

GIS REGISTRY INFORMATION

SITE NAME: Cream City Building - PLT2
 BRRTS #: 02-41-525171 FID # (if appropriate): 241942360
 COMMERCE # (if appropriate): _____
 CLOSURE DATE: _____
 STREET ADDRESS: 4077 N. 1st Str. aka zoo west Capital
 CITY: Glendale 53212
 SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection): X= 689768 Y= 293081

CONTAMINATED MEDIA: Groundwater Soil Both
 OFF-SOURCE GW CONTAMINATION >ES: Yes No

IF YES, STREET ADDRESS 1: _____
 GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL): Yes No
 IF YES, STREET ADDRESS 1: _____

GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____
 CONTAMINATION IN RIGHT OF WAY: Yes No

DOCUMENTS NEEDED:

- Closure Letter, and any conditional closure letter or denial letter issued
- Copy of any maintenance plan referenced in the final closure letter.
- Copy of (soil or land use) deed notice *if any required as a condition of closure*
- Copy of most recent deed, including legal description, for all affected properties
- Certified survey map or relevant portion of the recorded plat map (*if referenced in the legal description*) for all affected properties
- County Parcel ID number, *if used for county*, for all affected properties
- Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.
- Detailed Site Map(s) for all affected properties, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.
- Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)
- Tables of Latest Soil Analytical Results (no shading or cross-hatching)
- Isoconcentration map(s), *if required for site investigation (SI)* (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. If not available, include the latest extent of contaminant plume map.
- GW: Table of water level elevations, with sampling dates, and free product noted if present
- GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)
- SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour
- Geologic cross-sections, *if required for SI*. (8.5x14" if paper copy)
- RP certified statement that legal descriptions are complete and accurate
- Copies of off-source notification letters (if applicable)
- Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW)

NA
NA
X
X
X
X
X
X
X
NA
NA
NA
X
NA
X
NA
NA



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

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

May 1, 2008

Mr. Todd Bentley
Bentley Company
4080 N. Pt. Washington Rd.
Glendale, WI 53212

SUBJECT: Final Case Closure
Cream City Building – Plant 2, Bentley Company, Glendale, WI
WDNR BRRTS Activity #: 02-41-525171, FID#241942360

Dear Mr. Bentley:

On April 1, 2008, the Department of Natural Resources Southeast Region closure committee reviewed your request for closure of the case described above. The regional closure committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. Your project involved the assessment of an area around the former Cream City Building, prior to its demolition in 2005, which identified the presence of 1,1,1-trichloroethane in one soil boring located adjacent to the former building. After the building was demolished, you had the shallow fill material beneath it excavated and disposed properly at a solid waste landfill. The Department required additional soil samples to be collected from the area around this soil boring. 1,1,1-Trichloroethane was found in shallow soil from one of the four additional soil borings. Due to apparent limited extent of the contaminant in this area, your consultant requested case closure with a listing on the state GIS Registry of closed cases. Based on the correspondence and data provided, it appears that your case meets the requirements of ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time.

Please be aware that this case may be reopened pursuant to s. NR 726.09, Wisconsin Administrative 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.

GIS Registry

The conditions of case closure set out below in this letter require that your site be listed on the Remediation and Redevelopment Program's GIS Registry. The specific reasons are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed.

Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at: <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If your property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This

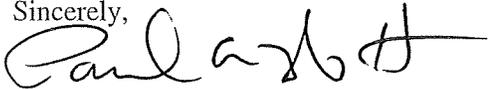
form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

Remaining Residual Soil Contamination

Residual soil contamination remains within five feet of the ground surface in the area south of the former Cream City Building, razed in 2005, as found in borings B-5 and B-14, indicated in the information submitted to the Department of Natural Resources. If soil in the location described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact me at (414) 263-8758.

Sincerely,



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

cc: Scott Hodgson - Terracon

4



DOC.# 09427998

State Bar of Wisconsin Form 6-2003
SPECIAL WARRANTY DEED

mw1300463_1

Document Number Document Name

REGISTER'S OFFICE | SS
Milwaukee County, WI

RECORDED 05/04/2007 03:39PM

JOHN LA FAVE
REGISTER OF DEEDS

AMOUNT: 17.00

THIS DEED, made between Bentley Development LLC, a Wisconsin limited liability company

_____ ("Grantor," whether one or more), and STAG III Milwaukee, LLC, a Delaware limited liability company

_____ ("Grantee," whether one or more)

Grantor for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in Milwaukee County, State of Wisconsin ("Property") (if more space is needed, please attach addendum)

See Exhibit A attached hereto and incorporated herein

Recording Area

Name and Return Address
Ms Kathryn Arnone
STAG III Milwaukee, LLC
99 Chauncey Street
Boston, MA 02111

242-0412-1 and 242-1197-003

Parcel Identification Number (PIN)

This is not _____ homestead property
(is) (is not)

TRANSFER
\$19,950.00
FEE

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances arising by, through, or under Grantor, except municipal and zoning ordinances and agreements entered under them, general and special taxes and assessments for the year 2007 not yet due and payable, and the permitted encumbrances listed on Exhibit B attached hereto and incorporated herein

Dated April 13, 2007

BENTLEY DEVELOPMENT LLC

(SEAL) *[Signature]* (SEAL)
* _____ * Thomas H Bentley, III, Managing Member

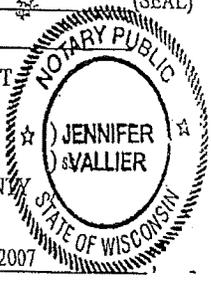
(SEAL) _____ (SEAL)
* _____ *

AUTHENTICATION

Signature(s) _____
authenticated on _____

ACKNOWLEDGMENT

STATE OF WISCONSIN
Milwaukee COUNTY



Personally came before me on April 13, 2007
the above-named Thomas H Bentley, III

TITLE MEMBER STATE BAR OF WISCONSIN
(If not, _____
authorized by Wis Stat § 706.06)

to me known to be the person(s) who executed the foregoing instrument and acknowledged the same

THIS INSTRUMENT DRAFTED BY

Jennifer L Vallier
Godfrey & Kahn, S C

[Signature]
* *[Signature]*
Notary Public, State of Wisconsin
My Commission (is permanent) (expires _____)

1300463_1

(Signatures may be authenticated or acknowledged Both are not necessary)

NOTE THIS IS A STANDARD FORM ANY MODIFICATIONS TO THIS FORM SHOULD BE CLEARLY IDENTIFIED.

SPECIAL WARRANTY DEED

© 2003 STATE BAR OF WISCONSIN

FORM NO. 6-2003

* Type name below signatures

EXHIBIT A

LEGAL DESCRIPTION

Parcel A

Parcel 2 of Certified Survey Map No 5506, being a Redivision of all of Lots 107, 108, 112 and part of Lots 95, 96, 99, 100, 101, 106, 111, 113, 118, 119, 120, 124 and 125, in Comstock and Williams Subdivision in the Southwest ¼ and Southeast ¼ of the Southeast ¼ of Section 5, Township 7 North, Range 22 East, being partly in the City of Milwaukee and partly in the City of Glendale, County of Milwaukee, State of Wisconsin recorded in the office of the Register of Deeds for Milwaukee County on January 15, 1991, in Reel 2530 at Image 1677, as Document No. 6450203.

Parcel B

A non-exclusive easement set forth in Easement Agreement dated January 8, 1992, recorded January 10, 1992, as Document No. 6558311

Parcel C

A non-exclusive easement for ingress and egress as contained in a Deed dated June 15, 1928 and recorded on June 15, 1928 in Volume 1201 of Deeds at Page 164, as Document No. 1618932

Parcel D

Part of Lot 96 in Comstock and William's Subdivision of Lots 1, 2, 3, 4 and 5 in Section 5 and the Southeast ¼ of Section 5 and the Northwest ¼ of Section 5, Town 7 North, Range 22 East, a recorded subdivision in the Southwest ¼ and Southeast ¼ of Section 5, Town 7 North, Range 22 East in the City of Glendale, Milwaukee County, Wisconsin, bounded and described as follows:

Commencing at the Northwest corner of said Southeast ¼; thence South 0°34'42" East along the West line of said ¼ section, 1328.22 feet to a point on the Northeasterly right of way line of the Canadian Pacific Railway; thence South 36°13'31" East along said right of way line, 93.71 feet to the South line of West Olive Street, thence North 89°47'28" East along said South line, 909.60 feet to the East line of Lot 88; thence South 0°34'50" East along said East line and the South line of said Olive Street, 8.00 feet to the Northwest corner of Lot 96; thence North 89°04'35" East along said South line and the North line of said Lot 96, 92.75 feet to the point of beginning; thence North 89°04'35" East along said North line, 207.25 feet to a point 300 feet East of the West line of said Lot 96, thence South 00°34'50" East along a line parallel with the West line of said Lot 96, 82.33 feet to a point on the North line of Certified Survey Map No 5506, thence South 89°04'35" West along said North line, 207.25 feet to a point 92.75 feet East of the West line of said Lot 96, thence North 00°34'50" West and parallel with the West line of said Lot 96, 82.33 feet to the South line of said street and the point of beginning

EXHIBIT B

PERMITTED ENCUMBRANCES

- 1 Covenant shown on Plat of Certified Survey Map No 506, providing as follows:
That all utility lines to provide electric power and telephone services and cable television or communications systems lines or cables to all lots in the map shall be installed underground in easements provided therefore
- 2 Rights of others to the use of the insured easements and all charges, assessments or liens with regard to the maintenance and repair of the insured easement
- 3 Utility Easement recorded on September 20, 1960, in Reel/Volume 4073, Image/Page 441, as Document No. 3834878 Assignment of said Easement recorded on January 17, 2001 as Document No. 8013176
- 4 Utility Easement recorded on November 19, 1965, in Reel/Volume 281, Image/Page 373, as Document No. 4221681 Assignment of said Easement recorded on January 17, 2001 as Document No. 8013176
- 5 Utility Easement recorded on January 19, 1971, in Reel/Volume 568, Image/Page 900, as Document No. 4569816. Assignment of said Easement recorded on January 17, 2001 as Document No. 8013176.
- 6 Utility Easement recorded on June 14, 1991, in Reel/Volume 2579, Image/Page 905, as Document No 6491427. Assignment of said Easement recorded on January 17, 2001 as Document No 8013176.
- 7 Reservations contained in Quit Claim Deed executed by Chicago and Northwestern Railway Company to E R Godfrey and Sons Company, recorded on August 13, 1953 in Reel/Volume 3190 of Deeds, Image/Page 129, as Document No. 3227627. (Affects Parcel D only)
- 8 Reservations contained in Quit Claim Deed executed by Chicago and Northwestern Railway Company to E.R. Godfrey and Sons Company, recorded on January 13, 1955 in Reel/Volume 3386 of Deeds, Image/Page 397, as Document No. 3360608. (Affects Parcel D only)
- 9 Effect, if any, due to the location of multiple fence(s) which do not lie entirely on the lot lines as shown on plat of survey drawn by National Survey and Engineering dated May 1, 2003 as Survey No 157659-MS
- 10 Effect, if any, due to the location of concrete curbs near the Southerly border and Southeast corner of the property, as shown on plat of survey drawn by National Survey and Engineering dated May 1, 2003 as Survey No 157659-MS

- 11 Encroachment of a concrete loading dock and train tracks upon a 10 foot easement located along the Southwesterly wall of concrete block and frame as shown on plat of survey drawn by National Survey and Engineering dated May 1, 2003 as Survey No. 157659-MS
12. Rights of Bentley World Packaging, Ltd , as tenant only, under unrecorded lease.

mw1300476_1

U ILL 2000 1111 1011 U

DCD 1671

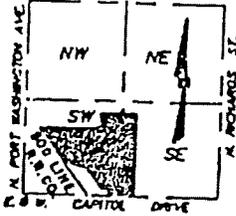
233-1197-001 & 233-1197-002, f/k/a 233-1197

CERTIFIED SURVEY MAP NO. 5506

BEING A REDVISION OF ALL OF LOTS 107, 108, AND 112 AND PART OF LOTS 95, 96, 99, 100, 101, 106, 111, 113, 118, 119, 120, 124, AND 125 IN COMSTOCK AND WILLIAMS SUBDIVISION IN THE SW 1/4 AND SE 1/4 OF THE SE 1/4 OF SECTION 5, T 7 N, R 22 E, BEING PARTLY IN THE CITY OF MILWAUKEE AND PARTLY IN THE CITY OF GLENDALE, MILWAUKEE COUNTY, WISCONSIN.

Zoning: I/B/85

GRAPHIC SCALE Tax Key No: 242-0210-100-X



(IN FEET)
1 inch = 200 ft

INDICATES 1" DIA. IRON PIPE, 24" LONG, WEIGHT 1.13 LBS. PER LINEAL FOOT.

ALL DIMENSIONS SHOWN ARE MEASURED TO THE NEAREST HUNDREDTH OF A FOOT.

ALL BEARINGS SHOWN ARE REFERENCED TO SOUTH LINE SE 1/4 SEC. 5, T. 5N., R. 22E. WHOSE ASSUMED BEARING IS EAST.

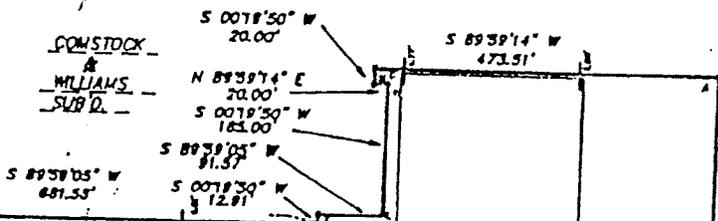
INDICATES CROSS SET IN CONC.

- A = 89°39'14"
- B = 90°20'00"
- C = 103°43'36"
- D = 165°58'45"
- E = 270°19'44"
- F = 125°18'26"
- G = 217°58'45"
- H = 147°01'12"
- I = 54°42'28"
- J = 287°39'15"
- K = 90°20'45"
- L = 287°39'15"
- M = 270°20'38"
- N = 89°39'21"
- O = 90°20'36"

CURVE ①
 Δ = 40°10'00"
 R = 80°15'00"
 L = 80°20'
 Δ L = 78.83'
 Δ L = 70.87'
 Δ L = 84.90' Δ O = 7'

PARCEL 1
 3.0544 AC.
 133,050 SQ. FT.

PARCEL 2
 15.3900 AC.
 669,935 SQ. FT.



Legal
PCL 2
CSM# 4303

CURVE ①
 Δ = 147°01'12"
 R = 573.00'
 L = 288.76'
 Δ L = 283.78'
 Δ L = 573.17' Δ E

CITY OF GLENDALE LIMITS
CITY OF MILWAUKEE LIMITS

SECTION LINE
EAST

W. CAPITOL DRIVE

VARIABLE R.O.W. SEE DETAIL B

PAGE 1 OF 4 PAGES

RECEIVED
 SEP 20 1990
 DEPT. OF
 City Development

DEPT. OF CITY
 DEVELOPMENT
 OF MILWAUKEE

SEP 24 1990

STAFF
 APPROVED

BUREAU OF ENGINEERS

Robert E. Berk 10-2-90
 CHIEF DRAFTSMAN

John P. Erickson 10/2/90
 ENGINEER IN CHARGE SENIOR ENGR. DIV.
 CORRECT

John P. Erickson 10-3-90
 CITY ENGINEER
 APPROVED



**Non-Residential
Property
Information**

For 2006

**Assessments reflect the estimated value on January 1st of the indicated year*
*Ownership reflects the most recent information available**

Tax Key Number: 2421197003
Property Address: 200 W CAPITOL DR

Parcel ID

Property Owner: BENTLEY DEVELOP. L.L.C.,
C/O BENTLEY PACKAGING
Owners Address: 4080 N PRT WASHINGTON RD
GLENDALE, WI 53212 1132

Description: COM NW COR OF SE 1/4 SEC5-7-22E S ALG W LI OF SD1/4 SEC 1,328.22'
TO A PT ON THE NELY ROW LI OF CANADIAN PACIFIC RR TH SELY ALG ROW LI 93.71' TO S
LI W OF LOT 88 TH S 8' TO NW COR OF LOT 96 TH E 92.75' TO POB TH E 207.25' TO A PT THS
82.33' TO A PT ON N LI OF CS

Current Land Assessment:	\$1,015,700.00
Current Improvement Assessment:	\$1,417,800.00
Assessment Total:	\$2,433,500.00
Fair Market Value:	\$2,584,700.00

Net Tax:	\$54,469.20
Lottery Credit:	\$0.00
Net Tax Due:	\$54,469.20
Special Assessments:	\$0.00
Special Charges:	\$0.00
Delinquent Utilities:	\$0.00
Total Billed:	\$54,469.20
Total Paid:	\$0.00

Seller:

Statement of Accurate Legal Descriptions

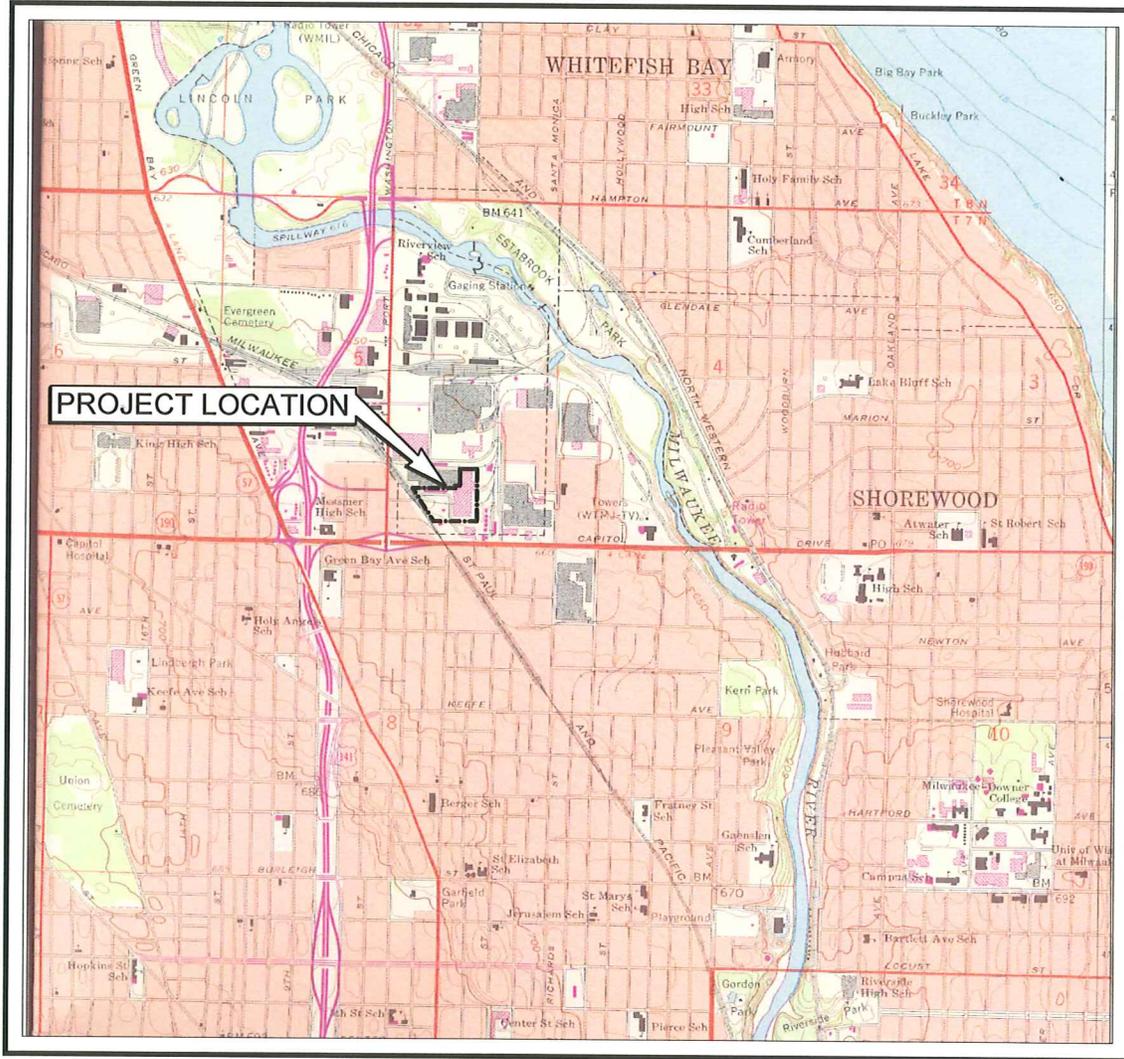
To the best of my knowledge, the attached property legal descriptions are complete, accurate, and identify those parcels with soil and groundwater impacts originating from the property located at 4077 North 1st Street in Glendale, Milwaukee County, Wisconsin.



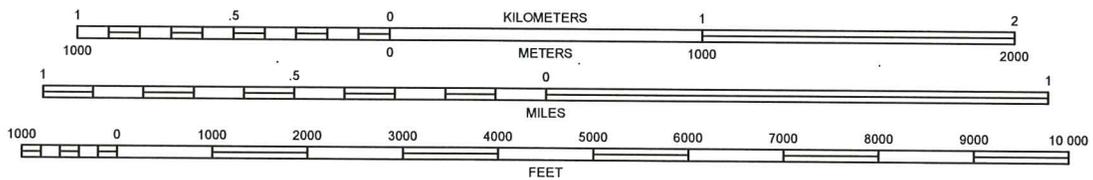
Todd Bentley
The Bentley Company

12/18/06
Date

UNITED STATES - DEPARTMENT OF THE INTERIOR - GEOLOGICAL SURVEY



SCALE 1:24 000



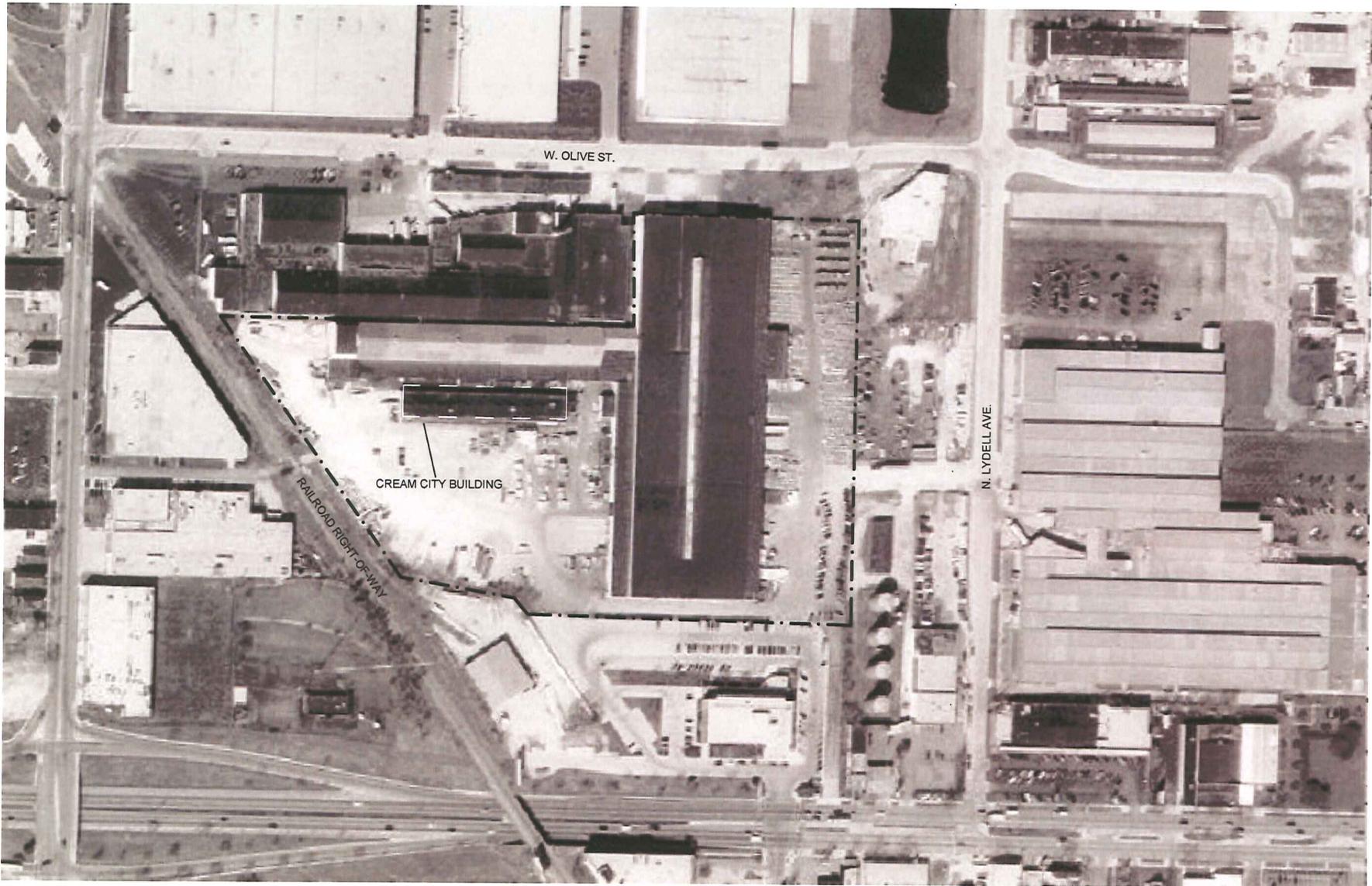
MILWAUKEE QUADRANGLE
 WISCONSIN - MILWAUKEE
 7.5 MINUTE SERIES (TOPOGRAPHIC)



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

SITE LOCATION MAP
 BENTLEY COMPANY
 4077 N. 1st STREET
 GLENDALE WISCONSIN

Project Mngr:	MAK	Terracon 3011B E. Capitol Drive Appleton, WI 54911	Project No.	38047011
Designed By:	BAL		Scale:	NO SCALE
Checked By:	BAL		Date:	9/27/04
Approved By:	MAK		Drawn By:	AJP (38)
File Name:	38047011Aerial.dwg	Layout1	Figure No.	1



LEGEND

-  APPROXIMATE PROPERTY BOUNDARY
-  LOCATION OF FORMER CREAM CITY BUILDING

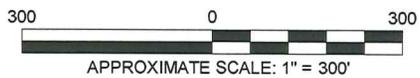


DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES



AERIAL PHOTOGRAPH
 BENTLEY COMPANY
 4077 N. 1st STREET
 GLENDALE, WISCONSIN

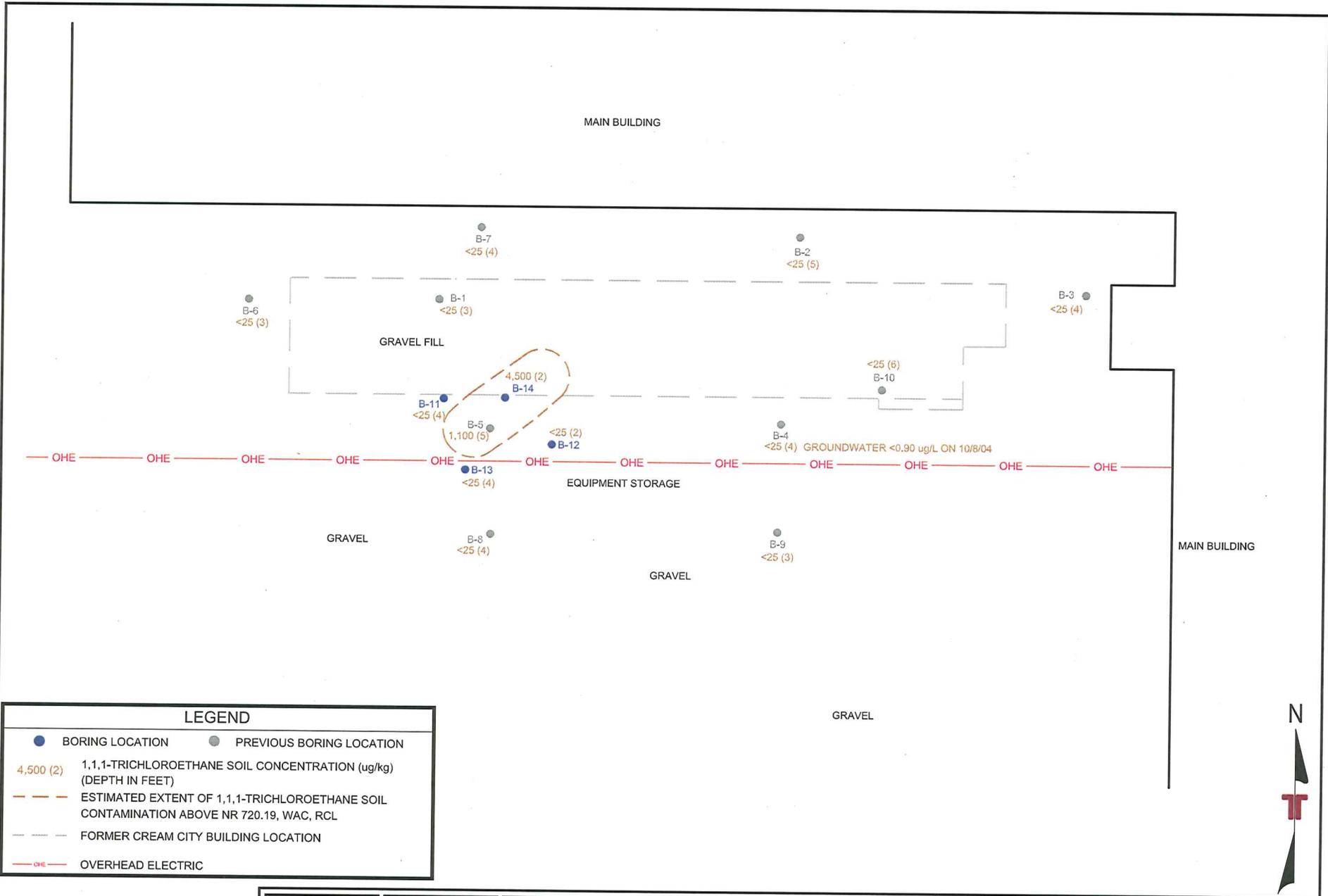
Project Mngr: MAK
 Designed By: AJP
 Checked By: MAK
 Approved By: MAK

Terracon
 3011B E. Capitol Drive
 Appleton, WI 54911

Project No. 38047011
 Scale: 1" = 300'
 Date: 12/14/06
 Drawn By: AJP (38)
 Figure No. 2

File Name: 38047011Aerials.dwg

Layout3



Project Mngr:	SAH
Drawn By:	AJP (38)
Checked By:	SAH
Approved By:	MAK

Project No.	38047011
Scale:	AS SHOWN
File No.	38047011.SM2
Date:	4/7/08

Terracon
Consulting Engineers and Scientists

3011B EAST CAPITOL DRIVE APPLETON, WI 54911
PH. (920) 993-9096 FAX. (920) 993-9108

BORING LOCATION MAP	
BENTLEY WORLD PACKAGING FACILITY 4077 NORTH FIRST STREET GLENDALE WISCONSIN	

FIG. No.	2
Layout7	

Table 1

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Characterization Soil Sample Analytical Summary - DRO and PAHs

Sample ID	Sample Date	DRO	Polycyclic Aromatic Hydrocarbons (PAH)															
		Diesel Range Organics	1-Methylnaphthalene	2-Methylnaphthalene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	Naphthalene	Phenanthrene	Pyrene
Units		mg/kg	mg/kg															
Soil Leaching to Groundwater Pathway - RCL ¹		NE	23	20	3,000	17	48	360	6,800	870	37	38	500	100	680	0.4	1.8	8,700
Direct Contact Pathway - RCL ^{2,3}		100	70,000	40,000	300,000	4	0.39	4	39	39	390	0.39	40,000	40,000	4	110	390	30,000
Comp #1	03/25/04	18	0.25	0.29	0.034	0.092	0.1	0.088	0.06	0.094	0.12	0.021	0.21	0.011	0.054	0.21	0.3	0.18

NOTES:

¹ PAH results compared to Suggested Soil Leaching to Groundwater Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97, April, 1997

² PAH results compared to Suggested Industrial Direct Contact Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97, April, 1997

³ DRO results compared to NR 720, WAC, Generic Residual Contaminant Levels

"RCL" Indicates Residual Contaminant Level

"mg/kg" Indicates milligrams per kilogram

"NE" Indicates standard not established

Table 2

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Characterization Soil Sample Analytical Summary - VOCs

Sample ID	Sample Date	Volatile Organic Compounds (VOC)						
		1,2,4-Trimethylbenzene	Ethylbenzene	Naphthalene	n-Propylbenzene	Tetrachloroethene	Toluene	Total Xylenes
Units		ug/kg						
Soil Leaching to Groundwater Pathway - RCL ¹		NE	2,900	NE	NE	NE	1,500	4,100
Comp #1	03/25/04	67	56	73	40	38	130	208

NOTES:

¹ VOC results compared to NR 720.09, WAC, Table 1 - Residual Contaminant Levels (RCL) Based on Protection of Groundwater

"µg/kg" indicates micrograms per kilogram

"<" indicates compound not detected above the listed laboratory method detection limit

"NE" indicates standard not established

Table 3

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Characterization Soil Sample Analytical Summary - Metals (Total)

Sample ID	Sample Date	Metals (Total)										
		Arsenic	Barium	Cadmium	Total Chromium	Copper	Lead	Mercury	Nickel	Selenium	Silver	Zinc
Units		mg/kg										
Direct Contact Pathway - RCL ¹		1.6	NE	510	200 ²	NE	500	NE	NE	NE	NE	NE
Comp #1	03/25/04	27	450	2.0	21	22	96	0.091	24	1.7	0.081	880

NOTES:

¹ Metals results compared to NR 720.11, WAC, Industrial Direct Contact, Table 2 - Residual Contaminant Level (RCL)

² Listed criteria is NR 720.11, WAC, Industrial Direct Contact, Table 2 - RCL for Hexavalent Chromium

"mg/kg" Indicates milligrams per kilogram

" < " Indicates compound not detected above the listed laboratory method detection limit

"NE" Indicates standard not established

Bold Values indicate compound was detected above listed RCL

Table 4

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Characterization Soil Sample Analytical Summary - Metals (TCLP)

Sample ID	Sample Date	Metals (TCLP)										
		Arsenic - TCLP	Barium - TCLP	Cadmium - TCLP	Chromium - TCLP	Copper - TCLP	Lead - TCLP	Mercury - TCLP	Nickel - TCLP	Selenium - TCLP	Silver - TCLP	Zinc - TCLP
Units		mg/L										
NR 605.08 - Table 1 ¹		5	100	1	5	NE	5	0.2	NE	1	5	NE
Comp #1	03/25/04	<1.0	<1.0	<0.25	<0.25	<0.25	<1.0	<0.0020	<0.25	<1.0	<0.25	1.2

NOTES:

- ¹ NR 605.08, WAC, Table 1, Maximum Concentration for the Toxicity Characteristic
- "RCL" Indicates Residual Contaminant Level
- "mg/L" Indicates milligrams per liter
- "< " Indicates compound not detected above the laboratory method detection limit
- "NE" Indicates standard not established

Table 5

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Characterization Soil Sample Analytical Summary
 PCBs and (TCLP) Pesticides and Herbicides

Sample ID	Sample Date	PCB	Pesticides - (TCLP)							Herbicides (TCLP)	
		Total PCBs	Chlordane, Technical	Endrin	gamma-BHC (Lindane)	Heptachlor	Heptachlor Epoxide	Methoxychlor	Toxaphene	2,4,5-TP (Silvex)	2,4-D
Units		ug/kg	mg/L								
NR 605.08 - Table 1 ¹		NE	0.03	0.02	0.4	0.008	0.008	10	0.5	1	10
Bentley Composite	04/21/04	<26	<10	<1.0	<0.50	<0.50	<0.50	<5.0	<50	<0.10	<0.50

NOTES:

- ¹ NR 605.08, WAC, Table 1, Maximum Concentration for the Toxicity Characteristic
- "RCL" Indicates Residual Contaminant Level
- "mg/L." Indicates milligrams per liter
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Table 6

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Probe Assessment Soil Analytical Summary - Metals and VOCs

Sample ID (Depth in Feet)	Sample Date	Metals					VOCs
		Lead	Arsenic	Cadmium	Total Chromium	Hexavalent Chromium	1,1,1-Trichloroethane
Units		mg/kg					µg/kg
Soil Leaching to Groundwater Pathway - RCL		NE	NE	NE	NE	NE	280 ¹
Industrial Direct Contact Pathway - RCL ²		500	1.6	510	200 ³	200	2.04E+08 ⁴
B-1(3)	10/08/04	8.2	2.6	0.19	11	<0.16	<25
B-2(5)	10/08/04	16	7.9	0.26	18	<0.16	<25
B-3(4)	10/08/04	19	11	0.51	42	<0.16	<25
B-4(4)	10/08/04	13	6.5	0.57	32	<0.16	<25
B-5(5)	10/08/04	8.8	6.5	0.22	16	<0.16	1,100
B-6(3)	10/08/04	11	5.4	0.22	16	<0.16	<25
B-7(4)	10/08/04	30	15	0.42	34	<0.16	<25
B-8(4)	10/08/04	10	5.7	0.27	20	<0.16	<25
B-9(3)	10/08/04	24	9.6	0.66	20	<0.16	<25
B-10(6)	10/08/04	16	7.4	0.54	17	<0.16	<25

NOTES:

¹ VOC results compared to calculated NR 720.19, WAC, Site-Specific RCL for the Soil Leaching to Groundwater pathway
 USEPA Soil Screening Guidance for Chemicals

² Metals results compared to NR 720.11, WAC, Industrial Direct Contact, Table 2 - RCL

³ Listed criteria is NR 720.11, WAC, Industrial Direct Contact, Table 2 - RCL for Hexavalent Chromium

⁴ VOC results compared to calculated NR 720, WAC, Site-Specific RCL for the Industrial Direct Contact Pathway, per
 USEPA Soil Screening Guidance for Chemicals

"RCL" Indicates Residual Contaminant Level

"mg/kg" Indicates milligrams per kilogram, "µg/kg" indicates micrograms per kilogram

"<" Indicates compound not detected above the laboratory method detection limit

"NE" Indicates standard not established

Bold Values indicate compound was detected above listed RCL

Table 7

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Probe Assessment Soil Analytical Summary - PAHs

Sample ID (Depth in Feet)	Sample Date	Polycyclic Aromatic Hydrocarbons (PAH)																	
		1-Methylnaphthalene	2-Methylnaphthalene	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	Naphthalene	Phenanthrene	Pyrene
Units		mg/kg																	
Soil Leaching to Groundwater Pathway - RCL ¹		23	20	38	0.7	3,000	17	48	360	6,800	870	37	38	500	100	680	0.4	1.8	8,700
Industrial Direct Contact Pathway - RCL ²		70,000	40,000	60,000	360	300,000	3.9	0.39	3.9	39	39	390	0.39	40,000	40,000	3.9	110	390	30,000
B-1(3)	10/08/04	0.0037	0.0046	<0.0019	<0.0067	<0.0026	<0.015	<0.012	<0.0098	<0.0066	<0.013	<0.014	<0.0040	<0.011	<0.0016	<0.0063	0.0039	<0.0067	<0.015
B-2(5)	10/08/04	<0.0026	<0.0037	<0.0018	<0.0064	<0.0025	<0.014	<0.012	<0.0094	<0.0064	<0.013	<0.013	<0.0038	<0.011	<0.0015	<0.0061	<0.0028	<0.0065	<0.014
B-3(4)	10/08/04	<0.0028	<0.0040	<0.0020	<0.0069	<0.0027	<0.015	<0.012	<0.010	<0.0069	<0.014	<0.014	<0.0041	<0.012	<0.0016	<0.0066	<0.0030	<0.0070	<0.015
B-4(4)	10/08/04	<0.0027	<0.0038	<0.0019	<0.0066	<0.0025	<0.015	<0.012	0.011	<0.0065	<0.013	0.015	<0.0039	0.034	<0.0016	<0.0062	<0.0029	0.019	0.024
B-5(5)	10/08/04	<0.0026	<0.0036	<0.0018	<0.0063	<0.0024	<0.014	<0.011	<0.0092	<0.0062	<0.012	<0.013	<0.0037	<0.011	<0.0015	<0.0059	<0.0028	<0.0063	<0.014
B-6(3)	10/08/04	<0.0026	<0.0037	<0.0018	<0.0063	<0.0024	<0.014	<0.011	<0.0093	<0.0063	<0.012	<0.013	<0.0038	<0.011	<0.0015	<0.0060	<0.0028	<0.0064	<0.014
B-7(4)	10/08/04	0.0071	0.0067	0.0080	<0.0068	0.020	0.059	0.065	0.059	0.052	0.057	0.077	0.011	0.170	0.0083	0.044	0.0098	0.120	0.120
B-8(4)	10/08/04	<0.0025	<0.0036	<0.0017	<0.0061	<0.0024	<0.014	<0.011	<0.0090	<0.0061	<0.012	<0.013	<0.0037	<0.010	<0.0015	<0.0058	<0.0027	<0.0062	<0.014
B-9(3)	10/08/04	<0.0026	<0.0037	<0.0018	0.011	0.0050	0.028	0.045	0.021	0.029	0.027	0.033	<0.0038	0.022	<0.0015	0.019	<0.0028	0.0089	0.046
B-10(6)	10/08/04	<0.0027	<0.0038	<0.0018	<0.0065	<0.0025	<0.015	<0.012	<0.0096	<0.0065	<0.013	<0.013	<0.0039	<0.011	<0.0015	<0.0062	<0.0029	<0.0066	<0.015

NOTES:

¹ PAH results compared to Suggested Soil Leaching to Groundwater Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97, April, 1997

² PAH results compared to Suggested Industrial Direct Contact Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance, RR-519-97, April, 1997

"RCL" Indicates Residual Contaminant Level

"mg/kg" Indicates milligrams per kilogram

"< " Indicates compound not detected above the laboratory method detection limit

"NE" Indicates standard not established

Bold Values indicate compound was detected above listed RCL

Table 1

Bentley Company
Glendale, Wisconsin
Terracon Project No. 38047011

Probe Assessment Soil Analytical Summary - Metals and VOCs

Sample ID (Depth in Feet)	Sample Date	Metals					VOCs						
		Lead	Arsenic	Total Chromium	Cadmium	Hexavalent Chromium	1,1,1-Trichloroethane	1,1-Dichloroethane	1,1-Dichloroethene	Naphthalene	Toluene	1,2,4-Trimethylbenzene	Total Xylene
Units		mg/kg					µg/kg						
Soil Leaching to Groundwater Pathway - RCL		NE	NE	NE	NE	NE	284 ¹	349 ¹	50 ¹	400	1,500	NE	4,100
Industrial Direct Contact Pathway - RCL ²		500	1.6	200 ³	510	200	2.04E+08 ⁴	2.04E+08 ⁴	5.11E+07 ⁴	NE	NE	NE	NE
B-1(3)	10/08/04	8.2	2.6	11	0.19	<0.16	<25	<25	<25	<25	<25	<25	<50
B-2(5)	10/08/04	16	7.9	18	0.26	<0.16	<25	<25	<25	<25	<25	<25	<50
B-3(4)	10/08/04	19	11	42	0.51	<0.16	<25	<25	<25	<25	<25	<25	<50
B-4(4)	10/08/04	13	6.5	32	0.57	<0.16	<25	<25	<25	<25	<25	<25	<50
B-5(5)	10/08/04	8.8	6.5	16	0.22	<0.16	1,100	<25	<25	<25	<25	<25	<50
B-6(3)	10/08/04	11	5.4	16	0.22	<0.16	<25	<25	<25	<25	<25	<25	<50
B-7(4)	10/08/04	30	15	34	0.42	<0.16	<25	<25	<25	<25	<25	<25	<50
B-8(4)	10/08/04	10	5.7	20	0.27	<0.16	<25	<25	<25	<25	<25	<25	<50
B-9(3)	10/08/04	24	9.6	20	0.66	<0.16	<25	<25	<25	<25	<25	<25	<50
B-10(6)	10/08/04	16	7.4	17	0.54	<0.16	<25	<25	<25	<25	<25	<25	<50
B-11(4)	07/26/07	-	-	-	-	-	<25	<25	<25	<25	<25	<25	<50
B-11(16)	07/26/07	-	-	-	-	-	<25	<25	<25	<25	<25	<25	<50
B-12(2)	07/26/07	-	-	-	-	-	<25	<25	<25	<25	<25	<25	<50
B-12(11)	07/26/07	-	-	-	-	-	<25	<25	<25	<25	<25	<25	<50
B-13(4)	07/26/07	-	-	-	-	-	<25	<25	<25	<25	<25	<25	<50
B-13(11.5)	07/26/07	-	-	-	-	-	<25	<25	<25	<25	<25	<25	<50
B-14(2)	07/26/07	-	-	-	-	-	4,500	1,680	57	119	50	70	168
B-14(8)	07/26/07	-	-	-	-	-	<25	<25	<25	<25	<25	<25	<50

NOTES:

¹ VOC results compared to calculated NR 720.19, WAC, Site-Specific RCL for the Soil Leaching to Groundwater pathway, per USEPA Soil Screening Guidance for Chemicals

² Metals results compared to NR 720.11, WAC, Industrial Direct Contact, Table 2 - RCL

³ Listed criteria is NR 720.11, WAC, Industrial Direct Contact, Table 2 - RCL for Hexavalent Chromium

⁴ VOC results compared to calculated NR 720, WAC, Site-Specific RCL for the Industrial Direct Contact Pathway, per USEPA Soil Screening Guidance for Chemicals

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Bold Values indicate compound was detected above listed RCL

"-" Not analyzed

Table 8

Bentley Fill Material
 Glendale, Wisconsin
 Terracon Project No. 38047011

Probe Assessment Groundwater Analytical Summary - Metals and VOCs

Sample ID	Sample Date	Metals				VOCs
		Lead	Arsenic	Cadmium	Total Chromium	1,1,1-Trichloroethane
Units		µg/L				
NR 140, WAC, Enforcement Standard (ES)		15	50	5	100	200
NR 140, WAC, Preventive Action Limit (PAL)		1.5	5	0.5	10	40
B-4	10/08/04	<1.5	<1.8	<0.28	2.0	<0.90

NOTES:

"µg/L" Indicates micrograms per liter

" < " Indicates not detected above the laboratory method detection limit