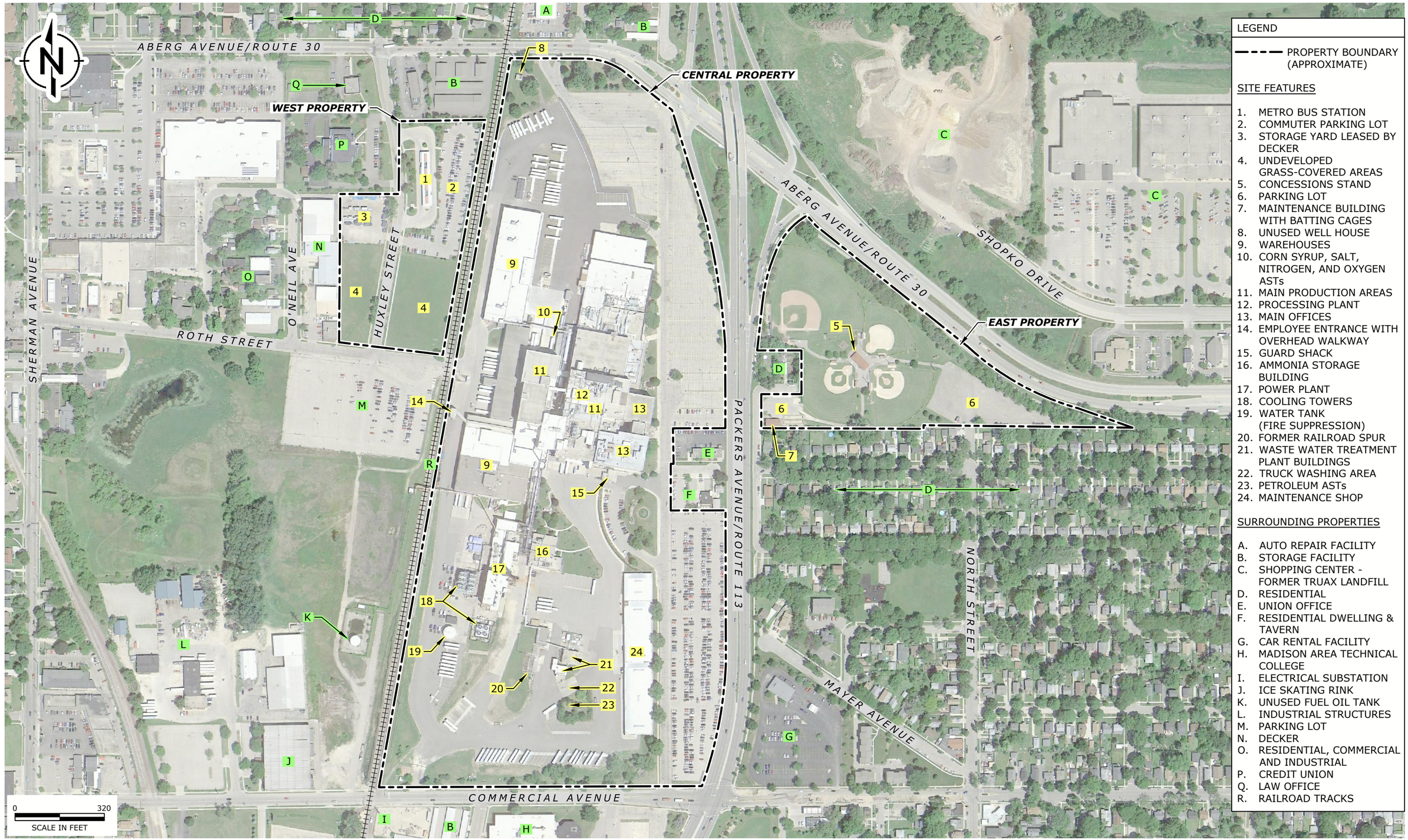
SITE LOCATION MAP

KRAFT HEINZ FOODS COMPANY
910 MAYER STREET
MADISON, WISCONSIN

FIGURE 1

21-38739A

E:\00_CAD FILES\NO#\The Kraft Heinz Company\01_Site Location Map.dwg



SOURCE: AERIAL IMAGERY: GOOGLE EARTH™, IMAGE DATED 06/12/2014.

LEGEND

PROPERTY BOUNDARY (APPROXIMATE)

SITE FEATURES

1. METRO BUS STATION
2. COMMUTER PARKING LOT
3. STORAGE YARD LEASED BY DECKER
4. UNDEVELOPED GRASS-COVERED AREAS
5. CONCESSIONS STAND
6. PARKING LOT
7. MAINTENANCE BUILDING WITH BATTING CAGES
8. UNUSED WELL HOUSE
9. WAREHOUSES
10. CORN SYRUP, SALT, NITROGEN, AND OXYGEN ASTs
11. MAIN PRODUCTION AREAS
12. PROCESSING PLANT
13. MAIN OFFICES
14. EMPLOYEE ENTRANCE WITH OVERHEAD WALKWAY
15. GUARD SHACK
16. AMMONIA STORAGE BUILDING
17. POWER PLANT
18. COOLING TOWERS
19. WATER TANK (FIRE SUPPRESSION)
20. FORMER RAILROAD SPUR
21. WASTE WATER TREATMENT PLANT BUILDINGS
22. TRUCK WASHING AREA
23. PETROLEUM ASTs
24. MAINTENANCE SHOP

SURROUNDING PROPERTIES

A. AUTO REPAIR FACILITY
B. STORAGE FACILITY
C. SHOPPING CENTER - FORMER TRUAX LANDFILL
D. RESIDENTIAL
E. UNION OFFICE
F. RESIDENTIAL DWELLING & TAVERN
G. CAR RENTAL FACILITY
H. MADISON AREA TECHNICAL COLLEGE
I. ELECTRICAL SUBSTATION
J. ICE SKATING RINK
K. UNUSED FUEL OIL TANK
L. INDUSTRIAL STRUCTURES
M. PARKING LOT
N. DECKER
O. RESIDENTIAL, COMMERCIAL AND INDUSTRIAL
P. CREDIT UNION
Q. LAW OFFICE
R. RAILROAD TRACKS

RAMBOLL ENVIRON

DRAFTED BY: APR/CKL | DATE: 6/8/16

SITE LAYOUT

KRAFT HEINZ FOODS COMPANY
910 MAYER STREET
MADISON, WISCONSIN

FIGURE
2

21-38739A

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APPENDIX D
QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

ERIN E. VEDER

Principal

Erin Veder specializes in conducting Phase I and II environmental site assessments, due diligence evaluations and regulatory compliance reviews, and providing technical support to attorneys, lenders, investors and industrial clients. Erin has completed and/or managed environmental assessments and due diligence reviews of more than a thousand industrial and commercial facilities in North America, South America, Europe and Asia, on behalf of buyers, sellers and lenders, to evaluate known and potential environmental liabilities. These assessments have been conducted over a broad array of industrial and commercial sectors, and have covered all environmental areas, including hazardous waste management, wastewater and stormwater discharges, air emissions, chemical storage, and reporting and soil and groundwater contamination. Erin has also managed multi-media EHS compliance auditing programs for Fortune 100 and 500 companies.

EDUCATION

2005
MS, Environmental Management
Stuart Graduate School of Business
Illinois Institute of Technology, Chicago, Illinois

1997
BS, Civil Engineering
Purdue University, West Lafayette, Indiana

PROJECTS

- Project Manager for a large-scale environmental due diligence project of a chemical company with more than 60 sites located in the United States, Canada, and Brazil. Developed a multi-phased approach to cost-effectively complete the environmental review in a timely manner, which included interviews with company personnel, file reviews, and full Phase I and abbreviated site visits at select sites. Approximately 30 sites were selected for site visits based on several factors, including age, operations, geography, regulatory compliance obligations, known and potential environmental liabilities, and on-going remediation issues. The evaluation included the development of reasonable expected costs associated with known and potential environmental liabilities. The deliverable included an evaluation of known and projected environmental capital expenditures, known and potential environmental liabilities and known and projected future environmental spending.

CONTACT INFORMATION

Erin E. Veder

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333 West Wacker Drive
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Chicago, IL 60606
United States of America

- Project Manager for an environmental liability assessment to evaluate the financial risk associated with the acquisition of more than 50 multi-national manufacturing, warehouse and commercial facilities. Developed a multi-phased approach that combined file reviews, focused site visits, telephone interviews and environmental agency research. Findings were summarized and ranked based on overall potential financial liability.
- Project Manager for the EHS compliance auditing program for a heavy machine manufacturing company, including multi-media EHS compliance audits of sites located in North America, South America, Europe and the Asia-Pacific. ENVIRON assisted with every step of the audit from the pre-planning to the development of the corrective actions. The deliverable incorporated the company's internal EHS management system requirements and a risk ranking.
- Project Manager for Phase II environmental assessments of six sites located in Germany, Singapore, Malaysia and Japan conducted on behalf of a potential buyer. Prepared scopes of work for the site investigations, coordinated the field work with regional staff, and reviewed and compared the analytical data to International and Local standards.
- Member of project management team for an environmental liability assessment of six manufacturing facilities located in United States, France, China, and Mexico. Review consisted of Phase I ESAs, Phase II Site Investigations, and environmental and health and safety compliance audits at the six facilities. Coordinated the staffing of audits, preparation of scope of work for Phase IIs, and reviewed project deliverables. Findings and potential financial risk associated with the facilities were summarized in site workbooks and summary reports.
- Acted as the EHS Manager for a printing industry chemical producer with six facilities located in the United States, following the acquisition by an existing client. Responsibilities included the preparation of compliance-related plans and permit applications, annual reporting and recordkeeping, training, accident/release reporting, and management of ongoing site investigation and remedial activities.
- Member of project management team and auditing team for environmental liability assessment to evaluate the financial risk associated with the acquisition of 66 automotive parts manufacturing facilities located in 23 countries in North America, Europe, Asia, and South America. Developed a multi-phased approach that combined file reviews, focused site visits, telephone interviews and environmental agency research. Findings were summarized and ranked based on overall potential financial liability.
- Auditor for ISO 14001 EMS and OHSAS 18001 health and safety management system Gap Analyses and EMS implementation for a major defense contractor in the United States. Coordinated audits, performed site management system reviews and gap analysis reporting.
- Manager and member of audit team for Environmental Performance, ISO 14001 EMS Gap Analysis and Sustainability review for a major international manufacturer in the flexible packaging and aluminum can industry. Performed site EMS reviews, compliance audits, and gap analysis reporting.
- Assisted in a file review to evaluate financial risk associated with the environmental condition of a major real estate portfolio (greater than 500 sites) for a United States lender.
- Assisted in the preparation of an environmental liability assessment associated with the terms of a previous agreement. The assessment included the evaluation of gasoline stations, oil pipelines, oil terminals, and off-site disposal locations associated with the agreement. Existing and potential environmental issues were determined and associated estimated costs of liability were assigned and reported.
- Assisted in the preparation of an ambient air quality analysis to determine off-site impacts from modifications and expansions of a power plant. This analysis included the preparation of an air emission inventory, use of air dispersion modeling to evaluate off-site impacts and Prevention of Significant Deterioration (PSD) increment standards.

- Assist clients in the preparation of state operating air permits and Annual Emission Reports for submittal to the Illinois Environmental Protection Agency (IEPA).
- Assisted in the preparation of the Operation and Maintenance (O&M) plan, the Addendum to the Work Plan for Additional Free Product Removal/Groundwater Control and the Monthly Reports on Groundwater Control and Product Removal for a State Hazardous Waste Site located in Ohio.
- Provided technical litigation support for matters involving soil and groundwater contamination, including document review, site evaluation, and evaluation of applicable state and federal regulations.

PROFESSIONAL TRAINING & ACADEMIC HONORS

OSHA 40-hour Hazardous Waste and Annual Updates
Attended a 16-hour ISO 14001 training seminar
2005 Academic Distinction Award (Illinois Institute of Technology)

MEMBERSHIPS

Air and Waste Management Association (AWMA)
Midwest Auditing Roundtable

PUBLICATIONS & PRESENTATIONS

Kennington, B.S., Travers, M.A. and Veder, E.E. Green Solutions: Development of a Sustainable Remedy for a CERCLA Site, Society of Environmental Toxicology and Chemistry Conference, 2009.

Regelbrugge, David and Veder, Erin. Environmental, Health and Safety Compliance Auditing to Minimize Business Risks, presentation at the National Association of Printing Ink Manufacturers Annual Conference, October 2012.

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ENVIRONMENT & HEALTH

ANDREA KLEINAITIS

Senior Associate

Andrea Kleinaitis specializes in conducting Phase I environmental site assessments (ESAs), due diligence evaluations and limited environmental compliance reviews. Andrea has completed assessments of more than 500 industrial and commercial facilities in North America, on behalf of buyers, sellers, or lenders, to evaluate known and potential environmental liabilities. These assessments have been conducted over a broad array of industrial and commercial sectors. She has also performed radon, lead-based paint (LBP), lead-in-drinking water (LIDW) and asbestos-containing material (ACM) surveys.

CAREER

Senior Associate, Ramboll Environ, Chicago, Illinois (2010 to present.

EDUCATION

1997
MS, Environmental Sciences
Minnesota State at Mankato

1994
BS, Biology
University of Illinois at Chicago

PROJECTS

Phase I ESA and Environmental Due Diligence

- Conducted Phase I ESAs and limited environmental compliance reviews of over 500 properties, including steel foundries, printing facility, and various manufacturing facilities.
- Conducted radon, LBP, LIDW, and ACM surveys of over 100 properties, including educational, residential, commercial, and industrial facilities.
- Conducted Phase I ESAs for stock and asset purchases, and refinancing and foreclosure transactions, as well as radon, LBP, and asbestos surveys as a non-ASTM part of Phase I ESAs.
- Created scopes of work, budgets, and report templates.
- Managed the status of environmental reports and portfolios.
- Performed internal review activities.

CONTACT INFORMATION

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United States of America

REGISTRATIONS AND CERTIFICATIONS

Licensed Asbestos Building Inspector, Illinois Department of Public Health (IDPH) License No. 100-09113

Licensed Lead Building Inspector, ISPH License No. L-007243