

GIS REGISTRY INFORMATION

SITE NAME: Bentley World Packaging Ltd.
 BRRTS #: 02-41-546852 FID # (if appropriate): 241226920
 COMMERCE # (if appropriate): _____
 CLOSURE DATE: _____
 STREET ADDRESS: 5350 S KIRKWOOD AVE.
 CITY: CUDAHA
 SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

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= _____

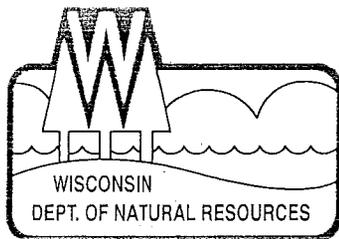
OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL): Yes No
 IF YES, STREET ADDRESS 1: _____
 GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

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)





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
Milwaukee, Wisconsin 53212-3128
Telephone 414-263-8500
FAX 414-263-8606
TTY 711

March 20, 2007

In Reply, Refer to: FID# 241226920
BRRTS#02-41-546852
BRR/ERP

Mr. Todd Bentley
Bentley Development, LLC
8600 W Bradley Road
Milwaukee, WI 53224

Subject: Final Case Closure, Bentley World Packaging Ltd., 5350 S Kirkwood Ave,
Cudahy, WI

Dear Mr. Bentley:

On January 4, 2007, the Wisconsin Department of Natural Resources (Department) reviewed your request for closure of the case described above. The Department reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases.

On January 8, 2007, the Department issued a "Conditional Closure" letter which listed the remaining requirements for case closure. On January 24, 2007, the Department received documentation that the required conditions (proper monitoring well abandonment and investigative waste disposal) have been met. After careful review of the closure request, the Department has determined that the volatile organic compound (VOC) and metals contamination on the site appears to have been investigated to the extent practicable under site conditions.

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.

Residual soil contamination remains at the site, as indicated in the information submitted to the Department. 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 at the time of excavation. **Special precautions may need to be taken during excavation activities to prevent a direct contact health threat to humans.** Based upon the results of sample analysis, the current owner will also have to properly store, treat, or dispose of any excavated materials, in accordance with state and federal laws.

Your site will be listed on the DNR 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://dnr.wi.gov/org/aw/rr/gis/index.htm>

Recent groundwater monitoring data at this site indicates exceedances of the NR 140 preventive action limit (PAL) for arsenic and lead at MW-2, but compliance with the NR 140 enforcement standard. The Department may grant an exemption to a PAL for a substance of

public health concern, other than nitrate, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, if all of the following criteria are met:

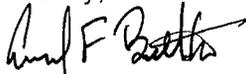
1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The enforcement standard for the substance will not be attained or exceeded at the point of standards application.
4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the Department believes that the above criteria have been or will be met. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for arsenic and lead at MW-2. This letter serves as your exemption.

Please be aware that the 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 to the environment.

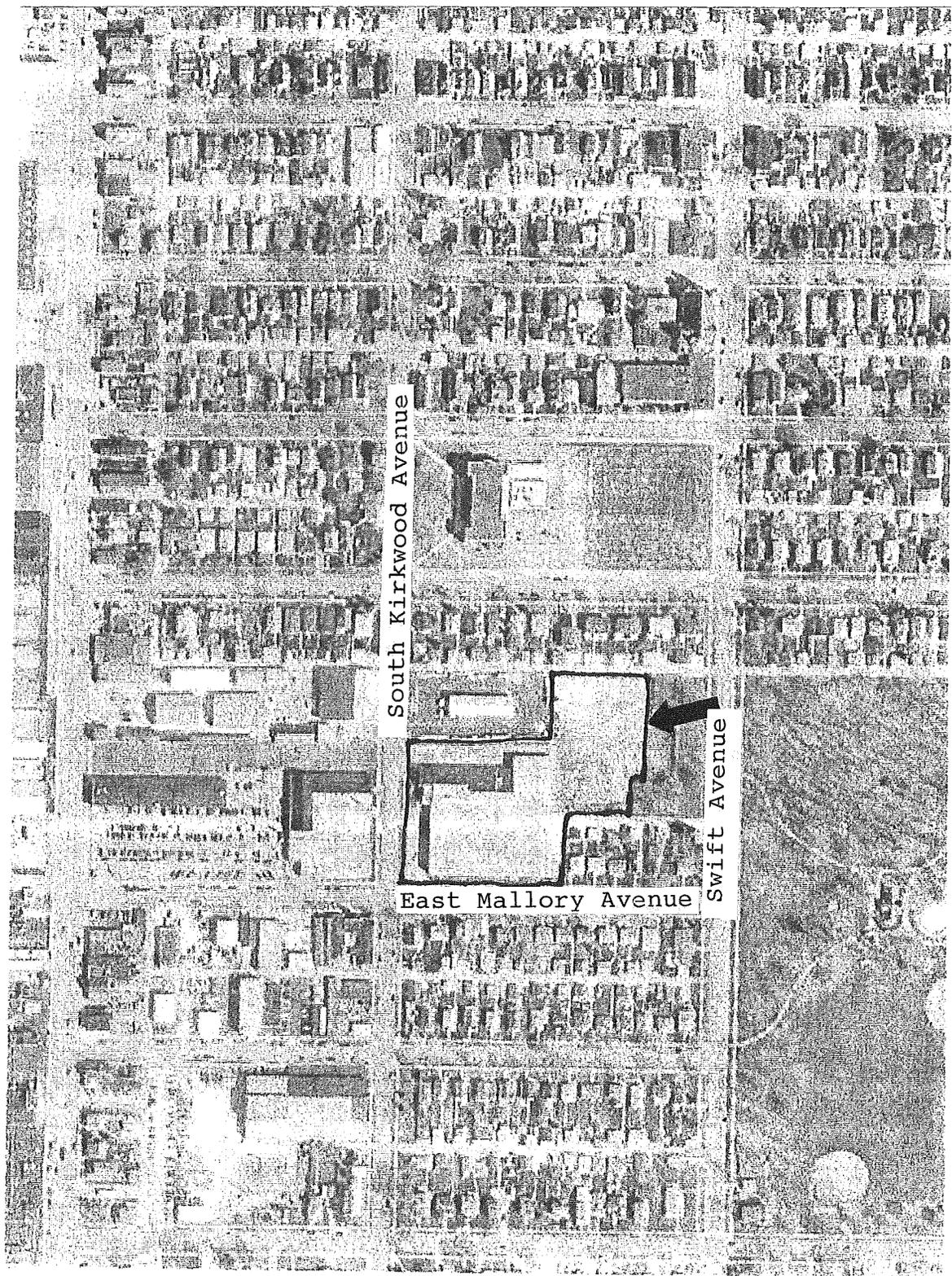
We appreciate your efforts to restore the environment at this site. If you have any questions or concerns regarding this letter, please contact me at (414) 263- 8541.

Sincerely,



Andrew F Boettcher
Hydrogeologist – RR/SER

CC: Konicek Environmental Consulting, 1032 S Spring Street, Port Washington, WI 53074
Bill Phelps, DG/2



SOURCE:
 Terraserver
 2000 Aerial Photograph

DESIGNED BY	DATE
KEK	05/15/06
DRAWN BY	PROJECT
	0604016
APPROVED BY	SHEET NO.
KEK	1

FIGURE 2
 SITE LOCATION MAP
 SITE INVESTIGATION
 BENTLEY WORLD-PACKAGING LTD.
 5350 S. KIRKWOOD AVENUE
 CUDAHY, WISCONSIN

KONICEK
 ENVIRONMENTAL
 CONSULTING, LLC

Bentley World Packaging Ltd
5350 S. Kirkwood Avenue
Cudahy, Wisconsin
FID #241226920
BRRTS #02-41-546852

The attached legal description is for the property within the contaminated site boundary.

Todd Bentley (Member)
Bentley Development LLC

8/14/06
Date

Soil Analytical Results
 Bentley World Packaging, Ltd
 5350 S. Kirkwood Ave.
 Cudahy, WI

PARAMETERS	SAMPLE IDENTIFICATION										NR 700 Generic RCLs			Soil Cleanup levels for PAHs WDNR Interim Guidance Table 1		
	SB/MW1		SB/MW2		SB/MW3		SB/MW4		SB/MW5		NR 720.09 Table 1	NR 720.09 Table 2 non-Industrial	NR 720.11 Table 2 Industrial	Groundwater Pathway - (mg/kg)	Direct Contact Pathway Non- Industrial (mg/kg)	Direct Contact Pathway Industrial (mg/kg)
	5/18/06		5/18/06		5/18/06		5/18/06		5/18/06		---	---	---	---	---	---
Date Collected	5/18/06		5/18/06		5/18/06		5/18/06		5/18/06		---	---	---	---	---	---
Depth (feet bgs)	2-4	8-10	2-4	24-26	2-4	8-10	2-4	12-14	2-4	34-35	---	---	---	---	---	---
PID IU	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	---	---	---	---	---	---
VOC (ug/kg)																
Naphthalene	68.7	28.1	116.0	31.3	49.5	27.4	35.8	<28.0	37.1	<28.3	*3,100	---	*313,000	---	---	---
Toluene	<30.1	<27.5	52.1	<28.9	<29.8	<27.4	<28.4	<28.0	<28.6	<28.3	1,500	---	---	---	---	---
1,2,3-Trichlorobenzene	39.8	<27.5	<28.3	<28.9	<29.8	<27.4	<28.4	<28.0	<28.6	<28.3	---	---	---	---	---	---
1,2,4-Trichlorobenzene	49.4	<27.5	<28.3	<28.9	<29.8	<27.4	<28.4	<28.0	<28.6	<28.3	*270	---	*156,000	---	---	---
1,2,4-Trimethylbenzene	<30.1	<27.5	43.0	<28.9	<29.8	<27.4	<28.4	<28.0	<28.6	<28.3	---	---	---	---	---	---
Metals (mg/kg)																
Arsenic	6.651	<2.706	<2.786	<2.847	<2.936	6.623	<2.799	<2.755	<1.829	<2.786	---	0.039	1.6	---	---	---
Barium	27	22	55	22	58	27	25	29	29	23	---	---	---	---	---	---
Cadmium	5.084	2.288	4.439	2.917	3.389	2.829	2.867	2.352	2.766	1.948	---	8	510	---	---	---
Chromium, total	16	11	13	12	17	7.654	13	10	12	9.151	---	*14 ⁽¹⁾	*16,000 ⁽²⁾	200 ⁽¹⁾	---	---
Lead	<12.72	<11.62	16	<12.22	<12.60	<11.58	<12.01	<11.83	<12.07	<11.96	---	50	500	---	---	---
Mercury	0.067	<0.026	0.032	<0.028	<0.029	<0.026	<0.027	<0.027	<0.027	<0.027	---	---	---	---	---	---
Selenium	<4.482	<4.092	<4.213	<4.306	<4.439	<4.079	<4.232	<4.166	<4.251	<4.213	---	---	---	---	---	---
Silver	<1.928	<1.760	<1.812	<1.852	<1.909	<1.754	<1.820	<1.792	<1.829	<1.812	---	---	---	---	---	---
PAHs (mg/kg)																
Acenaphthalene	<0.388	<0.383	2.93	<0.377	<0.397	<0.365	<0.376	<0.366	<0.380	<0.378	---	---	---	38	900	60,000
Flouranthene	<0.388	<0.383	2.06	<0.377	<0.397	<0.365	<0.376	<0.366	<0.380	<0.378	---	---	500	600	40,000	
Phenanthrene	<0.388	<0.383	2.69	<0.377	<0.397	<0.365	<0.376	<0.366	<0.380	<0.378	---	---	1.8	18	390	

Units are micrograms per kilogram unless otherwise noted

(1) Hexavalent

(2) Trivalent

bgs = below ground surface

PID = Photoionization Detector

IU = Instrument Units

--- = not analyzed/reported or no standard established

mg/kg = milligrams per kilogram

ug/kg = micrograms per kilogram

VOCs = Volatile Organic Compounds

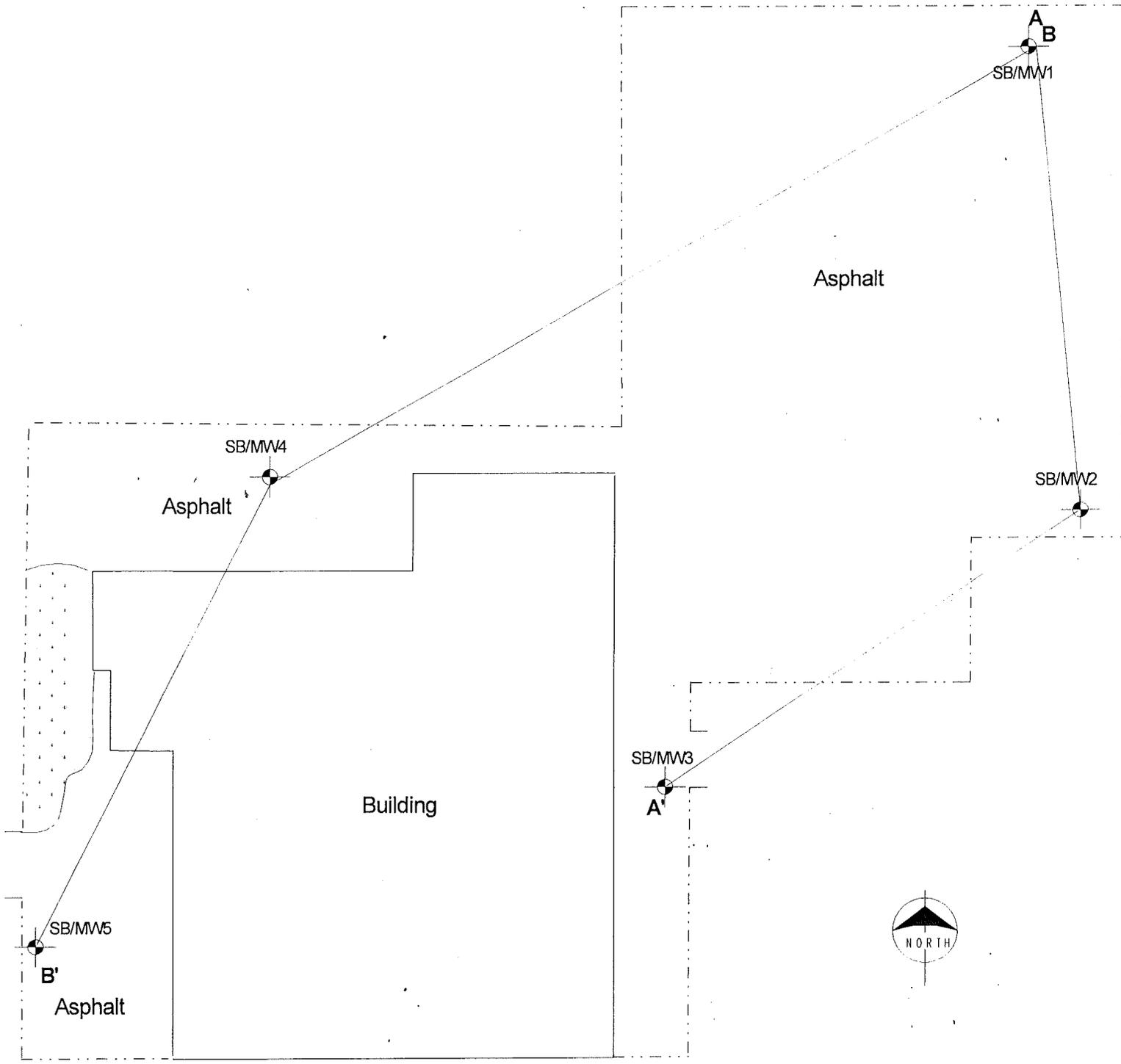
PAHs = Polynuclear aromatic hydrocarbons

RCL = Residual Contaminant Level

Table 1 RCLs based on Protection of Groundwater

Table 2 RCL based on Direct Contact levels

*Soil Screening Levels calculated using USEPA online Soil Screening Guidance Calculator



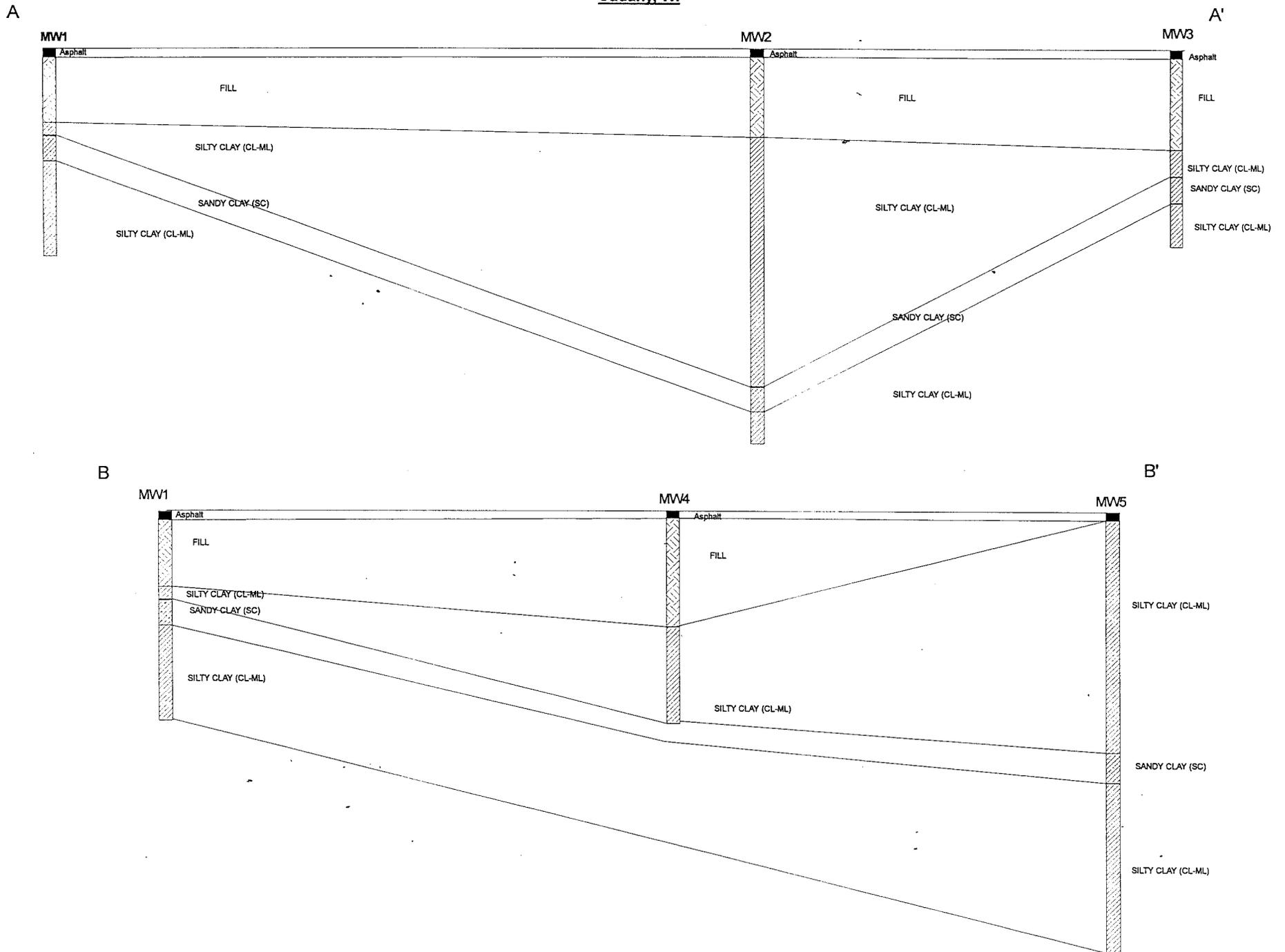
Legend:

- Fence
- ┌ └ Gate
- · · Grass
- ⊙ Monitoring Well

Konicek Environmental Consulting, LLC

Figure 4: Cross Section Transects
 Bentley World Packaging, LTD
 5350 S. Kirkwood
 Cudahy, WI

Figure 4: Schematic Cross Sections
Bentley World Packaging, LTD
Cudahy, WI



SB/MW4	
5/18/06	
2-4	12-14
<1	<1

35.8	<28.0
<28.4	<28.0
<28.4	<28.0
<28.4	<28.0
<28.4	<28.0

<2.799	<2.755
25	29
2.867	2.352
13	10
<12.01	<11.83
<0.027	<0.027
<4.232	<4.166
<1.820	<1.792

<0.376	<0.366
<0.376	<0.366
<0.376	<0.366

PARAMETERS	
Date Collected	
Depth (feet bgs)	
PID IU	
VOC (ug/kg)	
Naphthalene	
Toluene	
1,2,3-Trichlorobenzene	
1,2,4-Trichlorobenzene	
1,2,4-Trimethylbenzene	
Metals (mg/kg)	
Arsenic	
Barium	
Cadmium	
Chromium, total	
Lead	
Mercury	
Selenium	
Silver	
PAHs (mg/kg)	
Acenaphthalene	
Flouranthene	
Phenanthrene	

SB/MW1	
5/18/06	
2-4	8-10
<1	<1

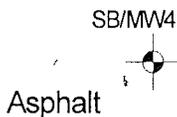
68.7	28.1
<30.1	<27.5
39.8	<27.5
49.4	<27.5
<30.1	<27.5

6.651	<2.706
27	22
5.084	2.288
16	11
<12.72	<11.62
0.067	<0.026
<4.482	<4.092
<1.928	<1.760

<0.388	<0.383
<0.388	<0.383
<0.388	<0.383



SB/MW1



Asphalt

SB/MW2

SB/MW3	
5/18/06	
2-4	8-10
<1	<1

49.5	27.4
<29.8	<27.4
<29.8	<27.4
<29.8	<27.4
<29.8	<27.4

<2.936	6.623
58	27
3.389	2.829
17	7.654
<12.60	<11.58
<0.029	<0.026
<4.439	<4.079
<1.909	<1.754

<0.397	<0.365
<0.397	<0.365
<0.397	<0.365

SB/MW2	
5/18/06	
2-4	24-26
<1	<1

116.0	31.3
52.1	<28.9
<28.3	<28.9
<28.3	<28.9
43.0	<28.9

<2.786	<2.847
55	22
4.439	2.917
13	12
16	<12.22
0.032	<0.028
<4.213	<4.306
<1.812	<1.852

2.93	<0.377
2.06	<0.377
2.69	<0.377



SB/MW3



NORTH

SB/MW5	
5/18/06	
2-4	34-35
<1	<1

37.1	<28.3
<28.6	<28.3
<28.6	<28.3
<28.6	<28.3
<28.6	<28.3

<1.829	<2.786
29	23
2.766	1.948
12	9.151
<12.07	<11.96
<0.027	<0.027
<4.251	<4.213
<1.829	<1.812

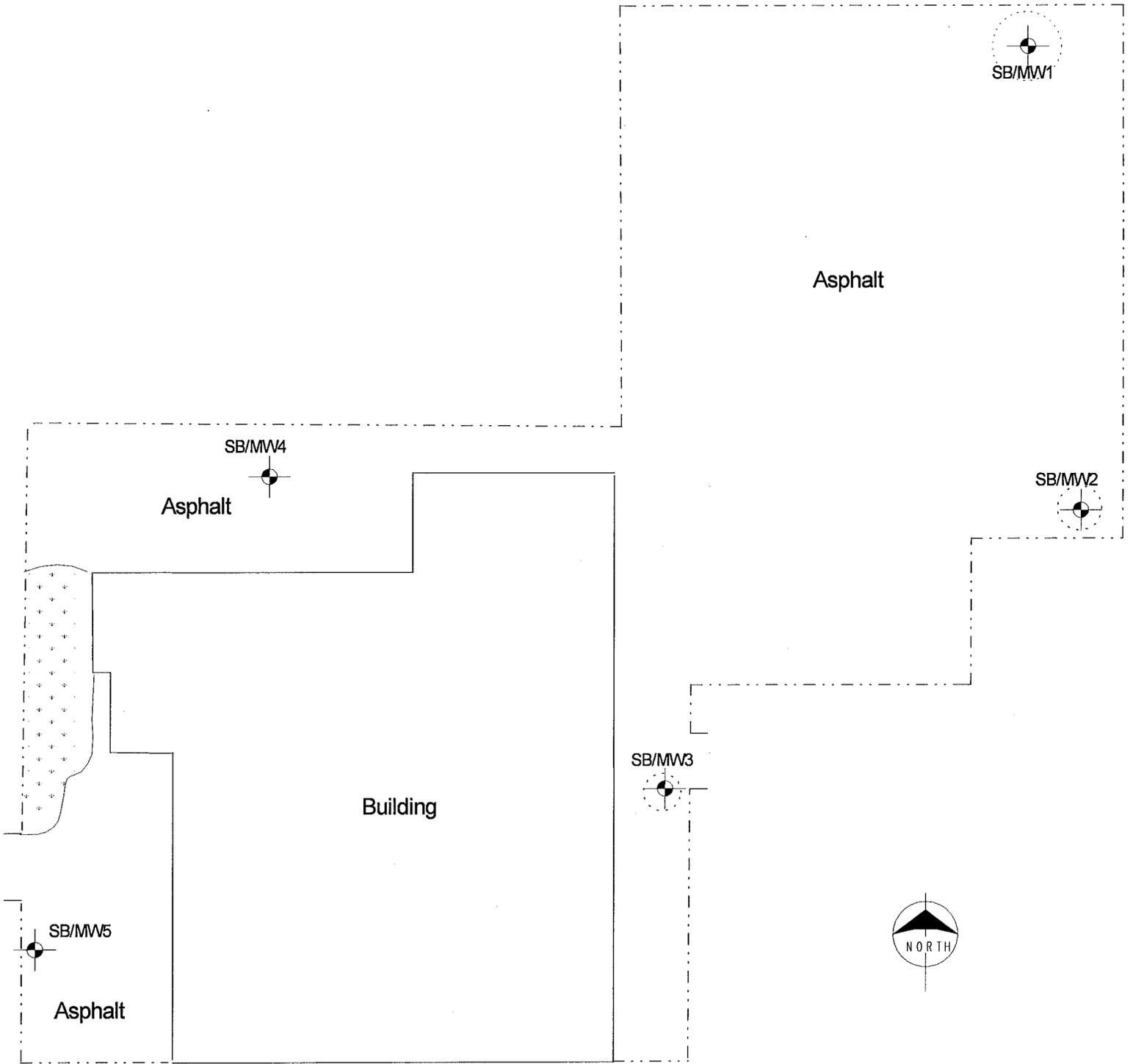
<0.380	<0.378
<0.380	<0.378
<0.380	<0.378

Legend:

- Fence
- Gate
- Grass
- Monitoring Well

Konicek Environmental Consulting, LLC

Figure 5: Soil Analytical Results
 Bentley World Packaging, LTD
 5350 S. Kirkwood Avenue
 Cudahy, WI



Legend:

- Fence
- ┌ Gate
- * * Grass
- Monitoring Well

Konicek Environmental Consulting, LLC

Figure 5A: Isoconcentration of Soil Above Generic RCLs
 Bentley World Packaging, LTD
 5350 S. Kirkwood Avenue
 Cudahy, WI

Table 2
Groundwater Analytical Results
Bentley World Packaging, Ltd
5350 S. Kirkwood Ave.
Cudahy, WI

	MW-1 5/25/06	MW-2 6/9/06	MW-3 5/25/06	MW-4 5/25/06	MW-4 10/9/06	MW-5 5/25/06	NR 140.10 Table 1 ES	NR 140.10 Table 1 <i>PAL</i>
VOCs								
Hexachlorobutadiene	ND	0.45	ND	ND	NA	ND	NS	NS
PAHs								
Chrysene	0.00721	<0.63	<0.0050	<0.0050	NA	NA	0.2	0.02
RCRA Metals								
Arsenic	<0.77	<u>1.35</u>	<0.77	<0.77	NA	NA	10	1
Barium (mg/L)	0.223	0.16	0.294	0.337	NA	NA	2	0.4
Cadmium	0.198	<0.13	<0.13	<0.13	NA	NA	5	0.5
Chromium, Total	<8.0	<8.0	<8.0	<8.0	NA	NA	100	10
Lead	<0.59	<u>1.97</u>	<0.59	<u>17</u>	<0.6	NA	15	1.5
Mercury	<0.1	<0.1	<0.1	<0.1	NA	NA	2	0.2
Selenium	<2.2	<2.2	2.3	<2.2	NA	NA	50	10
Silver	<2.0	<2.0	<2.0	<2.0	NA	NA	50	10

Units are in micrograms per liter unless otherwise noted

* Total trimethylbenzenes

NA= Not analyzed

ND= No Detections above laboratory detection limits

NS= No Groundwater Standard

mg/L=milligrams per liter

	NR 140.10 Table 1 ES	NR 140.10 Table 1 PAL	MW-1 5/25/06
VOCs			
Hexachlorobutadiene	NS	NS	ND
PAHs			
Chrysene	0.2	0.02	0.00721
RCRA Metals			
Arsenic	10	1	<0.77
Barium (mg/L)	2	0.4	0.223
Cadmium	5	0.5	0.198
Chromium, Total	100	10	<8.0
Lead	15	1.5	<0.59
Mercury	2	0.2	<0.1
Selenium	50	10	<2.2
Silver	50	10	<2.0

SB/MW1

SB/MW4
Asphalt

MW-4 5/25/06
ND
<0.0050
<0.77
0.337
<0.13
<8.0
17
<0.1
<2.2
<2.0

SB/MW2

MW-2 6/9/06
0.45
<0.63
1.35
0.16
<0.13
<8.0
1.97
<0.1
<2.2
<2.0

SB/MW3

MW-3 5/25/06
ND
<0.0050
<0.77
0.294
<0.13
<8.0
<0.59
<0.1
2.3
<2.0



MW-5 5/25/06
ND
NA

SB/MW5

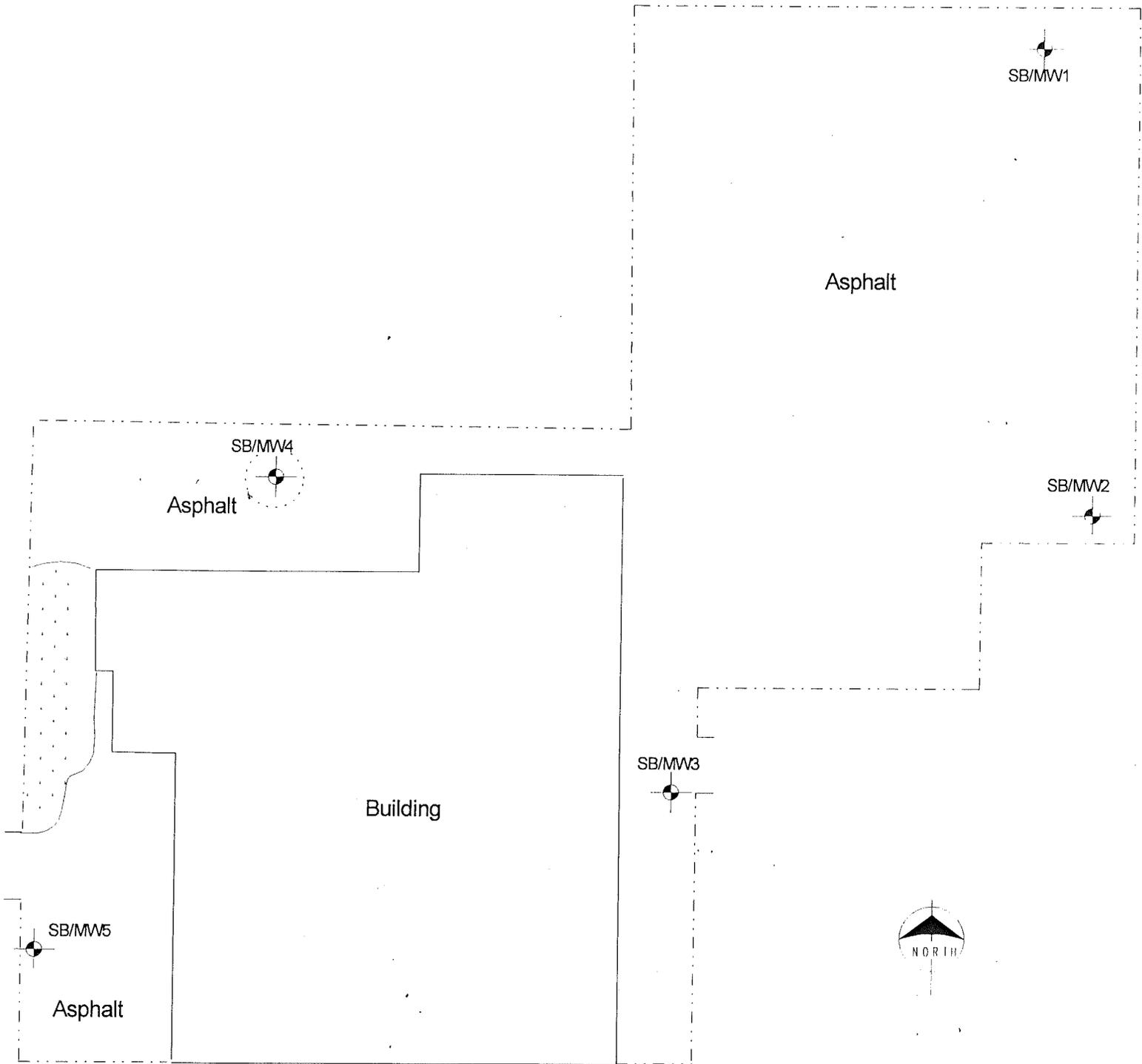
Asphalt

Legend:

- Fence
- ┌ Gate
- Grass
- Monitoring Well

Konicek Environmental Consulting, LLC

Figure 6: Summary of Groundwater Analytical Results
 Bentley World Packaging, LTD
 5350 S. Kirkwood Avenue
 Cudahy, WI

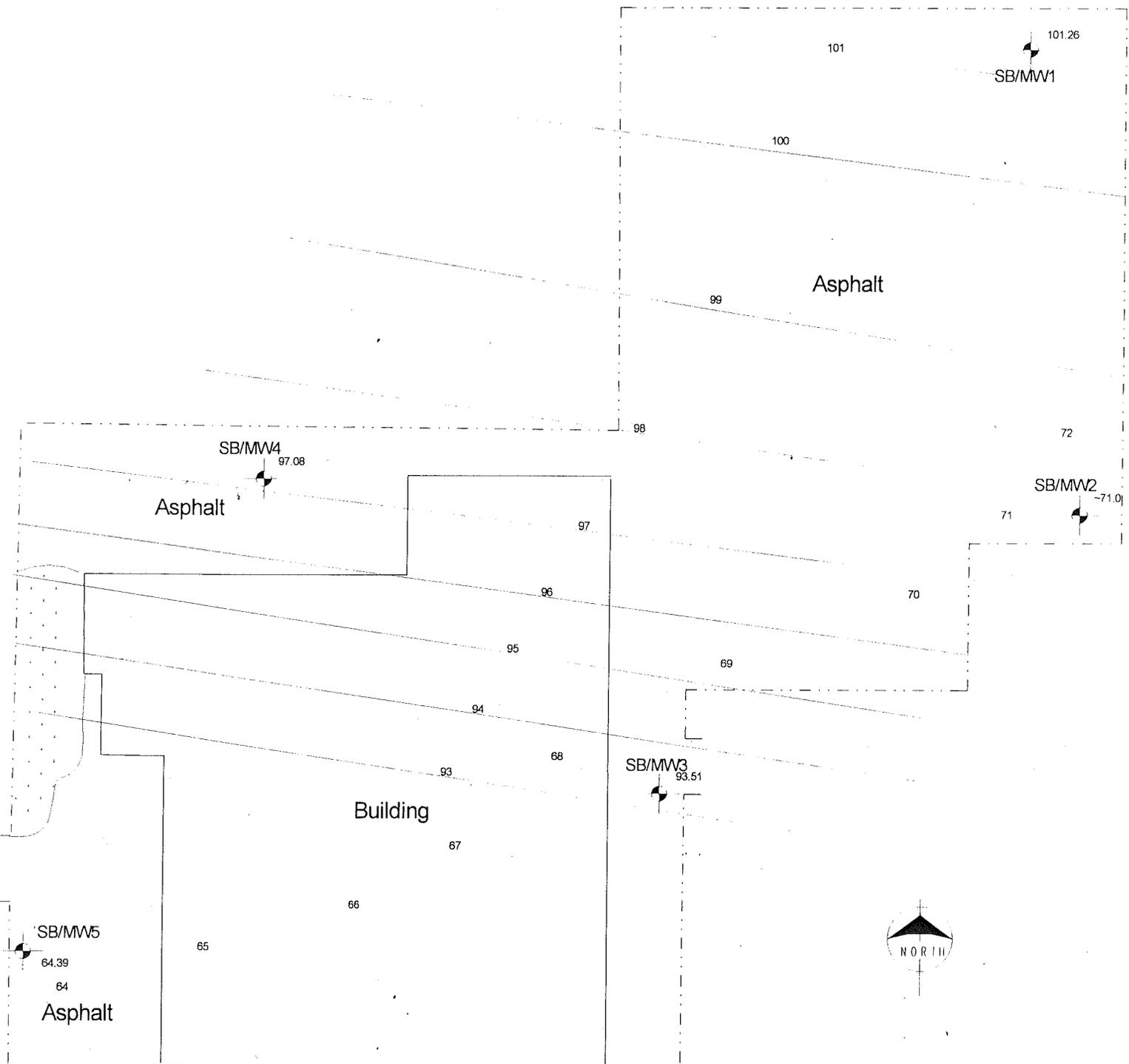


Legend:

- Fence
- ┌ Gate
- Grass
- ⊕ Monitoring Well

Konicek Environmental Consulting, LLC

Figure 6A: Isoconcentration of Groundwater Above ES
 Bentley World Packaging, LTD
 5350 S. Kirkwood Avenue
 Cudahy, WI



Legend:

- Fence
- ┌ └ Gate
- Grass
- Monitoring Well
- 98 Shallow groundwater contour
- 68 Deep groundwater contour

Konicek Environmental Consulting, LLC

Figure 7: Groundwater Flow Diagram
 May 2006
 Bentley World Packaging, LTD
 5350 S. Kirkwood Ave.
 Cudahy, WI