

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 414-263-8606
TTY 711

October 17, 2007

Mr. Richard Arneson
Kramer Lofts, LLC
321 East Main Street
Madison, WI 53703

Subject: Final Case Closure with Land Use Limitations or Conditions
Kramer Lofts - Lot 1
111 East Seeboth Street, Milwaukee, WI, 53204
FID#: 341133430; BRRTS#: 02-41-547971

Dear Mr. Arneson:

On September 10, 2007, your site as described above was reviewed by the Department of Natural Resources (Department). The Department reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On September 12, 2007, the Department notified your consultant (BT², Inc.), that additional information was needed to make a case closure determination. On September 20, 2007, the Department received correspondence regarding the additional information requested.

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 pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. It is the Department's intent to conduct inspections in the future to ensure that the conditions included in this letter including compliance with referenced maintenance plans are met.

Impervious Barrier Required

Pursuant to s. 292.12(2)(a), Wis. Stats., the paved surfaces, soil cover, and building foundation or other impervious cap that currently exists in Lot 1 at the location shown on the attached map (Area to be Maintained in Lot 1 - Exhibit B) shall be maintained in compliance with the **attached maintenance plan** in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil in the specific location(s) described above is excavated in the future, the property owner at the time of excavation must sample and analyze

Mr. Richard Arneson
RE: Final Case Closure with Land Use Limitations or Conditions
Kramer Lofts - Lot 1 (111 East Seeboth Street, Milwaukee, WI, 53204)
Page 2.

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 storage, treatment or disposal is in compliance with applicable statutes 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 during excavation activities to prevent a health threat to humans.

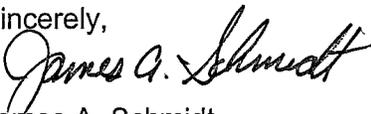
The following activities are prohibited on any portion of the above described impervious barrier area of the property where pavement, a building foundation, soil cover, engineered cap or other barrier is required as shown on the attached map (Area to be Maintained in Lot 1- Exhibit B), unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

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 GIS Registry. To review the sites on the GIS Registry web page, visit <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://www.dnr.state.wi.us/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

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 Eric Amadi at (414) 263-8639.

Sincerely,



James A. Schmidt
Southeast Region Remediation & Redevelopment Team Supervisor

cc: Betty Socha - BT², Inc. 2830 Dairy Drive, Madison, WI 53718-6751
SER Case File #: 02-41-547971
Bill Phelps, DG/2

PAVEMENT AND SOIL COVER AND BUILDING BARRIER MAINTENANCE PLAN

March 23, 2007 (revised September 18, 2007)

Property Located at:
111 East Seeboth Street, Milwaukee, Wisconsin

WDNR BRRTS #02-41-547971

Kramer Lofts:

All that part of Lots 1, 2, 15 and 16, in Block 7, in Walker's Point, being a Subdivision laid out in the Northeast Quarter (NE ¼) of Section 32, Town 7 North, Range 22 East, City of Milwaukee, Milwaukee County, Wisconsin, more particularly bounded and described as follows: Commencing at the Northwest corner of said Lot 15; thence South 89° 34' 29" East along the South line of East Seeboth Street, 124.86 feet to the West line of South Barclay Street; thence South along the West line of South Barclay Street, 75.27 feet; thence North 89° 57' 20" West (Previously deeded as North 89° 21' 46" West) along the South wall of an existing brick and concrete block building, 124.88 (Previously deeded as 124.89) feet to the East line of South Ferry Street; thence North 00° 01' 15" East along the East line of South Ferry Street, 76.10 (Previously deeded as 74.81) feet to the point of beginning.

PARCEL ID # 428-0244-100-7

And:

Lots 3, 4, 5 and 6, Block 7 and the North 35 feet of Lot 7, Block 7, and part of Lots 1 and 2, Block 7, in Walkers Point, a Subdivision, being laid out in the Northeast Quarter (NE ¼) of Section 32, Town 7 North, Range 22 East, City of Milwaukee, Milwaukee County, Wisconsin, more particularly bounded and described as follows: Commencing at the Northwest corner of East Pittsburgh Avenue and South Barclay Street, as presently laid out, said point being 5 feet North of the Southeast corner of Lot 7, Block 7, in said Walker's Point; thence North 89° 45' 17" West along the North right of way line of East Pittsburgh Avenue, 62.475 feet to the West line of said Lot 7; thence North 00° 00' 38" East along the West line of said Lots 7, 6, 5, 4, 3 and the extension thereof, 200.95 feet to the South wall of an existing brick and concrete block building; thence South 89° 21' 46" East along the South wall of said building, 62.445 feet to the West line of South Barclay Street; thence South along the West line of South Barclay Street, 200.52 feet to the point of beginning.

PARCEL ID # 428-0248-111-4

Introduction

This document is the Maintenance Plan for a pavement and soil cover and building barrier at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing building, soil cover, and paved surfaces occupying the area over the contaminated groundwater plume or soil on-site. The contaminated soil is impacted by diesel range organics, polynuclear aromatic hydrocarbons (benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo (a)pyrene, benzo(ghi)perylene, chrysene, dibenzo (a,h)anthracene, indeno (1,2,3-cd)pyrene, 1-methyl naphthalene, 2-methyl naphthalene, naphthalene, and phenanthrene), and metals (arsenic and lead). Groundwater has been impacted by benzo(b)fluoranthene, benzo(a)pyrene, chrysene, and cadmium. The location of the impacted soil and groundwater is shown on **Exhibit A**. The

location of the paved surfaces, building, and landscaped areas in Lot 1 to be maintained in accordance with this Maintenance Plan are shown in the attached construction plan map (Exhibit B).

Cover and Building Barrier Purpose

The paved surfaces, soil cover, and the building foundation over the contaminated groundwater and soil serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The paved surfaces and building foundation act as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

Annual Inspection

The paved surfaces, soil cover, and building foundation in Lot 1 overlying the contaminated groundwater and soil and as depicted in **Exhibit B** will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained by the property owner, and is included as **Exhibit C**, Cap Inspection Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be sent to the Wisconsin Department of Natural Resources ("WDNR") at least annually after every inspection, unless otherwise directed in the case closure letter.

Maintenance Activities

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling operations or they can include larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment ("PPE"). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the paved surfaces and/or the building overlying the contaminated groundwater and soil are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the paved surfaces, soil cover, and/or the building, will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

Contact Information
March 2007

Site Owners:

Mr. Richard B. Arneson
Kramer Lofts, LLC
321 E. Main Street
P.O. Box 1547
Madison, WI 53703
608-251-2399

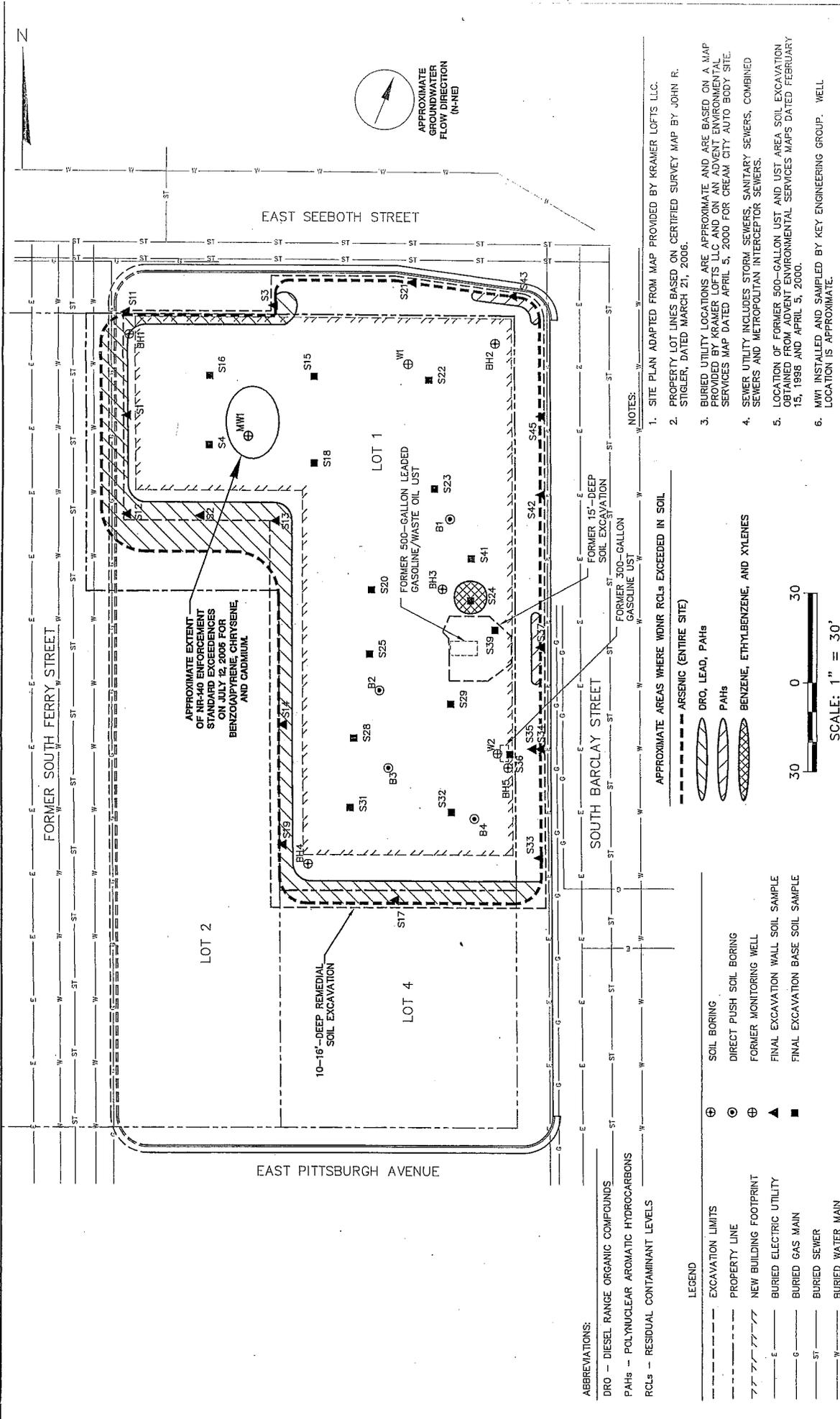
Mr. Tim Dixon
Kramer Lofts, LLC
1818 N. Hubbard Street
Milwaukee, WI 53212
414-727-7000

Consultant:

BT², Inc.
2830 Dairy Drive
Madison, WI 53718
608-224-2830

WDNR:

Mr. Eric Amadi
Wisconsin Department of Natural Resources
2300 North Martin Luther King Jr. Drive
P.O. Box 12436
Milwaukee, WI 53212



APPROXIMATE EXTENT OF NR-40 ENFORCEMENT STANDARD EXCEEDENCES ON JULY 12, 2006 FOR BENZOPYRENE, CHRYSENE, AND CADMIUM.

10'-16"-DEEP REMEDIAL SOIL EXCAVATION

FORMER 500-GALLON LEADED GASOLINE/WASTE OIL UST

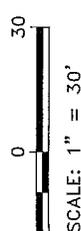
ABBREVIATIONS:
 DRO - DIESEL RANGE ORGANIC COMPOUNDS
 PAHs - POLYNUCLEAR AROMATIC HYDROCARBONS
 RCLs - RESIDUAL CONTAMINANT LEVELS

LEGEND

- ⊕ EXCAVATION LIMITS
- PROPERTY LINE
- NEW BUILDING FOOTPRINT
- BURIED ELECTRIC UTILITY
- BURIED GAS MAIN
- BURIED SEWER
- BURIED WATER MAIN
- ⊕ SOIL BORING
- ⊙ DIRECT PUSH SOIL BORING
- ⊕ FORMER MONITORING WELL
- ▲ FINAL EXCAVATION WALL SOIL SAMPLE
- FINAL EXCAVATION BASE SOIL SAMPLE

APPROXIMATE AREAS WHERE WDNR RCLs EXCEEDED IN SOIL

- ARSENIC (ENTIRE SITE)
- DRO, LEAD, PAHs
- PAHs
- BENZENE, ETHYLBENZENE, AND XYLENES



- NOTES:
- SITE PLAN ADAPTED FROM MAP PROVIDED BY KRAMER LOFTS LLC.
 - PROPERTY LOT LINES BASED ON CERTIFIED SURVEY MAP BY JOHN R. STIGLER, DATED MARCH 21, 2006.
 - BURIED UTILITY LOCATIONS ARE APPROXIMATE AND ARE BASED ON A MAP PROVIDED BY KRAMER LOFTS LLC AND ON AN ADJUTANT ENVIRONMENTAL SERVICES MAP DATED APRIL 5, 2000 FOR CREAM CITY AUTO BODY SITE. SEWER UTILITY INCLUDES STORM SEWERS, SANITARY SEWERS, COMBINED SEWERS AND METROPOLITAN INTERCEPTOR SEWERS.
 - LOCATION OF FORMER 500-GALLON UST AND UST AREA SOIL EXCAVATION OBTAINED FROM ADJUTANT ENVIRONMENTAL SERVICES MAPS DATED FEBRUARY 15, 1988 AND APRIL 5, 2000.
 - MW1 INSTALLED AND SAMPLED BY KEY ENGINEERING GROUP. WELL LOCATION IS APPROXIMATE.

PROJECT NO. 2839	K2/RBS	2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830 FAX: (608) 224-2839	KRAMER LOFTS, LLC 111 EAST SEEBOTH STREET MILWAUKEE, WISCONSIN	EXHIBIT A
DRAWN: 07/17/06	BS			
REVISOR: 07/25/07				
APPROVED BY:		ENGINEER	MAP OF CONTAMINATED PROPERTY	

2939
09/21

EXHIBIT A

Legal Description of the Property

Lots 3, 4, 5 and 6, Block 7 and the North 35 feet of Lot 7, Block 7, and part of Lots 1 and 2, Block 7, in Walkers Point, a Subdivision, being laid out in the Northeast Quarter (NE 1/4) of Section 32, Town 7 North, Range 22 East, City of Milwaukee, Milwaukee County, Wisconsin, more particularly bounded and described as follows: Commencing at the Northwest corner of East Pittsburgh Avenue and South Barclay Street, as presently laid out, said point being 5 feet North of the Southeast corner of Lot 7, Block 7, in said Walker's Point; thence North 89° 45' 17" West along the North right of way line of East Pittsburgh Avenue, 62.475 feet to the West line of said Lot 7; thence North 00° 00' 38" East along the West line of said Lots 7, 6, 5, 4, 3 and the extension thereof, 200.95 feet to the South wall of an existing brick and concrete block building; thence South 89° 21' 46" East along the South wall of said building, 62.445 feet to the West line of South Barclay Street; thence South along the West line of South Barclay Street, 200.52 feet to the point of beginning

Tax Key No. 428-0248-111-4

Property Address: 155 South Barclay Street

Lots 3, 4, 5 and 6, Block 7, in
Walkers Point, a Subdivision,
City of Milwaukee, Milwaukee County,
Wisconsin, more particularly bounded
and described as follows: Commencing
at the Northwest corner of East Pittsburgh
Avenue and South Barclay Street, as
presently laid out, said point being
5 feet North of the Southeast corner
of Lot 7, Block 7, in said Walker's
Point; thence North 89° 45' 17" West
along the North right of way line of
East Pittsburgh Avenue, 62.475 feet
to the West line of said Lot 7; thence
North 00° 00' 38" East along the West
line of said Lots 7, 6, 5, 4, 3 and the
extension thereof, 200.95 feet to the
South wall of an existing brick and
concrete block building; thence South
89° 21' 46" East along the South wall
of said building, 62.445 feet to the
West line of South Barclay Street; thence
South along the West line of South
Barclay Street, 200.52 feet to the
point of beginning

Tax Key No. 428-0248-111-4
Property Address: 155 South Barclay Street

Exhibit C
Barrier INSPECTION LOG

Inspection Date	Inspector	Condition of Cap	Recommendations	Have Recommendations from previous inspection been implemented?



* 0 9 2 2 8 7 2 6 *

State Bar of Wisconsin Form 1-2003
WARRANTY DEED

DOC.# 09228726

Document Number

Document Name

REGISTER'S OFFICE | SS
Milwaukee County, WI

RECORDED 05/03/2006 02:09PM

JOHN LA FAVE
REGISTER OF DEEDS

AMOUNT: 11.00

THIS DEED, made between The 1818, LLC, a Wisconsin limited liability company

("Grantor," whether one or more), and Kramer Lofts, LLC, a Wisconsin 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):

All that part of Lots 1, 2, 15 and 16, in Block 7, in Walker's Point, being a Subdivision laid out in the Northeast Quarter (NE 1/4) of Section 32, Town 7 North, Range 22 East, City of Milwaukee, Milwaukee County, Wisconsin, more particularly bounded and described as follows: Commencing at the Northwest corner of said Lot 15; thence South 89° 34' 29" East along the South line of East Seeboth Street, 124.86 feet to the West line of South Barclay Street; thence South along the West line of South Barclay Street, 75.27 feet; thence North 89° 57' 20" West (Previously deeded as North 89° 21' 46" West) along the South wall of an existing brick and concrete block building, 124.88 (Previously deeded as 124.89) feet to the East line of South Ferry Street; thence North 00° 01' 15" East along the East line of South Ferry Street, 76.10 (Previously deeded as 74.81) feet to the point of beginning.

Recording Area

Name and Return Address

Wayman Lawrence
Foley & Lardner LLP
150 E. Gilman Street
Madison, WI 53703-1481

part of 428-0244-100-7

Parcel Identification Number (PIN)

This is not homestead property.

(*) (is not)

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances except: municipal and zoning ordinances and agreements entered under them, recorded easements for the distribution of utility and municipal services, recorded building and use restrictions and covenants, and general taxes levied in the year of closing and will warrant and defend the same.

Dated April 28 2006

The 1818, LLC, a Wisconsin limited liability company

* **TRANSFER** (SEAL)

* **\$1,470.00**

* **FEE** (SEAL)

* Timothy Dixon, Manager (SEAL)

* _____ (SEAL)

AUTHENTICATION

Signature(s) _____

authenticated on _____

ACKNOWLEDGMENT

STATE OF Wisconsin)

) ss.

Milwaukee COUNTY)

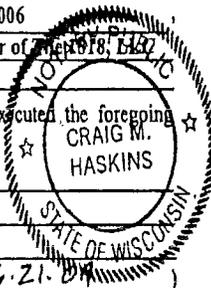
Personally came before me on April 25 2006

the above-named Timothy Dixon, Manager of The 1818, LLC

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

* Craig M. Haskins
Notary Public, State of Wisconsin

My commission (is permanent) (expires: 6-21-07)



TITLE: MEMBER STATE BAR OF WISCONSIN

(If not, _____
authorized by Wis. Stat. § 706.06)

THIS INSTRUMENT DRAFTED BY:
Attorney Jeffrey B. Green

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

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

WARRANTY DEED

©2003 STATE BAR OF WISCONSIN

FORM NO. 1-2003

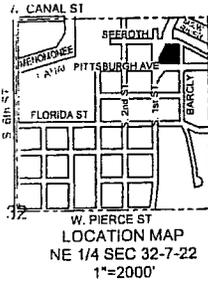
*Type name below signatures.

INFO-PRO™ Legal Forms • (800)855-2021 • info@forms.com

CERTIFIED SURVEY MAP No. _____

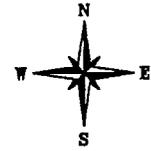
Sheet 2 of 8

Being a division of Lots 4, 5 and 6 and part of Lots 1, 2, 3, 7 and 10 through 14 in Block 6; Lots 1 through 6, 11 through 16 and part of Lots 7 and 10 in Block 7 and vacated South Ferry Street in Walkers Point, being part of the Northeast 1/4 of the Northeast 1/4 of Section 32, Township 7 North, Range 22 East in the City of Milwaukee, Milwaukee County, Wisconsin.

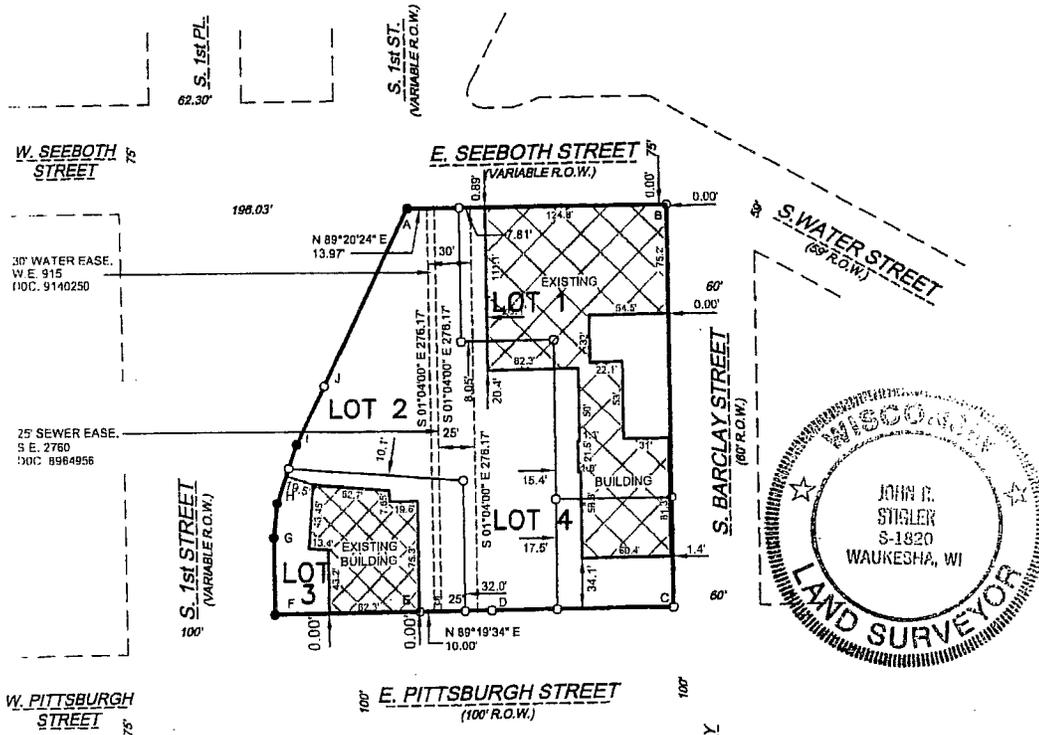
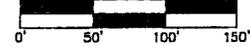


ANGLE CHART

- A = 115°57'33"
- B = 90°24'24"
- C = 89°58'10"
- D = 179°49'08"
- E = 180°07'13"
- F = 90°17'05"
- G = 173°08'45"
- H = 167°42'01"
- I = 172°50'43"
- J = 179°55'50"



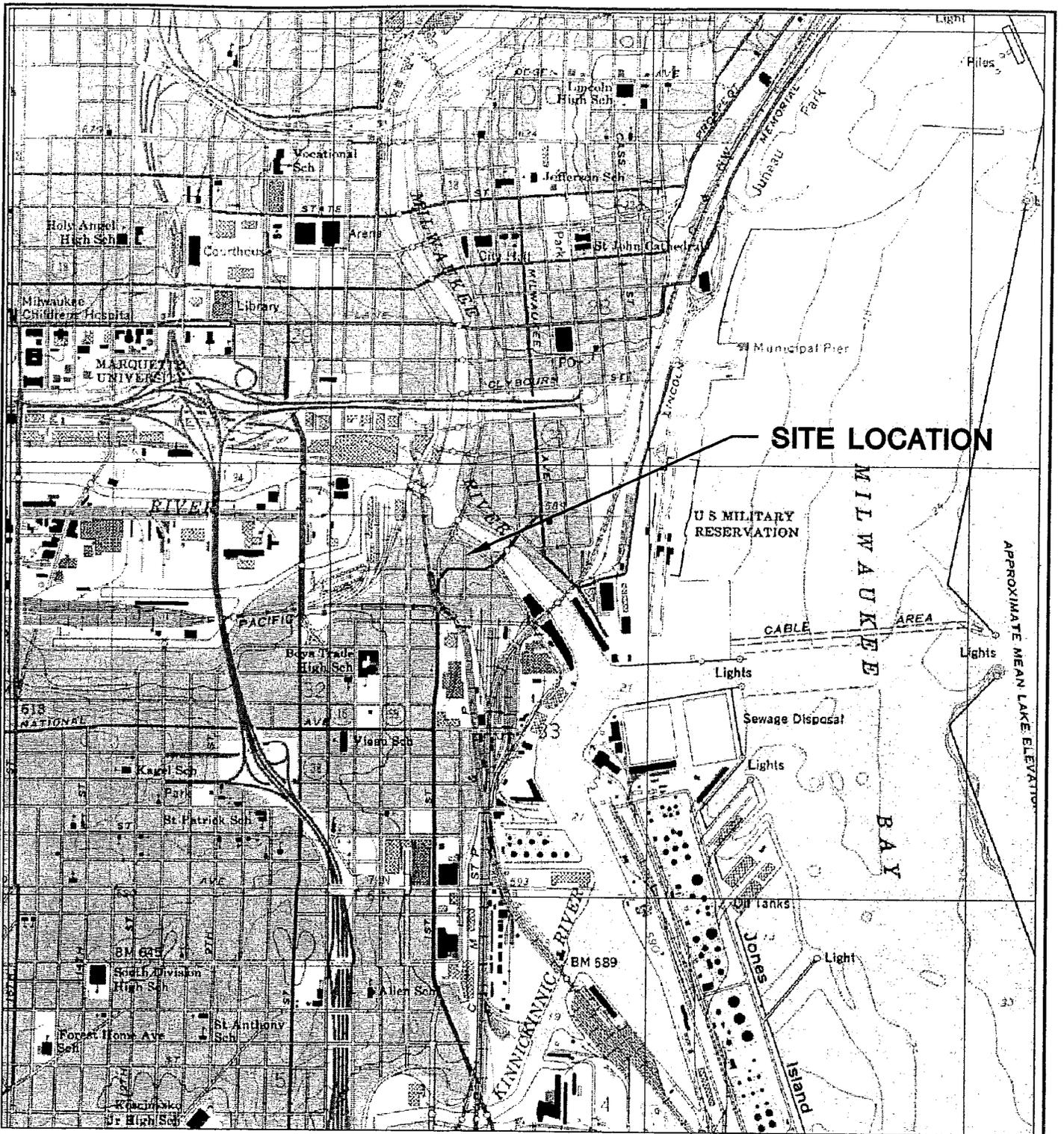
SCALE 1"=100'
GRAPHIC SCALE



John R. Stigler
JOHN R. STIGLER - Wis. Reg. No. S - 1820
DATED THIS 21st DAY OF March 2006
INSTRUMENT DRAFTED BY JOHN R. STIGLER

OWNERS: THE 1818 LLC
(LOTS 2 & 3)

CAD \Projects\S6779\DWG\S6779CSM
P.S. MILWAUKEE 1475
OWNERS: KRAMER LOFTS LLC
(LOTS 1 & 4)



SITE LOCATION



MILWAUKEE QUADRANGLE
 WISCONSIN—MILWAUKEE CO.
 7.5 MINUTE SERIES (TOPOGRAPHIC)
 SW/4 MILWAUKEE 15' QUADRANGLE
 1971
 SCALE: 1" = 2,000'



CLIENT
 KRAMER LOFTS, LLC.
 321 EAST MAIN STREET
 MADISON, WI 53703

SITE
 KRAMER LOFTS
 111 EAST SEEBOTH STREET
 MILWAUKEE, WISCONSIN

SITE LOCATION MAP

PROJECT NO. 2939
 DRAWN: 01/13/06
 REVISED: 11/29/06

DRAWN BY: KP
 CHECKED BY: JM
 APPROVED BY:



2830 DAIRY DRIVE
 MADISON, WI 53718-6751
 PHONE: (608) 224-2830
 FAX: (608) 224-2839

FIGURE
 A-2

Table E-1
Groundwater Analytical Results Summary - VOCs
Kramer Lofts, LLC / BT² Project #2939
(Results are in µg/l)

Sample	Date	Benzene	Ethylbenzene	Toluene	Xylenes	TMBs	MTBE	Other VOCs
MW1	7/21/2005	<0.26	<0.3	<0.52	<1.17	<1.15	<0.36	ND
W1	7/13/2006	<0.20	<0.50	<0.20	<0.50	<0.40	<0.50	ND
W2	7/13/2006	<0.20	<0.50	<0.20	<0.50	<0.40	<0.50	ND
Rinsate Blank	7/13/2006	<0.20	<0.50	<0.20	<0.50	<0.40	<0.50	ND
Trip Blank	7/13/2006	<0.20	<0.50	<0.20	<0.50	<0.40	<0.50	Methylene Chloride <i>1.1 Ja</i>
NR 140 Enforcement Standards (ES)		5	700	1,000	10,000	480	60	Methylene Chloride 5
NR 140 Preventive Action Limits (PAL)		0.5	140	200	1,000	96	12	Methylene Chloride 0.5

ABBREVIATIONS:

µg/l = micrograms per liter or parts per billion (ppb)
TMBs = 1,2,4- and 1,3,5-trimethylbenzenes

VOCs = Volatile Organic Compounds
MTBE = Methyl-tert-butyl ether

ND = Not Detected

NOTES:

Bold values meet or exceed NR 140 enforcement standards.

Italic values meet or exceed NR 140 preventive action limits.

NR 140 ES - Wisconsin Administrative Code (WAC), Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.

NR 140 PAL - WAC, Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.

MW1 data obtained by Key Engineering Group, Ltd.

LABORATORY NOTES:

Ja = Results reported between the Method Detection Limit (MDL) and Limit of Quantitation (LOQ) are less certain than results at or above the LOQ.

Created by: TLR 07/26/2006

Checked by: JMM 7/27/2006; JMM 10/5/2006

Table E-2
Groundwater Analytical Results Summary - PAHs
Kramer Lofts, LLC / BT² Project #2939
 (Results are in µg/l)

Sample	Date	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(a)pyrene	Benzo(ghi)perylene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Phenanthrene	Pyrene
MW1	7/21/2005	0.026 J	0.016 J	0.076	0.27	0.27	0.12	0.21	0.16	0.25	0.040	0.54	0.035 J	0.14	<0.018	0.029 J	0.042 J	0.30	0.51
W1	7/13/2006	<0.92	<1.9	<0.11	<0.12	<0.27	<0.14	<0.089	<0.33	<0.11	<0.36	<0.22	<0.17	<0.17	<0.89	<0.86	<1.1	<0.083	<0.12
NR 140 Enforcement Standards		NE	NE	3,000	NE	0.2	NE	0.2	NE	0.2	NE	400	400	NE	NE	NE	40	NE	250
NR 140 Preventive Action Limits		NE	NE	600	NE	0.02	NE	0.02	NE	0.02	NE	80	80	NE	NE	NE	8	NE	50

ABBREVIATIONS:

µg/l = micrograms per liter or parts per billion (ppb) PAHs = Polynuclear Aromatic Hydrocarbons NE = No Standard Established

NOTES:

Bold values meet or exceed NR 140 enforcement standards.
Italic values meet or exceed NR 140 preventive action limits.
 NR 140 ES - Wisconsin Administrative Code (WAC), Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.
 NR 140 PAL - WAC, Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.
 MW1 data obtained by Key Engineering Group, Ltd.

LABORATORY NOTES:

J = Analyte detected between Limit of Detection and Limit of Quantitation.

Created by: TLR 07/26/2006
 Checked by: JMM 7/27/2006; JMM 10/5/2006

Table E-3
Groundwater Analytical Results Summary - Metals
Kramer Lofts, LLC / BT² Project #2939
(Results are in µg/l)

Sample	Date	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
MW1	7/21/2005	<7.4	39	5.4	<3.1	<20.0	<0.066	<7.2	<3
W1	7/13/2006	<i>1.3 Ja</i>	130	<0.14	<2.1	<1.4	<0.065	<3.2	<1.3
NR 140.10 Enforcement Standards (ES)		10	2,000	5	100	15	2	50	50
NR 140.10 Preventive Action Limits (PAL)		1	400	0.5	10	1.5	0.2	10	10

ABBREVIATIONS:

µg/l = micrograms per liter or parts per billion (ppb)

NE = No Standard Established

NOTES:

Bold values meet or exceed NR 140 enforcement standards.

Italic values meet or exceed NR 140 preventive action limits.

NR 140.10 ES - Wisconsin Administrative Code (WAC), Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.

NR 140.10 PAL - WAC, Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.

MW1 data obtained by Key Engineering Group, Ltd.

LABORATORY NOTES:

Ja = Results reported between the Method Detection Limit (MDL) and Limit of Quantitation (LOQ) are less certain than results at or above the LOQ.

Created by: TLR 07/26/2006

Checked by: JMM 7/27/2006; JMM 10/5/2006

Table E-4
Groundwater Analytical Results Summary - SVOCs / Acid Extractables
Kramer Lofts, LLC / BT² Project #2939
 (Results are in µg/l)

Sample	Date	Benzoic Acid	4-Chloro-3-methylphenol	2-Chloro-phenol	Cresol(s)	2,4-Dichloro-phenol	2,4-Dimethyl-phenol	2,4-Dinitro-phenol	4,6-Dinitro-2-methylphenol	2-Methylphenol (o-Cresol)	4-Methylphenol (p-Cresol)	2-Nitro-phenol	4-Nitro-phenol	Pentachloro-phenol	Phenol	2,4,5-Trichloro-phenol	2,4,6-Trichloro-phenol
W1	7/13/2006	<13.0	<0.510	<0.770	<0.870	<0.770	<7.90	<0.490	<0.420	<0.870	<0.910	<0.720	<0.360	<0.770	<0.390	<0.670	<0.690
NR 140 Enforcement Standards		NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	1	6.000	NE	NE
NR 140 Preventive Action Limits		NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	0.1	1.200	NE	NE

ABBREVIATIONS:

µg/l = micrograms per liter or parts per billion (ppb)

SVOCs - Semivolatile Organic Compounds

NE = No Standard Established

NOTES:

Bold values meet or exceed NR 140 enforcement standards.

Italic values meet or exceed NR 140 preventive action limits.

NR 140 ES - Wisconsin Administrative Code (WAC), Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.

NR 140 PAL - WAC, Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards.

Created by: TLR 07/26/2006

Checked by: JMM 7/27/2006; JMM 10/5/2006

Table C-1
Site Investigation - Soil Analytical Results Summary
Kramer Lofts LLC / BT² Project #2939
(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	PID	Lab Notes	DRO (mg/kg)	GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	MTBE	Lead (mg/kg)	Other VOCs
B1	7/11/2006	4-6	2	--	310	<6.1	NA	NA	NA	NA	NA	NA	NA	NA	NA
	7/11/2006	11-12	4	--	NA	NA	<32	<32	<32	<110	<32	<32	<32	NA	ND
B2	7/11/2006	6-8	2	--	110	<7.3	NA	NA	NA	NA	NA	NA	NA	NA	NA
	7/11/2006	11-12	2	--	NA	NA	<30	<30	<30	<100	<30	<30	<30	11	ND
B3	7/11/2006	0-2	30	--	190	7.5	NA	NA	NA	NA	NA	NA	NA	NA	NA
	7/11/2006	11-12	6	--	NA	NA	<29	<29	<29	<100	<29	<29	<29	NA	ND
B4	7/11/2006	4-6	1	--	87	<6.0	NA	NA	NA	NA	NA	NA	NA	NA	NA
	7/11/2006	11-12	0	--	NA	NA	<28	<28	<28	<96	<28	<28	<28	NA	ND
BH3	1/31/2006	3.5-5	37	(2)	99	21	97	96	710	1,100	330	100	<29	180	Naphthalene 82
	1/31/2006	8.5-10	60	(2)	15	25	<29	<29	30	3,400	480	170	<29	12	Isopropylbenzene 32
BH4	1/30/2006	3.5-5	1	(2)	5.3	<5.8	<29	<29	<29	<98	<29	<29	<29	8.6	ND
	1/30/2006	8.5-10	1	(2)	14	<5.7	<29	<29	81	<97	<29	<29	<29	11	ND
BH5	1/31/2006	3.5-5	>615	(3)	300	2,500	<170	8,800	13,000	56,000	25,000	10,000	<170	99	sec-Butylbenzene 2,500 Isopropylbenzene 3,700 p-Isopropyltoluene 3,100 Naphthalene 8,800 n-Propylbenzene 6,200
BH5	1/31/2006	8.5-10	>565	(3)	660	200	<28	960	1,600	6,200	2,500	910	<28	55	sec-Butylbenzene 220 Isopropylbenzene 360 p-Isopropyltoluene 230 Naphthalene 1,300 n-Propylbenzene 620
GP-7	11/24/2003	8-10	0	--	NA	NA	<25	<25	45.6	91.3	30.4	<25	<25	4,680	Naphthalene 533 1,2,4-Trichlorobenzene 30.4
GP-11	7/20/2005	3-4	<1	--	NA	NA	<25	<25	<25	<75	<25	<25	<25	190	ND
	7/20/2005	10-12	<1	--	NA	NA	<25	<25	<25	<75	<25	<25	<25	26	ND
GP-12	7/20/2005	3-4	<1	--	NA	NA	<25	<25	<25	<75	<25	<25	<25	4.4	ND
	7/20/2005	10-11	<1	--	NA	NA	<25	<25	37	27	<25	<25	<25	31	ND
GP-13	7/20/2005	3-4	<1	--	NA	NA	<25	<25	<25	<75	<25	<25	<25	310	Naphthalene 26
S26 beneath UST	9/13/2006	6	240	--	280	280	1,400	6,700	1,500	14,000	4,800	1,400	<210	110	ND
Waste Char. (BH5)	1/31/2006	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
W2	7/11/2006	11-12	0	--	NA	NA	<31	<31	<31	<100	<31	<31	<31	NA	ND
MeOH Blank	1/30/2006	--	--	(1)	NA	NA	<25	<25	<25	<85	<25	<25	<25	NA	ND
	1/31/2006	--	--	(2)	NA	NA	<25	<25	<25	<85	<25	<25	<25	NA	ND
	7/11/2006	--	--	--	NA	NA	<25	<25	<25	<85	<25	<25	<25	NA	ND
NR 720 Residual Contaminant Level (RCL)					100	100	5.5	2,900	1,500	4,100	NE	NE	NE	50	
NR 746 Table 1					NE	NE	8,500	4,600	38,000	42,000	83,000	11,000	NE	NE	Naphthalene 2,700
NR 746 Table 2					NE	NE	1,100	NE	NE	NE	NE	NE	NE	NE	

Table C-1
Site Investigation - Soil Analytical Results Summary
Kramer Lofts LLC / BT² Project #2939

ABBREVIATIONS:

µg/kg = micrograms per kilogram or parts per billion (ppb)
DRO = Diesel Range Organics
MTBE = Methyl-tert-butyl ether
NA = Not Analyzed

mg/kg = milligrams per kilogram or parts per million (ppm)
GRO = Gasoline Range Organics
VOCs = Volatile Organic Compounds
ND = Not Detected

PID = Photo-Ionization Detector
TMB = Trimethylbenzene
NE = Not Established
-- = Not Applicable

NOTES:

Bold values exceed NR 720 RCLs.
NR 720 RCL - Wisconsin Administrative Code (WAC), Chapter NR 720 Residual Contaminant Level.
NR 746 Table 1 - WAC, Chapter NR 746.06(2)(b) Table 1 - Indicators of Residual Petroleum Product in Soil Pores.
NR 746 Table 2 - WAC, Chapter NR 746.06(2)(b) Table 2 - Protection of Human Health from Direct Contact with Contaminated Soil.
GP-7 Soil analytical results obtained by Sigma Environmental Services, Inc.
GP-11 - GP-13 Soil analytical results obtained by Key Engineering Group, Ltd.

LABORATORY NOTES:

- (1) Dichlorodifluoromethane - Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was above acceptance limits.
- (2) Bromoform - Calibration Verification recovery was outside the method control limits for this analyte. The LCS for this analyte met CCV acceptance criteria, and was used to validate the batch. Dichlorodifluoromethane - Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was above acceptance limits.
- (3) Dichlorodifluoromethane - Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was above acceptance limits. *Surr: Dibromofluoromethane* - Surrogate recovery was below acceptance limits.

Created by: TLR 02/07/06

Checked by: BJS 02/13/06, CMW 2/24/06, JMM 7/14/06, BJS 7/21/06; JMM 10/05/06

Table C-2
Site Investigation - Soil Analytical Results Summary - PAHs
Stonehouse Development Kramer Intl, Inc. / BT² Project #2939
 (Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	Lab Notes	Acenaph-thene	Acenaph-thylene	Anthracene	Benzo(a)anthracene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(a)pyrene	Benzo(ghi)perylene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	1-Methyl-naphthalene	2-Methyl-naphthalene	Naphthalene	Phenanthrene	Pyrene
B2, S6	7/11/2006	11-12	--	<60	<100	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<8.9	16	<12	<6.0	<36	<30	<36	9.9	<6.0
BH5	1/31/2006	3.5-5	--	240	<110	520	840	390	280	990	250	650	65	2,100	100	320	160	610	350	690	1,200
BH5	1/31/2006	8.5-10	--	<56	<95	11	120	49	9.0	16	9.4	26	<8.4	62	12	9.3	220	640	900*	43	58
GP-7	11/24/2003	8-10	--	11,500	864	8,560	11,400	10,200	5,390	8,590	4,880	13,400	745	42,400	6,050	4,420	12,900	9,410	1,110 *	37,200 *	12,200
GP-11	7/20/2005	3-4	--	80	100	261	1,540	1,410	489	1,270	1,270	1,130	392	2,090	82	1,190	177	198	161	1,050	1,670
	7/20/2005	10-12	--	<11	21 J	23 J	67	55	19	43	43	68	13 J	103	<10	37	<12	<14	<19	69	72
GP-12	7/20/2005	3-4	--	<11	14 J	<8.7	8.2 J	<6	<6	<5.3	<6.3	<7.3	<6	<7.3	<10	<10	<12	<14	<19	<7.3	<6.5
	7/20/2005	10-11	--	228	73	755	3,330	2,510	793	1,990	2,090	2,390	618	5,640	343	1,780	165	133	127	3,910 *	4,930
GP-13	7/20/2005	3-4	--	93	82	317	2,750	2,240	798	1,820	1,830	2,020	509	4,380	117	1,620	35 J	39 J	41 J	1,540 *	3,710
WDNR PAH Soil Generic Residual Contaminant Levels (RCLs) (Interim Guidance - April 1997)																					
Groundwater Pathway				38,000	700	3,000,000	17,000	360,000	870,000	48,000	6,800,000	37,000	38,000	500,000	100,000	680,000	23,000	20,000	400	1,800	8,700,000
Non-Industrial Direct Contact				900,000	18,000	5,000,000	88	88	880	8.8	1,800	8,800	8.8	600,000	600,000	88	1,100,000	600,000	20,000	18,000	500,000
Industrial Direct Contact				60,000,000	360,000	300,000,000	3,900	3,900	39,000	390	39,000	390,000	390	40,000,000	40,000,000	3,900	70,000,000	40,000,000	110,000	390,000	30,000,000

ABBREVIATIONS:

µg/kg = micrograms per kilogram or parts per billion (ppb)
 PAHs = Polynuclear Aromatic Hydrocarbons

-- = Not Applicable
 WDNR = Wisconsin Department of Natural Resources

NOTES:

Bold values indicate Interim Guidance Non-Industrial site Direct Contact RCLs exceeded.
Bold and underlined values indicate Interim Guidance Industrial site Direct Contact RCLs exceeded.
****Asterisk value** indicates Interim Guidance Groundwater Pathway RCLs exceeded.
 GP-7 Soil analytical results obtained by Sigma Environmental Services, Inc.
 GP-11 - GP-13 Soil analytical results obtained by Key Engineering Group, Ltd.

LABORATORY NOTES:

J = Analyte detected between limit of detection and limit of quantitation.

Created by: LMH 2/13/06

Checked by: BJS 2/13/06, CMW 2/24/06, BJS 7/21/06, JMM 10/5/06

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Table C-3
Site Investigation - Soil Analytical Results Summary - Metals
Kramer Lofts LLC / BT² Project #2939
(Results are in mg/kg)

Sample	Date	Depth (feet)	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
BH5	1/31/2006	3.5-5	<u>4.9</u>	71	0.17	8.0	99	0.62	<5.3	0.52
BH5	1/31/2006	8.5-10	<u>3.8</u>	28	0.41	7.4	55	0.062	<4.5	0.14
B2, S6	7/11/2006	11-12	<u>4.6</u>	31	<0.12	11	11	0.16	<4.8	<0.13
GP-7	11/24/2003	8-10	<u>10.5</u>	149	0.778	8.61	<u>4,680</u>	8.03	<3.04	<3.04
GP-11	7/20/2005	3-4	0.75 J	100	3.5	14	190	3.8	<0.42	1.9
	7/20/2005	10-12	<0.015	41	0.48	16	26	0.24	12	0.25 J
GP-12	7/20/2005	3-4	<0.015	12	0.62	7.1	4.4	0.0064 J	11	0.02 J
	7/20/2005	10-11	0.15 J	20	0.75	2.4	31	12	<0.21	0.94
GP-13	7/20/2005	3-4	<u>4.6</u>	140	1.1	17	310	0.70	6.5	0.43 J
NR 720 RCLs Non-Industrial			0.039	NE	8	(a)	50	NE	NE	NE
NR 720 RCLs Industrial			1.6	NE	510	(a)	500	NE	NE	NE

ABBREVIATIONS:

mg/kg - milligrams per kilogram or parts per million (ppm)

-- = Not Applicable

NE = No Standard Established

NOTES:

(a) Chromium, hexavalent non-industrial = 14 mg/kg; industrial = 200 mg/kg. Chromium, trivalent non-industrial = 16,000 mg/kg; industrial = not applicable.

Bold values exceed NR 720 Non-Industrial Site RCLs.

Bold and underlined values exceed NR 720 Industrial Site RCLs.

NR 720 RCLs Non-Industrial = NR 720 Table 2 Residual Contaminant Levels (RCLs) Based On Human Health Risk From Direct Contact Related To Land Use for Non-Industrial.

NR 720 RCLs Industrial = NR 720 RCLs Table 2 Based On Human Health Risk From Direct Contact Related To Land Use for Industrial.

GP-7 Soil analytical results obtained by Sigma Environmental Services, Inc.

GP-11 - GP-13 Soil analytical results obtained by Key Engineering Group, Ltd.

LABORATORY NOTES:

J = Analyte detected between limit of detection and limit of quantitation.

Created by: LMH 2/13/06

Checked by: BJS 2/13/06, CMW 2/24/06, BJS 7/21/06; JMM 10/5/06

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Table C-4
Site Investigation - Soil Analytical Results Summary - PCBs
Stonehouse Development Kramer Intl, Inc. / BT² Project #2939
 (Results are in mg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	Lab Notes	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1268
B2, S6	7/11/2006	11-12	(1)	<0.298	<0.298	<0.298	<0.298	<0.298	<0.298	<0.298	<0.298
EPA				1	1	1	1	1	1	1	1

ABBREVIATIONS:

PCB = Polychlorinated Biphenyls

mg/kg = milligrams per kilogram

LABORATORY NOTES:

(1) Surr: Tetrachloro-meta-xylene (46-136%) analysis - Surrogate recovery was outside control limits.

Created by: LMH 7/21/06

Checked by: BJS 7/21/06; JMM 10/5/06

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Table C-5
Site Investigation - Soil Analytical Results Summary - Pentochlorophenol
Stonehouse Development Kramer Intl, Inc. / BT² Project #2939
 (Results are in mg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	Lab Notes	Pentochlorophenol
GP-15	9/6/2005	9-10	--	<0.595
GP-16	9/6/2005	9-10	--	<0.617
GP-17	9/6/2005	9-10	--	<0.514
GP-18	9/6/2005	9-10	--	<0.588
GP-19	9/6/2005	9-10	--	<5.21

ABBREVIATIONS:

mg/kg = milligrams per kilogram

NOTES:

GP15 - GP19 Soil analytical results obtained by Key Engineering Group, Ltd.

Created by: TLR 10/3/2006

Checked by: JMM 10/5/06

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Table D-4
Post Remedial - Soil Analytical Results Summary
Kramer Lofts LLC / BT² Project #2939
(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	DRO (mg/kg)	GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	MTBE	Lead (mg/kg)	Arsenic (mg/kg)
S1 W Wall	8/29/2006	5.5	10	NA	NA	NA	NA	NA	NA	NA	NA	85	4.4
S2 S Wall	8/29/2006	3.5	250	NA	NA	NA	NA	NA	NA	NA	NA	600	9.8
S3 N Wall	8/29/2006	4	220	NA	NA	NA	NA	NA	NA	NA	NA	500	12
S4 S Base N Half	8/29/2006	9.5	14	NA	NA	NA	NA	NA	NA	NA	NA	8.4	3.6
S11 W Wall N Half	8/31/2006	2.5	1,700	NA	NA	NA	NA	NA	NA	NA	NA	26	4.2
S12 W Wall N Half	8/31/2006	3.5	900	NA	NA	NA	NA	NA	NA	NA	NA	14	5.2
S13 W Wall S Half	8/31/2006	4	3,300	NA	NA	NA	NA	NA	NA	NA	NA	440	15
S14 W Wall S Half	8/31/2006	4	300	NA	NA	NA	NA	NA	NA	NA	NA	81	13
S15 N Base of N Half	9/7/2006	11.5	18	NA	NA	NA	NA	NA	NA	NA	NA	7.9	4.4
S16 NW Base of N Half	9/7/2006	11.5	27	NA	NA	NA	NA	NA	NA	NA	NA	8.6	3.2
S17 S Wall of S Half	9/7/2006	3	320	NA	NA	NA	NA	NA	NA	NA	NA	200	16
S18 S Base of N Half	9/7/2006	13	23	NA	NA	NA	NA	NA	NA	NA	NA	9.3	7.1
S19 W Wall S Half	9/8/2006	3.5	1,000	NA	NA	NA	NA	NA	NA	NA	NA	170	8.5
S20 N Base S Half	9/8/2006	14	22	NA	NA	NA	NA	NA	NA	NA	NA	8.1	2.6
S21 N Wall N Half	9/8/2006	4	<5.6	NA	NA	NA	NA	NA	NA	NA	NA	19	2.7
S22 NE Base N Half	9/8/2006	11.5	9.1	NA	NA	NA	NA	NA	NA	NA	NA	8.7	2.9
S23 SE Base N Half	9/11/2006	13	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	7.4	5.9
S24 NE Base S Half	9/11/2006	13	<5.2	80	1,700	4,000	390	22,000	4,000	1,000	<29	9.1	8.9
S25 W Base S Half	9/13/2006	14	<5.5	NA	NA	NA	NA	NA	NA	NA	NA	8.8	6.0
S28 W Base S Half	9/14/2006	15	22	NA	NA	NA	NA	NA	NA	NA	NA	14	3.7
S29 E Base S Half	9/14/2006	15	<5.1	<6.2	<31	<31	<31	<92	<31	<31	<31	8.7	2.8
S31 SW Base S Half	9/15/2006	15	6.7	NA	NA	NA	NA	NA	NA	NA	NA	9.6	4.8
S32 SE Base S Half	9/15/2006	16	<5.4	<6.2	<31	<31	<31	<93	<31	<31	<31	5.7	3.1
S33 E Wall S Half	11/6/2006	4	9.5	NA	NA	NA	NA	NA	NA	NA	NA	19	4.3
S34 E Wall S Half	11/6/2006	3	<4.6	<5.7	<28	<28	<28	<85	<28	<28	<28	21	5.2
S35 E Wall S Half	11/6/2006	6	NA	<5.8	<29	<29	<29	<87	<29	<29	<29	NA	NA
S36 E Base S Half	11/6/2006	15	<5.0	<5.9	<29	<29	<29	<88	<29	<29	<29	8.4	4.0
S37 E Wall S Half	11/7/2006	4	<4.7	<5.8	<29	<29	<29	<87	<29	<29	<29	31	6.3
S39 E Base S Half	11/7/2006	13	NA	<5.8	<29	<29	<29	810	390	37	<29	NA	NA
S41 E Base N Half	11/9/2006	13	NA	<6.3	<31	<31	<31	<94	<31	<31	<31	NA	NA
S42 E Wall N Half	11/9/2006	3.5	8.8	NA	NA	NA	NA	NA	NA	NA	NA	9.5	4.7
S43 N Wall NE Corner	11/10/2006	2	17	NA	NA	NA	NA	NA	NA	NA	NA	17	4.5
S45 E Wall N Half	11/10/2006	4	15	NA	NA	NA	NA	NA	NA	NA	NA	9.9	4.2
Methanol Blank	9/13/2006	--	NA	<5.0	<25	<25	<25	<75	<25	<25	<25	NA	NA
	9/15/2006	--	NA	<5.0	<25	<25	<25	<75	<25	<25	<25	NA	NA
	11/6/2006	--	NA	<5.0	<25	<25	<25	<75	<25	<25	<25	NA	NA
	11/9/2006	--	NA	<5.0	<25	<25	<25	<75	<25	<25	<25	NA	NA

Table D-4
Post Remedial - Soil Analytical Results Summary
Kramer Lofts LLC / BT² Project #2939
 (Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	DRO (mg/kg)	GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	MTBE	Lead (mg/kg)	Arsenic (mg/kg)
NR 720 Residual Contaminant Level (RCL)			100	100	5.5	2,900	1,500	4,100	NE	NE	NE	50	0.039
NR 746 Table 1			NE	NE	8,500	4,600	38,000	42,000	83,000	11,000	NE	NE	NE
NR 746 Table 2			NE	NE	1,100	NE	NE	NE	NE	NE	NE	NE	NE

ABBREVIATIONS:

µg/kg = micrograms per kilogram or parts per billion (ppb)
 DRO = Diesel Range Organics
 MTBE = Methyl-tert-butyl ether

mg/kg - milligrams per kilogram or parts per million (ppm)
 GRO = Gasoline Range Organics
 VOCs = Volatile Organic Compounds

TMB = Trimethylbenzene
 NE = Not Established

NA = Not Analyzed
 -- = Not Applicable

NOTES:

Bold values exceed NR 720 RCLs (non-industrial sites).

Bold and underlined values indicated NR 746 Table 2 (Direct Contact) values exceeded.

* Asterisk value indicates NR 746 Table 1 value exceeded (Indicator of petroleum product in soil pores).

NR 720 RCL - Wisconsin Administrative Code (WAC), Chapter NR 720 Residual Contaminant Level.

NR 746 Table 1 - WAC, Chapter NR 746.06(2)(b) Table 1 - Indicators of Residual Petroleum Product in Soil Pores.

NR 746 Table 2 - WAC, Chapter NR 746.06(2)(b) Table 2 - Protection of Human Health from Direct Contact with Contaminated Soil.

Created by: TLR 09/28/06

Checked by: JMM 09/29/06; JMM 10/05/06; JMM 12/12/06

Table D-5
 Post Remedial - Soil Analytical Results Summary - PAHs
 Kramer Lofts / BT¹ Project #2939
 (Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	Lab Notes	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(a)pyrene	Benzo(ghi)perylene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Phenanthrene	Pyrene
S2 S Wall	8/29/2006	3.5	(1)	940	<1,500	3,980	<u>8,800</u>	3,700	2,600	<u>5,200</u>	2,700	5,600	<u>590</u>	17,000	2,300	3,300	2,800	9,500	760 *	15,000 *	11,800
S3 N Wall	8/29/2006	4	(1)	<1,100	<1,800	600	620	1,000	720	<u>1,600</u>	940	1,500	<160	4,400	460	1,000	<650	2,100	<650	3,300 *	3,100
S13 W Wall S Half	8/31/2006	4	—	20,000	<2,700	68,000	<u>110,000 *</u>	<u>53,000</u>	<u>42,000</u>	<u>87,000 *</u>	35,000	95,000 *	<u>8,500</u>	280,000	37,000	<u>44,000</u>	31,000 *	160,000 *	36,000 *	210,000 *	180,000
S14 W Wall S Half	8/31/2006	4	(1)	<710	<1,200	1,900	<u>4,300</u>	3,800	2,600	<u>5,500</u>	3,300	5,600	<u>550</u>	17,000	1,600	3,400	2,800	8,600	930 *	14,000 *	11,000
S17 S Wall S Half	9/7/2006	3	(1)	900	<780	4,000	<u>6,400</u>	3,600	2,600	<u>5,400</u>	2,300	4,700	<u>670</u>	17,000	2,400	2,800	1,300	<230	1,800 *	12,000 *	9,700
S19 W Wall S Half	9/8/2006	3.5	(1)	<10,000	<18,000	4,900	<u>21,000 *</u>	<u>10,000</u>	6,100	<u>12,000</u>	8,100	12,000	<u>1,600</u>	49,000	3,200	<u>7,600</u>	<6,200	17,000	<6,200	20,000 *	18,000
S22 NE Base N Half	9/8/2006	11.5	(2)	<58	<99	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<8.7	<12	<12	<5.8	<35	<29	<35	<5.8	<5.8
S29 E Base S Half	9/14/2006	15	—	<62	<100	<6.2	<6.2	<6.2	<6.2	<6.2	<6.2	<6.2	<9.2	<12	<12	<6.2	<37	<31	<37	<6.2	<6.2
S37 E Wall S Half	11/7/2006	4	—	<58	<98	<5.8	8.5	7.1	<5.8	9.4	<5.8	7.8	<8.7	16	<12	<5.8	<35	<29	<35	8.1	9.2
S43 N Wall NE Corner	11/10/2006	2	—	<57	<96	8.7	57	32	22	47	38	41	15	86	<11	40	<34	47	<34	34	63
WDNR PAH Soil Generic Residual Contaminant Levels (RCLs) (Interim Guidance - April 1997)																					
Groundwater Pathway				38,000	700	3,000,000	17,000	360,000	870,000	48,000	6,800,000	37,000	38,000	500,000	100,000	680,000	23,000	20,000	400	1,800	8,700,000
Non-Industrial Direct Contact				900,000	18,000	5,000,000	88	88	880	8.8	1,800	8,800	8.8	600,000	600,000	88	1,100,000	600,000	20,000	18,000	500,000
Industrial Direct Contact				60,000,000	360,000	300,000,000	3,900	3,900	39,000	390	39,000	390,000	390	40,000,000	40,000,000	3,900	70,000,000	40,000,000	110,000	390,000	30,000,000

ABBREVIATIONS:

µg/kg = micrograms per kilogram or parts per billion (ppb)
 PAHs = Polynuclear Aromatic Hydrocarbons

— = Not Applicable
 WDNR = Wisconsin Department of Natural Resources

NOTES:

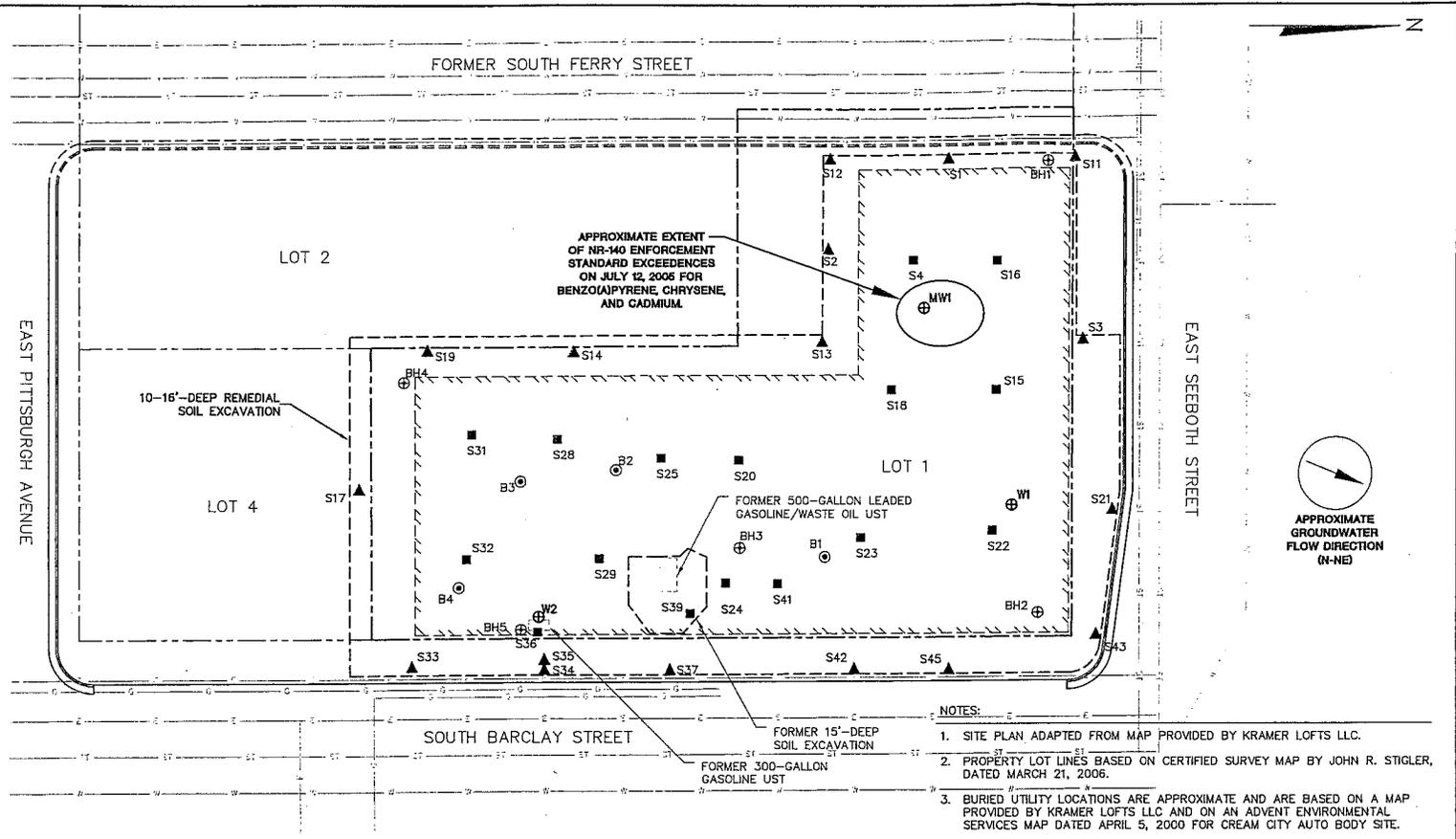
Bold values indicate Interim Guidance Non-Industrial site Direct Contact RCLs exceeded.
 Bold and underlined values indicate Interim Guidance Industrial site Direct Contact RCLs exceeded.
 **Asterisk value indicates Interim Guidance Groundwater Pathway RCLs exceeded.

LABORATORY NOTES:

(1) *Surr: 2-Fluorobiphenyl* = The sample required a dilution due to the nature of the sample matrix. Because of this dilution, the surrogate spike concentration in the sample was reduced to a level where the recovery calculation does not provide useful information.
 (2) *Surr: 2-Fluorobiphenyl* = Surrogate recovery was below acceptance limits.

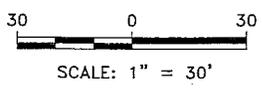
Created by: TLR 09/28/2006
 Checked by: JMM 09/29/2006; JMM 12/12/06

I:\2939\Tables-General\Soil_PAHs_D-5.xls\Soil PAHs



LEGEND

---	PROPERTY LINE	⊕	SOIL BORING
	NEW BUILDING FOOTPRINT	⊙	DIRECT PUSH SOIL BORING
---	BURIED ELECTRIC UTILITY	⊕	FORMER MONITORING WELL
---	BURIED GAS MAIN	▲	FINAL EXCAVATION WALL SOIL SAMPLE
---	BURIED SEWER	■	FINAL EXCAVATION BASE SOIL SAMPLE
---	BURIED WATER MAIN		



NOTES:

1. SITE PLAN ADAPTED FROM MAP PROVIDED BY KRAMER LOFTS LLC.
2. PROPERTY LOT LINES BASED ON CERTIFIED SURVEY MAP BY JOHN R. STIGLER, DATED MARCH 21, 2006.
3. BURIED UTILITY LOCATIONS ARE APPROXIMATE AND ARE BASED ON A MAP PROVIDED BY KRAMER LOFTS LLC AND ON AN ADVENT ENVIRONMENTAL SERVICES MAP DATED APRIL 5, 2000 FOR CREAM CITY AUTO BODY SITE.
4. SEWER UTILITY INCLUDES STORM SEWERS, SANITARY SEWERS, COMBINED SEWERS AND METROPOLITAN INTERCEPTOR SEWERS.
5. LOCATION OF FORMER 500-GALLON UST AND UST AREA SOIL EXCAVATION OBTAINED FROM ADVENT ENVIRONMENTAL SERVICES MAPS DATED FEBRUARY 15, 1998 AND APRIL 5, 2000.
6. MW1 INSTALLED AND SAMPLED BY KEY ENGINEERING GROUP. WELL LOCATION IS APPROXIMATE.
7. GROUNDWATER FLOW DIRECTION BASED ON ADVENT ENVIRONMENTAL SERVICES MAPS FOR WATER LEVELS MEASURED NOVEMBER 3 1998, SEPTEMBER 17, 1999 AND DECEMBER 3, 1999.
8. MW1 GROUNDWATER ANALYTICAL RESULTS BY KEY ENGINEERING GROUP, LTD.

PROJECT NO. 2939	DRAWN BY: KP/BLS		2830 DAIRY DRIVE MADISON, WI 53718-5751 PHONE: (608) 224-2830 FAX: (608) 224-2839	CLIENT	KRAMER LOFTS, LLC 321 EAST MAIN STREET MADISON, WI 53703	SITE	KRAMER LOFTS 111 EAST SEEBOTH STREET MILWAUKEE, WISCONSIN	MONITORING WELL LOCATION AND GROUNDWATER CONTAMINATION SUMMARY MAP	FIGURE
DRAWN: 07/17/08	CHECKED BY: BS								
REVISED: 01/02/07	APPROVED BY:								

I:\2939\figures-general\REMEDIAL EXCAV.dwg, WELL LOCATION, 2/5/2007 8:48:57 AM

**Table E-6
Depth to Water Summary
Kramer Lofts / Project #2939
Milwaukee, Wisconsin**

Raw Data		Depth to Water in feet below top of well casing							
		W1	W2						
Measurement Date									
12-Jul-06	(1)	18.67	12.91						
13-Jul-06	(2)	15.73	12.94						

Well Number		Approximate Depth to Water from Ground Surface							
		W1	W2						
Measurement Date									
		16.7	10.9						
12-Jul-06		13.7	10.9						
13-Jul-06									

ABBREVIATIONS:

NM = not measured

NOTES:

- (1) Monitoring wells W1 and W2 had protective pipes that stuck up approximately 2 feet above ground surface. Water levels measured at W1 were recovering and are not static.

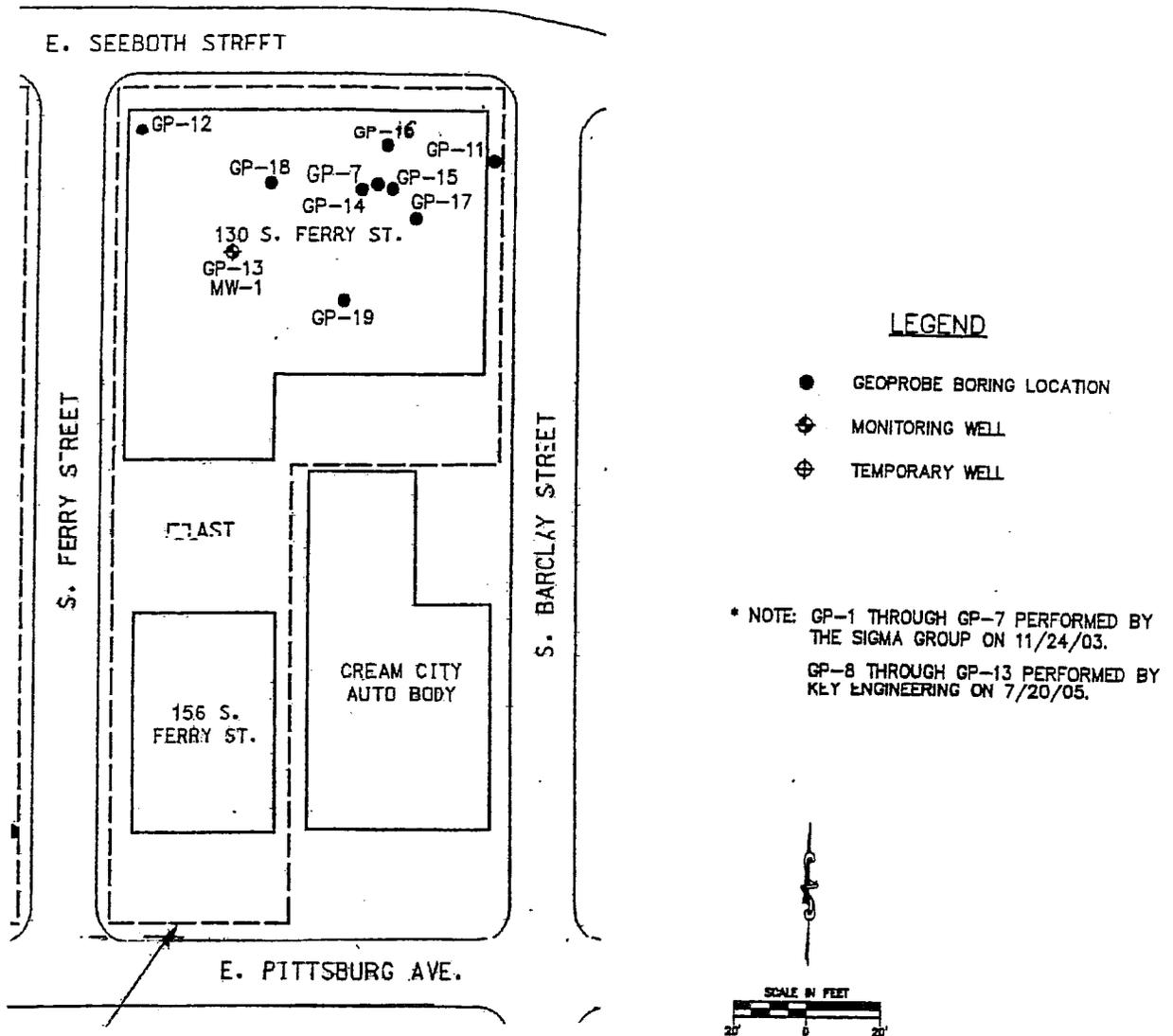
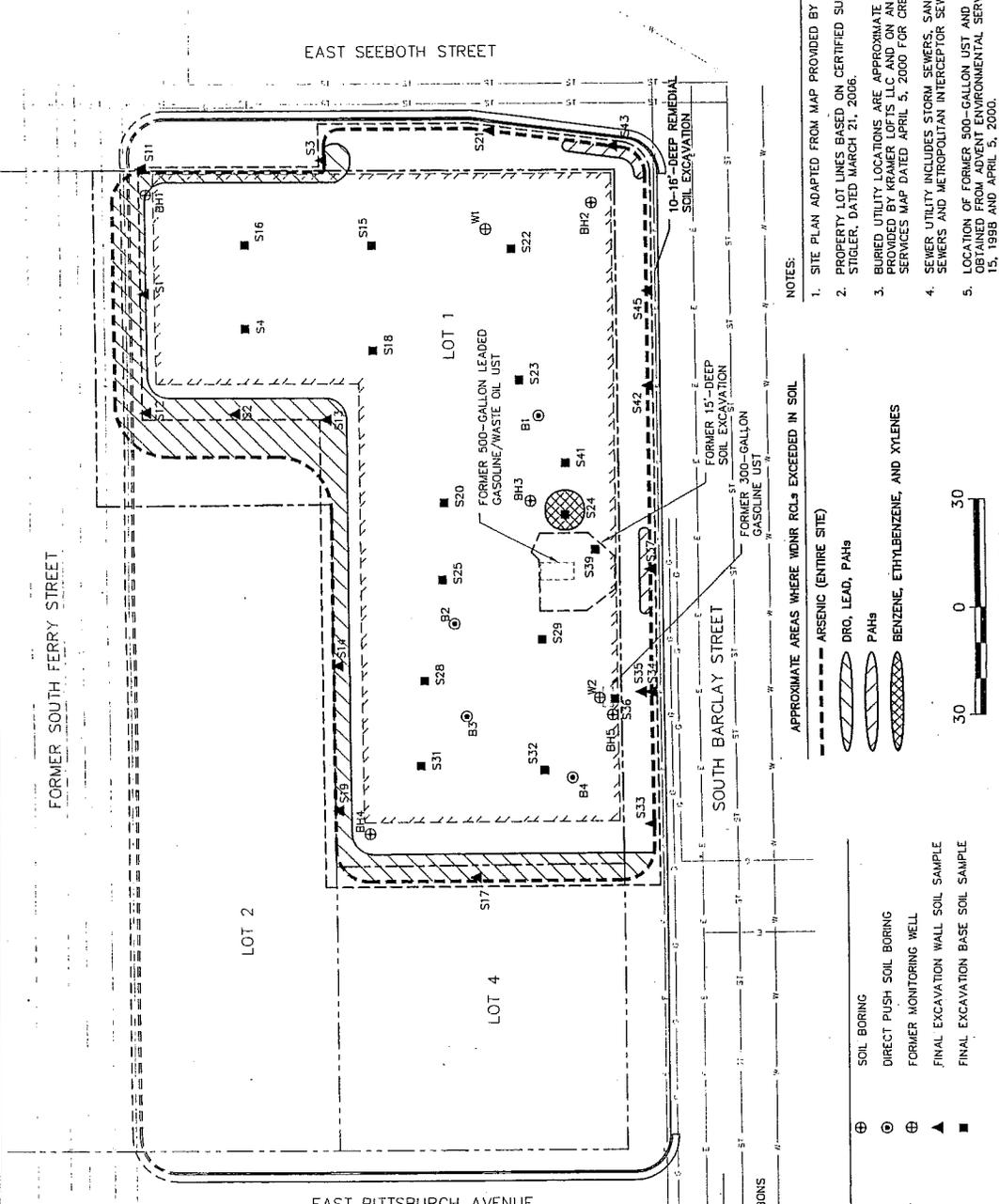


Figure C-6 Pre-Remedial Soil Sample Location Map - Key and Sigma

(Map Adapted from Key Engineering Group Report Figure - August 8, 2005)



- ABBREVIATIONS:**
- ORO - DIESEL RANGE ORGANIC COMPOUNDS
 - PAHs - POLYNUCLEAR AROMATIC HYDROCARBONS
 - RCLs - RESIDUAL CONTAMINANT LEVELS
- LEGEND**
- ⊕ SOIL BORING
 - DIRECT PUSH SOIL BORING
 - ⊕ FORMER MONITORING WELL
 - ▲ FINAL EXCAVATION WALL SOIL SAMPLE
 - FINAL EXCAVATION BASE SOIL SAMPLE
 - BURIED WATER MAIN
 - BURIED GAS MAIN
 - BURIED SEWER
 - BURIED ELECTRIC UTILITY
 - NEW BUILDING FOOTPRINT
 - PROPERTY LINE
 - EXCAVATION LIMITS

APPROXIMATE AREAS WHERE WDNMR RCLs EXCEEDED IN SOIL

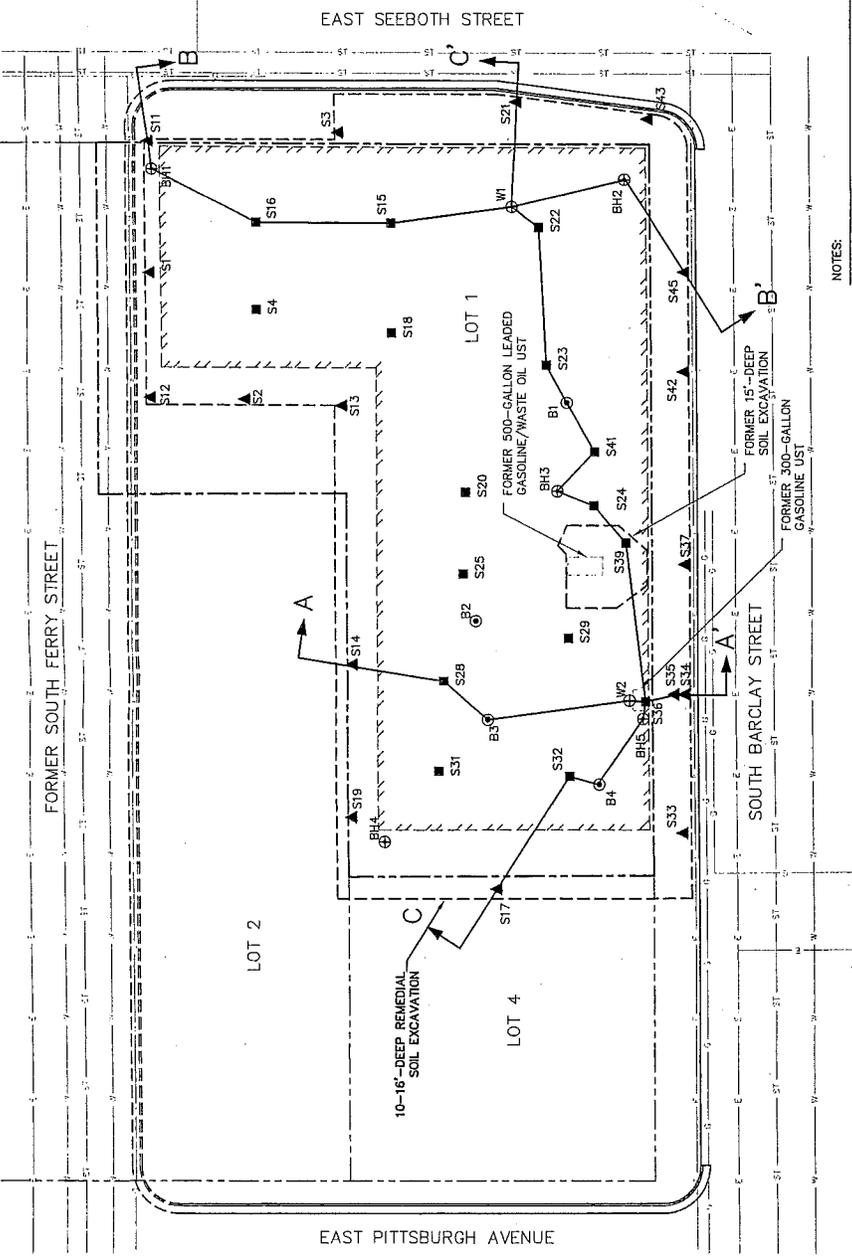
- ARSENIC (ENTIRE SITE)
- DRG, LEAD, PAHs
- BENZENE, ETHYLBENZENE, AND XYLENES

SCALE: 1" = 30'

NOTES:

- SITE PLAN ADAPTED FROM MAP PROVIDED BY KRAMER LOFTS LLC.
- PROPERTY LOT LINES BASED ON CERTIFIED SURVEY MAP BY JOHN R. STIGLER, DATED MARCH 21, 2006.
- BURIED UTILITY LOCATIONS ARE APPROXIMATE AND ARE BASED ON A MAP PROVIDED BY KRAMER LOFTS LLC FOR CITY ENVIRONMENTAL SERVICES MAP DATED APRIL 2, 2000 FOR CREAM CITY AUTO BODY SITE.
- SEWER UTILITY INCLUDES STORM SEWERS, SANITARY SEWERS, COMBINED SEWERS AND METROPOLITAN INTERCEPTOR SEWERS.
- LOCATION OF FORMER 500-GALLON UST AND UST AREA SOIL EXCAVATION (S17) FROM ENVIRONMENTAL SERVICES MAPS DATED FEBRUARY 15, 1998 AND APRIL 5, 2000.

PROJECT NO. 2939		DRAWN BY: KP/ELS		ENGINEER	
DRAWING: 07/17/05		CHECKED BY: BS		CLIENT	
REVISED: 07/25/07		APPROVED BY:		KRAMER LOFTS, LLC 111 EAST SEEBOTH STREET MILWAUKEE, WISCONSIN	
2830 DAIRY DRIVE MADISON, WI 53718-6751 TEL: (608) 224-2830 FAX: (608) 224-2833		KRAMER LOFTS, LLC 321 EAST MAIN STREET MADISON, WI 53703		SOIL CONTAMINATION SUMMARY MAP	
1:2007/figures/figures/REMEDIAL_ECKO/P-05_ECKO/P-04_1252007_R-155-01				FIGURE D-2	



- NOTES:**
1. SITE PLAN ADAPTED FROM MAP PROVIDED BY KRAMER LOFTS LLC.
 2. PROPERTY LOT LINES BASED ON CERTIFIED SURVEY MAP BY JOHN R. STIGLER, DATED MARCH 21, 2008.
 3. BURIED UTILITY LOCATIONS ARE APPROXIMATE AND ARE BASED ON A MAP PROVIDED BY KRAMER LOFTS LLC AND ON AN ADVENT ENVIRONMENTAL SERVICES MAP DATED APRIL 5, 2000 FOR CREAM CITY AUTO BODY SITE.
 4. SEWER UTILITY INCLUDES STORM SEWERS, SANITARY SEWERS, COMBINED SEWERS AND METROPOLITAN INTERCEPTOR SEWERS.
 5. LOCATION OF FORMER 500-GALLON UST AND UST AREA SOIL EXCAVATION OBTAINED FROM ADVENT ENVIRONMENTAL SERVICES MAPS DATED FEBRUARY 15, 1998 AND APRIL 5, 2000.



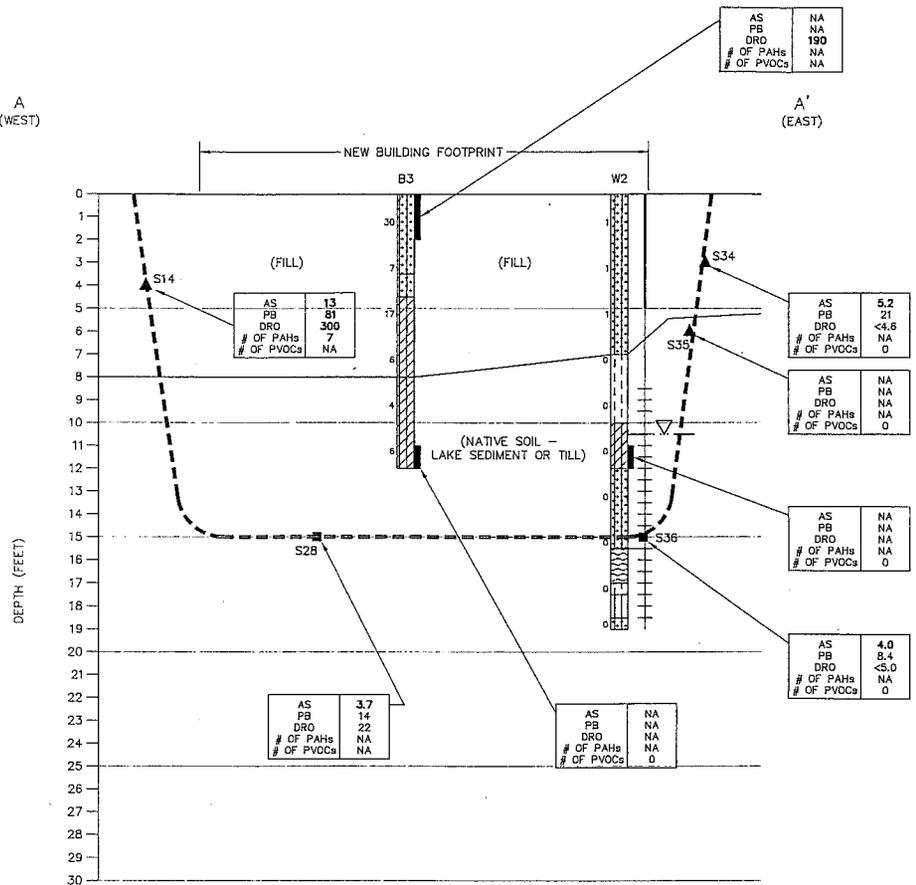
- LEGEND**
- PROPERTY LINE
 - - - NEW BUILDING FOOTPRINT
 - - - BURIED ELECTRIC UTILITY
 - - - BURIED GAS MAIN
 - - - BURIED SEWER
 - - - BURIED WATER MAIN
 - ⊕ SOIL BORING
 - ⊙ DIRECT PUSH SOIL BORING
 - ⊕ FORMER MONITORING WELL
 - ▲ FINAL EXCAVATION WALL SOIL SAMPLE
 - FINAL EXCAVATION BASE SOIL SAMPLE
 - ↔ CROSS SECTION LOCATION

PROJECT NO. 2939	DRAWN BY: KP/BS		2830 DAIRY DRIVE MADISON, WI 53716-6751 PHONE: (608) 224-2830 FAX: (608) 224-2825	KRAMER LOFTS, LLC. 111 EAST SEEBOTH STREET MADISON, WI 53703	KRAMER LOFTS 111 EAST SEEBOTH STREET MILWAUKEE, WISCONSIN	CROSS SECTION LOCATION MAP	FIGURE D-7
DRAWN: 07/17/08	CHECKED BY: BS						
REVISED:	01/02/07	APPROVED BY:					

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A
(WEST)

A'
(EAST)

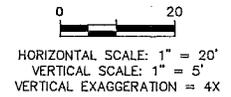
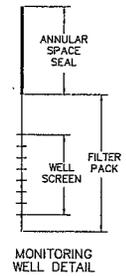


LEGEND

- | | | |
|--|-------|--------------------------------------|
| | AS | ARSENIC (mg/kg) |
| | PB | LEAD (mg/kg) |
| | DRO | DESEL RANGE ORGANIC (mg/kg) |
| | PAHs | POLYNUCLEAR AROMATIC HYDROCARBONS |
| | PVOCs | PETROLEUM VOLATILE ORGANIC COMPOUNDS |
| | | |
| | | |
| | 25 | PHOTO-IONIZATION DETECTOR READING |
| | | LIMITS OF EXCAVATION |
| | | EXCAVATION WALL SOIL SAMPLE |
| | | EXCAVATION BASE SOIL SAMPLE |
| | | WATER TABLE ON 7/13/06 |

NOTES:

1. NUMBER OF PAHs AND PVOCs INDICATES THE NUMBER OF COMPOUNDS DETECTED AT CONCENTRATIONS GREATER THAN GENERIC RESIDUAL CONTAMINANT LEVELS (RCLs). SEE TABLES C-1, C-2, D-4, AND D-5 FOR DETAILED ANALYTICAL RESULTS.
2. BOLD VALUES INDICATE RCLs EXCEEDED.

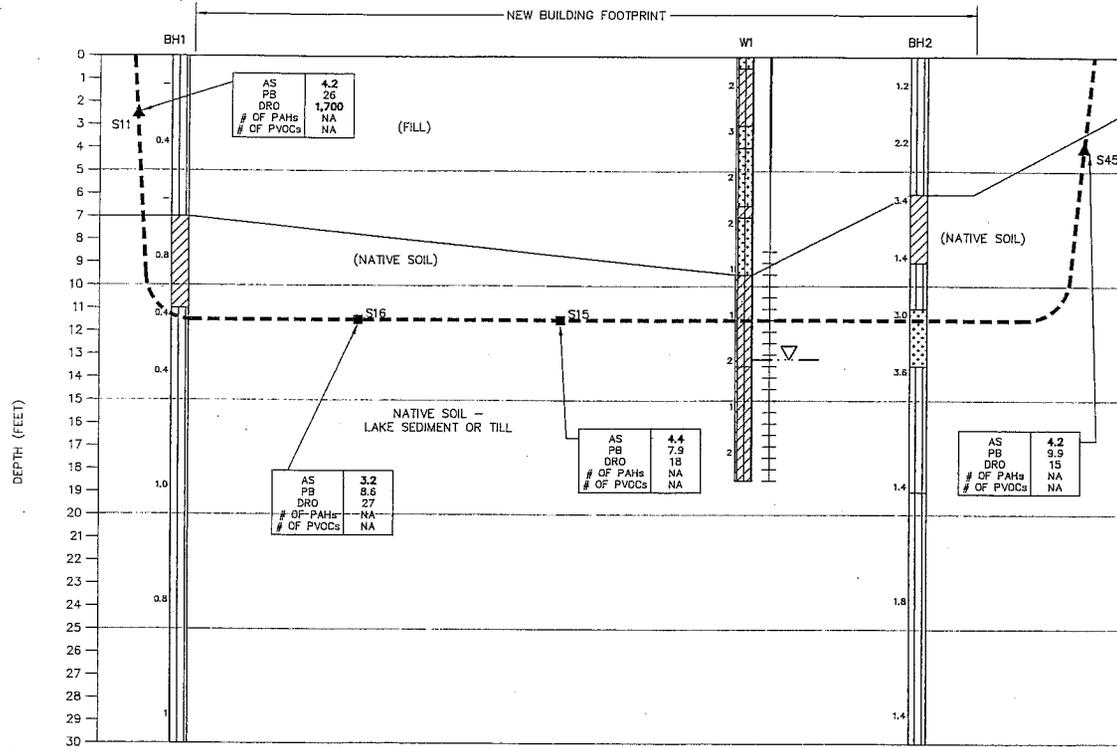


PROJECT NO. 2939	DRAWN BY: KP/BLS	ENGINEER: BT ² inc.	2830 DAIRY DRIVE MADISON, WI 53718-5751 PHONE: (608) 224-2830 FAX: (608) 224-2839	CLIENT: KRAMER LOFTS, LLC. 321 EAST MAIN STREET MADISON, WI 53703	SITE: KRAMER LOFTS 111 EAST SEEBOTH STREET MILWAUKEE, WISCONSIN	CROSS SECTION A-A'	FIGURE D-8
DRAWN: 07/17/06	CHECKED BY: BS						
REVISED: 01/25/07	APPROVED BY:						

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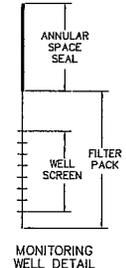
B
(WEST)

B'
(EAST)



LEGEND		AS	ARSENIC (mg/kg)
[Symbol]	SAND, WELL GRADED, LITTLE OR NO FINES (SW)	PB	LEAD (mg/kg)
[Symbol]	SAND, POORLY GRADED, LITTLE OR NO FINES (SP)	DRO	DIESEL RANGE ORGANIC (mg/kg)
[Symbol]	SILT (ML)	PAHs	POLYNUCLEAR AROMATIC HYDROCARBONS
[Symbol]	ORGANIC SILT OR CLAY, LOW PLASTICITY (OL)	PVOCS	PETROLEUM VOLATILE ORGANIC COMPOUNDS
[Symbol]	LEAN CLAY (CL)		
[Symbol]	SILTY SAND (SM)		
[Symbol]	SILTY CLAY (CL-ML)		
[Symbol]	PEAT (PT)		
25	PHOTO-IONIZATION DETECTOR READING		
[Symbol]	LIMITS OF EXCAVATION		
[Symbol]	EXCAVATION WALL SOIL SAMPLE		
[Symbol]	EXCAVATION BASE SOIL SAMPLE		
[Symbol]	WATER TABLE ON 7/13/06		

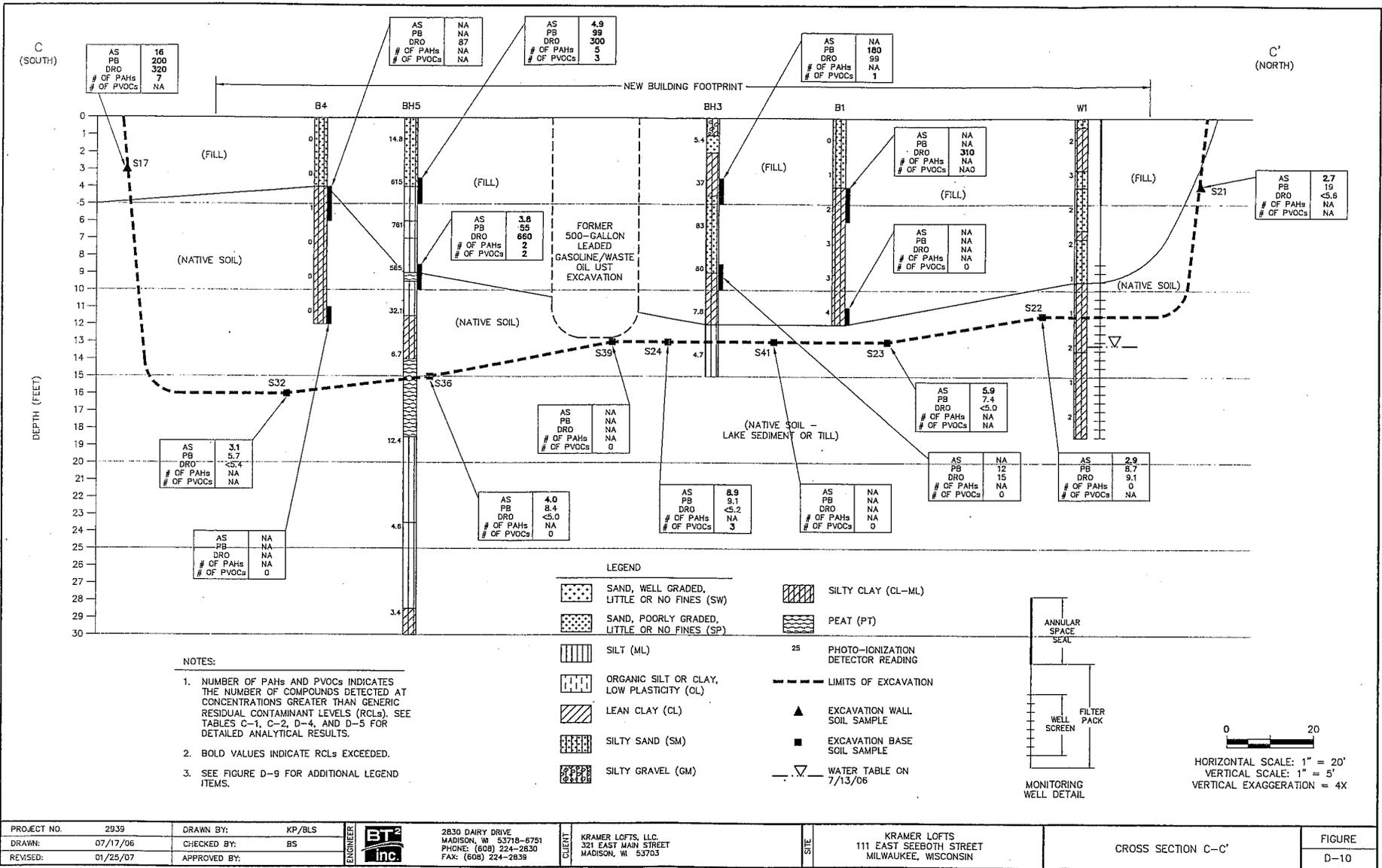
- NOTES:
- NUMBER OF PAHs AND PVOCS INDICATES THE NUMBER OF COMPOUNDS DETECTED AT CONCENTRATIONS GREATER THAN GENERIC RESIDUAL CONTAMINANT LEVELS (RCLs). SEE TABLES C-1, C-2, D-4, AND D-5 FOR DETAILED ANALYTICAL RESULTS.
 - BOLD VALUES INDICATE RCLs EXCEEDED.



0 20
HORIZONTAL SCALE: 1" = 20'
VERTICAL SCALE: 1" = 5'
VERTICAL EXAGGERATION = 4X

PROJECT NO. 2939	DRAWN BY: KP/BLS		2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830 FAX: (608) 224-2839	CLIENT	KRAMER LOFTS, LLC 321 EAST MAIN STREET MADISON, WI 53703		111 EAST SEEBOTH STREET MILWAUKEE, WISCONSIN	CROSS SECTION B-B'	FIGURE	
DRAWN: 07/17/06	CHECKED BY: BS		ENGINEER							D-9
REVISED: 01/25/07	APPROVED BY:									

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February 5, 2007

To: Wisconsin Department of Natural Resources

Subject: Statement that the Legal Description for the Property within the
Contaminated Site Boundary has been Included
Kramer Lofts Property
111 East Seeboth Street, Milwaukee, WI 53204
WDNR BRRTS # 02-41-547971
BT² Project #2939

To Whom it May Concern:

To the best of my knowledge, I believe that with the submittal of the attached property information the legal description for each property within, or partially within the contaminated site boundary has been included with the closure request.

The attached property information includes the Deeds and Legal Descriptions for the properties located at 111 East Seeboth Street, Milwaukee, Wisconsin.

If you need additional information, please contact me at (608) 251-2399.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard B. Arnesen". The signature is stylized with a large initial "R" and a long horizontal stroke at the end.

Mr. Richard B. Arnesen
Kramer Lofts, LLC