

GIS REGISTRY

Cover Sheet

May, 2009
(RR 5367)

Source Property Information

CLOSURE DATE: Jul 21, 2009

BRRTS #: 02-41-552418
ACTIVITY NAME: Bresler-Eitel Property
PROPERTY ADDRESS: 525 W. Walnut Street
MUNICIPALITY: Milwaukee
PARCEL ID #: 361-0147-112-2

FID #:
DATCP #:
COMM #:

*WTM COORDINATES:

X: 689576 Y: 288705

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

WTM COORDINATES REPRESENT:

- Approximate Center Of Contaminant Source
 Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

Contaminated Media:

Groundwater Contamination > ES (236)

Contamination in ROW

Off-Source Contamination

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

Soil Contamination > *RCL or **SSRCL (232)

Contamination in ROW

Off-Source Contamination

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

Land Use Controls:

N/A (Not Applicable)

Soil: maintain industrial zoning (220)

*(note: soil contamination concentrations
between non-industrial and industrial levels)*

Structural Impediment (224)

Site Specific Condition (228)

Cover or Barrier (222)

*(note: maintenance plan for
groundwater or direct contact)*

Vapor Mitigation (226)

Maintain Liability Exemption (230)

*(note: local government or economic
development corporation)*

Monitoring Wells:

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

Yes No N/A

** Residual Contaminant Level*

***Site Specific Residual Contaminant Level*

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

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

BRRTS #: 02-41-552418

PARCEL ID #: 361-0147-112-2

ACTIVITY NAME: Bresler-Eitel Property

WTM COORDINATES: X: 689576 Y: 288705

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

- Closure Letter**
- Maintenance Plan** (if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)
- Conditional Closure Letter**
- Certificate of Completion (COC)** for VPLE sites

SOURCE LEGAL DOCUMENTS

- Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.

Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.

- Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

Figure #: **Title:** Plat of the Town of Milwaukee on the West Side of the River

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

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

Maps must be no larger than 8.5 x 14 inches unless the map is submitted electronically.

- Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.

Note: Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.

Figure #: 1 **Title:** Vicinity Diagram - with CAP MAINTENANCE PLAN

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

Figure #: 2 **Title:** Site Features Diagram - with Cap Maintenance Plan

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

Figure #: 3 **Title:** UST Features and Sample Locations Diagram

BRRTS #: 02-41-552418

ACTIVITY NAME: Bresler-Eitel Property

MAPS (continued)

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

Figure #: Title:

Figure #: Title:

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

Note: This is intended to show the total area of contaminated groundwater.

Figure #: Title:

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

Figure #: Title:

Figure #: Title:

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

Tables must be no larger than 8.5 x 14 inches unless the table is submitted electronically. Tables must not contain shading and/or cross-hatching. The use of **BOLD** or *ITALICS* is acceptable.

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

Table #: 1 Title: Soil Analytical Results

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

Table #: Title:

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

Table #: Title:

IMPROPERLY ABANDONED MONITORING WELLS

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.

Note: If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.

- Not Applicable**

- Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.

Note: If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.

Figure #: Title:

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

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

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

BRRTS #: 02-41-552418

ACTIVITY NAME: Bresler-Eitel Property

NOTIFICATIONS

Source Property

- Letter To Current Source Property Owner:** If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.
- Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying current source property owner.

Off-Source Property

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

- Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.
Note: Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.
Number of "Off-Source" Letters:
- Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying any off-source property owner.
- Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Letter To "Governmental Unit/Right-Of-Way" Owners:** Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
Number of "Governmental Unit/Right-Of-Way Owner" Letters:



November 24, 2009

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

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

Mr. David Buckley, Co-Trustee
For Clive B. Buckley Revocable Trust
Colliers Barry, Inc.
1232 N. Edison Street
Milwaukee, WI 53202

SUBJECT: Revision to Final Case Closure with Continuing Obligations
Bresler-Eitel Property, 525 W. Walnut Street, Milwaukee, WI
WDNR BRRTS Activity #: 02-41-552418, FID#341167200

Dear Mr. Buckley:

On October 29, 2009, you requested that the Department issue a revision to the case closure letter for the Bresler-Eitel Property, 525 W. Walnut Street, Milwaukee. The Department issued the original Final Case Closure with Continuing Obligations on July 21, 2009, which included a condition to maintain the property zoning and use as "industrial". In response to the information received, the industrial zoning condition will be removed, based on the maintenance of the direct contact barrier as required in the July 21, 2009 original case closure letter. This letter supersedes the original case closure letter, and will be added on the Remediation and Redevelopment Program's GIS Registry listing for the Bresler-Eitel site.

The closure request document, titled "Results of the UST Abandonment and Soil Disposal for the Bresler-Eitel Property Located at 525 West Walnut Street in Milwaukee, Wisconsin", was prepared and submitted on your behalf by Environmental & Development Solutions (EDS). An underground storage tank was discovered at the site, which was apparently used by previous property owners for storage of transformer oil. Soil samples collected in the vicinity of the tank found diesel range organic compounds and low level polychlorinated biphenyl compounds (PCBs). Near-surface impacted soil was excavated and disposed, the tank was emptied, cleaned and abandoned in place, and clean soil was placed above the tank. Some limited soil contamination remains in the vicinity of the tank, and may exist beneath the building to the north of the tank, and a cap maintenance plan has been submitted to require long-term maintenance of the clean soil above this contamination.

Based on the correspondence and data provided, it appears that your case meets the closure requirements in ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time, however, you and future property owners must comply with certain continuing obligations as explained in this letter.

GIS Registry

This site will be listed on the Remediation and Redevelopment Program's GIS Registry. The specific reasons are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed
- If a structural impediment that obstructed a complete site investigation or cleanup is removed or modified, additional environmental work must be completed
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier

This letter and information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If the property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

Closure Conditions

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. You must pass on the information about these continuing obligations to the next property owner or owners. 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. The Department intends to conduct inspections in the future to ensure that the conditions included in this letter, including compliance with referenced maintenance plans, are met.

Residual Soil Contamination

Residual soil contamination remains at S-1, S-2, S-3, S-4, S-5, S-6, S-7, and B-2, B-3, B-4, B-5, B-6, (locations shown on the attached map) based on the information submitted to the Department of Natural Resources. If soil in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Structural Impediments

Structural impediments existing at the time of cleanup, specifically the building to the north of the former tank, made complete investigation of the soil contamination on this property impracticable. Pursuant to s. 292.12(2)(b), Wis. Stats., if the structural impediments on this property that are described above are to be removed, the property owner shall notify the Department of Natural Resources before removal and conduct an investigation of the degree and extent of diesel range organic compounds and PCB contamination. If contamination is found at that time, the contamination shall be properly remediated in accordance with applicable statutes and rules.

Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the building foundation or soil cover that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. In this case, the building is also considered a structural impediment, and additional investigation and response requirements apply as outlined above under the section titled Structural Impediments. The attached maintenance plan and inspection log are to be kept up-to-date and on-site. Please submit the inspection log to the Department only upon request.

Prohibited Activities

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; 6) construction or placement of a building or other structure.

Vapor Migration

In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of 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.

Post-Closure Notification Requirements

In accordance with ss, 292.12 and 292.13, Wis. Stats., you must notify the Department before making changes that affect or relate to the conditions of closure in this letter. For this case, examples of changed conditions requiring prior notification include, but are not limited to:

- Any activity or construction that results in the removal or modification of a structural impediment that obstructed a complete site investigation or cleanup
- Disturbance, construction on, change or removal in whole or part of pavement, an engineered cover or a soil barrier that must be maintained over contaminated soil

Please send written notifications in accordance with the above requirements to the **WDNR Southeast Region Headquarters**, to the attention of **RR Program Environmental Program Associate**.

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 Pam Mylotta at 414-263-8758.

Sincerely,



James A. Schmidt, Team Supervisor
Southeast Region Remediation & Redevelopment Program

Attachments: Cap Maintenance Plan

cc: Trent Ott – Environmental & Development Solutions, Inc.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

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

July 21, 2009

Mr. Clive Buckley
3550 Chesterfield Drive
Brookfield, WI 53005

SUBJECT: Final Case Closure with Continuing Obligations
Bresler-Eitel Property, 525 W. Walnut Street, Milwaukee, WI
WDNR BRRTS Activity #: 02-41-552418, FID#341167200

Dear Mr. Buckley:

On July 16, 2009, the Wisconsin Department of Natural Resources reviewed the above referenced case for closure. The Department reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. The closure request document, titled "Results of the UST Abandonment and Soil Disposal for the Bresler-Eitel Property Located at 525 West Walnut Street in Milwaukee, Wisconsin", was prepared and submitted on your behalf by Environmental & Development Solutions (EDS). An underground storage tank was discovered at the site, which was apparently used by previous property owners for storage of transformer oil. Soil samples collected in the vicinity of the tank found diesel range organic compounds and low level polychlorinated biphenyl compounds (PCBs). Near-surface impacted soil was excavated and disposed, the tank was emptied, cleaned and abandoned in place, and clean soil was placed above the tank. Some limited soil contamination remains in the vicinity of the tank, and may exist beneath the building to the north of the tank, and a cap maintenance plan has been submitted to require long-term maintenance of the clean soil above this contamination.

Based on the correspondence and data provided, it appears that your case meets the closure requirements in ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time, however, you and future property owners must comply with certain continuing obligations as explained in this letter.

GIS Registry

This site will be listed on the Remediation and Redevelopment Program's GIS Registry. The specific reasons are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed
- If a structural impediment that obstructed a complete site investigation or cleanup is removed or modified, additional environmental work must be completed
- Before the land use may be changed from industrial to non-industrial, additional environmental work must be completed
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier

This letter and information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If the property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in

accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

Closure Conditions

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. You must pass on the information about these continuing obligations to the next property owner or owners. 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. The Department intends to conduct inspections in the future to ensure that the conditions included in this letter, including compliance with referenced maintenance plans, are met.

Residual Soil Contamination

Residual soil contamination remains at S-1, S-2, S-3, S-4, S-5, S-6, S-7, and B-2, B-3, B-4, B-5, B-6, (locations shown on the attached map) based on the information submitted to the Department of Natural Resources. If soil in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Structural Impediments

Structural impediments existing at the time of cleanup, specifically the building to the north of the former tank, made complete investigation of the soil contamination on this property impracticable. Pursuant to s. 292.12(2)(b), Wis. Stats., if the structural impediments on this property that are described above are to be removed, the property owner shall notify the Department of Natural Resources before removal and conduct an investigation of the degree and extent of diesel range organic compounds and PCB contamination. If contamination is found at that time, the contamination shall be properly remediated in accordance with applicable statutes and rules.

Industrial Residual Soil Standards

Soil samples that are representative of remaining soil contamination on this property were collected on September 8, 2008. These samples contained PCBs in concentrations that meet the site-specific industrial soil standards developed for this site. Therefore, pursuant to s. NR 726.05(8)(b)1., Wis. Adm. Code, this property 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) the property owner provides notification to the Department of Natural Resources of the change in land use and an investigation is conducted, to determine the degree and extent of PCB contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards.

Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the building foundation or soil cover that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. In this case, the building is also considered a structural impediment, and additional investigation and response requirements apply as outlined above under the section titled Structural Impediments. The attached maintenance plan and inspection log are to be kept up-to-date and on-site. Please submit the inspection log to the Department only upon request.

Prohibited Activities

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; 6) construction or placement of a building or other structure.

Vapor Migration

In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of 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.

Post-Closure Notification Requirements

In accordance with ss, 292.12 and 292.13, Wis. Stats., you must notify the Department before making changes that affect or relate to the conditions of closure in this letter. For this case, examples of changed conditions requiring prior notification include, but are not limited to:

- Any activity or construction that results in the removal or modification of a structural impediment that obstructed a complete site investigation or cleanup
- Development, construction or other changes, including zoning changes, that change the land use from industrial to non-industrial
- Disturbance, construction on, change or removal in whole or part of pavement, an engineered cover or a soil barrier that must be maintained over contaminated soil

Please send written notifications in accordance with the above requirements to the **WDNR Southeast Region Headquarters**, to the attention of **RR Program Environmental Program Associate**.

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 Pam Mylotta at 414-263-8758.

Sincerely,



James A. Schmidt, Team Supervisor
Southeast Region Remediation & Redevelopment Program

Attachments: Cap Maintenance Plan

cc: Trent Ott – Environmental & Development Solutions, Inc.

CAP MAINTENANCE PLAN

525 W. W Walnut Street, Milwaukee, Wisconsin

DNR BRRTS # 02-41-552418

May 30, 2009

This Cap Maintenance Plan (the "Plan") has been prepared in accordance with ch. NR 724.13(2) Wis. Adm. Code, and shall be applicable to the Property located at 525 W. Walnut Street in Milwaukee, Wisconsin (the "Property").

A copy of this Plan shall be kept on file with the current Property owner and its successors. This Plan has been developed for the existing ground surface at the Property that is serving as a direct contact barrier ("Cap") for residual soil impacts at the Property.

1. Property Owner. Clive Buckley c/o David Buckley, 3550 Chesterfield Drive, Brookfield, WI 53005, (414) 795-4443.
2. Consultant. Environmental & Development Solutions, Inc., 6637 N. Sidney Place, Milwaukee, Wisconsin 53209. Richard W. Frieseke, President - (414) 228-9810.
3. Property Information. 525 W. Walnut Street in Milwaukee, Wisconsin. The Property location and features are illustrated on the attached Exhibits A and B.
4. Nature and Extent of Contamination. One transformer oil underground storage tank (UST) was abandoned in-place at the property and remedial activities have been conducted. The results of remedial activities at the Property indicated the presence of diesel range organics (DRO) and/or polychlorinated biphenyls (PCBs) in the soils from 3 to 12 feet below grade at the Property. The residual soil impacts will be addressed by maintaining the existing Cap and maintaining the fenced enclosure around the capped area as depicted on the attached Exhibit C.

5. Normal Operation and Maintenance – Ch. NR 724.13(2)(b). Per a condition of closure, the Cap and fenced enclosure must be maintained at the Property. The Cap and fence will be inspected once a year, normally in the spring after the snow and ice are melted. The inspection will be documented on the attached inspection log (Exhibit D). Any disturbances of the Cap or fence noted during the inspection, such as significant rutting or significant erosion, burrowing or other damage shall be repaired within a reasonable period of time after discovery. Any alterations or repairs to the Cap or fence shall be documented on the attached inspection log, and the documentation shall be kept on file by the Property owner with a copy of this Plan. A copy of this Plan and any additions to the Plan shall be made available for inspection by representatives of the DNR upon reasonable requests during normal business hours of the Property owner.

6. Cap Modification and Replacement. If it becomes necessary or desirable to remove or alter the existing Cap or fence, the Cap or fence so removed or altered shall be replaced with another equivalent barrier, and shall be maintained on the Property in compliance with this Plan. If impacted materials are excavated from the Property during the Cap modification, they will require proper handling and/or disposal in accordance with applicable State of Wisconsin regulations.

7. Plan Amendment or Withdrawal. The Plan can be amended or withdrawn by the Property owner or its successors with the written approval of the DNR.

080801g

In Col of deeds page 330.
 13 of same plat 14-6

PLAT 3-104
 4th Pte. (Church) now CSM 3952 - Rec 1339 Image 909
 + 15 NOWCSM 5026, REEL 2145 IM 2471

Know all men by these presents that we the undersigned for parties hereunto and them as the "Town of Milwaukee" situate on the West side of Milwaukee River in the County of Milwaukee and Territory of Wisconsin this Town Plat comprises the South half of Section 16 twenty in Township 12 seven North of Range 12 twenty two East, also Lots 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

ALL BK 62 LTS 1-8 BK 63
 NOW CSM 6234. R. 3120 I. 11
 FT 11, All LT12, BK 59 NKA
 Cawker Bldg Condo, R. 3458, I. 5
 LTS 7+8 BK 58, Now River, Fro.
 LOFTS Condos R. 4213, I. 113
 LTS 1-6, BK 1 Now CSM 6675
 R. 4588 I 2676
 LTS 9, 12, 13, 16, BK 85 N/K/A
 Warehouse Lofts Condo
 Dec# 8556391, Rec 3006 18, Dec
 LTS 9-16, 19-20, BK 71, Now CSM 76
 Doc # 9019311 5/21
 LTS 1-13 BK 30, PT of LTS 1-3 BK 31, LTS 1-8
 LTS 1-11 BK 32, LTS 1-3 BK 33 on 6/2/2008
 LTI BK 40, Now CSM 7775 Doc# 9057626
 LTS 1-12, 7, LT 13 BK 108 Now CSM 7801
 Doc # 935 7342 on 12/1/2006
 LTS 1-3, PT LTS 3-5 + 10-14 BK 121, LTS 1-16 1
 NOW CSM 7862 # 935 7343 on 12/1/2006

PLAT OF THE TOWN
 OF MILWAUKEE
 ON THE WEST SIDE OF THE RIVER
 Surveyed by Garrett Hill
 Scale 4000 ft to an inch.

ON 12/21/2006
 LTS 1-21, BK 107, Now CSM 7864 # 9357342
 LTS 7-10, BK 36, Now CSM 7724
 Rec 3-18-2007
 LTS 7-21, BK 106, LTS 13-14, BK 112
 LTS 1-2 + 11-16 BK 113, LTS 1-3, BK 122
 Now CSM 8016, Recd 12-21-07



June 4, 2009

Mr. Pam Mylotta
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr. Dr.
Milwaukee, WI 53212

RE: Site Closure with GIS Registry for the Bresler Eitel Property, Located at 525 West Walnut Street in Milwaukee, Wisconsin — EDS Project No. 080801

Dear Ms. Mylotta:

The site is located at 525 West Walnut Street in Milwaukee, Wisconsin. I have provided the necessary information in order to obtain site closure with placement of the property on the DNR's soil GIS registry. To the best of my knowledge, I believe that the legal description attached to this statement is complete and accurate.

Respectfully,

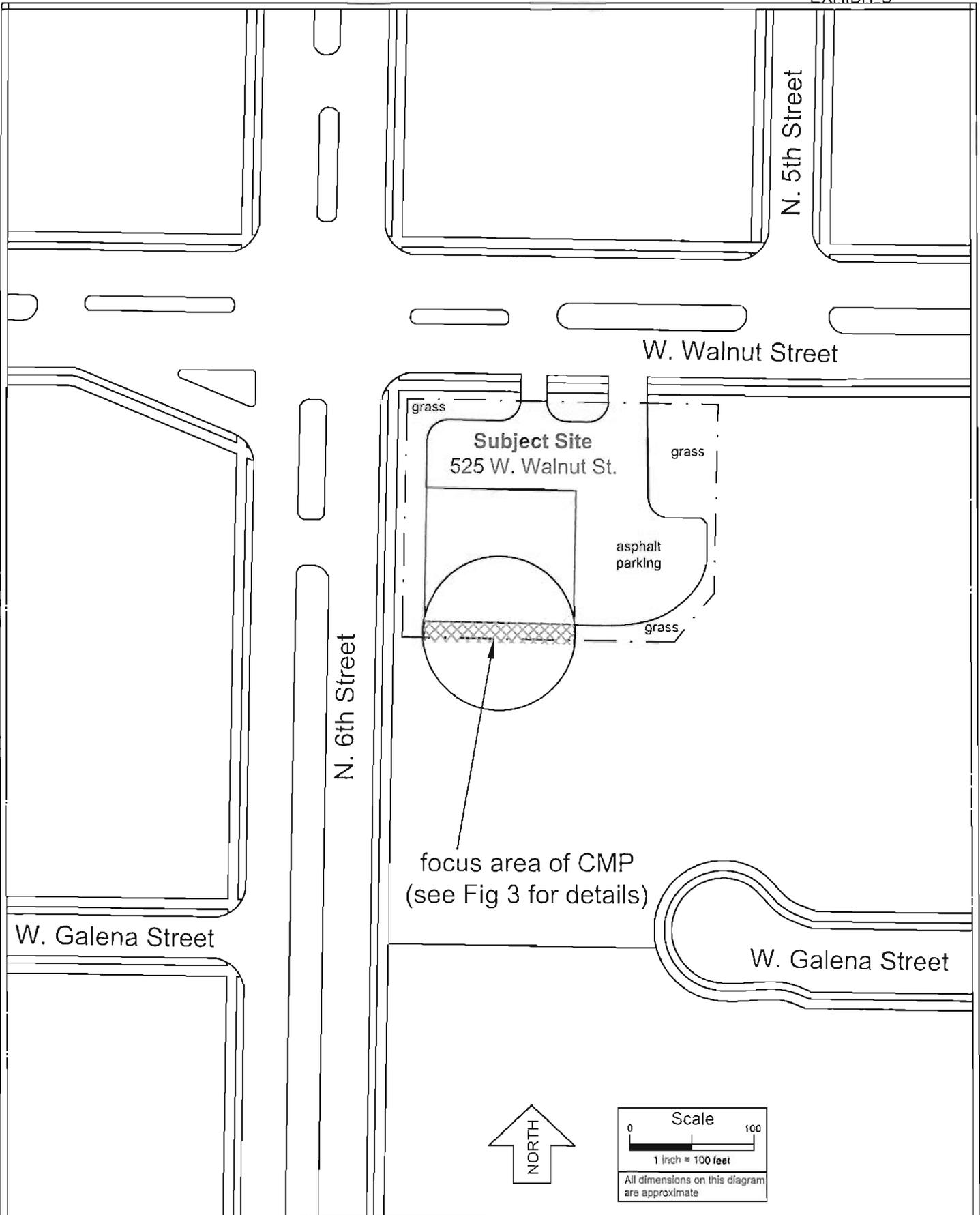
A handwritten signature in black ink that reads "Clive Buckley". The signature is written in a cursive style with a large, looping "y" at the end.

Mr. Clive Buckley



<p>Approximate Scale 1" = 1,600'</p>	<p>United States Geologic Society Topographic Map Milwaukee Quadrangle NW 1/4 of SE 1/4 of Sec 20, T7N, R22E</p>	
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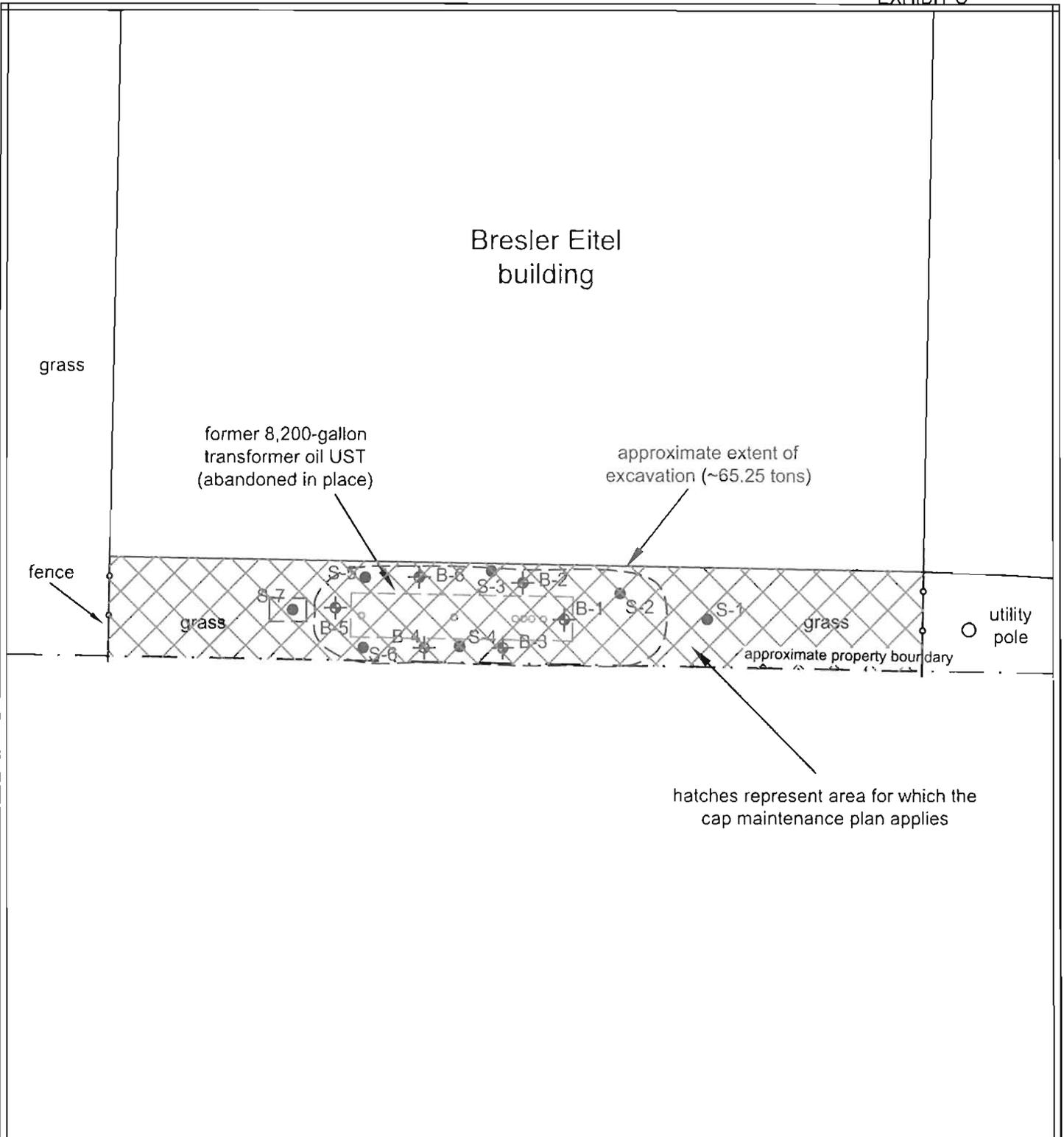
	<p>Site Location Diagram Bresler Eitel Property 525 W. Walnut Street Milwaukee, Wisconsin</p>	<p>Figure 1</p>
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File No.: 080801c
 DWG Date: 2-18-09
 Rev Date: 7-16-09
 Drawn By: JEB
 Checked By (PM): TJO

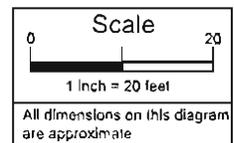
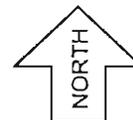
Site Features Diagram
 Bresler Eitel Property
 525 W. Walnut Street
 Milwaukee, Wisconsin

Figure
 2



KEY

- ⊕ = previous soil boring
- = excavation soil sample

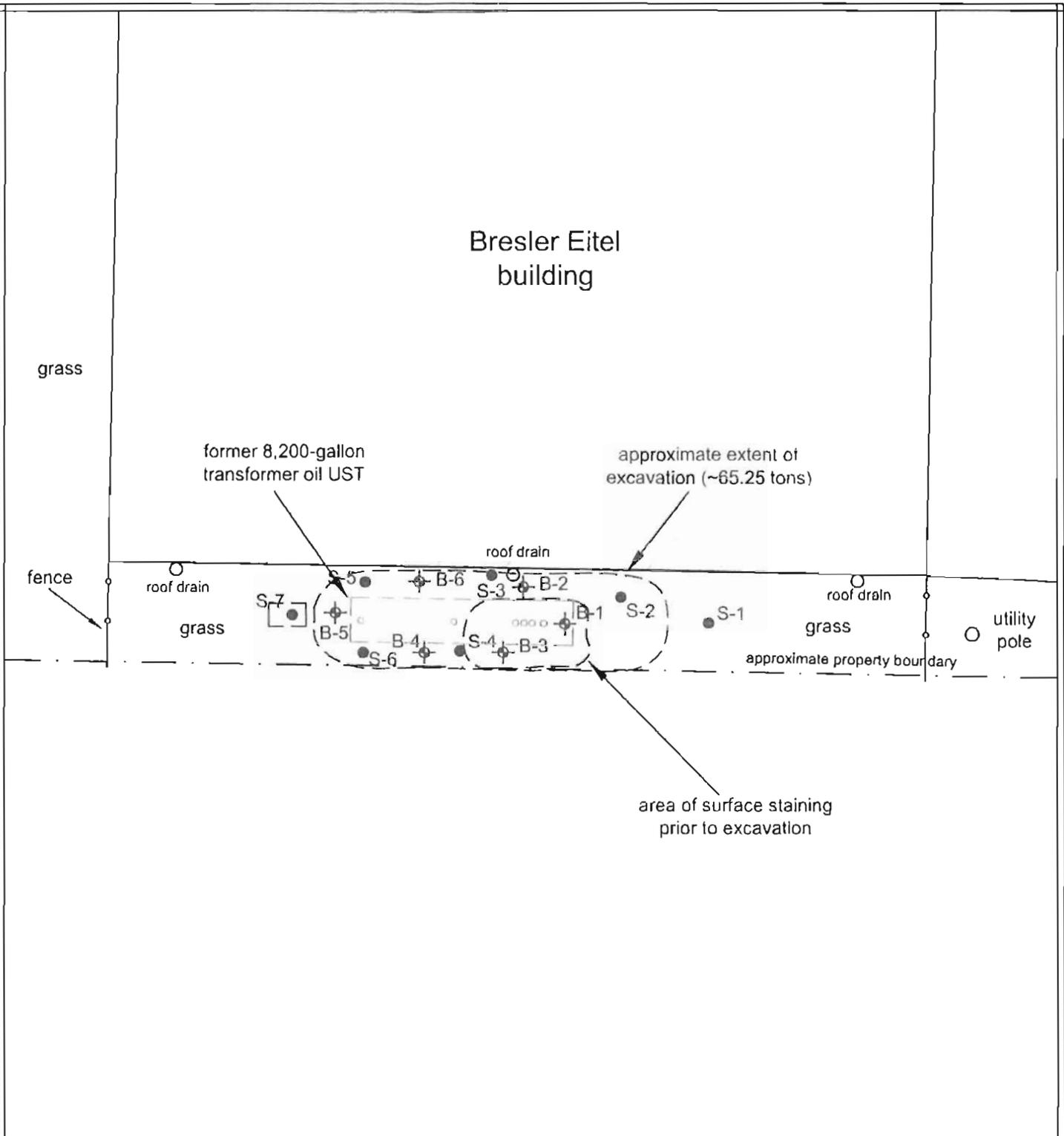


File No.: 080801d
 DWG Date: 2-18-09
 Rev Date: 7-16-09
 Drawn By: JEB
 Checked By (PM): TJO

Cap Maint. Plan Area and Sample Locations Diagram
 Bresler Eitel Property
 525 W. Walnut Street
 Milwaukee, Wisconsin

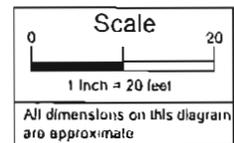
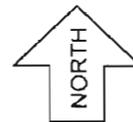
Figure
 3

Bresler Eitel building



KEY

- ⊕ = previous soil boring
- = excavation soil sample



File No.: 080801b
 DWG Date: 2-18-09
 Rev Date: 2-19-09
 Drawn By: JEB
 Checked By (PM): RWF

UST Features and Sample Locations Diagram

Bresler Eitel Property
 525 W. Walnut Street
 Milwaukee, Wisconsin

Figure

3

TABLE 1
 Soil Analytical Results
 Bresler- Eitel Property - 525 W. Walnut Street
 Milwaukee, Wisconsin

Sample Description	S-1	S-2	S-3	S-4	S-5	S-6	S-7	GW RCLs	DC RCLs
Sample Date	9/18/08	9/18/08	9/18/08	9/18/08	9/18/08	9/18/08	9/18/08		
Sample Depth (feet)	1'	3'	3'	3'	2'	2'	3'		
Diesel Range Organics (mg/kg)	101	3,400	221	468	136	801	453	250	NS
Volatle Organic Compounds (µg/kg)									
benzene	ND	5.5	*2,900						
naphthalene	ND	ND	36.7J	131	ND	ND	ND	400	110,000
ethylbenzene	ND	2,900	*400,000						
1,1,1-Trichloeoethane	ND	ND	45.5J	ND	ND	ND	ND	*1,600	NS
tetrachloroethene	ND	ND	42.9J	ND	ND	ND	ND	*4.1	*35,000
1,2,4-trimethylbenzenes	ND	ND	105.5	ND	ND	ND	ND	*1,400	*350,000
total xylenes	ND	4,100	*2,000,000						
PCBs (ug/kg)									
PCB-1016	ND	210	41,000						
PCB-1221	ND	NS	1,400						
PCB-1232	ND	NS	1,400						
PCB-1242	ND	NS	1,400						
PCB-1248	42	726	104J	244	43J	280	64	NS	1,400
PCB-1254	122	405	333	228	98J	499	170	54	1,400
PCB-1260	62	150	187	69J	65J	178	62	NS	1,400
PCB-Total	228	1,280	624	541	206	957	296	21	1,400

Notes:

1. GW RCLs are generic standards for the groundwater pathway.
1. DC RCLs are generic standards for the direct contact pathway.
2. * Calculated Industrial RCLs were obtained from EPA website with Wisconsin defaults.
3. PCB standards are from the EPA Region III RBC Table

TABLE 1
Soil Analytical Results Summary (DRO, VOCs & PCBs)
Bresler Eitel
525 West Walnut Street
Milwaukee, WI
Sample Date: 11/08/06

Analyte	Sample Location												WAC NR720.09 RCL ₈	NR746.06 Table 1	NR746.06 Table 2
	B-1		B-2		B-3		B-4		B-5		B-6				
Sample Depth (feet)	2-3	8-12	4-8	8-12	0-4	4-8	0-4	4-5	8-12	12-16	8-12	12-16			
PID(IU)	7	0	7	0	2	0	0	8	6	0	5	NA			
DRO(mg/kg)	8,500	33	500	33	2,600	15	6,900	7,600	2,800	37	900	8.9	100	NS	NS
VOCs(ug/kg)															
Benzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	5.5	8,500	1,100
Bromobenzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Bromochloromethane	<80	<42	<39	NA	NA	NA	NA	NA	<40	NA	<42	<42	NS	NS	NS
Bromodichloromethane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Bromoform	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Bromomethane	<230	<120	<110	NA	NA	NA	NA	NA	<120	NA	<120	<120	NS	NS	NS
n-Butylbenzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Sec-Butylbenzene	250	<30	76	NA	NA	NA	NA	NA	80	NA	110	<30	NS	NS	NS
Tert-Butylbenzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Carbon Tetrachloride	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Chlorobenzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Chlorodibromomethane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Chloroethane	<110	<60	<55	NA	NA	NA	NA	NA	<58	NA	<60	<60	NS	NS	NS
Chloroform	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Chloromethane	<110	<60	<55	NA	NA	NA	NA	NA	<58	NA	<60	<60	NS	NS	NS
2-Chlorotoluene	<110	<60	<55	NA	NA	NA	NA	NA	<58	NA	<60	<60	NS	NS	NS
4-Chlorotoluene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,2-Dibromo-3-chloropropane	<110	<60	<55	NA	NA	NA	NA	NA	<58	NA	<60	<60	NS	NS	NS
1,2-Dibromoethane (EDB)	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Dibromomethane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,2-Dichlorobenzene	140	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,3-Dichlorobenzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,4-Dichlorobenzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Dichlorodifluoromethane	<110	<60	<55	NA	NA	NA	NA	NA	<58	NA	<60	<60	NS	NS	NS
1,1-Dichloroethane	<57	31	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,2-Dichloroethane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS

Analyte	Sample Location												WAC NR720.09 RCLs	NR746.06 Table 1	NR746.06 Table 2
	B-1		B-2		B-3		B-4		B-5		B-6				
Sample Depth (feet)	2-3	8-12	4-8	8-12	0-4	4-8	0-4	4-5	8-12	12-16	8-12	12-16			
1,1-Dichloroethene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Cis-1,2-Dichloroethene	<57	32	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Trans-1,2-Dichloroethene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,2-Dichloropropane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,3-Dichloropropane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
2,2-Dichloropropane	<57*	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30*	<30	NS	NS	NS
1,1-Dichloropropene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Cis-1,3-Dichloropropene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Trans-1,3-Dichloropropene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
2,3-Dichloropropene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Isopropyl Ether	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Ethylbenzene	150	<30	98	NA	NA	NA	NA	NA	<29	NA	<30	<30	2,900	4,600	NS
Hexachlorobutadiene	<80	<42	<39	NA	NA	NA	NA	NA	<40	NA	<42	<42	NS	NS	NS
Isopropylbenzene	79	<30	56	NA	NA	NA	NA	NA	<29	NA	40	<30	NS	NS	NS
p-Isopropyltoluene	520	<30	43	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Methylene Chloride	<110	<60	<55	NA	NA	NA	NA	NA	<58	NA	<60	<60	NS	NS	NS
Methyl tert-Butyl Ether	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Naphthalene	250	<60	120	NA	NA	NA	NA	NA	<58	NA	62	<60	NS	2,700	NS
n-Propylbenzene	250	<30	130	NA	NA	NA	NA	NA	36	NA	95	<30	NS	NS	NS
Styrene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,1,1,2-Tetrachloroethane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,1,2,2-Tetrachloroethane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Tetrachloroethene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Toluene	<57	34	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	1,500	38,000	NS
1,2,3-Trichlorobenzene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,2,4-Trichlorobenzene	<57	<30*	<28*	NA	NA	NA	NA	NA	<29*	NA	<30	<30*	NS	NS	NS
1,1,1-Trichloroethane	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
1,1,2-Trichloroethane	<57	<42	<39	NA	NA	NA	NA	NA	<40	NA	<42	<42	NS	NS	NS
Trichloroethene	<57	<30	<28	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	NS	NS
Trichlorofluoromethane	<57*	<30*	<28*	NA	NA	NA	NA	NA	<29*	NA	<30*	<30*	NS	NS	NS
1,2,3-Trichloropropane	<110	<60	<55	NA	NA	NA	NA	NA	<58	NA	<60	<60	NS	NS	NS
1,2,4-Trimethylbenzene	4,400	<30	690	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	83,000	NS
1,3,5-Trimethylbenzene	1,200	<30	120	NA	NA	NA	NA	NA	<29	NA	<30	<30	NS	11,000	NS
Vinyl Chloride	<80	<42	<39	NA	NA	NA	NA	NA	<40	NA	<42	<42	NS	NS	NS
Xylenes, total	450	<100	320	NA	NA	NA	NA	NA	<98	NA	<100	<100	4,100	42,000	NS

Analyte	Sample Location												WAC NR720.09 RCLs	NR746.06 Table 1	NR746.06 Table 2
	B-1		B-2		B-3		B-4		B-5		B-6				
Sample Depth (feet)	2-3	8-12	4-8	8-12	0-4	4-8	0-4	4-5	8-12	12-16	8-12	12-16			
PCBs(ug/kg)															
PCB-1016	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS
PCB-1221	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS
PCB-1232	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS
PCB-1242	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS
PCB-1248	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS
PCB-1254	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS
PCB-1260	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS
PCB-1268	<285	<300	<277	<294	<290	<294	<289	<284	<288	<275	<299	<299	NS	NS	NS

Notes:

PID: 11.7 eV Photoionization Detector
DRO: Diesel Range Organics
VOCs: Volatile Organic Compounds
PCBs: Polychlorinated Biphenyl Compounds
WAC: Wisconsin Administrative Code
NR: Natural Resources Chapter
RCLs: Residual Contaminant Levels
IU: Instrument Units

mg/kg: milligrams per kilogram
ug/kg: micrograms per kilogram
NA: Not Analyzed
NS: No Standard Established
*: indicates laboratory data qualifier present (see complete lab report)
BOLD result exceeds WAC NR720.09 RCLs
<: indicates no laboratory detection at the stated concentration