GIS REGISTRY
Cover Sheet

March, 2010
(RR 5367)

Source Property Information

CLOSURE DATE: Jan 25, 2006

BRRTS #: **02-41-000035**

FID #: 241645030

ACTIVITY NAME: TROSTEL TANNERY

DATCP #:

PROPERTY ADDRESS: 1776 N Commerce St

COMM #:

MUNICIPALITY: Milwaukee

PARCEL ID #: 3541054100(415 Vine), *4300(410 E Ship), *4200(1818 N Commerce)

***WTM COORDINATES:**

X: **690436** Y: **288902**

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

WTM COORDINATES REPRESENT:

- (•) Approximate Center Of Contaminant Source
- ( ) Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

Contaminated Media:

- [ ] Groundwater Contamination > ES *(236)*
  - [ ] Contamination in ROW
  - [ ] Off-Source Contamination

  (***note:*** *for list of off-source properties see "Impacted Off-Source Property" form)*
- [x] Soil Contamination > *RCL or **SSRCL *(232)*
  - [ ] Contamination in ROW
  - [ ] Off-Source Contamination

  (***note:*** *for list of off-source properties see "Impacted Off-Source Property" form)*

Land Use Controls:

- [ ] N/A (*Not Applicable*)
- [ ] Soil: maintain industrial zoning *(220)*

  (***note:*** *soil contamination concentrations between non-industrial and industrial levels)*
- [ ] Structural Impediment *(224)*
- [ ] Site Specific Condition *(228)*
- [x] Cover or Barrier *(222)*

  (***note:*** *maintenance plan for groundwater or direct contact)*
- [ ] Vapor Mitigation *(226)*
- [ ] Maintain Liability Exemption *(230)*

  (***note:*** *local government unit or economic development corporation was directed to take a response action)*

Monitoring Wells:

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

(•) Yes ( ) No ( ) N/A

** Residual Contaminant Level*
***Site Specific Residual Contaminant Level*

State of Wisconsin
Department of Natural Resources
http://dnr.wi.gov

GIS Registry Checklist

Form 4400-245 (R 3/10)

This Adobe Fillable form is intended to provide a list of information that is required for evaluation for case closure. It is to be used in conjunction with Form 4400-202, Case Closure Request. The closure of a case means that the Department has determined that no further response is required at that time based on the information that has been submitted to the Department.

NOTICE: Completion of this form is mandatory for applications for case closure pursuant to ch. 292, Wis. Stats. and ch. NR 726, Wis. Adm. Code, including cases closed under ch. NR 746 and ch. NR 726. The Department will not consider, or act upon your application, unless all applicable sections are completed on this form and the closure fee and any other applicable fees, required under ch. NR 749, Wis. Adm. Code, Table 1 are included. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than reviewing closure requests and determining the need for additional response action. The Department may provide this information to requesters as required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

BRRTS #: 02-41-000035 PARCEL ID #: 3541054100(415 Vine), *4300(410 E Ship), *4200(1818 N Co

ACTIVITY NAME: TROSTEL TANNERY WTM COORDINATES: X: 690436 Y: 288902

CLOSURE DOCUMENTS (the Department adds these items to the final GIS packet for posting on the Registry)

- [x] **Closure Letter**
- [x] **Maintenance Plan** (*if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.*)
- [ ] **Continuing Obligation Cover Letter** (for property owners affected by residual contamination and/or continuing obligations)
- [ ] **Conditional Closure Letter**
- [ ] **Certificate of Completion (COC)** (for VPLE sites)

SOURCE LEGAL DOCUMENTS

- [ ] **Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
  Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*
- [x] **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map *for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map.* (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

  Figure #: 6882 **Title:**
- [ ] **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

MAPS (meeting the visual aid requirements of s. NR 716.15(2)(h))

Maps must be no larger than 11 x 17 inches unless the map is submitted electronically.

- [ ] **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.
  Note: *Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.*

  Figure #: **Title:**
- [x] **Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.

  Figure #: 1 **Title: Workplan for the Implementation of the Integrated Site Barrier**
- [x] **Soil Contamination Contour Map:** For sites closing with residual soil contamination, this map is to show the location of all contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL)as determined under s. NR 720.09, 720.11 and 720.19.

  Figure #: 3-1 **Title: Boring Diagram *Multiple maps**

BRRTS #: 02-41-000035 ACTIVITY NAME: TROSTEL TANNERY

MAPS (continued)

☒ **Geologic Cross-Section Map:** A map showing the source location and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL). If groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES) when closure is requested, show the source location and vertical extent, water table and piezometric elevations, and locations and elevations of geologic units, bedrock and confining units, if any.

Figure #: **Title: See File**

Figure #: **Title:**

☐ **Groundwater Isoconcentration Map:** For sites closing with residual groundwater contamination, this map shows the horizontal extent of all groundwater contamination exceeding a ch. NR140 Preventive Action Limit (PAL) and an Enforcement Standard (ES). Indicate the direction and date of groundwater flow, based on the most recent sampling data.
Note: *This is intended to show the total area of contaminated groundwater.*

Figure #: **Title:**

☐ **Groundwater Flow Direction Map:** A map that represents groundwater movement at the site. If the flow direction varies by more then 20° over the history of the site, submit 2 groundwater flow maps showing the maximum variation in flow direction.

Figure #: **Title:**

Figure #: **Title:**

TABLES (meeting the requirements of s. NR 716.15(2)(h)(3))

Tables must be no larger than 11 x 17 inches unless the table is submitted electronically. Tables must not contain shading and/or cross-hatching. The use of **BOLD** or *ITALICS* is acceptable.

☒ **Soil Analytical Table:** A table showing remaining soil contamination with analytical results and collection dates.
Note: This is one table of results for the contaminants of concern. Contaminants of concern are those that were found during the site investigation, that remain after remediation. It may be necessary to create a new table to meet this requirement.

Table #: 3-1 **Title: Lead Analytical Testing Results**

☐ **Groundwater Analytical Table:** Table(s) that show the most recent analytical results and collection dates, for all monitoring wells and any potable wells for which samples have been collected.

Table #: **Title:**

☐ **Water Level Elevations:** Table(s) that show the previous four (at minimum) water level elevation measurements/dates from all monitoring wells. If present, free product is to be noted on the table.

Table #: **Title:**

IMPROPERLY ABANDONED MONITORING WELLS

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.
Note: *If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.*

☒ **Not Applicable**

☐ **Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.
Note: *If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.*

Figure #: **Title:**

☐ **Well Construction Report:** Form 4440-113A for the applicable monitoring wells.

☐ **Deed:** The most recent deed as well as legal descriptions for each property where a monitoring well was not properly abandoned.

☐ **Notification Letter:** Copy of the notification letter to the affected property owner(s).

BRRTS #: 02-41-000035 ACTIVITY NAME: TROSTEL TANNERY

NOTIFICATIONS

Source Property

☒ **Not Applicable**

☐ **Letter To Current Source Property Owner:** If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.

☐ **Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying current source property owner.

Off-Source Property

Group the following information per individual property and label each group according to alphabetic listing on the "Impacted Off-Source Property" attachment.

☒ **Not Applicable**

☐ **Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.
Note: *Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.*

Number of "Off-Source" Letters:

☐ **Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying any off-source property owner.

☐ **Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies).** This does not apply to right-of-ways.
Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*

☐ **Letter To "Governmental Unit/Right-Of-Way" Owners:** Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).

Number of "Governmental Unit/Right-Of-Way Owner" Letters:

WISCONSIN
DEPT. OF NATURAL RESOURCES

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8716
TTY 414-263-8713

January 25, 2006

Mr. Barry R. Mandel
Trostel Square Apartments LLC
111 East Wisconsin Avenue #1700
Milwaukee, WI 53202

Subject: Final Case Closure for Parcel 4, former Trostel Tannery
Commerce Street Facility
FID#241645030; BRRTs# 02-41-000035

Dear Mr. Mandel:

The Wisconsin Department of Natural Resources (WDNR) has received documentation for the final remedial actions taken for that portion of the former Trostel Tannery property (former address of 1776 Commerce Street, Milwaukee) identified as Parcel 4. The submittal from your attorney, Foley & Lardner, dated January 30, 2003, included documentation of the placement of the integrated site barrier over the former building foundation footprint and in a small area where lead impacted soil had been found. It also included an Operation and Maintenance Plan for the integrated site barrier and documentation that a deed restriction was filed for this property, as well as the required information and $200 fee for posting the site on the WDNR's GIS Registry of Closed Remediation Sites. In response to our preliminary review of the GIS Registry packet, additional information was received on March 17, 2003. The WDNR had previously issued a case closure letter for the chromium and sulfate contamination for this property (November 16, 2000).

On January 18, 2006, the WDNR received documentation that monitor wells MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, and MW-8, which were used for the investigation and monitoring of this property, had been properly abandoned in accordance with ch. NR 141, Wis. Adm. Code. Efforts to locate and abandon former MW-1 were unsuccessful, and your research indicated that this well was located in the area where Commerce Street was reconstructed. The City of Milwaukee has been notified of the potential presence of this former monitor well in the reconstructed Commerce Street right-of-way. No further action to locate and abandon this well will be required.

Subsurface investigations conducted at the property had found impacts to soil and groundwater that were related to the former leather tannery operations at the property. Concentrations of chromium, lead, and sulfates prompted remedial response actions by Trostel and subsequently Mandel Group, which included hot spot soil removal and disposal, groundwater monitoring and placement of cover material where lead remained above standards and where the building foundation had been filled with demolition debris, restricting access for investigation activities.

- Based on the information submitted, the site has been remediated to WDNR standards in accordance with s. NR 726.05, Wis. Adm. Code. The WDNR considers this case closed and no further investigation, remediation or other action is required at this time. This case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare, or the environment.

Your site will be listed on the WDNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the registry. To review the sites on the GIS Registry web page, visit http://gomapout.dnr.state.wi.us/org/at/et/geo/gwur/index.htm

The WDNR appreciates the efforts you have taken to remediate this property and return it to use. Please call me at (414) 263-8758, if you have any questions regarding this letter.

Sincerely,

Pamela A. Mylotta
Hydrogeologist, Remediation & Redevelopment Program
Southeast Region, Milwaukee Service Center

c: Julie Solmer – Foley & Lardner

1776 North Commerce Street
Integrated Site Barrier Operation and Maintenance Plan
WDNR FID# 241645030 – BRRTs # 02-41-000035

Revised 11/16/00

Certified Survey Map No. 6882
City of Milwaukee, Milwaukee County, Wisconsin

A DIVISION OF PART OF LOTS 3, 4, & 5 IN BLOCK 48 OF SHERMAN'S ADDITION; PART OF LOT 1 OF PLAT OF LOTS 2 & 3 AND PART OF PARCELS 1 & 2 IN C.S.M. NO. 1433, BEING PART OF THE S.E. ¼ OF THE N.E. ¼ OF SECTION 20, AND THE S.W. ¼ OF THE N.W. ¼ AND THE N.W. ¼ OF THE S.W. ¼ OF SECTION 21, ALL IN TOWNSHIP 7 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN.

Introduction

The purpose of this document is to present an Operation and Maintenance Plan fulfilling the requirements of NR 724.13, Wisconsin Administrative Code for the above-referenced property. The proposed operation and maintenance activities relate to the "integrated site barrier" ("ISB") referenced in the letter from Ms. Pam Mylotta of the Wisconsin Department of Natural Resources to Mr. James Orth, 1776 Development Corporation, dated March 1, 2000. As indicated in that letter, the ISB consists of fill soil, hard pavement or building over the areas of residual affected soils on the property. The ISB is contained entirely within Parcel 4 of Certified Survey Map No. 6882, recorded in Milwaukee, Wisconsin on October 24, 2000 ("Parcel 4").

Background

On March 1, 2000, STS Consultants, Ltd. in a letter to Ms. Pam Mylotta ("STS") identified the following environmentally-related issues concerning Parcel 4: 1) the presence of lead-affected soil in a small area near the northern portion of the site ("lead affected soils") and 2) the presence of certain tannery-related residual material generally located greater than six feet below grade in the area of the former beaming and chrome tanning rooms (the central portion of the site) ("building foundations"), These areas are more specifically identified in the attached

Property Exhibit, EXHIBIT A. STS proposed to address the lead affected soil and building foundation issues utilizing an ISB over these areas.

ISB Construction and Function

As shown on the attached Workplan for the Implementation of an Integrated Site Barrier ("Workplan") (EXHIBIT B), the lead affected soil and building foundation areas are to be covered with a minimum of two feet of imported fill or covered with pavement. The normal operation of the ISB will simply be as a direct contact barrier between site soils in the two areas outlined above and typical, non-invasive users of the property. The ISB will function as intended unless disturbed.

Disturbance Management

Trostel Square Apartments LLC and subsequent owners of Parcel 4 shall take the following steps to assure that uncontrolled disturbances of the ISB do not occur:

- A deed restriction has been recorded regarding Parcel 4 of CSM #6882 which limits future use, development and management of the property. A copy of the deed restriction is attached as EXHIBIT C. The deed restriction delineates the environmentally affected areas, the nature of the integrated site barrier, the requirements regarding the management of lead contaminated soil, and the availability of this Operation and Maintenance Plan online through the World Wide Web and from the WDNR.

- A copy of this Operation and Maintenance plan will be available on site from the property manager to all interested parties.

- A copy of this Operation and Maintenance Plan will be provided to all private utilities seeking easements for the purpose of installing facilities on the Property in the area of the ISB.

- A copy of this Operation and Maintenance Plan will be provided to all contractors and repair workers, including utility and landscaping services, during construction and repairs in the area of the Integrated Site Barrier.

- All contractors are advised to ensure that they follow safety protocols reflecting "Level D" precautionary measures.

- On-site staff employed by Trostel Square Apartments LLC or its successors/assigns will be made familiar with the contents and restriction requirements of this Operation & Maintenance Plan. For further information contact the Property Manager for the Trostel Square Apartments LLC at (414) 347 – 3600 or at www.mandelgroup.com

In the event the ISB is breached, the following precautions shall be taken:

- The Owner is to be notified within 24 hours of any breach;

- In the event that any tannery-related debris or residual materials are excavated from the area of former building foundations, these materials shall be disposed off-site in accordance with the applicable solid and hazardous waste rules and regulations. Otherwise, to the extent possible, all clean fill material excavated in the area of the ISB will be kept on site and returned to the excavation prior to the restoration of the ISB. The excavation zone and any soils excavated from the area of the ISB will be secured from public access until the ISB is restored. While stored on site, the excavated material will be underlaid and covered by plastic. Material which can not be returned to the excavation will be sampled and treated and/or disposed of in accordance with the applicable solid and hazardous waste rules and regulations.

- The ISB will be restored in accordance with the Workplan. This work, including the proper disposal of any excess soils, should be completed within 72 hours following the completion of any work in the area of the ISB, or as soon as reasonably practical.

- Details of the breach, the handling of excavated soils, assessment of tannery related materials and the individuals responsible for the work and the restoration of the ISB shall be recorded in the ISB maintenance log kept on site and available for inspection by representatives of WDNR.

Reporting

Annual inspections of the ISB will be performed to determine whether the ISB has been disturbed. A log will be maintained on-site to record any disturbances of the ISB and the steps that have been taken to maintain the integrity of the ISB. The on-site log will be made available for inspection by WDNR representatives upon reasonable prior request. The on-site log will be maintained as long as maintenance of an ISB is required.

On an annual basis, a letter will be sent to the WDNR describing any disturbances of the ISB during the year and certifying the integrity of the ISB. The letter will include the following:

- The heading "Annual ISB Inspection Summary (*insert year*)"
- WDNR tracking numbers: FID # 241645030 and BRRTS # 02-41-000035.
- A statement indicating whether the ISB has been disturbed and, if so, what mitigating steps were taken to retain the integrity of the ISB.

Amendments to the Integrated Site Barrier Disturbance Management and Reporting Plan

The Integrated Site Barrier Disturbance Management and Reporting Plan may be amended or withdrawn upon written approval of the Wisconsin Department of Natural Resources or its successor agency.

1776 North Commerce Street
Integrated Site Barrier Operation and Maintenance Plan
WDNR FID# 241645030 – BRRTs # 02-41-000035

Revised 11/16/00

Contact Information

For responsible party information contact:

Mr. James P. Orth
1776 Development Corp.
10201 West Lincoln Avenue
West Allis, Wisconsin 53227
Phone: (414) 327-8005
Fax: (414) 327-3054

For owner information contact:

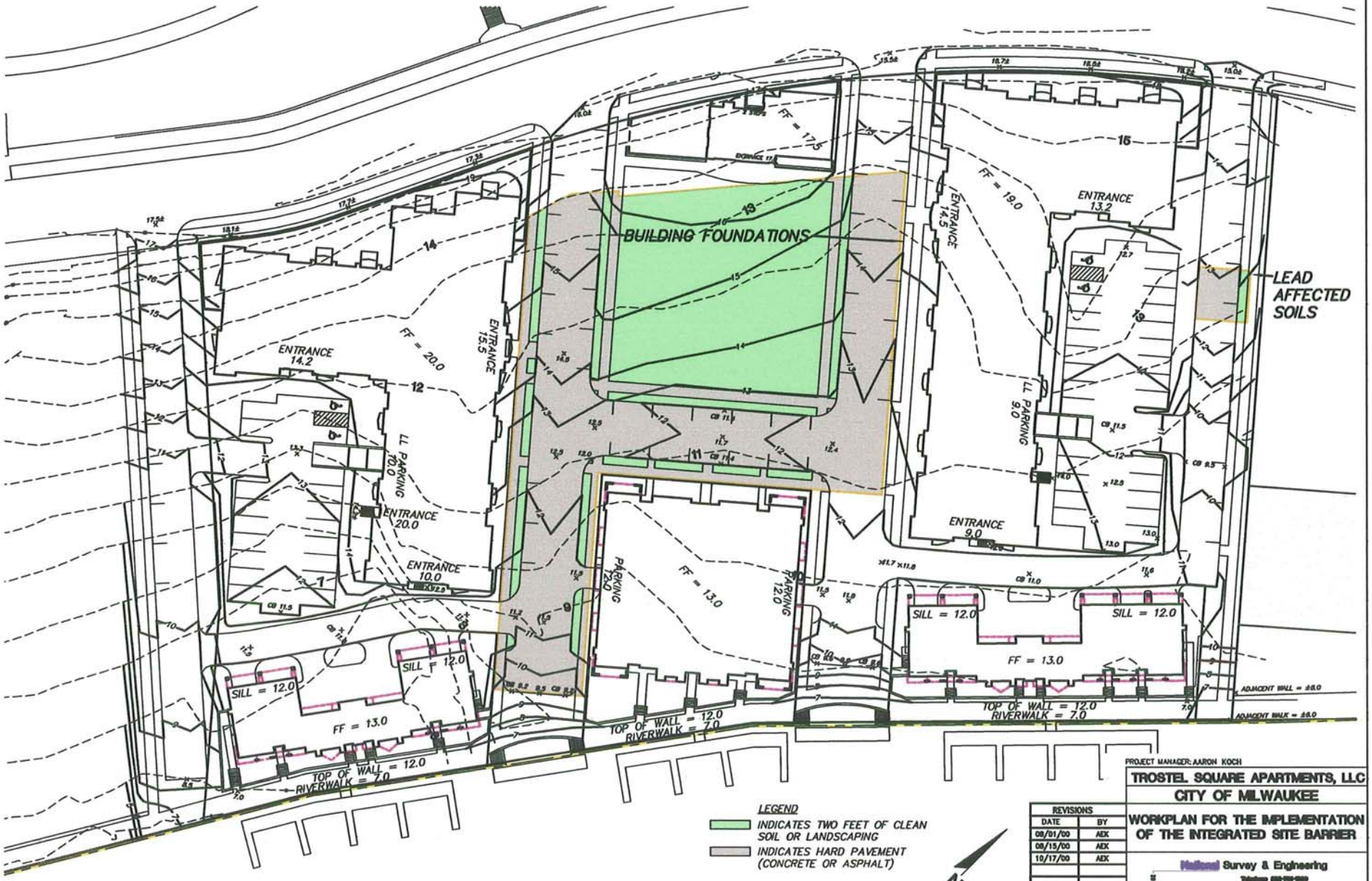
Mr. Barry R. Mandel
Trostel Square Apartments LLC
111 E. Wisconsin Avenue # 1700
Milwaukee, WI 53202
Phone: (414) 347-3600
Fax: (414) 347-3619

For consultant information contact:

Mr. Kevin Brehm
STS Consultants, LTD
11425 West Lake Park Drive
Milwaukee, Wisconsin 53224
Phone: (414) 577-1302
Fax: (414) 259-0822

If to WDNR:

Ms. Pam Mylotta
State of Wisconsin
Department of Natural Resources
Regional Remediation and Redevelopment Team
2300 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin 53212
Phone (414) 263-8713
Fax: (414) 263-8716



REVISIONS	
DATE	BY
08/01/00	AEK
08/15/00	AEK
10/17/00	AEK

PROJECT MANAGER: AARON KOCH

TROSTEL SQUARE APARTMENTS, LLC

CITY OF MILWAUKEE

WORKPLAN FOR THE IMPLEMENTATION OF THE INTEGRATED SITE BARRIER

National Survey & Engineering

NSE PROJECT NO.: 3000235

DATE: 6/29/00 | SCALE: 1" = 80'

SHEET NO. 1 OF 1

Exhibit B

Barrier Inspection Log

Inspection Date	Inspector	Condition of Cap	Recommendations	Have recommendations from previous inspection been implemented? Who did work, what was done & when?

DCD #2085

CERTIFIED SURVEY MAP NO. 6882

A division of part of Lots 3, 4 & 5 in Block 48 of Sherman's Addition; part of Lot 1 of Plat of Lots 2 & 3 and part of Parcels 1 & 2 in C.S.M. No. 1433, being part of the SE 1/4 of the NE 1/4 of Section 20 and the SW 1/4 of the NW 1/4 and the NW 1/4 of the SW 1/4 of Section 21, all in Township 7 North, range 22 East, in the City of Milwaukee, Milwaukee County, Wisconsin.

SURVEYOR'S CERTIFICATE

STATE OF WISCONSIN }
:SS
WAUKESHA COUNTY }

I, DONALD C. CHAPUT, Registered Land Surveyor, do hereby certify:

THAT I have surveyed, divided and mapped a division of part of Lots 3, 4 & 5 in Block 48 of Sherman's Addition; part of Lot 1 of Plat of Lots 2 & 3 and part of Parcels 1 & 2 in C.S.M. No. 1433, being part of the SE 1/4 of the NE 1/4 of Section 20 and the SW 1/4 of the NW 1/4 and the NW 1/4 of the SW 1/4 of Section 21, all in Township 7 North, range 22 East, in the City of Milwaukee, Milwaukee County, Wisconsin, which is bounded and described as follows:

COMMENCING at the Southwest corner of the Northwest 1/4 said Section 21; thence North 00°33'14" West along the West line of said Northwest 1/4 Section 25.89 feet to the point of beginning of the lands to be described; thence North 48°14'16" West 52.18 feet to a point on the East line of North Commerce Street; thence North 37°47'37" East along said East line 31.36 feet to a point; thence Northeasterly 48.86 feet along the arc of a curve whose center lies to the Northwest, whose radius is 233.00 feet and whose chord bears North 31°47'09" East 48.77 feet to a point; thence North 25°46'41" East along the East line 108.31 feet to a point; thence Northeasterly 451.60 feet along said East line and the arc of a curve whose center lies to the Southeast, whose radius is 879.00 and whose chord bears North 40°29'47" East 446.65 feet to a point; thence South 40°41'02" East 361.07 feet to a point in the established dock line of the right bank of the Milwaukee River as established by Ordinance No. 65, File No. 69-11, Adopted by the City of Milwaukee on May 6, 1969; thence South 44°32'03" West along said dock line 278.60 feet to a point; thence South 35°58'30" West along said dock line 257.40 feet to a point; thence South 30°23'56" West along said dock line 65.62 feet to a point; thence North 40°40'58" West 123.03 feet to a point; thence North 48°14'16" West 158.89 feet to the point of beginning.

THAT I have made such survey, land division and map by the order and direction of 1776 DEVELOPMENT CORP., owner.

THAT such map is a correct representation of all the exterior boundaries of the land surveyed and the land division thereof made.

THAT I have fully complied with Chapter 236 of the Wisconsin Statutes and Chapter 119 of the Milwaukee Code of Ordinances in surveying, dividing and mapping the same.

June 26, 2000
DATE
Rev. August 22, 2000

DONALD C. CHAPUT, RLS
REGISTERED LAND SURVEYOR S-1316

WISCONSIN
DONALD C. CHAPUT
(SEAL)
S-1316
BROOKFIELD,
AND SURVEYOR

DCD #2085

CERTIFIED SURVEY MAP NO. 6882

A division of part of Lots 3, 4 & 5 in Block 48 of Sherman's Addition; part of Lot 1 of Plat of Lots 2 & 3 and part of Parcels 1 & 2 in C.S.M. No. 1433, being part of the SE 1/4 of the NE 1/4 of Section 20 and the SW 1/4 of the NW 1/4 and the NW 1/4 of the SW 1/4 of Section 21, all in Township 7 North, range 22 East, in the City of Milwaukee, Milwaukee County, Wisconsin.

CORPORATE OWNER'S CERTIFICATE

1776 DEVELOPMENT CORP., a corporation duly organized and existing under and by virtue of the laws of the State of Wisconsin, as owner, certifies that said corporation caused the land described on this map to be surveyed, divided and mapped as represented on this map in accordance with the requirements of Chapter 119 of the Milwaukee Code of Ordinances.

IN consideration of the approval of the map by the Common Council and in accordance with Chapter 119 of the Milwaukee Code, the undersigned agrees:

A. That all utility lines to provide electric power and telephone service and cable television or communications systems lines or cables to all lots in the Certified Survey Map shall be installed underground in easements provided therefor, where feasible.

THIS agreement shall be binding on the undersigned and assigns.

IN Witness Whereof, 1776 DEVELOPMENT CORP., has caused these presents to be signed by Thomas F. Clasen, its Secretary, this 31st day of August, 2000

1776 DEVELOPMENT CORP.

STATE OF WISCONSIN }
:SS
Milwaukee COUNTY }

PERSONALLY came before me this 31st day of August, 2000, THOMAS F. CLASEN, its Secretary, of the above named corporation, to me know as the person who executed the foregoing instrument, and to me known to be the _____ of the corporation, and acknowledged that he executed the foregoing instrument as such officer as the deed of the corporation, by its authority.

_____ (SEAL)
Notary Public, State of Wisconsin
My commission expires 11/26/03

WISCONSIN
DONALD C. CHAPUT
S-1318
BROOKFIELD, WI
LAND SURVEYOR

REV. 8-22-00

DCD #2085

CERTIFIED SURVEY MAP NO. ~~6882~~

A division of part of Lots 3, 4 & 5 in Block 48 of Sherman's Addition; part of Lot 1 of Plat of Lots 2 & 3 and part of Parcels 1 & 2 in C.S.M. No. 1433, being part of the SE 1/4 of the NE 1/4 of Section 20 and the SW 1/4 of the NW 1/4 and the NW 1/4 of the SW 1/4 of Section 21, all in Township 7 North, range 22 East, in the City of Milwaukee, Milwaukee County, Wisconsin.

CERTIFICATE OF CITY TREASURER

STATE OF WISCONSIN }
:SS
MILWAUKEE COUNTY }

I, WAYNE F. WHITTOW, being the duly elected, qualified and acting City Treasurer of the City of Milwaukee, certify that in accordance with the records in the office of the City Treasurer of the City of Milwaukee there are no delinquent taxes and that the method of payment of any special assessments relating to the land included in this Certified Survey Map has been agreed upon between the owner and the City of Milwaukee.

9-22-00
DATE

Wayne F. Whittow
WAYNE F. WHITTOW, CITY TREASURER

COMMON COUNCIL CERTIFICATE OF APPROVAL

I certify that this Certified Survey Map was approved under Resolution File No. 000232 adopted by the Common Council of the City of Milwaukee on SEPT. 6, 2000.

Ronald D. Leonhardt
RONALD D. LEONHARDT, CITY CLERK

JOHN O. NORQUIST, MAYOR

WISCONSIN
DONALD C. CHAPUT
S-1316
BROOKFIELD, WI
6-22-00
LAND SURVEYOR

REV. 8-22-00

THIS INSTRUMENT WAS DRAFTED BY DONALD C. CHAPUT, REGISTERED LAND SURVEYOR S-1316

154549.CSM

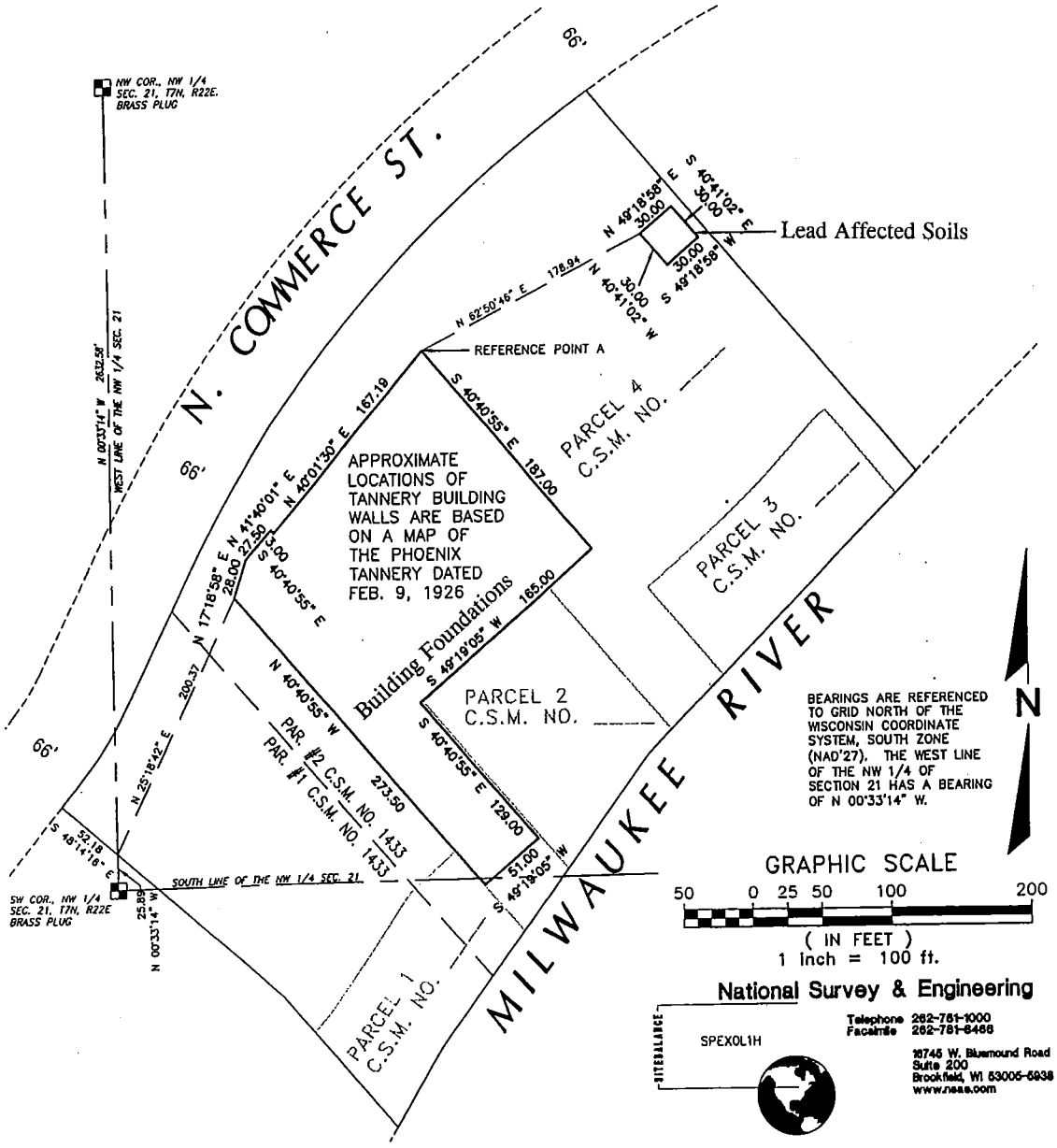
PROPERTY EXHIBIT

SITUATED ON NORTH COMMERCE STREET IN THE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN

PART OF PARCEL 2 OF CERTIFIED SURVEY MAP NO. 1433 IN THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 AND THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 21, TOWN 7 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN, BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTHWEST CORNER OF SAID NORTHWEST 1/4 SECTION; THENCE NORTH 00°33'14" WEST ALONG THE WEST LINE OF SAID NORTHWEST 1/4 SECTION 25.89 FEET TO A POINT ON THE SOUTHWESTERLY LINE OF CERTIFIED SURVEY MAP NO. 1433, SAID POINT BEING SOUTH 48°14'16" EAST 52.18 FEET FROM THE SOUTHEASTERLY LINE OF NORTH COMMERCE STREET; THENCE NORTH 25°18'42" EAST 200.37 FEET TO THE POINT OF BEGINNING; THENCE NORTH 17°18'58" EAST 28.00 FEET TO A POINT; THENCE NORTH 41°40'01" EAST 27.50 FEET TO A POINT; THENCE SOUTH 40°40'55" EAST 3.00 FEET TO A POINT; THENCE NORTH 40°01'30" EAST 167.19 FEET TO REFERENCE POINT "A"; THENCE SOUTH 40°40'55" EAST 187.00 FEET TO A POINT; THENCE SOUTH 49°19'05" WEST 165.00 FEET TO A POINT; THENCE SOUTH 40°40'55" EAST 129.00 FEET TO A POINT; THENCE SOUTH 49°19'05" WEST 51.00 FEET TO A POINT; THENCE NORTH 40°40'55" WEST 273.50 FEET TO THE POINT OF BEGINNING.

ALSO: COMMENCING AT REFERENCE POINT "A" DESCRIBED ABOVE; THENCE NORTH 62°50'46" EAST 178.94 FEET TO THE POINT OF BEGINNING; THENCE NORTH 49°18'58" EAST 30.00 FEET TO A POINT; THENCE SOUTH 40°41'02" EAST 30.00 FEET TO A POINT; THENCE SOUTH 49°18'58" WEST 30.00 FEET TO A POINT; THENCE NORTH 40°41'02" WEST 30.00 FEET TO THE POINT OF BEGINNING.

AUGUST 4, 2000 MANDEL GROUP SURVEY NO. 154549 – MHK



National Survey & Engineering
SPEXOL1H
Telephone 262-781-1000
Facsimile 262-781-8466
16745 W. Bluemound Road
Suite 200
Brookfield, WI 53005-5938
www.nsae.com

RECORDED
CERTIFIED SURVEY MAP

DCD #2085

CERTIFIED SURVEY MAP NO. 6882

A DIVISION OF PART OF LOTS 3, 4 & 5 IN BLOCK 48 OF SHERMAN'S ADDITION; PART OF LOT 1 OF PLAT OF LOTS 2 & 3 AND PART OF PARCELS 1 & 2 IN C.S.M. NO. 1433, BEING PART OF THE S.E. 1/4 OF THE N.E. 1/4 OF SECTION 20, AND THE S.W. 1/4 OF THE N.W. 1/4 AND THE N.W. 1/4 OF THE S.W. 1/4 OF SECTION 21, ALL IN TOWNSHIP 7 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN.

NW COR. OF NW 1/4 SEC. 21, T7N, R22E.
BRASS PLUG
N: 393,430.70
E: 2,559,104.38

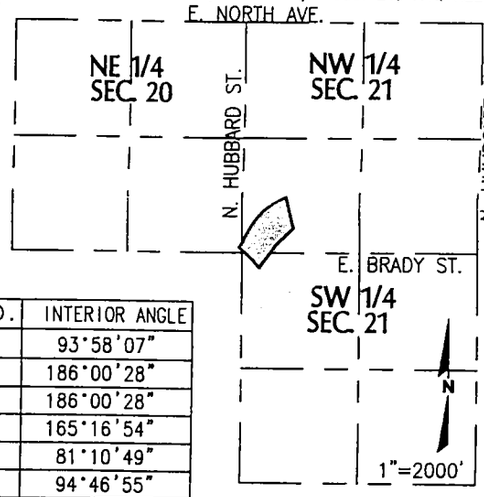
TAX KEY NO. 354-0922-111 & -0922-112 ZONING: C9B(A)

- ● INDICATES 1" IRON PIPE (FOUND)
- o INDICATES SET 1" IRON PIPE 24" IN LENGTH, 1.13 LBS. PER LINEAL FOOT.
- • INDICATES SET 1" IRON PIPE 24" IN LENGTH, 1.13 LBS. PER LINEAL FOOT ON LOT LINE, 20.00 FEET NORTHWEST OF DOCK LINE.

ALL DIMENSIONS SHOWN ARE MEASURED TO THE NEAREST HUNDREDTH OF A FOOT.
ALL BEARINGS ARE REFERENCED TO THE WISCONSIN STATE PLANE COORDINATE SYSTEM (SOUTH ZONE) IN WHICH THE WEST LINE OF NW 1/4 OF SECTION 21 WHICH BEARS N 00°33'14" W (JAN. 1993 DATUM)

VICINITY MAP

NE 1/4 SEC. 20 & NW 1/4 & SW 1/4 SEC. 21, T7N, R22E.



NO.	INTERIOR ANGLE
A	93°58'07"
B	186°00'28"
C	186°00'28"
D	165°16'54"
E	81°10'49"
F	94°46'55"
G	188°33'33"
H	185°34'34"
I	71°04'54"
J	187°33'18"

SW COR. OF NW 1/4 SEC. 21, T7N, R22E.
BRASS PLUG
N: 390,798.46
E: 2,559,129.83

LOT 2
SCHROEDER & TROSTEL'S SUBDIVISION
SHERMANS ADDITION

LINE	DISTANCE
L1	21.07

CURVE	PARCEL	ARC	RADIUS	CHORD BEARING	CHORD	DELTA	DELTA / 2
1	4	48.86	233.00	N 31°47'09" E	48.77	12°00'56"	06°00'28"
2	TOTAL	451.60	879.00	N 40°29'47" E	446.65	29°26'12"	14°43'06"
2	4	13.72	879.00	N 26°13'31" E	13.72	00°53'40"	00°26'50"
2	ESMNT	57.76	879.00	N 28°33'18.5" E	57.75	03°45'55"	01°52'57.5"
2	4	125.79	879.00	N 34°32'15" E	125.68	08°11'58"	04°05'59"
2	ESMNT	54.67	879.00	N 40°25'08.5" E	54.66	03°33'49"	01°46'54.5"
2	4	156.52	879.00	N 47°18'07" E	156.31	10°12'08"	05°06'04"
2	ESMNT	43.14	879.00	N 53°48'32" E	43.13	02°48'42"	01°24'21"
3	3	169.52	966.34	S 46°05'44" W	169.30	10°03'04"	05°01'32"
4	1	6.42	25.00	S 40°30'31.5" W	6.41	14°43'19"	07°21'39.5"
5	1	28.06	224.64	S 38°29'27.5" W	28.04	07°09'21"	03°34'40.5"

GRAPHIC SCALE
75 0 37.5 75 150 300
(IN FEET)
1 inch = 150 ft.

WISCONSIN
RONALD C. CHAPUT
S-1316
BROOKFIELD, WI
LAND SURVEYOR
REV 8-29-00

National Survey & Engineering
Telephone 262-781-1000
Facsimile 262-781-8466
NSE NO. 5154549\SPCS0L15 - GRB
16745 W. Bluemound Road
Suite 200
Brookfield, WI 53005-5938
www.nsae.com

INFRASTRUCTURE SERVICES DIVISION
Marcia Lindholm 8/31/00
CENTRAL DRAFTING & RECORDS MANAGER
Martin Aguirre 9/5/00
ENGR. IN CHARGE ENVIRON. ENGR.
CORRECT
Jeffrey Polenske 9/5/00
CITY ENGINEER
APPROVED

RECEIVED
JUL 17 2000
DEPT
City Development

DEPARTMENT OF CITY DEVELOPMENT
JUN 17 2000
APPROVED

CERTIFIED SURVEY MAP
DATE RECORDED OCT 24 2000
MAP NO. 6882
DOCUMENT NO. 7980454
CITY OF MILWAUKEE
DEPARTMENT OF CITY DEVELOPMENT
809 N. BROADWAY ST.
MILWAUKEE, WIS. 53202
PHONE 223-5710

5154549.dwg SPCS0L15.DWG, 08/25/2000 03:03:52 PM, mnk

DRAFT
Exhibit C

Document Number	DEED RESTRICTION

In Re: **[legal description of Parcel 4 - Trostel Square Apartments property] as described in EXHIBIT A**

Recording Area

Name and Return Address
Bruce A. Keyes
Foley & Lardner
777 East Wisconsin Ave.
Milwaukee, WI 53202-5367

Declaration of Restrictions

Tax Key Number

STATE OF WISCONSIN)
) ss
COUNTY OF MILWAUKEE)

WHEREAS, Trostel Square Apartments LLC is the owner of the above-described property (the "Property").

WHEREAS, lead has been found in the area depicted in EXHIBIT B ("Lead Affected Soils Area") at levels above the Chapter NR 700, Wisconsin Administrative Code, residual contaminant level for protection of direct contact at non-industrial sites.

WHEREAS, waste materials may still be present in the subsurface of the Property in the area where building foundations were filled with demolition debris, as depicted in EXHIBIT B ("Building Foundations").

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

NOW THEREFORE, the Owner hereby declares that the Property described above is held and shall be held, conveyed or encumbered, leased, used, occupied and improved subject to the following limitation and restrictions:

An integrated site barrier has been implemented over the Lead Affected Soils Area and the Building Foundations on the Property, as depicted in EXHIBIT B. The cover may consist of any of the following:

(a) two feet of clean soil or an equivalent amount of other landscaping, or
(b) hard pavement, such as concrete or asphalt, or
(c) buildings.

The integrated site barrier is to be maintained in accordance with a written Operation and Maintenance Plan. This plan is available from the Wisconsin Department of Natural Resources' Southeast Regional Office, Milwaukee, Wisconsin or on the World Wide Web at http://www.DNR.state.wi.us/org/aw/rr/brrts.

Soil on the Property beneath the integrated site barrier, as depicted in EXHIBIT B, may be contaminated. If contaminated soil that remains on the Property is excavated from the Property, it will have to be sampled. The treatment or disposal of the soil as a solid or hazardous waste may be necessary.

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

Any person who is or becomes an owner of the Property may request that the WDNR issue a determination that the restrictions set forth in this covenant may be modified or are no longer required. Upon receipt of such a request, the WDNR shall determine whether or not the restrictions contained herein can be extinguished or modified. If the WDNR determines that the restrictions can be extinguished or modified, an affidavit with the WDNR's written determination may be recorded to give notice that this Declaration of Restrictions or portions of this Declaration of Restrictions are no longer binding. Upon recording of such Affidavit, this Declaration of Restrictions shall be thereby amended.

By signing this document, Barry R. Mandel asserts that he is duly authorized to sign this document on behalf of Mandel/Trostel Square Apartments LLC and that Mandel/Trostel

Square Apartments LLC is authorized as manager to act on behalf of Trostel Square Apartments LLC.

IN WITNESS WHEREOF, the Owner of the Property has executed this Declaration of Restrictions, this _____ day of _____, 20__.

TROSTEL SQUARE APARTMENTS LLC

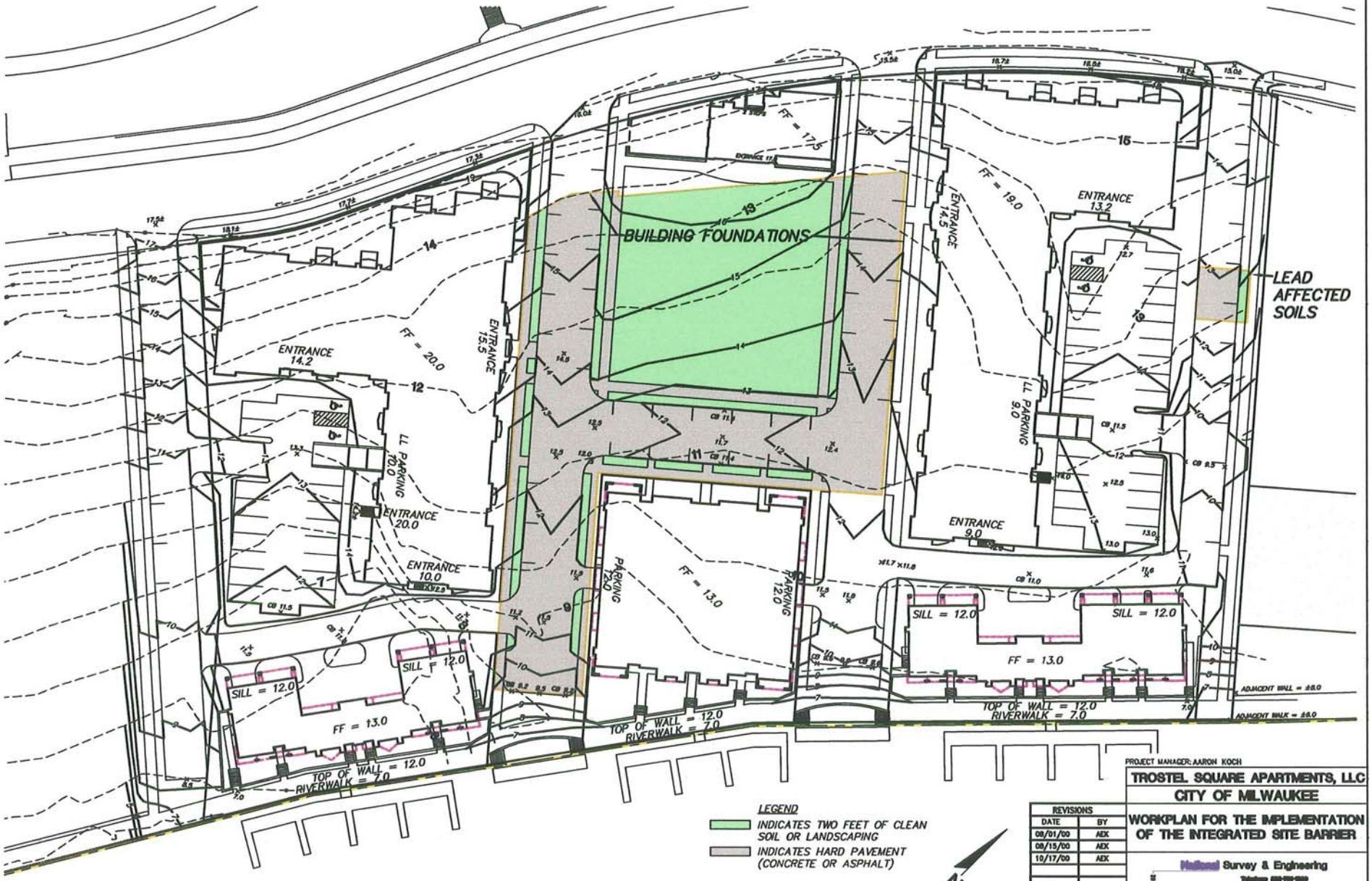
By: **MANDEL/TROSTEL SQUARE APARTMENTS LLC**
Its Manager

By: _____ _____
Barry R. Mandel, Its Manager Date

Subscribed and sworn to before me
This _____ day of _____, 20__.

_____
Notary Public, State of _____
My commission expires_____

This document was drafted by and after recording should be returned to Bruce A. Keyes (WBN 1015751) of Foley & Lardner, 777 East Wisconsin Avenue, Milwaukee, Wisconsin 53202-5367.



REVISIONS	
DATE	BY
08/01/00	AEK
08/15/00	AEK
10/17/00	AEK

PROJECT MANAGER: AARON KOCH

TROSTEL SQUARE APARTMENTS, LLC

CITY OF MILWAUKEE

WORKPLAN FOR THE IMPLEMENTATION OF THE INTEGRATED SITE BARRIER

National Survey & Engineering

NSE PROJECT NO.: 3000235

DATE: 6/29/00 | SCALE: 1" = 80'

SHEET NO. 1 OF 1

TABLE 3
SOIL ANALYTICAL RESULTS

TROSTEL SQUARE
1818 N. COMMERCE STREET
MILWAUKEE, WISCONSIN

	Tank Vault 5/30/2001
Analyte	
VOCs (µg/kg)	None Detected
RCRA Metals (mg/kg)	
Arsenic	14
Barium	76
Cadmium	0.31
Chromium	230
Lead	54
Selenium	0.95
Silver	<0.18
Mercury	0.62
PCBs (µg/kg)	
Aroclor 1016	<36
Aroclor 1221	<36
Aroclor 1232	<36
Aroclor 1242	<36
Aroclor 1248	<36
Aroclor 1254	<36
Aroclor 1260	<36
DRO (mg/kg)	130

Notes:

VOCs = Volatile organic compounds

DRO = Diesel range organics

µg/kg = Micrograms per kilogram

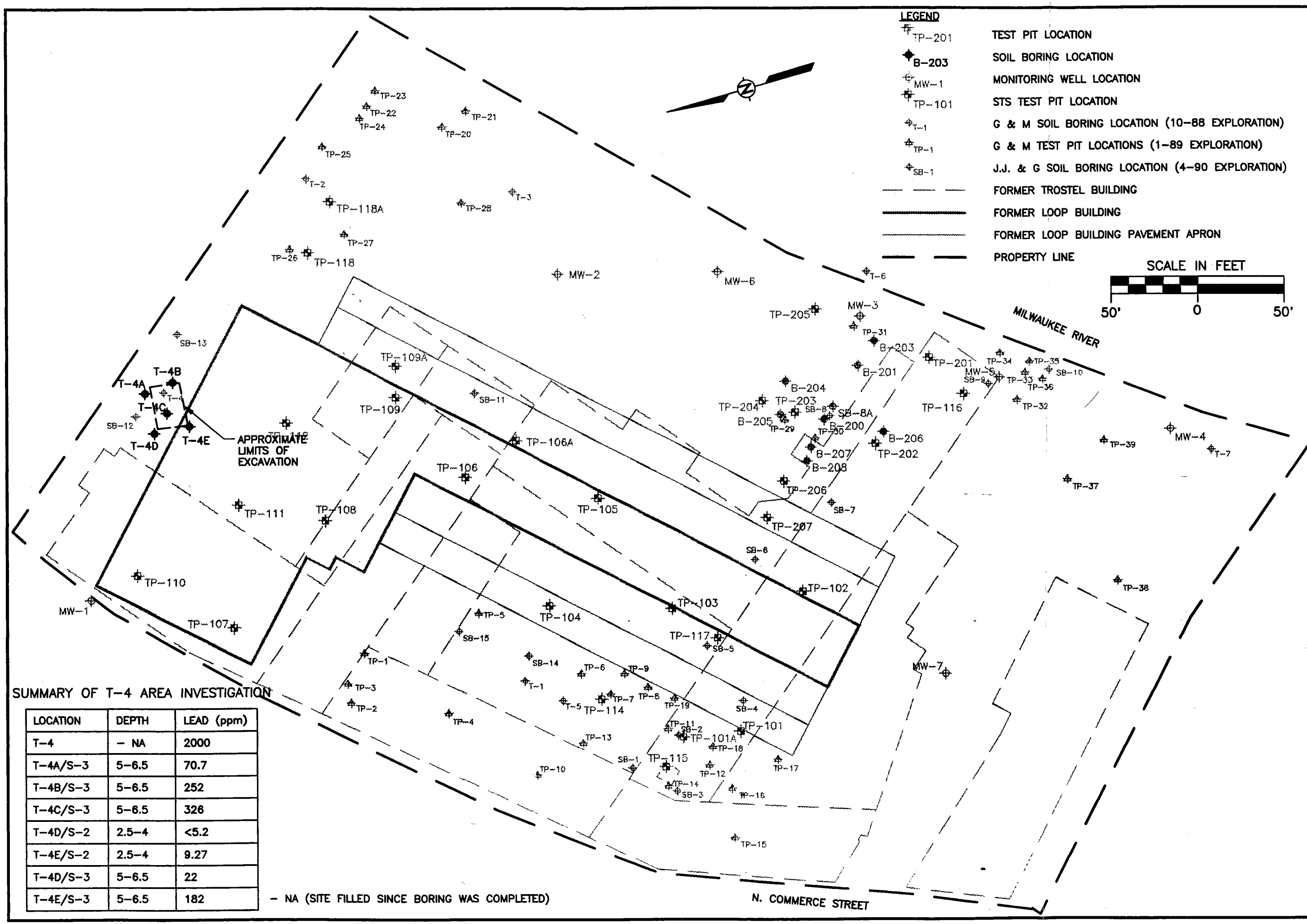
mg/kg = Milligrams per kilogram

GRCL = Wisconsin Dept. of Natural Resources generic residual contaminant level

Only positive VOC detections reported.

Metals RCLs - Calculated using USEPA generic soil screening level (dilution attenuation factor = 20) value.

PCBs RCLs - A USEPA preliminary remediation goal of 1 mg/kg (1000 ug/kg) has been set.



SUMMARY OF T-4 AREA INVESTIGATION

LOCATION	DEPTH	LEAD (ppm)
T-4	– NA	2000
T-4A/S-3	5-6.5	70.7
T-4B/S-3	5-6.5	252
T-4C/S-3	5-6.5	326
T-4D/S-2	2.5-4	<5.2
T-4E/S-2	2.5-4	9.27
T-4D/S-3	5-6.5	22
T-4E/S-3	5-6.5	182

– NA (SITE FILLED SINCE BORING WAS COMPLETED)

DRAWN BY J.M.I. DATE 3/8/95
CHECKED BY K.L.B. DATE 3/8/95
APPROVED BY T.W.W. DATE 3/8/95
CADFILE 83760/83760035 XREF=FIGBASE

BORING DIAGRAM T-4 LEAD AREA TROSTEL DEVELOPMENT MILWAUKEE, WISCONSIN

STS Consultants Ltd.
Consulting Engineers

STS PROJECT NO. 83760XD
STS PROJECT FILE
SCALE AS SHOWN
FIGURE NO. 3-1

3.0 T-4 AREA LEAD INVESTIGATION AND REMEDIATION

Five soil borings were completed in the area of T-4. The locations of the five borings (T-4A to T-4E) are shown on the attached Figure 3-1. The depth of the borings were five feet with sampling to 6.5 feet below the existing ground surface. The general procedures used during the drilling are summarized in Appendix F of the STS Work Plan submittal dated September 29, 1992. Boring logs for the borings are attached in the Work Plan Amendment in Appendix A of this report. Fill soils consisting of cohesive and non-cohesive materials were encountered. Soil impairment was not observed on the basis of soil color or odor.

A total of seven soil samples were analyzed for total lead during this phase of investigation. The former T-4 sample, having a lead concentration of 2,000 mg/kg, prompted this investigation. The results of the analytical testing are summarized on Table 1, the Lead Analytical Testing Results table, below. The laboratory analytical testing reports are included in Appendix A with the Work Plan Amendment.

Table 3-1
Lead Analytical Testing Results
T-4 Lead Area
Trostel Tannery Site

Location	Depth (ft)	Total Lead (mg/kg)
T-4	2 - 4	2,000
T-4A/S-3	5 - 6.5	70.7
T-4B/S-3	5 - 6.5	252
T-4C/S-3	5 - 6.5	326
T-4D/S-2	2.5 - 4	<5.2
T-4D/S-3	5 - 6.5	22.0
T-4E/S-2	2.5 - 4	9.27
T-4E/S-3	5 - 6.5	182

Based upon the results of the soil sampling and analytical testing the highly affected soils were confined to a relatively small area in the area of former boring locations T-4, T-4B and T-4C.

The soil from from this area was excavated on November 18, 1994. The excavation was approximately 15 feet wide, 20 feet long and five feet deep accounting for approximately 90 tons of soil. The location of the excavation is shown on the attached Figure 3-1.

Five soil samples were collected from the limit of the excavation for confirmatory analytical testing. The results of the analytical testing quantified soil lead levels at the limits of the excavation near or below 250 mg/kg. The highest sample was 252 mg/kg. The following table summarizes the excavation limits confirmatory analytical testing. The laboratory analytical report is included in Appendix C.

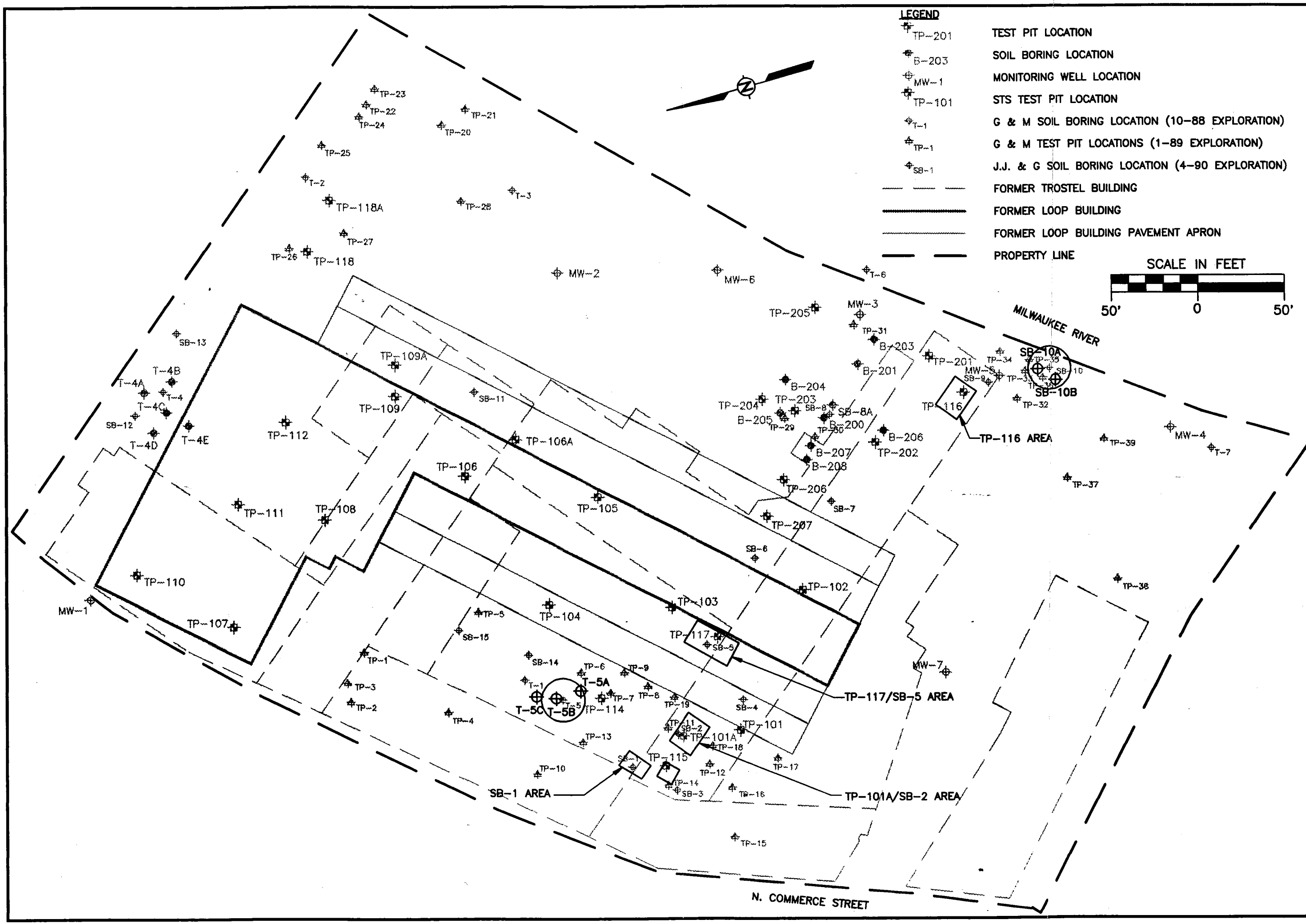
Table 3-2
Excavation Confirmatory Analytical Testing
T-4 Lead Area
Trostel Tannery Site

Sample	Location	Depth (ft.)	Concentration
T-4/S-1	bottom	5	47
T-4/S-2	south wall	4	<5
T-4/S-3	west wall	3.5	14
T-4/S-4	north wall	3.5	252
T-4/S-5	east wall	4	211

Note: Concentrations in mg/kg.

Based upon the confirmatory analytical testing, the highly-affected soil in this area has been excavated and landfilled.

The soil was landfilled at Land Reclamation Landfill in Racine, Wisconsin. The analytical characterization testing report and the landfill application form are included in Appendix C.



DRAWN BY	J.M.I.	DATE 3/8/95
CHECKED BY	K.L.B.	DATE 3/8/95
APPROVED BY	T.W.W.	DATE 3/8/95
CADFILE	83760/83760037	XREF=FIGBASE

CHROMIUM EXCAVATION LOCATIONS
TROSTEL DEVELOPMENT
MILWAUKEE, WISCONSIN

STS Consultants Ltd.
Consulting Engineers

STS PROJECT NO.
83760XD

STS PROJECT FILE

SCALE
AS SHOWN

FIGURE NO.
4-1

placed in two stockpiles (TP-117 Stockpile 1 & TP-117 Stockpile 2). Total chromium had been previously quantified at a concentration of 5,730 mg/kg in a gray-brown clayey sand material in SB-5.

The following excavation limits soil samples were collected and the soil samples analyzed for total chromium. Table 4-1 summarizes the testing results.

Table 4-1
Excavation Limits Analytical Testing
TP-117 Area
Trostel Tannery Site
(SEI:WL12746)

Sample	Sample Depth (feet)	Sample Location	Soil Description	Chromium Concentration
TP-117/S-1	13	bottom	clay/sand fill	256 mg/kg
TP-117/S-2	9	west wall	black sand	2220 mg/kg
TP-117/S-3	9	south wall	clay fill	1580 mg/kg
TP-117/S-4	8	north wall	silty clay fill	642 mg/kg

A blackish clay-like material was encountered from approximately six feet to ten feet. The material was field tested for reactive sulfides using a HACH Kit and the results of the testing suggested that the reactive sulfide concentration may be as high as 50 to 100 ppm. The testing for reactive sulfides was performed since highly elevated concentrations of reactive sulfides had previously been quantified in this area. Subsequently, one sample of the stockpiled material was laboratory tested for reactive sulfides and the analytical testing resulted in <4 mg/kg reactive sulfide being quantified (SEI:WL12746).

Additional excavation to the west and south was completed on November 18, 1994 since the west and south walls of the excavation still contained chromium above the 1,000 mg/kg remediation goal. The soil was stockpiled in stockpiles TP-117/SP#1 and TP-117/SP#2. Two additional excavation perimeter soil samples were collected (TP-117/W and TP-117/South wall) and the soil samples analyzed for total chromium. TP-117/W had a chromium concentration of 395 mg/kg and TP-117/South wall had a chromium

chromium. The analytical testing quantified 489 mg/kg chromium (SEI:WL12805). Excavation limits samples documented that the residual soil chromium concentrations were below the goal of 1,000 mg/kg.

Representative composite soil samples were collected from each of the soil stockpiles and the soil samples were analyzed for TCLP chromium. TCLP testing was completed on these soil stockpiles since TCLP concentrations exceeding 5 mg/l were previously quantified in this area. The following Table 4-2 presents the TCLP concentrations quantified.

Table 4-2
Stockpile Analytical Testing
TP-101A/SB-2 Area
Trostel Tannery Site
(SEI:WL12746)

Stockpile	TCLP Chromium (mg/l)
TP-101A Stockpile #1	0.21
TP-101A Stockpile #2	0.02
TP-101A Stockpile #3	11.80

As the TCLP chromium testing from TP-101A Stockpile #3 result exceeded 5 mg/l, coordination for hazardous disposal of the soil was initiated. The soil was placed into lugger boxes on December 12, 1994 for storage while disposal was being arranged.

TP-115 Area (vault)

The material identified at this location during the investigation was present in a concrete-walled vault structure. Previous analytical testing quantified elevated chromium and reactive sulfides in the soil.

Excavation in this area was initiated on November 14, 1994. The concrete vault measured approximately 8 feet by 5 feet. The soil was excavated to approximately 15 feet below grade. The apparently clean fill overlying the blackish underlying soil was placed aside for characterization testing. The blackish soil further in the vault was

A soil sample TP-116 S-1 was collected from approximately nine feet below grade and submitted for total chromium analytical testing. The testing quantified 14,000 mg/kg total chromium (SEI:WL12746).

Additional soil was excavated from this area extending the excavation to approximately 12 feet below grade. The excavated soil was incorporated into stockpile TP-116 Stockpile 2. Soil sample TP-116 Bottom was collected and the analytical testing quantified 11 mg/kg total chromium (SEI:WL12805). Excavation limits samples documented that the residual soil chromium concentrations were below the goal of 1,000 mg/kg.

SB-10 Area

Two test pits, SB-10A and SB-10B were excavated in the area to former soil boring SB-10. The soil from the test pits was stockpiled (stockpile SB-10 #1). The test pits were excavated to an approximate depth of 12 feet. Green hair mixed in the soil from 5 to 10 feet and a green hair layer at 10.5 feet was noted on the boring log for SB-10. No green hair or similar materials were observed in the test pits excavated by STS. Soil samples SB-10 S-1, SB-10 S-2, SB-10B/#1 and SB-10B/#2 were collected from the test pits and the soil samples analyzed for total chromium. The analytical testing resulted in the quantification of 212 mg/kg, 335 mg/kg, 53 mg/kg and 438 mg/kg, respectively, in the locations of SB-10A and SB-10B (SEI:WL12746 and WL12805). The green hair material once observed could not be found. The previous testing had quantified 7,270 mg/kg total chromium in a sample from 5 to 10 feet below grade. The following table summarizes the analytical testing.

Table 4-3
Excavation Analytical Testing
SB-10 Area
Trostel Tannery Site

Sample	Sample Depth (feet)	Sample Location	Soil Description	Chromium Concentration
SB-10 S-1	12	bottom	brown sand	212 mg/kg
SB-10 S-2	6	wall	brown sand	335 mg/kg
SB-10B/#1	10	bottom	brown sand	53 mg/kg
SB-10B/#2	8	wall	brown sand	438 mg/kg

The locations that STS selected to excavate the test pits were based upon correlations with existing features and past boring location diagrams. The attempt to relocate this material is, in our opinion, sufficient to demonstrate that the material is not widely distributed in this area and that further exploration is not warranted. The soil excavated and stockpiled in this area remained on-site and was used to backfill the test pits.

Soil Characterization and Disposal

Soil samples were collected and analytical testing performed on the soil stockpiles for total chromium and reactive sulfides. The following Table 4-4 summarizes the results of the characterization analytical testing.

Table 4-4
Stockpile Testing for Chromium and Reactive Sulfide
Trostel Tannery Remediation

Sample ID	Source	Total Chromium (mg/kg)	Reactive Sulfide (mg/kg)
SB-1 Stockpile 1	SB-1	599	< 1
T-5 Stockpile 1	T-5	377	NT
T-5 Stockpile 2	T-5	80	NT
TP 116 Stockpile 1	TP-116	7,560	< 1
TP 116 Stockpile 2	TP-116	4,630	< 1
SB-9 Stockpile 1	SB-9	223	< 1
TP-117 Stockpile 1	TP-117	3,540	< 1
TP-117 Stockpile 2	TP-117	16,500	< 1
TP-117/SP #1	TP-117	201	< 1
TP-117/SP #2	TP-117	4,350	< 1
TP-101A/#1	TP-101A	2,560	< 1
TP-116/Stockpile	TP-116	4,100	< 1
Lugger A	TP-115	NT	< 1
Lugger B	TP-115	NT	< 1
TP-101A Stockpile 1	TP-101A	0.21 (1)	< 1
TP-101A Stockpile 2	TP-101A	0.02 (1)	< 1
TP-101A Stockpile 3(2)	TP-101A	11.8 (1)	NT

NT - Not tested
(1) - TCLP analysis, reported in mg/l.
(2) - Placed into Lugger C and Lugger D.

APPROXIMATE LIMITS OF EXCAVATION

S-37 S-68 (11.4) S-67 (12.3) S-66 (11.3) S-65 (10.8) S-64 (10.6) S-17 S-11 S-16 S-15

S-47 (10.6) S-28 (<5.0) S-13 S-25 S-22 S-5 S-1

S-39 S-38 S-24 S-21 S-18 S-10 S-9 S-8 MW-3

S-43 (9.72) S-34 S-7 S-4 S-14 (5.46)

S-40 S-29 (7.58) S-20 S-58 (24.9) S-48 (14.3)

S-35 (9.64) S-26

S-41 (14.1) S-63 (11.7) S-62 S-60 (7.97) (26) S-59 (15.1) S-57 S-53 S-56 (8.59) S-27 (13)

S-54 (16.1) S-55 (14.4) S-42

LEGEND

- BOTTOM SAMPLE LOCATION
- SIDE WALL SAMPLE LOCATION
- MW-3 MONITORING WELL LOCATION
- (14.3) DRO CONCENTRATION, ug/kg

SCALE IN FEET

10' 0 10'

SAMPLING LOCATION DIAGRAM
SB-8 PETROLEUM AREA
TROSTEL DEVELOPMENT
MILWAUKEE, WISCONSIN

DRAWN BY J.M.I.	CHECKED BY K.L.B.	APPROVED BY T.W.W.
DATE 3/8/95	DATE 3/8/95	DATE 3/8/95

CADFILE 83760/83760038 XREF=

STS Consultants Ltd.
Consulting Engineers

STS PROJECT NO. 83760XD

STS PROJECT FILE

SCALE AS SHOWN

FIGURE NO. 5-2

Table 5 - 3
Excavation Limits
Soil Sampling
Trostel - Commerce Street
January, 1995

Sample Number	PID Reading (PID units)	DRO* (ppm)	Soil Description	Sample Depth (feet)
S-1	1.2		Fill	9
S-4	<1		Gray clayey silt	10
S-5	<1		Gray clayey silt	10
S-7	3		Gray clayey silt, trace fill	10
S-8	1.8		Gray Clayey Silt	10
S-9	<1		Gray Clayey Silt	10.5
S-10	<1		Gray Clayey Silt	10
S-11	<1		Brown silty sand, fill	6
S-13	<1		Fill	10
S-14	<1	5.46	Fill	6
S-15	<1		Brown clay, fill	3
S-16	1.2		Brown clay, fill	3
S-17	20		Sandy silt, fill	3
S-18	1		Gray clayey silt	10
S-20	3		Gray clayey silt	10
S-21	<1		Gray clayey silt	10
S-22	26		Gray clayey silt	8
S-24	1		Gray sandy silt	12
S-25	18		Dark brown sandy clayey silt, fill	9.5
S-26	2		Gray sandy silt with shells	12
S-27	40	13	Brown silty clay, fill	8
S-28	15	<5.0	Gray clayey silt	13
S-29	<1	7.58	Gray clayey silt	13
S-34	2		Dark brown sandy silty clay	8
S-35	<1	9.64	Gray clayey silt	13
S-37	4		Dark brown to black sandy silty clay	5
S-38	9		Gray sandy silt and gravel	9
S-39	11		Dark brown sandy silty clay	7
S-40	1		Gray sandy silt with brown silty clay	8
S-41	1		Brown silty sandy clay, fill	6
S-42	1	14.4	Gray sandy silt	10
S-43	<1	9.72	Gray sandy silt	13
S-47	<1	10.6	Gray silty clay	10
S-48	<1	14.3	Gray silty clay	10
S-53	5		Dark Brown silty clay	9
S-54	2		Brown silty clay, fill	8
S-55	1	16.1	Brown silty clay, fill	9
S-56	<1	8.59	Gray sandy clayey silt	11
S-57	<1	15.1	Brown silty clay, fill	8
S-58	<1	24.9	Gray sandy clayey silt	11
S-59	<1	26	Brown silty clay	9

Table 5 - 3 Cont.

Sample Number	PID Reading (PID units)	DRO* (ppm)	Soil Description	Sample Depth (feet)
S-60	<1	7.97	Gray sandy clayey silt	12
S-62	1	11.7	Gray sandy silt	8
S-63	<1	14.1	Brown silty clay	7
S-64	<1	10.6	Brown silty clay	7
S-65	1	10.8	Gray silty clay	9
S-66	<1	11.3	Dark brown silty clay	6
S-67	<1	12.3	Dark brown silty clay	7
S-68	<1	11.4	Dark brown silty clay	6

Note:
DRO - Diesel Range Organics
* - Not all samples were analyzed for DRO.
(1) - The detection limit for DRO for this sample was 70 ppm.
(2) - The detection limit for DRO for this sample was 16 ppm.

p:spreadsh/mlr/trostel.xls/excavation limits