

GIS REGISTRY INFORMATION

SITE NAME:

Manpower Parking Structure

BRRTS #:

02-41-548110

FID # (if appropriate): 341136950

COMMERCE # (if appropriate): _____

CLOSURE DATE: _____

STREET ADDRESS:

210-230 W. Cherry Street

CITY:

Milwaukee 53212

SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection):

X= 689907

Y= 288503

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 **SEE DEED**

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)

X
X
NA
X
NA
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 53212-3128
FAX 414-263-8606
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TTY Access via relay - 711

January 30, 2008

Samuel H. Denny
The Brewery Works
1555 N. River Center Drive
Milwaukee, WI 53212

Subject: Final Case Closure with Land Use Limitations or Conditions, Manpower Parking Structure,
210-230 W. Cherry Street, Milwaukee, WI WDNR FID#341136950,
WDNR BRRTS# 02-41-548110

Dear Mr. Denny:

On January 30, 2008, the Southeast Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On January 30, 2008, you were notified that the Closure Committee had granted conditional closure to this case.

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.

The most recent soil samples that were collected on this property, which were collected on May 2, 2000, September 20, 2006 and November 2, 2006 contained Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(ghi)perylene, Benzo(k)fluoranthene in concentrations that exceeded NR 720.11, Table 2, Wis. Adm. Code, soil standards. Therefore, pursuant to s. 292.12(2)(c), Wis. Stats., the property described above may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) an investigation is conducted, to determine the degree and extent of PAH contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards. If soil in the specific locations described above is excavated in the future, 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 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.

Pursuant to s. 292.12(2)(a), Wis. Stats., the parking structure that currently exists in the location shown on the attached map 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 locations described above is excavated in the future, 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 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 property where [pavement, a building foundation, soil cover, engineered cap or other barrier] is required as shown on the attached map, 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.

Recent groundwater monitoring data at this site indicates exceedances of the NR 140 preventive action limit (PAL) for Benzo(a)pyrene, Benzo (b)fluoranthene at MW -18 and Benzo(a)pyrene, Benzo (b)fluoranthene, Benzo(k)fluoranthene at MW-21, 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:

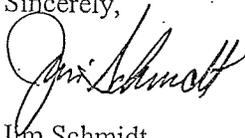
1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The enforcement standard for the substance will not be attained or exceeded 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 because of the implementation of an engineered cap in the form of a parking structure. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for Benzo(a)pyrene, Benzo (b)fluoranthene at MW -18 and Benzo(a)pyrene, Benzo (b)fluoranthene, Benzo(k)fluoranthene at MW-21, . This letter serves as your exemption.

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 Barbara Grundl at 414-263-8564.

Sincerely,



Jim Schmidt
Southeast Remediation & Redevelopment Team Supervisor

cc: Lanette Altenbach – STS Consultants, Ltd.
WDNR SER Case File

**Cap Maintenance Plan
Manpower Parking Structure
210-230 W. Cherry Street
Milwaukee, Wisconsin**

The Brewery Works, Inc
Milwaukee, WI

STS Project No. 200605829

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Attachments

Cap Inspection Form (sample)

1.0 INTRODUCTION

The Manpower Parking Structure is located at 210-230 West Cherry Street northwest of the intersection of North 2nd and West Cherry Street, Milwaukee, Wisconsin. Further described, the subject site is south of West Galena Street, west of North River Center Drive; east of North Old World Third Street (North Dr. Martin Luther King Jr. Dr.), and north of West Cherry Street.

In 2007, soil was excavated to bring the site to the planned elevation (18 feet CMD) of the first parking deck level. Deeper excavation was conducted around the parking deck perimeter and at interior locations for the shallow spread footing structure foundation. Some fill soil remains present at sub-grade elevations across the subject property at the conclusion of the site preparation. The parking structure will act as a cover to prevent future direct contact exposure risks. The newly constructed parking structure will provide a barrier to both direct contact and water infiltration through the impacted soil. The parking structure covers the subject property entirely, except for small strips of grass on the south and east sides of the structure. Hence, the majority of the subject property is concrete covered.

The purpose of this Cap Maintenance Plan (CMP) is to present requirements for maintaining the integrity of the direct contact barrier over the impacted soils remaining on-site. The CMP describes procedures necessary to observe and document that the barriers over the impacted soil remains intact and in relatively good condition. The next sections describe the observation, inspection and documentation requirements.

2.0 PAVEMENT MAINTENANCE PLAN

2.1 Inspection and Evaluation

Regular evaluation of the pavement surfaces with respect to surface condition, strength and drainage is the first step in pavement maintenance. In order to accomplish this, the following steps will be taken.

- The pavement should be inspected once per calendar year; either in the Spring or in the Fall.
- The inspection should be scheduled either after or before the ground thaws or freezes.
- Inspections should be conducted by completing a thorough walkover of the site to allow for observations of loss of integrity in the surface.

A log of inspections should be maintained. The following information should be included in the inspection log:

- Date and time of Inspection
- Weather conditions
- Person(s) conducting inspection
- Condition of pavement
- Areas of distress (loss of integrity)

When areas of distress are noted, the following information should be logged:

1. Type of distressed area

- Pot Holes
- Ruts
- Depressed areas
- Heaved areas

2. Size of distressed area

- Dimensions (length and width) of distressed area

3. Take photographs of each distressed area observed

- Label the photographs with date and locations
- Include an object in the photos of the distressed areas for scale (ruler, pen, coin, etc.)

2.2 Repair Measures

The purpose of the cap is to maintain a suitable barrier preventing direct contact with the impacted soil. Repair measures are required when disruptions to the surface of the cap such as potholes or ruts are present and extend through the cap material. Repairs to distressed areas shall be made as soon as possible after the inspection, but no later than 2 to 3 months after the date of inspection. Repair measures should be logged, including the starting time and date the repair activities occurred, location of the repaired area, and who performed the work. Photographs should be taken to record the repair activities. The repaired area should be inspected after the repair activities to confirm the integrity of the pavement surface.

2.3 Records

Inspection and repair logs including photographs should be maintained for a period of at least five years.

3.0 LANDSCAPE MAINTENANCE PLAN

Maintenance of the landscape is required for the care of the landscaped areas that may lie over impacted soil at the property.

3.1 Inspection and Evaluation

Regular evaluation of the landscaped surfaces with respect to surface condition and drainage is the first step in landscape maintenance. In order to accomplish this, the following steps will be taken by the property owner or his designee:

- The landscape will be inspected annually (either spring or fall), indefinitely.
- Inspections will be conducted by completing a thorough walkover of the site to allow for observations of stressed vegetation, bare soil areas, signs of animal burrows, etc.

A log of inspections should be maintained. The following information should be included in the inspection log:

- Date and time of Inspection
- Weather conditions
- Person(s) conducting inspection
- Condition of the landscape
- Areas of stressed vegetation, bare soil, animal activity etc.

If areas of distressed landscape are noted, the following information will be logged:

1. Type of distressed area:
 - Stressed vegetation (brown grass, wilted shrubs or tree leaves)
 - Lack of vegetation, dead shrubs or trees
 - Bare soil areas
 - Signs of animal burrows
2. Size of distressed area
3. Take photographs of each distressed area observed
 - Label the photographs with date and locations
 - Include an object in the photos of the distressed areas for scale (ruler, pen, coin, etc.)

3.2 Repair Measures

The objective of the repair activities to distressed areas is to protect the cover soil that prevents direct contact with the historic fill soil below the clean fill soil cover. Repairs to distressed areas shall be made as soon as possible after the inspection, weather dependent, but no later than 2 weeks after the date of inspection. Repair measures should be logged, including the starting time and date the repair activities occurred, location of the repaired area, and who performed the work. Photographs should be taken to record the repair activities. The repaired area should be inspected after the repair activities to confirm the integrity of the repair. Temporary repair measures such as erosion control mats should be used if the weather conditions are unsuitable for supporting vegetative growth (such as late fall, winter, or early spring before the growing season begins).

3.3 Records

Inspection and repair logs including photographs should be maintained for a period of at least five years.

CAP INSPECTION FORM (Sample)

Site: _____

Date: _____

Inspected By: _____

Weather: _____

Page ___ of ___

Distress Types in Pavement

- | | | |
|-----------------------|-----------------------------|---------------------------|
| 1. Alligator Cracking | 5. Edge Cracking * | 9. Potholes * |
| 2. Linear Cracking * | 6. Joint Reflection Crack * | 10. Rutting |
| 3. Blocks and Sags * | 7. Edge Drop Off * | 11. Heaving |
| 4. Depression | 8. Patching (incl. Utility) | 12. Weathering & Raveling |

Existing Pavement Distress Observed

<u>Distress Type</u>	<u>Quantity</u>	<u>Severity</u>			<u>Photo No.</u>	<u>Description</u>
		<u>Low</u>	<u>Medium</u>	<u>High</u>		

* All distresses are measured in square feet except for 2,3,5,6 & 7 are in feet and 9 is number of potholes

Distress Types in Landscape Areas

1. Stressed Vegetation (brown grass, wilted shrubs or tree leaves)
2. Lack of Vegetation (dead grass, shrubs or trees)
3. Bare Soil Areas
4. Signs of Animal Burrows

Existing Landscape Distress Observed

<u>Distress Type</u>	<u>Quantity</u>	<u>Severity</u>			<u>Photo No.</u>	<u>Description</u>
		<u>Low</u>	<u>Medium</u>	<u>High</u>		

All distresses are measured in square feet except for 4 is number of burrows

4. PRODUCTION, IMPORT, USE, AND DISPOSAL

4.1 PRODUCTION

Production of chlorobenzene in the United States has declined by nearly 60%, from the peak production volume of 274,000 kkg in 1960 to 112,000 kkg in 1987. This decline is attributed primarily to the replacement of chlorobenzene by cumene in phenol production and the cessation of DDT production in the United States. In addition, pesticide production using chlorobenzene as an intermediate has declined and no major new uses have been found for chlorobenzene in recent years. Therefore, the decline in chlorobenzene production is expected to continue (EPA 1980c, 1985; Hughes et al. 1983; USITC 1988).

Chlorobenzene is produced by three United States chemical companies: Monsanto Chemical Company, Sauget, Illinois; PPG Industries, Inc., Natrium, West Virginia; and Standard Chlorine Chemical Co., Inc., Delaware City, Delaware. Production capacity for chlorobenzene at these plants has remained constant since 1985 although it appears that actual production has declined slightly during that period (Hughes et al. 1983; SRI 1985, 1986, 1987, 1988; USITC 1988).

Chlorobenzene is produced commercially by the chlorination of benzene in the presence of a catalyst (e.g., ferric chloride, aluminum chloride, or stannic chloride). This process yields a mixture of chlorobenzene, dichlorobenzenes, and higher analogs which are distilled and crystallized to obtain pure products (EPA 1985a; Hughes et al. 1983).

4.2 IMPORT

Import and export data for chlorobenzene are not readily available. Estimates indicate that for the last ten years, both imports and exports have been negligible (Hughes et al. 1983).

4.3 USE

The current primary uses of chlorobenzene are as a solvent for pesticide formulations, diisocyanate manufacture, degreasing automobile parts, and for the production of nitrochlorobenzene. Solvent uses accounted for about 37% of chlorobenzene consumption in the United States in 1981, nitrochlorobenzene production for 33%, and diphenyl oxide and phenylphenol production for 16% of consumption. Chlorobenzene

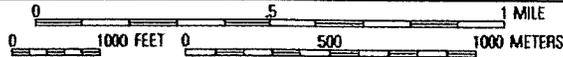
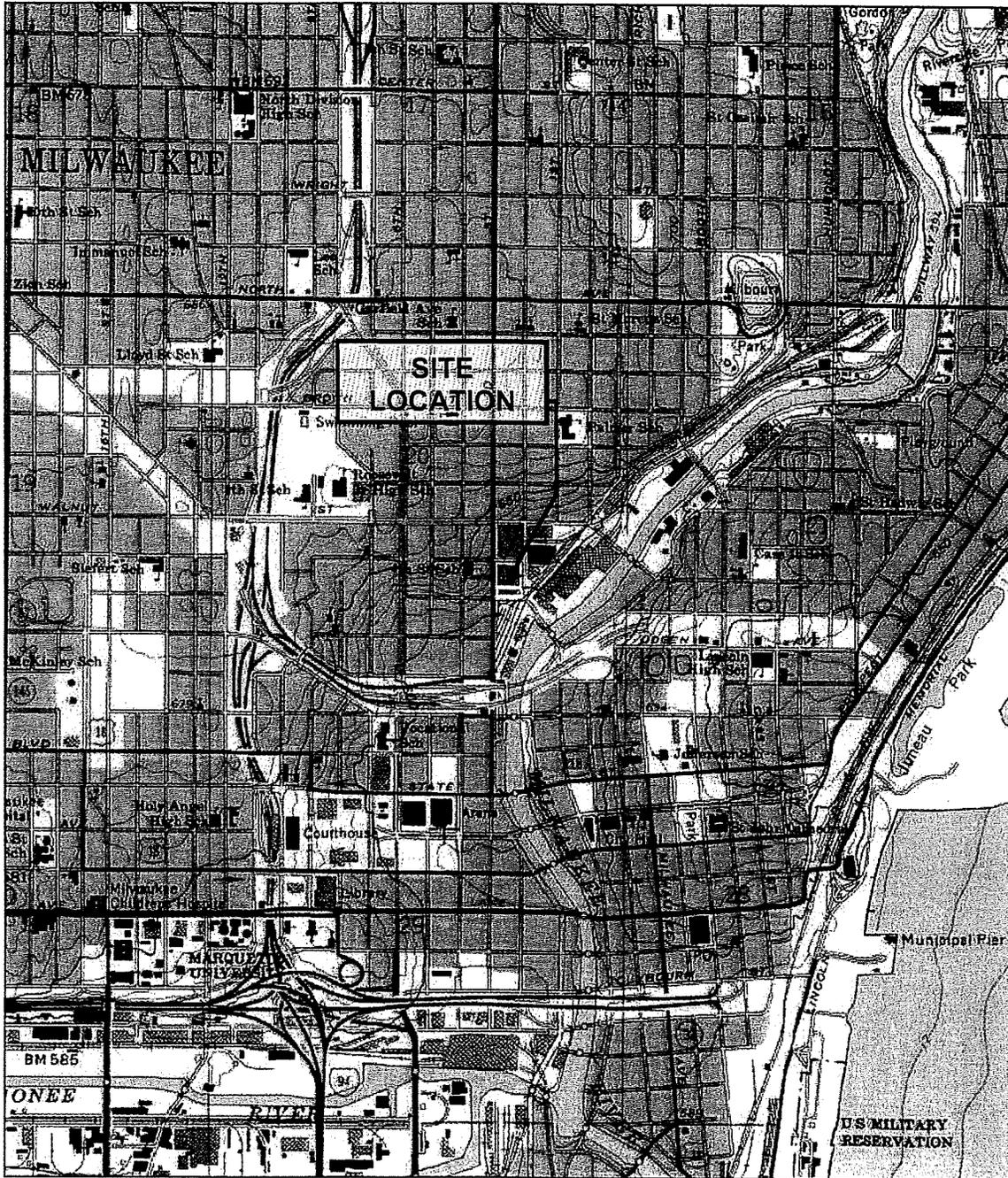
Exhibit A

Legal Description of the Property

Lot 2 of Certified Survey Map No. 7775, recorded June 22, 2006 as Document No. 9257620, a division of Lots 1 through 13, in Block 30, part of Lots 1, 2 and 3 and all of Lots 4 through 10 inclusive, in Block 31, Lots 1 through 11 inclusive, in Block 32, Lots 1 through 3 inclusive, in Block 33, part of Lot 1, in block 40, the vacated alleys in Blocks 30, 31 and 32, vacated North Commerce Street, vacated West Vliet Street and part of vacated West McKinley Avenue adjacent to Blocks 30, 31, 32, 33 and 40, all in Plat of the Town of Milwaukee on the West side of the River and lands, all in the Northeast 1/4, Northwest 1/4, Southwest 1/4 and Southeast 1/4 of the Southeast 1/4 of Section 20, Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.

Exhibit A

Lot 2 of Certified Survey Map No. 7775, recorded June 22, 2006 as Document No. 92574024 division of Lots 1 through 13, in Block 30, part of Lots 1, 2 and 3 and all of Lots 4 through 10 inclusive, in Block 31, Lots 1 through 11 inclusive, in Block 32, Lots 1 through 3 inclusive, in Block 33, part of Lot 1, in block 40, the vacated alleys in Blocks 30, 31 and 32, vacated North Commerce Street, vacated West Vliet Street and part of vacated West McKinley Avenue adjacent to Blocks 30, 31, 32, 33 and 40, all in Plat of the Town of Milwaukee on the West side of the River and lands, all in the Northeast 1/4, Northwest 1/4, Southwest 1/4 and Southeast 1/4 of the Southeast 1/4 of Section 20, Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.



Map created with TOPO1© ©2003 National Geographic (www.nationalgeographic.com/topo)

Source: USGS, 1958

APPROXIMATE SCALE 1" = 2,000'



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SITE LOCATION MAP
 MANPOWER PARKING STRUCTURE
 210-230 WEST CHERRY STREET
 MILWAUKEE, WISCONSIN

Drawn: MTB 9/12/2006

Checked: MTB 2/10/2007

Approved: KLB 2/12/2007

PROJECT NUMBER 200605829

FIGURE NUMBER 1

X:\Projects\583746C\dwg\parking structure - existing-8-30-07.dwg: 9/5/2007 10:00:03 AM: DREW, PAUL

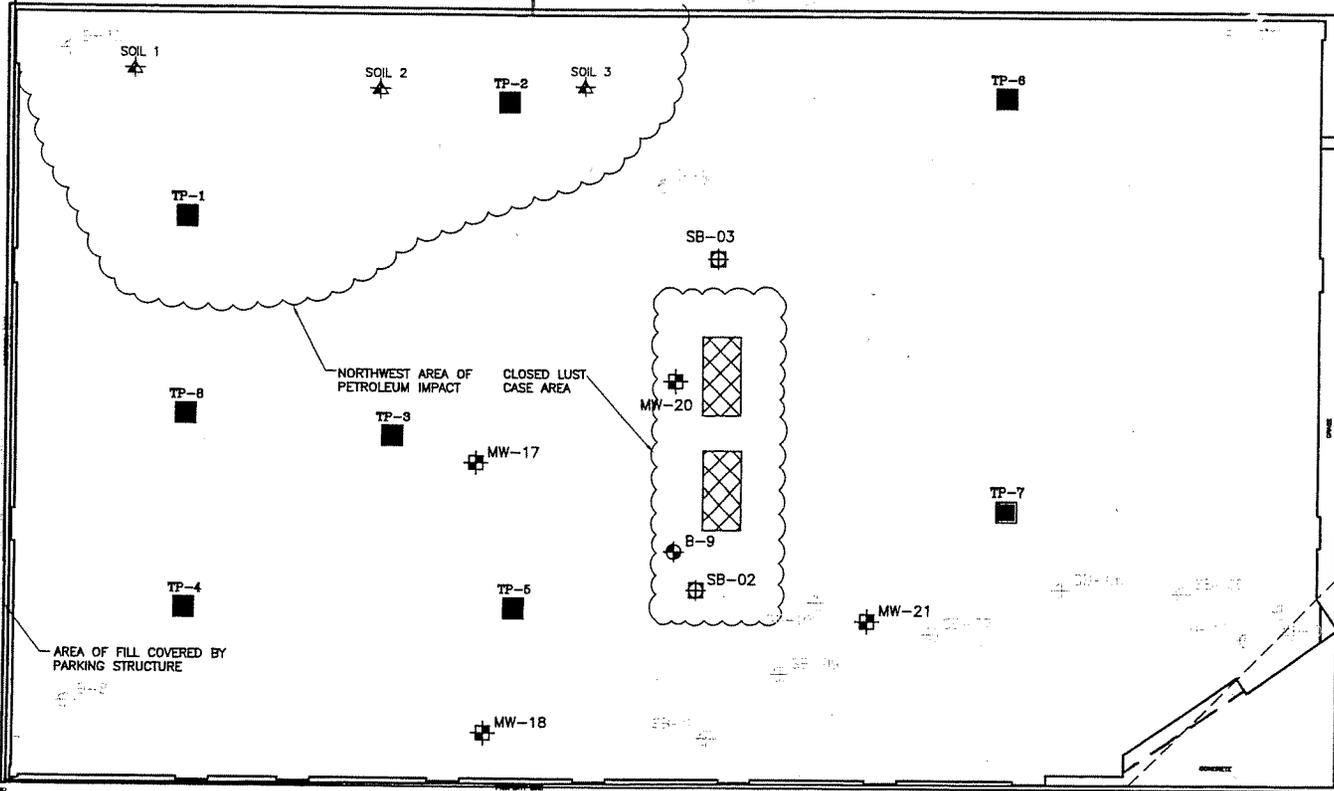


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NORTH DR. MARTIN LUTHER KING JR. DRIVE

NORTH 2ND STREET

WEST CHERRY STREET



LEGEND

- CONCRETE PAVING
- BUILDING ADJ. TO NORTH
- POST EXCAVATION SOIL SAMPLE & NUMBER
- GEOTECHNICAL SOIL BORING
- MONITORING WELL & NUMBER (NOW ABANDONED)

SOIL 1

SB-03

MW-18

0 30
1" = 30'

SITE LAYOUT - POST REMEDIATION
 MANPOWER PARKING STRUCTURE
 MILWAUKEE, WISCONSIN

Drawn:	PDD 08/30/2007
Checked:	LLA 08/30/2007
Approved:	KLB 08/30/2007
PROJECT NUMBER	200605829
FIGURE NUMBER	2

Table 1
Soil Laboratory Analytical Results - Residual Concentrations below Parking Structure
Manpower Parking Structure, 230 W. Cherry, Milwaukee, WI
STS Project No. 200605829

Parameters	Generic RCLs			SB-01	SB-02	SB-02	SB-03	MW-17	MW-17	MW-18	MW-20
	Direct Contact Pathway		Groundwater Pathway	4-8'	0-4'	12-16'	8-12'	10-12'	15-17'	10-12'	10-12'
	Non-Industrial	Industrial		5/2/2000	5/2/2000	5/2/2000	5/2/2000	1/5/2006	1/5/2006	1/5/2006	1/5/2006
Detected VOCs (µg/kg)											
Benzene	1,100 ^D	52,000	5.5 ^D	<30	<29	<271	<29	<25	<25	<25	<25
Ethylbenzene	1,560,000	102,000,000	2,900 ^D	<30	<29	736	<29	<25	<25	<25	<25
Methyl-tert-butyl-ether	—	—	—	<30	<29	<271	<29	<25	<25	<25	<25
Toluene	3,130,000	204,000,000	1,500 ^D	<30	<29	<271	39	<25	<25	<25	<25
1,2,4-Trimethylbenzene	782,000	51,100,000	7573	<30	<29	4870	240	<25	<25	<25	<25
1,3,5-Trimethylbenzene	782,000	51,100,000	3520	<30	<29	519	<29	<25	<25	<25	<25
o-Xylene ¹	3,130,000.0	204,000,000	4,100 ^D	*	*	*	*	<25	<25	<25	<25
m & p Xylene ¹	3,130,000.0	204,000,000	4,100 ^D	<90	<87	1,950	<86	55	<25	<25	<25
PAHs (µg/kg)^E											
Acenaphthene	900,000	60,000,000	38,000	NP	NP	<2700	NP	<110	<5.80	<12	<25
Acenaphthylene	18,000	360,000	700	NP	NP	<4600	NP	<110	<5.80	<12	<5.50
Anthracene	5,000,000	300,000,000	3,000,000	NP	NP	4,650	NP	170	<1.20	20	<1.10
Benzo(a)anthracene	88	3,900	17,000	NP	NP	28,100 ^{ABC}	NP	330 ^A	<1.20	42	3.8
Benzo(a)pyrene	8.8	390	48,000	NP	NP	6,600 ^{AB}	NP	350 ^A	<1.20	50 ^A	6.8
Benzo(b)fluoranthene	88	3,900	360,000	NP	NP	4,220 ^{AB}	NP	470 ^A	2.6	59	11
Benzo(ghi)perylene	1,800	39,000	6,800,000	NP	NP	1,950 ^A	NP	370	4.1	42	6.3
Benzo(k)fluoranthene	880	39,000	870,000	NP	NP	4,440 ^A	NP	190	<1.20	27	4.7
Chrysene	8,800	390,000	37,000	NP	NP	4,110	NP	390	<1.20	54	6.4
Dibenzo(a,h)anthracene	8.8	390	38,000	NP	NP	<550	NP	280 ^A	<3.50	<7.0	7.3
Fluoranthene	600,000	40,000,000	500,000	NP	NP	47,600	NP	1,400	6.1	180	18
Fluorene	600,000	40,000,000	100,000	NP	NP	<550	NP	<46	<2.30	<4.70	<2.20
Indeno(1,2,3-cd)pyrene	88	3,900	680,000	NP	NP	1,080 ^A	NP	350 ^A	2.1 ^J	41	6.1
1-Methylnaphthalene	1,100,000	70,000,000	23,000	NP	NP	44,400 ^C	NP	<140	<7.0	<14	<6.60
2-Methylnaphthalene	600,000	40,000,000	20,000	NP	NP	27,100 ^C	NP	<140	<7.0	<14	<6.60
Naphthalene	20,000	110,000	400	NP	NP	22,700 ^{AC}	NP	<250	<13	<26	<12
Phenanthrene	18,000	390,000	1,800	NP	NP	23,800 ^{AC}	NP	720	<1.20	93	<1.10
Pyrene	500,000	30,000,000	8,700,000	NP	NP	71,400	NP	1,200	<2.30	150	16

Data on this table represents residual impacts associated with the closed Leaking UST case BRRTS # 03-41-259729 which was used to characterize the fill prior to removal for construction of the parking structure.

Notes:

VOCs = Volatile Organic Compounds

PAHs = Polynuclear Aromatic Hydrocarbons

^A Parameter exceeds NR 720 Generic RCL for Non-Industrial Direct Contact.

^B Parameter exceeds NR 720 Generic RCL for Industrial Direct Contact.

^C Parameter exceeds NR 720 Generic RCL for Groundwater Pathway.

^D Generic RCL is established under NR 720 or NR 746

^E Generic RCLs provided in *Soil Cleanup Levels for PAHs Interim Guidance*, WDNR RR-5 1997

Bold Value = Generic RCL Exceedance

¹ Standards are for combined isomers, m,p-xylene and o-xylene.

* Concentration reported as "total xylenes" shown below as m,p-xylene.

— No Generic RCL established.

^J Value is between LOD and LOQ.

Generic RCLs not included in Wisconsin Administrative Code or Guidance is calculated from the US EPA Soil Screening Level Web Page and the default values contained in *Determining Residual Contaminant Levels using the EPA Soil Screening Level Web Site* WDNR PUB-RR-682

Table 2
Pre-Remediation Soil Laboratory Analytical Results - Fill Characterization Test Pits
Manpower Parking Structure
STS Project No. 200605829

Parameters	Generic RCLs				Groundwater Pathway	TP-2	TP-3	TP-4	TP-5	TP-6	TP-7	TP-8
	Direct Contact Pathway		Volatile Inhalation			0-7'	0-6.5'	0-6'	0-4.5'	0-4'	0-2'	0-7'
	Non-Industrial	Industrial	Non-Industrial	Industrial		9/20/2006	9/20/2006	9/20/2006	9/20/2006	9/20/2006	9/20/2006	9/20/2006
Metals (mg/kg)												
Arsenic	0.039 ^D	1.6 ^D	--	--	0.58	2.4 ^{ABC}	4.1 ^{ABC}	6.3 ^{ABC}	4.7 ^{ABC}	3.9 ^{ABC}	3.5 ^{ABC}	5.6 ^{ABC}
Barium	3,130	2.4 x 10 ⁵	--	--	3,300	22	112	76	107	69	132	137
Cadmium	8 ^D	510 ^D	--	--	1.5	<0.062	0.33	0.47	0.26	0.84	0.47	0.55
Chromium	16,000 ^D	1.53 x 10 ⁶	--	--	0.36	7.5 ^C	13.5 ^C	13.8 ^C	12.6 ^C	13.3 ^C	11.3 ^C	12.2 ^C
Lead	50 ^D	500 ^D	--	--	--	9.7	168 ^A	116 ^A	259 ^A	177 ^A	185 ^A	550 ^{AB}
Selenium	78.2	5,110	--	--	1	1.4 ^C	0.88	0.84	0.93	1.2 ^C	1.3 ^C	1.7 ^C
Silver	78.2	5,110	--	--	1.67	<0.31	<0.30	<0.30	<0.28	<0.31	<0.33	<0.31
Mercury	--	--	--	--	0.42	0.032	0.18	0.086	0.37	0.13	0.075	0.13
DRO (mg/kg)	--	--			100/250	9.3	66	34	36	62	100	66
Dry Weight (%)	--	--			--	92.8	88.1	87.7	87.4	87.6	88.6	85.9
Detected VOCs (µg/kg)												
1,3,5-Trimethylbenzene ¹	782,000	51,100,000	26,000	190,000	3520	<25	<25	<25	39	<25	<25	<25
Xylenes, total	3,130,000	204,000,000	260,000	1,800,000	4,100 ^D	<50	<50	<50	22	<50	<50	<50
PAHs (µg/kg)^E												
Acenaphthene	900,000	60,000,000	--	--	38,000	760	3,800	2,100	6,200	11,000	49,000 ^C	11,000
Acenaphthylene	18,000	360,000	--	--	700	<200	<1,100	<430	<1,100	<1,100	<11,000	<1,100
Anthracene	5,000,000	300,000,000	--	--	3,000,000	<410	<750	<300	870	1,100	<7,500	<1,500
Benzo(a)anthracene	88	3,900	--	--	17,000	310 ^A	1,200 ^A	750 ^A	2,100 ^A	4,500 ^{AB}	17,000 ^{ABC}	4,500 ^{AB}
Benzo(a)pyrene	8.8	390	--	--	48,000	340 ^A	1,200 ^{AB}	810 ^{AB}	1,900 ^{AB}	4,000 ^{AB}	16,000 ^{AB}	3,800 ^{AB}
Benzo(b)fluoranthene	88	3,900	--	--	360,000	310 ^A	1,400 ^A	840 ^A	2,400 ^A	4,100 ^{AB}	20,000 ^{AB}	4,700 ^{AB}
Benzo(ghi)perylene	1,800	39,000	--	--	6,800,000	230	900	520	1,400	2,500 ^A	11,000 ^A	2,600 ^A
Benzo(k)fluoranthene	880	39,000	--	--	870,000	150	530	320	900 ^A	1,600 ^A	6,900 ^A	1,700 ^A
Chrysene	8,800	390,000	--	--	37,000	340	1,700	1,100	3,000	6,400	22,000 ^A	5,300
Dibenzo(a,h)anthracene	8.8	390	--	--	38,000	<25	<130	<52	<130	<130	<1,300	<130
Fluoranthene	600,000	40,000,000	--	--	500,000	400	3,000	1,700	4,500	6,500	43,000	9,000
Fluorene	600,000	40,000,000	--	--	100,000	<94	<500	<200	590	1,000	<5,000	680
Indeno(1,2,3-cd)pyrene	88	3,900	--	--	680,000	310 ^A	1,100 ^A	670 ^A	1,800 ^A	2,400 ^A	13,000 ^{AB}	3,200 ^A
1-Methylnaphthalene	1,100,000	70,000,000	--	--	23,000	<220	<1,100	<460	<1,100	<1,100	<12,000	<1,200
2-Methylnaphthalene	600,000	40,000,000	--	--	20,000	<410	<2,200	930	2,700	3,900	<22,000	3,800
Naphthalene	20,000	110,000	--	--	400	<230	1,600 ^C	990 ^C	2,400 ^C	1,500 ^C	17,000 ^C	5,000 ^C
Phenanthrene	18,000	390,000	--	--	1,800	160	1,500	960	3,400 ^C	3,200 ^C	25,000 ^{AC}	5,300 ^C
Pyrene	500,000	30,000,000	--	--	8,700,000	820	3,900	2,800	6,800	7,000	73,000	12,000

Notes:

PVOCs = Volatile Organic Compounds

PAHs = Polynuclear Aromatic Hydrocarbons

¹ Standards are for 1,2,4- and 1,3,5-Trimethylbenzene combined.

³ Standards are for Total PCBs.

^A Parameter exceeds NR 720 Generic RCL for Non-Industrial Direct Contact.

^B Parameter exceeds NR 720 Generic RCL for Industrial Direct Contact.

^C Parameter exceeds NR 720 Generic RCL for Groundwater Pathway.

^D Generic RCL is established under NR 720 or NR 746

^E Generic RCLs provided in *Soil Cleanup Levels for PAHs Interim Guidance*, WDNR RR-5 1997

-- No Generic RCL established or not volatile.

Generic RCLs not included in Wisconsin Administrative Code or Guidance are calculated from the US EPA Soil Screening Level Web Page and the default values contained in *Determining Residual Contaminant Levels using the EPA Soil Screening Level Web Site* WDNR PUB-RR-682 on May 12, 2006.

NA = Not analyzed

Table 3
Post Excavation Soil Laboratory Analytical Results - Northwest Corner
Manpower Parking Structure
STS Project No. 200605829

Parameters	Generic RCLs			SOIL 1 11/2/2006	SOIL 2 11/2/2006	SOIL 3 11/2/2006
	Direct Contact Pathway		Groundwater Pathway ^C			
	Non-Industrial ^A	Industrial ^B				
Detected VOCs (µg/kg)						
Acetone	--	--	--	400	410 ^Q	350 ^Q
Naphthalene	60,000 ^E	4,000,000 ^E	400 ^E			55
Detected PAHs (µg/kg) ^E						
Benzo(a)pyrene	8.8	390	48,000	24 ^A	<1.9	82 ^A
Benzo(b)fluoranthene	88	3,900	360,000	<0.86	<0.84	46
Chrysene	8,800	390,000	37,000	16	<6.1	190
Fluoroanthene	600,000	40,000,000	500,000	96	49	310
Fluorene	600,000	40,000,000	100,000	31	<18	130 ^Q
1-Methylnaphthalene	1,100,000	70,000,000	23,000	160	87 ^Q	<220
2-Methylnaphthalene	600,000	40,000,000	20,000	230	140 ^Q	540 ^Q
Phenanthrene	18,000	390,000	1,800	87	44	260
Pyrene	500,000	30,000,000	8,700,000	310	110 ^M	990

Notes:

VOCs = Volatile Organic Compounds

PAHs = Polynuclear Aromatic Hydrocarbons

¹ Standards are for 1,2,4- and 1,3,5-Trimethylbenzene combined.^A Parameter exceeds NR 720 Generic RCL for Non-Industrial Direct Contact.^B Parameter exceeds NR 720 Generic RCL for Industrial Direct Contact.^C Parameter exceeds NR 720 Generic RCL for Groundwater Pathway.^D Generic RCL is established under NR 720 or NR 746^E Generic RCLs provided in *Soil Cleanup Levels for PAHs Interim Guidance*, WDNR RR-5 1997^M Analyte detected in associated Method Blank.^Q Value in between Limit of Detection and Limit of Quantitation

-- No Generic RCL calculated.

Generic RCLs not included in Wisconsin Administrative Code or Guidance are calculated from the US EPA Soil Screening Level Web Page and the default values contained in *Determining Residual Contaminant Levels using the EPA Soil Screening Level Web Site* WDNR PUB-RR-682 on May 12, 2006

NA = Not analyzed

Table 4
Groundwater Analytical Results
Manpower Parking Structure
STS Project No. 200605829

Parameters	NR 140 Standards		MW-17	MW-18	MW-20	MW-20	MW-21	MW-21
	ES	PAL	1/10/2006	1/10/2006	1/10/2006	5/1/2006	1/19/2006	5/1/2006
VOCs (µg/L)								
Acetone	1,000	200	32	54	<9.0	<9.0	<9.0	<9.0
1,2-Dichloroethane	5	0.5	<0.50	<0.50	<u>4</u>	<u>1.1</u>	<u>1.1</u>	<u>1.1</u>
Naphthalene	100	10	0.63	<0.60	<0.60	<0.60	<0.60	<0.60
Tetrachloroethene	5	0.5	<0.40	<0.40	<0.40	<0.40	0.46	<0.40
PAHs (µg/L)								
Benzo(a)anthracene	--	--	0.014	0.03	0.012	NA	0.15	NA
Benzo(a)pyrene	0.2	0.02	<0.011	<u>0.031</u>	0.012	NA	<u>0.11</u>	NA
Benzo(b)fluoranthene	0.2	0.02	0.011	<u>0.056</u>	0.018	NA	<u>0.17</u>	NA
Benzo(ghi)perylene	--	--	<0.024	0.054	<0.021	NA	0.11	NA
Benzo(k)fluoranthene	--	--	<0.0099	0.022	<0.0087	NA	0.073	NA
Chrysene	0.2	0.02	<0.060	<0.061	<0.053	NA	<u>0.18</u>	NA
Dibenzo(a,h,)anthracene	--	--	<0.068	<0.069	<0.060	NA	0.077	NA
Fluroanthene	400	80	0.098	0.18	0.06	NA	0.93	NA
Indeno(1,2,3-cd)pyrene	--	--	<0.027	0.056	0.024	NA	0.13	NA
Phenanthrene	--	--	0.17	0.10	<0.036	NA	0.96	NA
Pyrene	250	50	0.41	0.11	<0.030	NA	0.77	NA

Notes:

VOCs = Volatile Organic Compounds

PAHs = Polynuclear Aromatic Hydrocarbons

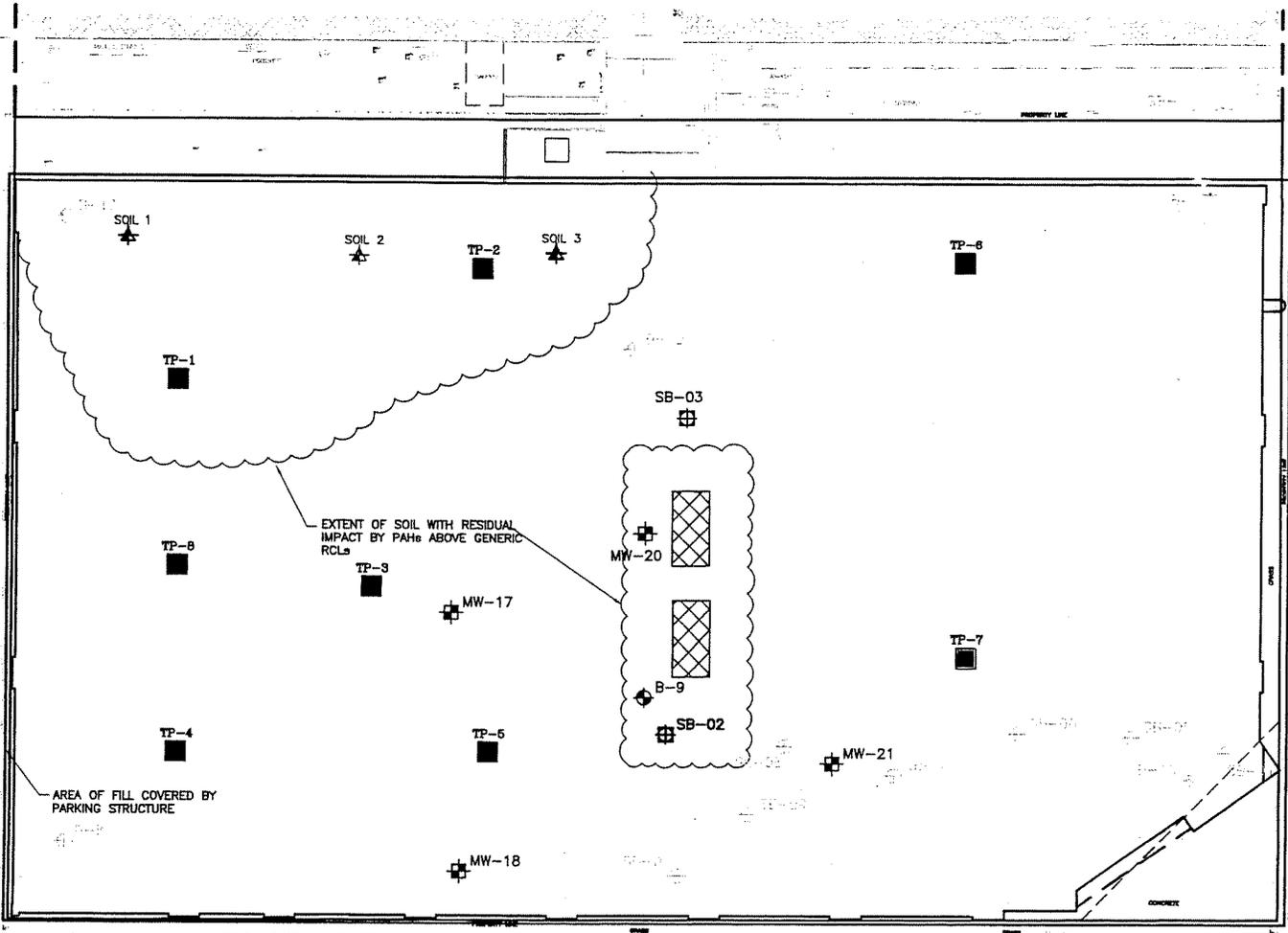
¹ Standards are for 1,2,4- and 1,3,5-Trimethylbenzene combined.² Standards are for Total Xylenes (-m, -p and -o).**Bold value** = NR 140 Enforcement Standard Exceedance - Wisconsin Administrative Code, NR140.10, Table 1, January 2007.*Italic value* = NR 140 WAC Preventive Action Limit Exceedance - Wisconsin Administrative Code, NR140.10, Table 1, January 2007.

-- No NR 140 ES or PAL established.

NA = Not analyzed

X:\Projects\563746C\dwg\parking structure - existing-8-30-07.dwg: 9/5/2007 10:00:08 AM: DREV, PAUL

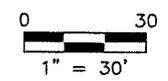
NORTH DR. MARTIN LUTHER KING JR. DRIVE



WEST CHERRY STREET

NORTH 2ND STREET

- LEGEND**
- CONCRETE PAVING
 - BUILDING ADJ. TO NORTH
 - POST EXCAVATION SOIL SAMPLE & NUMBER
 - GEOTECHNICAL SOIL BORING
 - MONITORING WELL & NUMBER (NOW ABANDONED)



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SITE LAYOUT - POST REMEDIATION
MANPOWER PARKING STRUCTURE
MILWAUKEE, WISCONSIN

Drawn:	PDD 08/30/2007
Checked:	LLA 08/30/2007
Approved:	KLB 08/30/2007
PROJECT NUMBER	200605829
FIGURE NUMBER	3

Date: October 22, 2007

Site Name: Manpower Parking Structure

Site Address: 210-230 W. Cherry Street

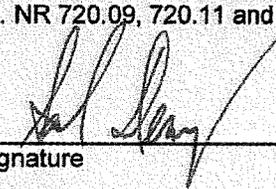
Milwaukee, WI 53212

Responsible Party: The Brewery Works, Inc.

Address: 1555 North River Center Drive, Suite 204

Milwaukee, WI 53212

I, the above named responsible party, certify that the attached legal description is complete and accurate for all of the property within or partially within the contaminated site's boundaries that have soil contamination that exceeds generic residual contaminant levels, as determined under ss. NR 720.09, 720.11 and 720.19 at the time of this case closure request.



Signature