GIS REGISTRY
Cover Sheet

July, 2008
(RR 5367)

Source Property Information

CLOSURE DATE: Jan 14, 2009

BRRTS #: **02-41-553127**

FID #: 341116600

ACTIVITY NAME: West Milwaukee Center - TCF Bank

DATCP #:

PROPERTY ADDRESS: 1441 Miller Parkway

COMM #:

MUNICIPALITY: West Milwaukee

PARCEL ID #: 457-0469-005

***WTM COORDINATES:**

X: **685565** Y: **284562**

** 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:

☐ Soil: maintain industrial zoning *(220)*

*(**note:** soil contamination concentrations between residential 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 properly abandoned? *(234)*

◉ Yes ○ No ○ N/A

** Residual Contaminant Level*
***Site Specific Residual Contaminant Level*

State of Wisconsin Department of Natural Resources http://dnr.wi.gov	**GIS Registry Checklist** Form 4400-245 (R 4/08) Page 1 of 3

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 #: 06-41-543975 PARCEL ID #: part of 457-0469-005

ACTIVITY NAME: West Milwaukee Center- TCF Bank WTM COORDINATES: X: 685565 Y: 284562

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

- [ ] **Closure Letter**
- [x] **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**
- [x] **Certificate of Completion (COC)** for VPLE sites

SOURCE LEGAL DOCUMENTS

- [x] **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.* Attachment A
- [x] **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:**~~ Attachment B
- [x] **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. Attachment A

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.

- [x] **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 #: **Title:** Attachment C
- [x] **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 #: **Title:** Attachment D - w/ Maintenance Plan
- [x] **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 #: **Title:** Attachment H w/ Maintenance Plan

BRRTS #: 06-41-543975 ACTIVITY NAME: West Milwaukee Center TCF Bank

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:** Attachment F w/ Maintenance Plan

☐ **Groundwater Flow Direction Map:** A map that represents groundwater movement at the site. If the flow direction varies by more then 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 #: A-3, A-4, A-5, A-6, **Title:** Attachment E

☒ **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 #: B-2, B-3, B-5 **Title:** Attachment E

☒ **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 #: B-1 **Title:** Attachment G

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 #: 06-41-543975 ACTIVITY NAME: West Milwaukee Center-TCF Bank

NOTIFICATIONS

Source Property – NA

☐ **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 – NA

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:

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

January 14, 2009

Richard Thiermann
TCF National Bank
500 W. Brown Deer Rd
Milwaukee, WI 53217

SUBJECT: Final Case Closure with Land Use Limitations or Conditions and Status of Voluntary Party Liability Exemption
West Milwaukee Center – TCF Bank, 1441 Miller Park Way, West Milwaukee, WI
WDNR BRRTS Activity #: 02-41-553127, 06-41-543975, FID#341116600

Dear Mr. Thiermann:

On December 9, 2008, the Department of Natural Resources reviewed the above referenced case for closure and for final Voluntary Party Liability Exemption requirements. The Department reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. Based on that review, the Department requested submittal of certain forms and a map revision, to be reviewed for the closure decision. On January 5, 2009, the Department received a submittal from The Sigma Group, providing the requested documents.

Your property was originally a portion of the former RHI Holdings Inc. property, which was purchased for redevelopment into the West Milwaukee Center. Previous property owners began the assessment and developed and received Department approval for the remedial action plans and Conditional Grant of Exemption for Historic Fill Site development. Your consultant, Sigma Group, conducted additional subsurface assessment work and also provided the final remedial and case closure documentation. Contaminants found on the TCF Bank parcel were primarily polynuclear aromatic hydrocarbons (PAHs) in soil and to a lesser extent in groundwater. No specific sources for these contaminants were found on or immediately adjacent to the TCF Bank parcel. Although the historic fill site development exemption that was issued by the WDNR did include the TCF Bank parcel, subsurface investigation conducted within this parcel did not identify any significant waste fill materials. To address the presence of PAHs in near surface soil at concentrations exceeding accepted risk based levels, the redevelopment features (building, pavement, soil cover) will be maintained as direct contact barriers.

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.

GIS Registry

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

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier.

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

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. 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.

Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement, building foundation and 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. If soil at the site 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 attached maintenance plan and inspection log are to be kept up-to-date and on-site, and the inspection log need only be submitted to the Department upon request.

Prohibited Activities

The following activities are prohibited on any portion of the property where pavement, a building foundation, soil cover, 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.

Chapter NR 140, Wis. Adm. Code Exemption

Recent groundwater monitoring data at this site indicates exceedances of the NR 140 preventive action limit (PAL) for benzo(a)pyrene, benzo(b) fluoranthene, and chrysene at MW-20 and 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.

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 limited occurrence of these contaminants. 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, and chrysene at MW-20. This letter serves as your exemption.

Voluntary Party Liability Exemption Status

As you are aware, s. 292.15, Wis. Stats., authorizes the Department to issue a Certificate of Completion to a voluntary party that conducts an approved environmental investigation of a property and restores the environment to the extent practicable and minimizes the harmful effects with respect to hazardous substance discharges on or originating from the property. Based on the information received by the department, the Department has determined that the investigation and cleanup of the Property is complete and that all the conditions in s. 292.15(2), Wis. Stats., have been met. Your Certificate of Completion is being reviewed and routed for signature by the Secretary of the Department. We will notify you if any information or fees are required prior to your Certificate issuance.

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 Pamela Mylotta at (414) 263-8758.

Sincerely,

James A. Schmidt

James A. Schmidt
Southeast Remediation & Redevelopment Team Supervisor

cc: Mafizul Islam – Sigma Group
Bill Phelps, DG/2

BARRIER MAINTENANCE PLAN

WEST MILWAUKEE CENTER – TCF BANK
1441 MILLER PARK WAY, WEST MILWAUKEE, WISCONSIN
DECEMBER 2008

Legal Description: See attached description.

Parcel ID Number: part of 457-0469-005

BRRTS#: 06-41-543975

In accordance with Ch. NR 724.13(2), Wis. Admin. Code, this Barrier Operation and Maintenance Plan (BOMP) is designed to limit direct contact with and limit infiltration of surface precipitation to the known residual soil contamination as shown in Figures 1 and 2. Site investigation activities at the site have shown shallow soil at the site to contain relatively low concentrations of PAHs and metals above direct-contact Residual Contaminant Levels. The concrete slab, asphalt pavement, and/or clean soil fill, or any replacement barrier, will function as intended unless disturbed.

Disturbance Management. The site owner shall take the following steps to assure that uncontrolled disturbances of the barrier do not occur:

- A copy of this BOMP will be available on-site from the property owner to all interested parties.
- A copy of this BOMP will be provided to all private utilities seeking easements for the purpose of installing facilities on the property.
- A copy of this BOMP will be provided to all contractors and repair workers during any intrusive subsurface work on this portion of the property.
- On-site personnel employed by future business operators will be made familiar with the contents and restriction requirements of this BOMP.

Inspections of Barrier. Inspections will be required to assure that the barrier is functioning as intended:

- Annual inspections of the paved surfaces will be performed by authorized personnel from the site owner, and will include observations about the integrity of the paved surfaces in the vicinity of the residual soil impacts. Inspections will be compared to the previous inspection notes to monitor the relative condition of the paved surface.
- As necessary, the engineered barriers will be repaired to maintain integrity. Repairs may include, but are not limited to, patching or replacing the paved surface where it has cracked or otherwise broken, and filling in areas of topsoil if erosion or other displacement occurs.

- An inspection log will be maintained on-site to record any disturbances of the barrier and the steps that have been taken to repair and maintain the integrity of the barrier. The inspection log will be made available for inspection by representatives of the Wisconsin Department of Natural Resources, its successors and/or other state or municipal agency upon reasonable prior request. The on-site inspection log will be maintained as long as inspection and maintenance of the barrier is required. A copy of the log is attached hereto.

Planned Breaches of Barrier. In the event that a planned breach of the barrier is required, the following precautions shall be taken:

- The site owner shall be given 48-hour notice of any planned breach.

- During breaches of the barrier, if material is excavated from beneath the barrier, the excavated material will be periodically screened for the presence of volatile organic vapors using a photo-ionization detector (PID), organic vapor monitor (OVM), or other comparable instrument. If an unexpected soil condition is observed during excavation activities (e.g. PID readings exceeding 10 ppm, obvious volatile organci compound (VOC) odor, free product in soil, or drums) the impacted soil should be sampled and disposed of at a licensed landfill facility in accordance with applicable solid and hazardous waste rules and regulations.

- Any material excavated from beneath the barrier that does not contain unexpected conditions as described above may be returned to the excavation prior to the restoration of the barrier. The excavation zone and any soils excavated will be secured from public access until the barrier is restored. While on-site, the excavated soil will be placed on an impervious surface (e.g., existing concrete and/or plastic) and covered with plastic. Soil that cannot be returned to the excavation will be sampled and disposed of at a licensed landfill facility in accordance with applicable solid and hazardous waste rules and regulations. All contaminated soils that are stored, treated, excavated, removed, or transported off-site shall be managed per procedures and reporting requirements set forth in ch. NR 500, Wisconsin Administrative Code.

- The barrier will be restored to meet original conditions. This work, including the proper disposal of excess soils, should be completed within 72 hours following the completion of any on-site work, or as soon as reasonably practical.

- Details of the barrier breach, the handling of excavated soils, individuals responsible for the work, and the restoration of the barrier shall be recorded in the barrier maintenance log.

- This BOMP can be amended or withdrawn by the property owner or successors with the written approval of the Wisconsin Department of Natural Resources.

Contact Information.

For responsible party information contact:

Mr. Richard Thiermann – Vice President
TCF National Bank
500 W. Brown Deer Rd.
Milwaukee, WI 53217

For environmental consultant information contact:

Mr. Mafizul Islam, P.E.
Sigma Environmental Services, Inc.
1300 West Canal Street
Milwaukee, WI 53233
Telephone: (414) 643-4200
Fax: (414) 643-4210

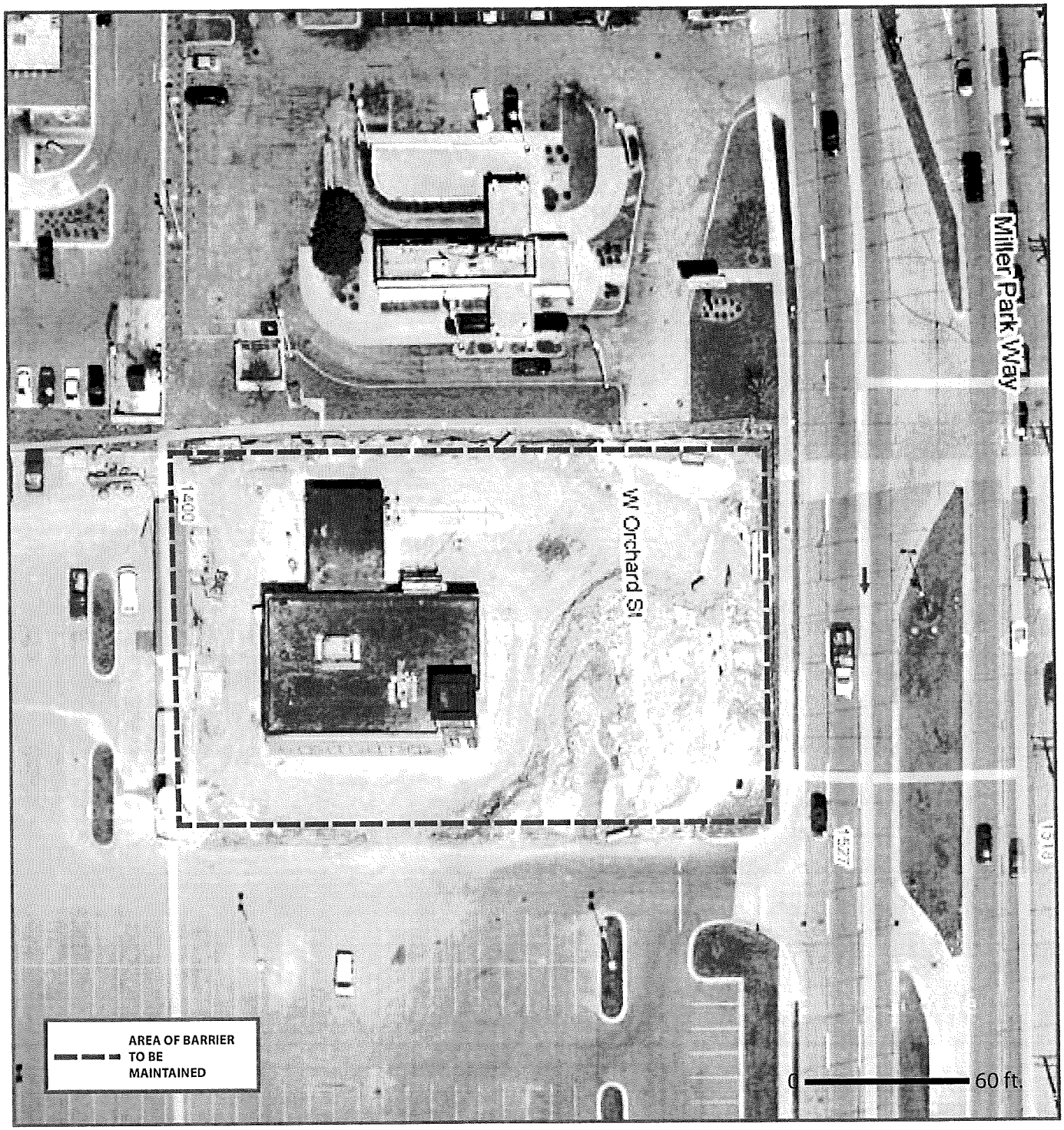
For Wisconsin Department of Resources

Wisconsin Department of Natural Resources
Remediation and Redevelopment Program
2300 N. Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53212

EXHIBIT A

LEGAL DESCRIPTION

Lot 3 of Certified Survey Map No. 7203, recorded on February 27, 2003 on Reel 5528, Image 2799 as Document No. 8464849, being a division of Lots 22 through 42 and part of Lots 1 through 21 in Block 6, Lots 21 through 40 and part of Lots 1 through 20 in Block 7, Lots 1 through 21 in Block 11, Lots 1 through 7 in Block 10 and portions of vacated South 44th Street, West Orchard Street, West Lapham Street and alley all in Juneau Heights Subdivision. Also part of Lot 1 and part of Lots 2, 5 and 6 in Block 16 and part of Lot 1 Block 18 in Assessor's Plat No. 290, all being in the Northeast ¼ and Southeast ¼ of the Northeast ¼ of Section 2, Town 6 North, Range 21 East, in the Village of West Milwaukee, Milwaukee County, Wisconsin.



Client:	TCF Bank	THE SIGMA GROUP — Single Source. Sound Solutions. — www.thesigmagroup.com, 1300 West Canal Street, Milwaukee, WI 53233, 414-643-4200
Site Address:	1441 Miller Park Way West Milwaukee, WI 53217	N
Project:	#11458	**FIGURE 1** **SITE PLAN MAP**

Exhibit A

Barrier Inspection Log

Inspection Date	Inspector	Condition of Cap	Recommendations	Have recommendations from previous inspection been implemented? Who did work, what was done & when?

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

WISCONSIN
DEPT. 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

September 4, 2009

Richard Thiermann
TCF National Bank
500 W. Brown Deer Rd
Milwaukee, WI 53217

File Ref: FID#341116600
BRRTS#06-41-543975

Subject: A *Certificate of Completion* for the Environmental Investigation and Cleanup of Property Owned by TCF National Bank, located at 1441 Miller Park Way, West Milwaukee, Wisconsin

Dear Mr. Thiermann:

Congratulations on your successful completion of the Voluntary Party Liability Exemption process for the TCF National Bank property at 1441 Miller Park Way, in West Milwaukee! We are pleased to send you the *Certificate of Completion* for your property. Your investigation and remediation project at this property received case closure status in January of this year.

As you are aware, s. 292.15 Wisconsin Statutes authorizes the Department to issue a *Certificate of Completion* to a voluntary party that conducts an approved environmental investigation of a property and restores the environment to the extent practicable and minimizes the harmful effects with respect to hazardous substance discharges on or originating from the property. Based on the information received by the department, the Department has determined that the investigation and cleanup of the Property is complete and that all the conditions in s. 292.15(2), Wis. Stats., have been met. Attached is the *Certificate of Completion* for this Property.

The Department appreciates the work undertaken by TCF National Bank to investigate and cleanup contamination associated with the Property. The exemption provided by the *Certificate of Completion* applies to any successor or assignee of TCF National Bank, if the successor or assignee complies with the appropriate conditions, pursuant to s. 292.15(3), Wis. Adm. Code. If you have any questions or concerns regarding this letter or the *Certificate of Completion*, please call me at 414-263-8758.

Sincerely,

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

Attachment: *Certificate of Completion*

cc: Michael Prager – DNR Land Recycling Program - RR/3
Kathleen Strasbaugh- DNR Program Attorney - LS/5
James A. Schmidt – RR Program Supervisor – Southeast Region
Mafizul Islam – The Sigma Group

State of Wisconsin
Department of Natural Resources

CERTIFICATE OF COMPLETION OF RESPONSE ACTIONS UNDER SECTION 292.15(2)(a), WIS. STATS.

Whereas, **TCF National Bank** has applied for an exemption from liability under s. 292.15, Wis. Stats., for property located at **1441 Miller Park Way, West Milwaukee**, which is commonly referred to as TCF Bank, further described in the legal description found on Attachment A ("the Property");

Whereas, an environmental investigation of the Property has been conducted and has determined that contamination exists at the Property;

Whereas, **TCF National Bank** has submitted to the Wisconsin Department of Natural Resources ("WDNR") investigation reports and a remedial action plan for the Property which comply with the requirements set forth in chs. NR 700-754, Wis. Adm. Code, consisting of the documents and reports listed in Attachment B;

Whereas, in accordance with s. 292.15(2)(a), Wis. Stats., the WDNR has determined that an environmental investigation has been conducted which adequately identified and evaluated the nature and extent of the hazardous substance discharges on the Property and WDNR has approved of the remedial action plan for the Property;

Whereas, the WDNR has granted **TCF Bank** an exemption under **s. NR 140.28(2)(a), Wis. Adm. Code**, for having **benzo(a)pyrene, benzo(b) fluoranthene, and chrysene** in the groundwater above the ch. NR 140 preventive action limit;

Whereas, the Property, with soil contamination (polycyclic aromatic hydrocarbons – PAH's) that exceeds residual contaminant levels ("RCLs") under ch. NR 720, Wis. Adm. Code, will be included on the WDNR's Geographical Information System Registry of Closed Remediation Sites ("the GIS Registry") pursuant to s. 292.12(3), Wis. Stats. **TCF National Bank** has submitted to the WDNR all the information necessary to be included on the Registry pursuant to s. NR 726.05(2)(a)3, Wis. Adm. Code;

Whereas, on January 14, 2009, WDNR determined that response actions necessary to restore the environment to the extent practicable with respect to the discharges and minimize the harmful effects from the discharges to the air, land, and waters of the state were completed, and issued a case closure letter for the Property (Attachment C) based on the current land use as a retail business/ office and parking lot. The WNDR that requires maintenance of a surface barrier in order to prevent direct contact with residual soil contamination (polycyclic aromatic hydrocarbons – PAH's) that might otherwise pose a threat to public health. The case closure letter described the following requirements to which current and future Property owners must adhere:

> Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement, building foundation and 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. If soil at the site 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 attached maintenance plan and inspection log are to be kept up-to-date and on-site, and the inspection log need only be submitted to the Department upon request.
>
> The following activities are prohibited on any portion of the Property where pavement, a building foundation, soil cover, 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.

Whereas, the WDNR determination that the response action is complete with regards to residual soil contamination that may pose a human health threat through direct contact was based on the Property being used as a retail business/ office and parking lot. In the event that the cover barrier areas that currently exist are removed, the replacement barrier must be equally protective. In the event there is a proposed land use change at the Property, the existing cover would need to be re-evaluated to determine if it is protective based on future land uses. If these requirements are not followed, or if the land use changes, the WDNR may take actions under ss. 292.11 or 292.12, Wis. Stats., to ensure compliance with the specified

requirements and the person who owns or controls the Property may no longer qualify for the liability protections under s. 292.15, Wis. Stats.;

Therefore, based upon the information that has been submitted to the WDNR, the WDNR hereby certifies that the response actions set forth in the WDNR approved remedial action plan for the Property and any other necessary response actions have been completed.

Upon issuance of this Certificate, **TCF National Bank** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to the existence of hazardous substances on or originating from the Property, the release of which occurred prior to the date the department approved the environmental investigation required under s. 292.15(2)(a)1., Wis. Stats. However, **TCF National Bank** and a person otherwise qualified for protection under s. 292.15(3), Wis. Stats., who owns or controls the Property would no longer qualify for this liability exemption if that person fails to maintain or monitor the Property as required by the conditions in the January 14, 2009, case closure letter and the maintenance plan, ss. 292.12 and 292.15, Wis. Stats., this Certificate, and administrative rules promulgated by the WDNR. Any discharges of a hazardous substance to or from the Property that occur after the date that the environmental investigation was approved will be the responsibility of the person that caused the discharge or the person who possesses or controls that discharge.

The protection from liability provided under s. 292.15(2), Wis. Stats., does not apply to any person who has obtained a Certificate of Completion by fraud or misrepresentation, or by the knowing failure to disclose material information or under circumstances in which **TCF National Bank** knew or should have known about more discharges of hazardous substances than was revealed by the investigation approved by the WDNR.

Nothing in this Certificate or in s. 292.15, Wis. Stats., affects the authority of the WDNR to exercise any powers or duties under applicable laws other than ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to any release or threatened release of contaminants at the Property, or the right of the WDNR to seek relief available against any person who is not entitled to protection from liability under s. 292.15, Wis. Stats., with respect to such release or threatened release.

SIGNED AND CERTIFIED this 27 day of August, 2009.

Matthew Frank, Secretary
Wisconsin Department of Natural Resources

ATTACHMENT A
LEGAL PROPERTY DESCRIPTION
TCF Bank - 1441 Miller Park Way

See attached Special Warrant Deed Doc. # 08910605 Recorded with Milwaukee County Register of Deeds Office on December 6, 2004.

SPECIAL WARRANTY DEED

* 0 8 9 1 0 6 0 5 *

DOC.# 08910605

REGISTER'S OFFICE | SS
Milwaukee County, WI

RECORDED 12/06/2004 03:14PM

JOHN LA FAVE
REGISTER OF DEEDS

AMOUNT:15.00

THIS SPECIAL WARRANTY DEED made between

WEST MILWAUKEE RETAIL LIMITED PARTNERSHIP,

a Wisconsin limited partnership

Grantor,

and

TCF NATIONAL BANK

Grantee,

WITNESSETH, That the said Grantor, for a valuable consideration conveys to Grantee the following described real estate and improvements located thereon in Milwaukee County, State of Wwisconsin, and legally described on Exhibit A, attached hereto, and by this reference incorporated herein, subject to those matters shown on Exhibit B, attached hereto and by this reference incorporated herein together with all the hereditaments and appurtenances thereunto belonging or in any way appertaining thereto.

Return Address:
COOK & FRANKE MIKE LUND
660 E. MASON ST
MILWAUKEE WI 53202

Tax Parcel No. Part of 457-0469-005

Except as set forth above, Grantor, for itself and its successors, warrants that it has not done, nor suffered to be done, anything whereby the premises granted hereby are, or may be, encumbered or charged, and warrants and will defend the premises unto Grantee, and its successors and assigns, against any person lawfully claiming or to claim the same or any part thereof by, through and under Grantor, but not otherwise.

This is not homestead property.

Dated this 3 day of DECEMBER 2004.

TRANSFER
$2,700.00
FEE

WEST MILWAUKEE RETAIL LIMITED PARTNERSHIP (SEAL)
a Wisconsin limited partnership
By: West Milwaukee Retail I, Inc, general partner

By: _____
James C. Wallace, Jr. President

AUTHENTICATION

Signature(s) of JAMES C. WALLACE, JR.

authenticated this 3RD day of DECEMBER 2004.

* _____
Title: MEMBER STATE BAR OF WISCONSIN

This document was drafted by:
Paul G. Sherburne

ACKNOWLEDGMENT

STATE OF WISCONSIN)
) SS
COUNTY OF _____)

Personally came before me this _____ day of _____ 2003 the above-named _____

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

* _____
Notary Public, _____ County, Wisconsin.
My Commission is permanent/expires _____

EXHIBIT A

LEGAL DESCRIPTION

Lot 3 of Certified Survey Map No. 7203, recorded on February 27, 2003 on Reel 5528, Image 2799 as Document No. 8464849, being a division of Lots 22 through 42 and part of Lots 1 through 21 in Block 6, Lots 21 through 40 and part of Lots 1 through 20 in Block 7, Lots 1 through 21 in Block 11, Lots 1 through 7 in Block 10 and portions of vacated South 44th Street, West Orchard Street, West Lapham Street and alley all in Juneau Heights Subdivision. Also part of Lot 1 and part of Lots 2, 5 and 6 in Block 16 and part of Lot 1 Block 18 in Assessor's Plat No. 290, all being in the Northeast ¼ and Southeast ¼ of the Northeast ¼ of Section 2, Town 6 North, Range 21 East, in the Village of West Milwaukee, Milwaukee County, Wisconsin.

EXHIBIT B

PERMITTED EXCEPTIONS

General taxes for the year 2004

Utility Easement granted to Wisconsin Electric Power Company and Wisconsin Telephone Company recorded as Document No.4561968.

Easements, if any, of the public or any school district, utility, municipality or person, as provided in Section 80.32(4) of the Statutes, for the continued use and right of entrance, maintenance, construction and repair of underground or overground structures, improvements or service in that portion of the subject premises which were formerly a part of streets and alleys now vacated.

Covenants, conditions and restrictions set forth in Declaration of Restrictive Covenant, recorded as Document No.6682094, providing for no forfeiture or reversion of title in case of violation.

Covenants, conditions and restrictions set forth in Memorandum of Lease, executed by WEST MILWAUKEE RETAIL LIMITED PARTNERSHIP to CHILI'S OF WISCONSIN, INC., dated August 12, 2003, recorded September 2, 2003, Reel 5658 Image 3835, as Document No.8611198, providing for no reversion of title in case of violation.

Memorandum of Development Agreement recorded as Document No 8668434.

Operation and Easement Agreement recorded as Document No 8539219

Utility Easement granted to Wisconsin Electric Power Company recorded as Document No.8518499.

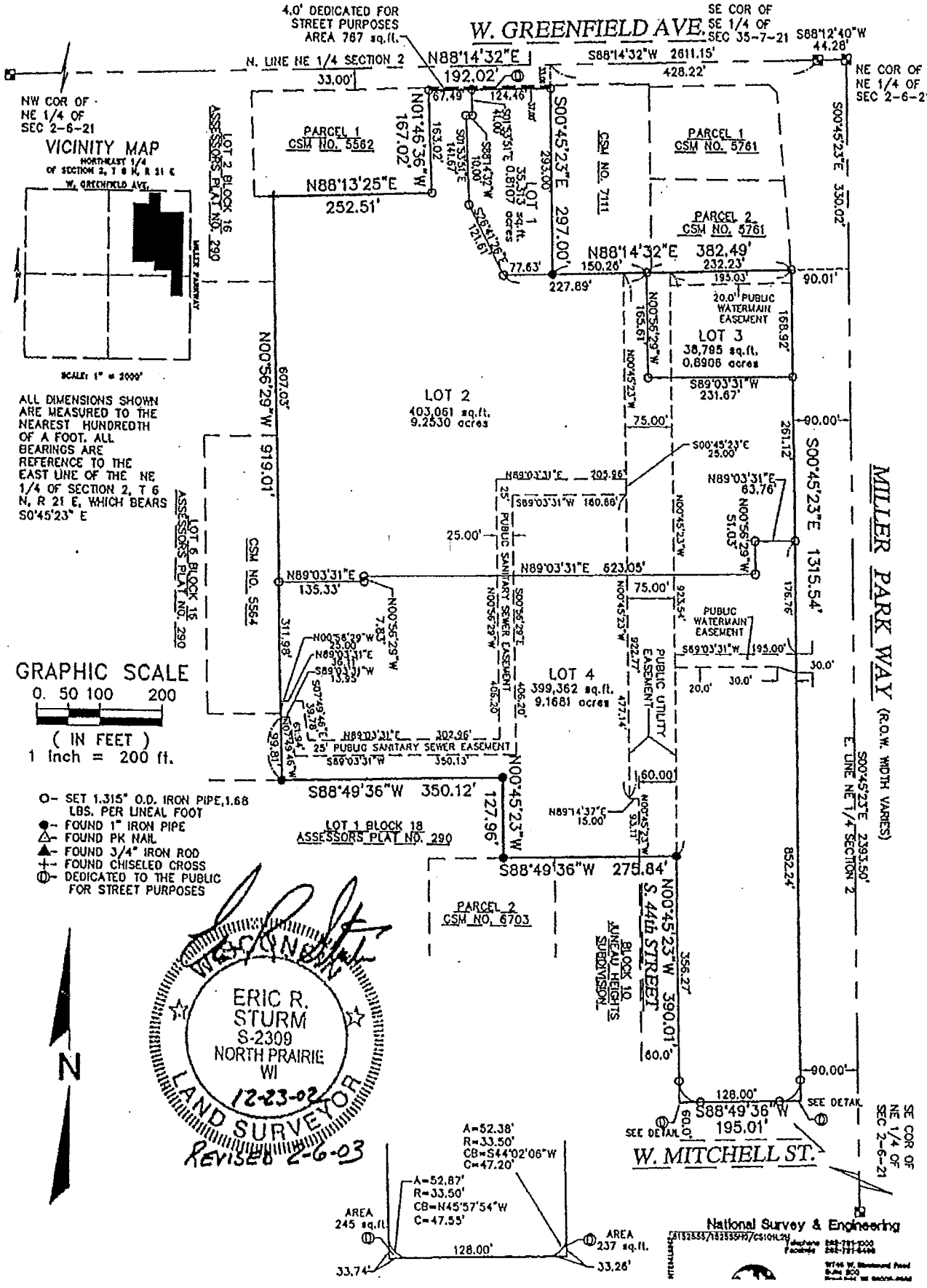
Public utility and water main easements set forth on Certified Survey Map No.7203.

Rights of the Village of West Milwaukee and the West Milwaukee Community Development Authority by reason of the fact that the subject premises are included in the Updated and Amended Comprehensive Redevelopment Plan for the 43rd Street Corridor Project Area of the Village of West Milwaukee, Wisconsin. A certified copy of said Redevelopment Plan was recorded in the office of the Register of Deeds for Milwaukee County on April 5, 2000, as Document No.7892665.

Covenants, conditions and restrictions set forth in Amended and Restated Easement Agreement with Covenants and Conditions by and between West Milwaukee Retail Limited Partnership and H&K Partners, LLC, dated November 30, 2004, recorded in the Office of Register of Deeds for Milwaukee County on December 6, 2004 as Document No. 08910604.

CERTIFIED SURVEY MAP NO. 7203

BEING A DIVISION OF LOTS 22 THRU 42 AND PART OF LOTS 1 THRU 21 IN BLOCK 6, LOTS 21 THRU 40 AND PART OF LOTS 1 THRU 20 IN BLOCK 7, LOTS 1 THRU 21 IN BLOCK 11, LOTS 1 THRU 7 IN BLOCK 10 AND PORTIONS OF VACATED SOUTH 44th STREET, WEST ORCHARD STREET, WEST LAPHAM STREET AND ALLEY ALL IN JUNEAU HEIGHTS SUBDIVISION, ALSO LOT 1 AND PART OF LOTS 2, 5 AND 6 IN BLOCK 16 AND PART OF LOT 1 BLOCK 18 IN ASSESSOR'S PLAT NO. 290, ALL BEING IN THE NORTHEAST 1/4 AND SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 2, TOWN 6 NORTH, RANGE 21 EAST, IN THE VILLAGE OF WEST MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN.



ATTACHMENT B
INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS
TCF Bank - 1441 Miller Park Way

Originating within FID#341116600

1. August 19, 2005, Sigma Group submittal "RE: Separate VPLE Application/Request for Case Closure, TCF Bank Property, West Milwaukee Center Site"
2. October 6, 2005, WDNR letter to TCF National Bank, Regarding "Approval to Proceed in the Voluntary Party Liability Exemption (VPLE) Process"
3. December 23, 2008, Sigma Group submittal regarding "Additional Information, West Milwaukee Center – TCF Bank Site", containing case closure form and GIS Registry packet
4. January 14, 2009, WDNR letter to TCF National Bank, regarding "Final Case Closure with Land Use Limitations or Conditions and Status of Voluntary Party Liability Exemption, West Milwaukee Center – TCF Bank, 1441 Miller Park Way, West Milwaukee, WI"

Originating within FID#241496310

1. January 22, 1993, Woodward-Clyde Consultants, "Notification of Apparent Petroleum Product Release"
2. March 16, 1993, WDNR Responsible Letter to RHI Holdings, Inc. for "Contaminated soils on RHI Holdings property, South 43rd and West Greenfield Avenue, West Milwaukee"
3. April 9, 1993, Woodward-Clyde Consultants, "Work Plan for Site Investigation Activities, Former Industrial Site, 43rd & Greenfield, West Milwaukee, Wisconsin"
4. June 29, 1993, Woodward-Clyde Consultants, "Request for Exemption to Construct a Building"
5. July 5, 1995, Eder Associates "Addendum to 1993 Request for Exemption to Construct a Building on an Abandoned Landfill"
6. November 29, 1995, Eder Associates, "Proposed Remedial Investigation Work Plan, RHI Holdings, Inc., West Milwaukee, WI"
7. March 1, 1996, WDNR letter to Eder Associates, regarding "Proposed Remedial Investigation Workplan"
8. November 28, 2000, Arcadis Geraghty & Miller, "Phase I Environmental Site Assessment, RHI Holdings Property, West Milwaukee, WI"
9. November 28, 2000, Arcadis Geraghty & Miller, "Work Plan for Phase II Environmental Site Assessment, RHI Holdings, Inc. Property, West Milwaukee, WI"
10. September 6, 2001, Gannett Fleming, "Phase II Work Plan, RHI Holdings, Inc., West Milwaukee, Wisconsin"
11. October 18, 2001, WDNR Letter to RHI Holdings, Inc., regarding "Phase II Work Plan, Voluntary Party Liability Exemption Process, RHI Holdings, Inc. Property, 1501 S. 43rd St. (Miller Parkway), West Milwaukee"
12. November 8, 2001, Gannett Fleming, "Phase II Work Plan, Voluntary Party Liability Exemption Process, RHI Holdings, Inc. Property, 1501 S. 43rd Street (Miller Parkway), West Milwaukee"

ATTACHMENT B (Continued)
INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS
TCF Bank - 1441 Miller Park Way

13. February 5, 2002, Gannett Fleming, "Revised Phase II Work Plan, RHI Holdings, Inc., West Milwaukee, Wisconsin"
14. March 22, 2002, Gannett Fleming, "Revised Figures and Tables for Work Plan, RHI Holdings, Inc. West Milwaukee, Wisconsin"
15. April 11, 2002, WDNR Letter to RHI Holdings, Inc., regarding "Revised Phase II Work Plan, Voluntary Party Liability Exemption Process, RHI Holdings, Inc. Property, 1501 S. 43rd St. (Miller Parkway), West Milwaukee"
16. April 16, 2002, WDNR Letter to RHI Holdings, Inc., regarding "Revision to Phase II Work Plan, Voluntary Party Liability Exemption Process, RHI Holdings, Inc. Property, 1501 S. 43rd St. (Miller Parkway), West Milwaukee"
17. July 1, 2002, Gannett Fleming, "Site Investigation Status Report – Area 20"
18. December 19, 2002, Gannett Fleming, Information & Data packet, RHI Holdings, including soil analytical data tables, boring logs, maps, discussion memorandum
19. January 7, 2003, Gannett Fleming, "Remedial Action Plan, RHI Holdings, West Milwaukee"
20. February 7, 2003, Gannett Fleming, "Work Plan for Soil Gas Investigations"
21. March 17, 2003, Gannett Fleming, "Soil Gas Investigation Report"
22. April 11, 2003, West Milwaukee Retail L.P., Form 4400-226, "Development at Historic Fill Site or Licensed Landfill Exemption Application"
23. May 2003, Gannett Fleming, "Soil Management Plan, West Milwaukee Center Site, West Milwaukee, Wisconsin"
24. May 8, 2003, WDNR Letter to RHI Holdings, regarding "Conditional Approval of Remedial Action Plan, Voluntary Party Liability Exemption Process, RHI Holdings, Inc. Property, 1501 S. 43rd St. (Miller Parkway), West Milwaukee"
25. May 13, 2003, Gannett Fleming, "Soil Management Plan, Former RHI Holdings, Inc., West Milwaukee, Wisconsin"
26. May 13, 2003, Gannett Fleming, "April 2003 Groundwater Sample Analytical Results & Abandonment Forms"
27. June 6, 2003, WDNR Letter to West Milwaukee Retail, L.P., regarding "Condtional Grant of Exemption for the Development of the West Milwaukee Center Site Where Solid Waste has been Disposed"

ATTACHMENT C
WDNR CASE CLOSURE LETTER & BARRIER OPERATION AND MAINTENANCE PLAN
TCF Bank - 1441 Miller Park Way

See attached January 14, 2009 Case Closure Letter and the Barrier Operation and Maintenance Plan

GIS Registry P cket
West Milwauk e Center – TCF Bank

STATEMENT BY RESPONSIBLE PARTY

TCF National E nk, the responsible party for the property located at 1441 Miller Park Way, West Milwauk e, Wisconsin, states that the legal description for each property within the contaminated s te boundaries for case file reference 06-41-543975 is attached.

TCF National Bank

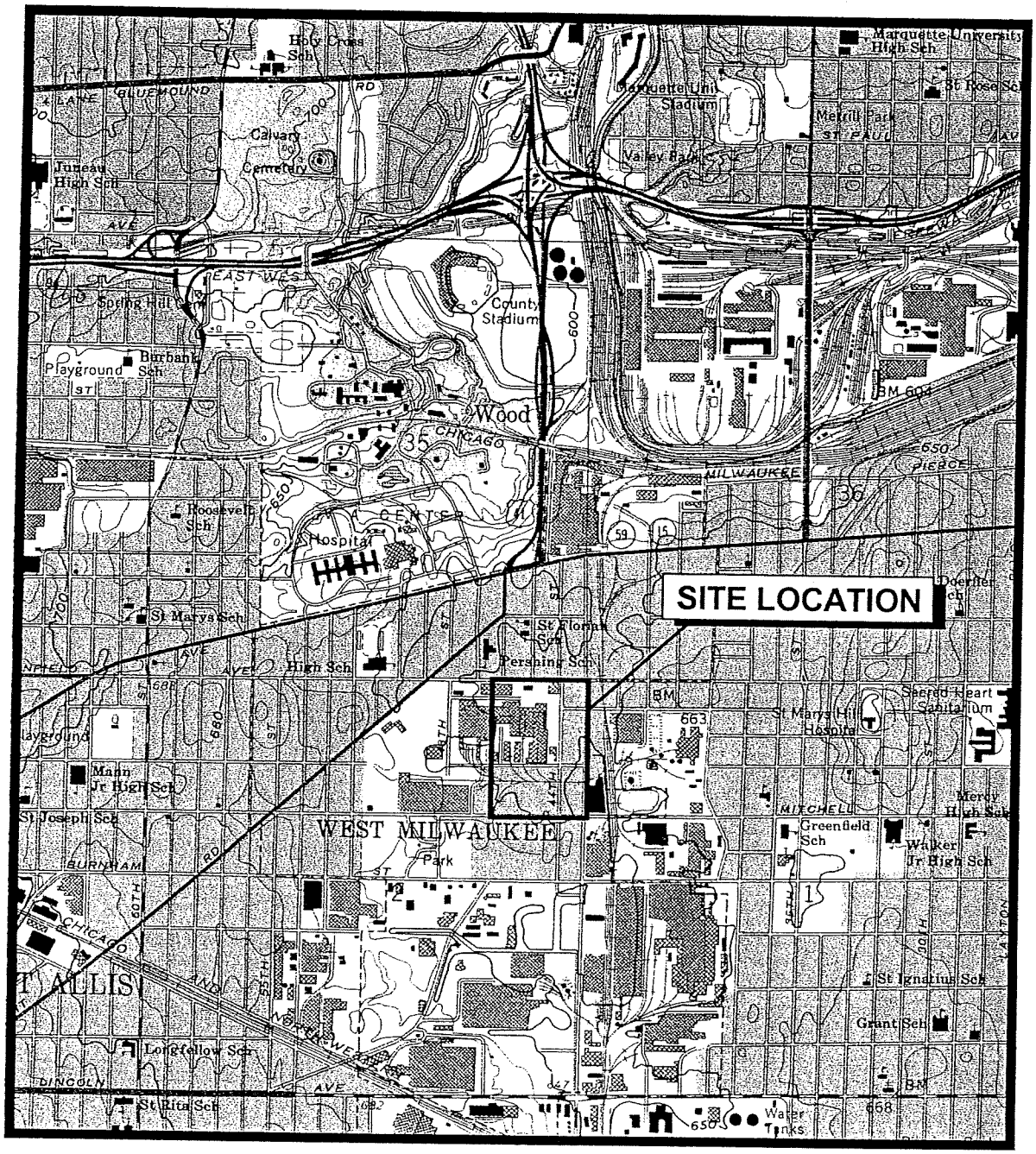
Signature of Re presentative for Responsible Party

12/22/08
Date

Richard C. Thierman
Vice President

Gannett Fleming

FIGURE 1



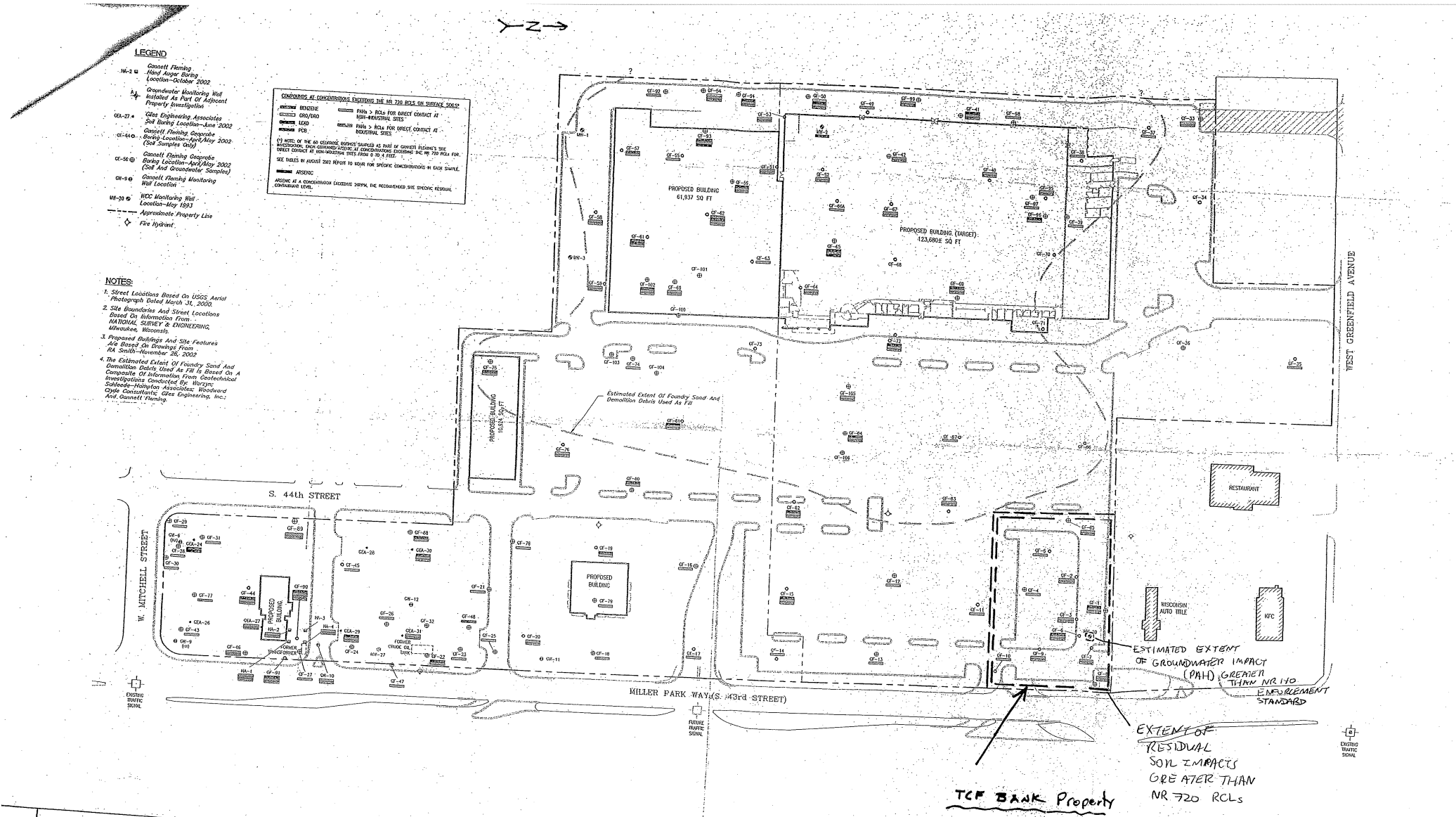
SCALE: 1 INCH = 2000 FEET
CONTOUR INTERVAL = 10 FEET

7.5 MIN TOPOGRAPHIC MAP
MILWAUKEE, WISCONSIN
1958
PHOTOREVISED 1971

LOCATION MAP

WEST MILWAUKEE CENTER
RHI HOLDINGS, INC.
WEST MILWAUKEE, WISCONSIN

080801
36782.000



THIS DRAWING IS AND SHALL REMAIN THE PROPERTY OF GANNETT FLEMING ENGINEERS AND PLANNERS. REUSE ON PROJECT EXTENSIONS OR ANY OTHER PROJECT, OR ALTERATIONS OR ADDITIONS TO THIS PROJECT SHALL BE AT THE USER'S SOLE RISK, AND WITHOUT LIABILITY TO GANNETT FLEMING ENGINEERS AND PLANNERS.

No.	DESCRIPTION	DATE	BY
	REVISIONS		

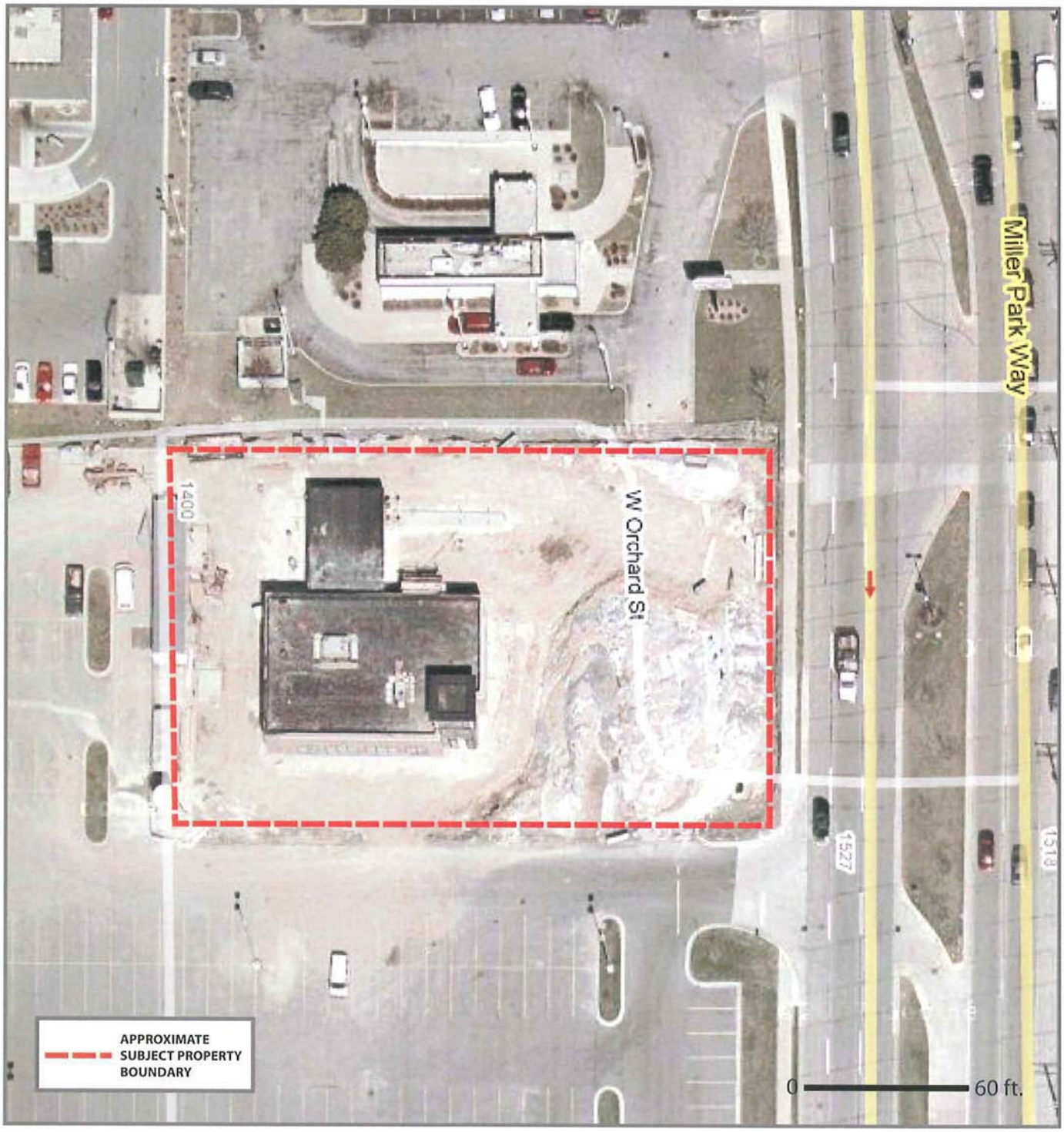
DRAWN	PS
SCALE	1" = 60'
DESIGNED	AWM
JOB No:	36782.001
APPROVED	AWM
DATE	DEC. 2002

Gannett Fleming
HARRISBURG, PENNSYLVANIA

PROJECT
WEST MILWAUKEE CENTER
RHI HOLDINGS, INC.
WEST MILWAUKEE, WISCONSIN

TITLE
SITE PLAN WITH SAMPLE AND CONTAMINANT LOCATIONS IN SURFACE SOILS

SHEET No.
2



Client:	TCF Bank	THE SIGMA GROUP — Single Source. Sound Solutions. — www.thesigmagroup.com, 1300 West Canal Street, Milwaukee, WI 53233, 414-643-4200
Site Address:	1441 Miller Park Way West Milwaukee, WI 53217	N
Project:	#11458	**FIGURE 1a** **SITE PLAN MAP**

Table A-4 Continued . . .

	Sample Number						USEPA Pathway-Specific Soil Clean-up Values[1]		
	GF-127		GF-128	GF-129	GF-130	GF-131			
Sample Depth (ft)	0 - 1	3 - 4	0 - 1	0 - 1	0 - 1	0 - 0.5	Ingestion	Inhalation[2]	Soil to Groundwater
PCBs (mg/kg)									
PCB - 1016	<0.0296	<0.00155	<0.00804	<0.00152	<0.00160	<0.00287	0.319	2.8	0.056
PCB - 1221	<0.0592	<0.00310	<0..0161	<0.00304	<0.00320	<0.00573	0.319	6,600[3]	NS
PCB - 1232	<0.102	<0.00537	<0.0278	<0.00527	<0.00554	<0.00992	0.319	6,600[3]	NS
PCB - 1242	<0.0228	<0.00119	<0.00619	<0.00117	<0.00123	<0.00221	0.319	2.2	0.056
PCB - 1248	<0.0705	<0.00370	<0.0192	<0.00363	<0.00381	<0.00684	0.319	5,600[3]	NS
PCB - 1254	1.34	<0.00107	<0.00557	<0.00105	0.0129	<0.00198	0.319	3.2	0.34
PCB - 1260	<0.0319	<0.00167	<0.00866	<0.00164	0.0132	<0.00309	0.319	2.7	0.49
Total PCBs (mg/kg)	1.34	--	--	--	0.0261	--	0.319	5.7	6.2

NOTES:

All units are in mg/kg (parts per million).
Results calculated on a dry-weight basis.
PCBs = Polychlorinated biphenyls.
-- = No PCBs were detected at concentrations greater than their detection limits.

FOOTNOTES:

(1) The soil clean-up values were calculated using the USEPA's Soil Screening Guidance for Chemicals [http://risk.lsd.ornl.gov/calc_start.shtml] using default values.

(2) The USEPA lists two different pathways for inhalation: inhalation of volatiles, and inhalation of fugitive dust. The lower of these two values are shown on this table, and unless otherwise noted, are for inhalation of volatiles.

(3) The USEPA value listed is for the inhalation of fugitive dust, as the USEPA spreadsheet does not provide a value for inhalation of volatiles.

RHI HOLDINGS, INC.
WEST MILWAUKEE, WISCONSIN

TABLE A-5

ANALYTICAL RESULTS FOR SOIL SAMPLES COLLECTED BY WOODWARD-CLYDE - AREA 20
MAY 1993

Sample Depth (ft)	Sample Number						NR 720 RCLs (Direct Contact)	NR 746 Soil Screening Levels
	B-20E-5	B-20E-7	B-20F-4	B-20F-6	B-20G-3	B-20G-4		
	8 - 10	12 - 14	6 - 8	10 - 12	4 - 6	6 - 8		
Metals (mg/kg)							**Non-Ind / Ind.**	
Lead	8.6	7.6	7.3	6.9	211	7.4	50 / 500	NA
Cadmium	--	--	--	--	--	--	8 / 510	NA
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	0.0059	0.0055	8.5 [3]
Xylenes	--	--	--	--	--	--	4.100	42.0
1,3,5-TMB	--	--	--	--	--	--	NS	11.0
1,2,4-TMB	--	--	--	--	--	--	NS	83.0
n-Butylbenzene	--	--	--	--	--	--	NS	NS
Naphthalene	--	--	--	--	--	--	20 / 100	2.7

Table A-5 Continued . . .

	Sample Number						Suggested Generic RCLs (1) GW / Direct Non-Ind / Ind	NR 746 Soil Screening Levels
	B-20E-5	B-20E-7	B-20F-4	B-20F-6	B-20G-3	B-20G-4		
Sample Depth (ft)	8 - 10	12 - 14	6 - 8	10 - 12	4 - 6	6 - 8		
PAHs (mg/kg)								
Naphthalene	--	--	--	--	--	--	0.4 / 20 / 110	2.7
Acenaphthylene	--	--	--	--	--	--	0.7 / 18 / 360	NA
Acenaphthene	--	--	--	--	--	--	38 / 900 / 60,000	NA
Fluorene	--	--	--	--	--	--	100 / 600 / 40,000	NA
Phenanthrene	0.0124	0.0293	0.00783	0.0174	0.013	--	1.8 / 18 / 30,000	NA
Anthracene	--	--	--	0.137	0.0848	0.00798	3,000 / 5,000 / 300,000	NA
Chrysene	0.0033	0.0169	--	0.0193	0.0110	--	37 / 8.8 / 390	NA
Fluoranthene	0.00201	0.00446	0.00146	0.158	0.0978	--	500 / 600 / 40,000	NA
Pyrene	--	0.00882	0.00230	0.277	0.153	0.00326	8,700 / 500 / 30,000	NA
Benzo(a) Anthracene	0.00062	--	--	0.197	0.110	0.00219	17 / .088 / 3.9	NA
Benzo(b) Fluoranthene	--	0.00222	0.00096	0.156	0.0880	0.00072	360 / .088 / 3.9	NA
Benzo(k) Fluoranthene	--	--	--	0.104	0.067	0.00086	870 / .88 / 39	NA
Benzo(a) Pyrene	--	--	--	0.0674	0.0424	--	48 / .0088 / .39	NA
Dibenzo(a,h) Anthracene	--	--	--	0.122	0.0754	--	38 / .0088 / .39	NA
Benzo(g,h,i) Perylene	0.00112	0.00498	0.00281	0.0215	0.0126	--	6,800 / 1.8 / 39	NA
Indeno(1,2,3-cd) Pyrene	--	--	--	0.0919	0.061	0.00196	680 / .088 / 3.9	NA
1-Methyl Naphthalene	--	--	--	0.0703	0.0468	--	23 / 1,100 / 70,000	NA
2-Methyl Naphthalene	0.0525	--	--	--	--	--	20 / 600 / 40,000	NA

Table A-5 Continued . . .

Sample Depth (ft)	Sample Number						NR 720 RCLs[1]	NR 746 Soil Screening Levels
	B-20H-4	B-20H-7	B-20I-4	B20I-6	B20J-5	B-20J-7		
	6 - 8	12 - 14	6 - 8	10 - 12	8 - 10	12 - 14		
Metals (mg/kg)							**Non-Ind / Ind.**	
Lead	12.2	4.4	11.8	6.6	11.4	6.1	50 / 500	NA
Cadmium	--	--	0.31	--	--	--	8 / 510	NA
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	--	0.0055	8.5 [3]
Xylenes	--	0.2159	--	--	--	--	4.100	42.0
1,3,5-TMB	–	0.1306	--	--	--	--	NS	11.0
1,2,4-TMB	–	0.4421	--	--	--	--	NS	83.0
n-Butylbenzene	–	0.1451	--	--	--	--	NS	NS
Naphthalene	--	0.5482	--	--	--	--	20 / 100	2.7

Table A-5 Continued . . .

Sample Depth (ft)	Sample Number						Suggested Generic RCLs (1) GW / Direct Non-Ind / Ind	NR 746 Soil Screening Levels
	B-20H-4	B-20H-7	B-20I-4	B20I-6	B20J-5	B-20J-7		
	6 - 8	12 - 14	6 - 8	10 - 12	8 - 10	12 - 14		
PAHs (mg/kg)								
Naphthalene	--	1.220	--	--	--	--	0.4 / 20 / 110	2.7
Acenaphthylene	–	0.474	--	--	--	--	0.7 / 18 / 360	NA
Acenaphthene	--	0.984	--	--	0.0267	--	38 / 900 / 60,000	NA
Fluorene	–	4.570	--	--	--	--	100 / 600 / 40,000	NA
Phenanthrene	0.00736	12.6	0.00909	0.00594	0.0634	0.0123	1.8 / 18 / 30,000	NA
Anthracene	--	0.0778	--			--	3,000 / 5,000 / 300,000	NA
Chrysene	0.00706	0.107	0.00800	--	0.0257	0.00725	37 / 8.8 / 390	NA
Fluoranthene	0.00166	0.338	0.00105	0.00070	0.00869	0.00098	500 / 600 / 40,000	NA
Pyrene	–	0.171	0.00274	--	0.0162	0.00291	8,700 / 500 / 30,000	NA
Benzo(a) Anthracene	–	0.00870	--	--	--	--	17 / .088 / 3.9	NA
Benzo(b) Fluoranthene	0.00147	0.0120	0.00098	--	0.00343	0.00086	360 / .088 / 3.9	NA
Benzo(k) Fluoranthene	–	--	--	--	--	--	870 / .88 / 39	NA
Benzo(a) Pyrene	–	0.00955	--	--	--	--	48 / .0088 / .39	NA
Dibenzo(a,h) Anthracene	–	--	--	--	0.0167	--	38 / .0088 / .39	NA
Benzo(g,h,i) Perylene	0.00095	0.0102	0.00231	0.00141	0.00934	0.00180	6,800 / 1.8 / 39	NA
Indeno(1,2,3-cd) Pyrene	–	--	0.00613	--	--	--	680 / .088 / 3.9	NA
1-Methyl Naphthalene	--	9.390	--	--	--	--	23 / 1,100 / 70,000	NA
2-Methyl Naphthalene	--	17.800	--	--	--	--	20 / 600 / 40,000	NA

Table A-5 Continued . . .

NOTES:

Metals and PAHs are reported in mg/kg (parts per million), and VOCs are reported in µg/kg (parts per billion), on a dry-weight basis. Only compounds detected in one or more samples are shown.
Exceedances of non-industrial standards are underlined, industrial standards are shown in bold, and groundwater pathway standards are shaded.
Methylene chloride was present in most samples and in the method blanks, indicating its presence is due to lab contamination.

-- = Not detected at or above the detection limit.
NA = Not applicable.
NS = No standard

FOOTNOTES:

(1) There are no established RCLs for PAHs. The concentrations shown are interim guidance values from WDNR Publication RR-519-97.
(2) A full EPA SW-846 Method 8021 volatile screen was run. Only compounds detected in one or more samples are shown on the table.
(3) The NR 746 direct contact clean-up level for benzene in the top 4 feet of soil is 1.1 ppm. Direct contact concentrations for all other VOCs are the Soil Screening Levels.

RHI HOLDINGS, INC.
WEST MILWAUKEE, WISCONSIN

TABLE A-6

ANALYTICAL RESULTS FOR SOIL SAMPLES COLLECTED BY GANNETT FLEMING - AREA 20
APRIL 2002

	Sample Number						NR 720 RCLs[1]	NR 746 Soil Screening Levels
	GF - 1	GF - 1	GF - 1	GF - 2	GF - 2	GF - 2		
Sample Depth (ft)	0 - 1	3 - 4	9 - 10	0 - 1	3 - 4	9 - 10	GW / Non-Ind / Ind.	
Metals (mg/kg)								
Arsenic	5.27	3.46	3.09	NA	NA	NA	NS/ 0.039 / 1.6	NL
Lead	65.3	4.99	4.78	NA	NA	NA	NS / 50 / 500	NL
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	--	0.0055 / 1.1 / 1.1	8.5
n -Butylbenzene	--	--	0.378	--	--	--	NS / NS / NS	NL
sec-Butylbenzene	--	--	0.197	--	--	--	NS / NS / NS	NL
Ethylbenzene	--	--	0.120	--	--	--	2.9 / NS / NS	4.6
Isopropylbenzene	--	--	0.0994	--	--	--	NS / NS / NS	NL
p-Isopropyltoluene	--	--	0.150	--	--	--	NS / NS / NS	NL
Naphthalene	--	--	3.760	--	--	--	0.4 / 20 / 110	2.7
n-Propylbenzene	--	--	0.177	--	--	--	NS / NS / NS	NL
Toluene	--	--	--	--	--	--	1.5 / NS / NS	38
Trimethylbenzenes	--	--	0.911	--	--	--	NS / NS / NS	94
Xylenes	--	--	0.0323	--	--	--	4.1 / NS / NS	42

Table A-6 Continued . . .

Sample Depth (ft)	Sample Number						Suggested Generic RCLs [1] GW / Non-Ind / Ind	NR 746 Soil Screening Levels
	GF - 1	GF - 1	GF - 1	GF - 2	GF - 2	GF - 2		
	0 - 1	3 - 4	9 - 10	0 - 1	3 - 4	9 - 10		
PAHs (mg/kg)								
Acenaphthene	--	--	--	--	--	--	38 / 900 / 60,000	NL
Acenaphthylene	--	--	--	--	--	--	0.7 / 18 / 360	NL
Anthracene	0.208	--	--	0.143	--	0.00633	3,000 / 5,000 / 300,000	NL
Benzo(a) Anthracene	0.799	--	--	0.658	--	0.0445	17 / .088 / 3.9	NL
Benzo(a) Pyrene	**1.03**	--	--	**0.833**	--	0.0671	48 / .0088 / .39	NL
Benzo(b) Fluoranthene	1.30	0.0033 J	--	1.01	--	0.0997	360 / .088 / 3.9	NL
Benzo(k) Fluoranthene	0.452	--	--	0.364	--	0.0318	870 / .88 / 39	NL
Benzo(g,h,i) Perylene	0.854	--	--	0.675	--	0.0669	6,800 / 1.8 / 39	NL
Chrysene	0.821	--	--	0.671	--	0.0534	37 / 8.8 / 390	NL
Dibenzo(a,h) Anthracene	**1.05**	--	--	**0.793**	--	0.0540	38 / .0088 / .39	NL
Fluoranthene	2.14	--	--	1.88	--	0.0922	500 / 600 / 40,000	NL
Fluorene	0.0554	--	0.202	0.0374	--	--	100 / 600 / 40,000	NL
Indeno (1,2,3-cd) Pyrene	0.847	--	--	0.646	--	0.0632	680 / .088 / 3.9	NL
1-Methyl Naphthalene	--	--	0.497	--	--	0.00546 J	23 / 1,100 / 70,000	NL
2-Methyl Naphthalene	--	--	2.60	--	--	--	20 / 600 / 40,000	NL
Naphthalene	--	--	1.14	--	--	0.004 J	0.4 / 20 / 110	2.7
Phenanthrene	0.797	--	0.172	0.623	0.00276 J	0.0269	1.8 / 18 / 390	NL
Pyrene	2.14	0.00198 J	--	1.79	--	0.102	8,700 / 500 / 30,000	NL

; A-6 Continued . . .

	Sample Number						NR 720 RCLs[1]	NR 746 Soil Screening Levels
	GF - 3	GF - 3	GF - 3	GF - 4	GF - 4	GF - 4		
ample Depth (ft)	0 - 1	3 - 4	9 - 10	0 - 1	3 - 4	10 - 11	GW / Non-Ind / Ind.	
Metals (mg/kg)								
Arsenic	NA	NA	NA	NA	NA	NA	NS/ 0.039 / 1.6	NL
Lead	NA	NA	NA	NA	NA	NA	NS / 50 / 500	NL
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	--	0.0055 / 1.1 / 1.1	8.5
n -Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
sec-Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Ethylbenzene	--	--	--	--	--	--	2.9 / NS / NS	4.6
Isopropylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
p-Isopropyltoluene	--	--	--	--	--	--	NS / NS / NS	NL
Naphthalene	--	--	--	--	--	--	0.4 / 20 / 110	2.7
n-Propylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Toluene	--	--	--	--	--	--	1.5 / NS / NS	38
Trimethylbenzenes	--	--	--	--	--	--	NS / NS / NS	94
Xylenes	--	--	--	--	--	--	4.1 / NS / NS	42

Sample Depth (ft)	Sample Number						Suggested Generic RCLs (1) GW / Non-Ind / Ind	NR 746 Soil Screening Levels
	GF - 3	GF - 3	GF - 3	GF - 4	GF - 4	GF - 4		
	0 - 1	3 - 4	9 - 10	0 - 1	3 - 4	10 - 11		
PAHs (mg/kg)								
Acenaphthene	--	--	--	--	--	--	38 / 900 / 60,000	NL
Acenaphthylene	--	--	--	--	--	--	0.7 / 18 / 360	NL
Anthracene	0.0617	--	--	0.0279	--	--	3,000 / 5,000 / 300,000	NL
Benzo(a) Anthracene	0.236	--	--	0.119	--	--	17 / .088 / 3.9	NL
Benzo(a) Pyrene	0.334	--	--	0.142	--	--	48 / .0088 / .39	NL
Benzo(b) Fluoranthene	0.462	--	--	0.193	--	--	360 / .088 / 3.9	NL
Benzo(k) Fluoranthene	0.146	--	--	0.0814	--	--	870 / .88 / 39	NL
Benzo(g,h,i) Perylene	0.382	--	--	0.133	--	--	6,800 / 1.8 / 39	NL
Chrysene	0.253	--	--	0.124	--	0.00381 J	37 / 8.8 / 390	NL
Dibenzo(a,h) Anthracene	0.455	--	--	0.176	--	--	38 / .0088 / .39	NL
Fluoranthene	0.597	--	--	0.368	--	0.00895	500 / 600 / 40,000	NL
Fluorene	--	--	--	--	--	--	100 / 600 / 40,000	NL
ndeno (1,2,3-cd) Pyrene	0.373	--	--	0.126	--	--	680 / .088 / 3.9	NL
-Methyl Naphthalene	--	--	--	--	--	--	23 / 1,100 / 70,000	NL
Methyl Naphthalene	--	--	--	--	--	--	20 / 600 / 40,000	NL
phthalene	--	--	--	--	--	--	0.4 / 20 / 110	2.7
enanthrene	0.225	--	--	0.145	--	--	1.8 / 18 / 390	NL
ene	0.587	--	--	0.320	--	0.00515	8,700 / 500 / 30,000	NL

Table A-6 Continued . . .

	Sample Number						NR 720 RCLs[1]	NR 746 Soil Screening Levels
	GF - 5	GF - 5	GF - 5	GF - 6	GF - 6	GF - 6		
Sample Depth (ft)	0 - 1	3 - 4	6 - 7	0 - 1	3 - 4	6 - 7	GW / Non-Ind / Ind.	
Metals (mg/kg)								
Arsenic	NA	NA	NA	4.19	3.69	4.32	NS/ 0.039 / 1.6	NL
Lead	NA	NA	NA	132	21.8	5.24	NS / 50 / 500	NL
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	--	0.0055 / 1.1 / 1.1	8.5
n -Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
sec-Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Ethylbenzene	--	--	--	--	--	--	2.9 / NS / NS	4.6
Isopropylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
p-Isopropyltoluene	--	--	--	--	--	--	NS / NS / NS	NL
Naphthalene	--	--	--	--	--	--	0.4 / 20 / 110	2.7
n-Propylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Toluene	--	--	--	--	--	--	1.5 / NS / NS	38
Trimethylbenzenes	--	--	--	--	--	--	NS / NS / NS	94
Xylenes	--	--	--	--	--	--	4.1 / NS / NS	42

Table A-6 Continued . . .

Sample Depth (ft)	Sample Number						Suggested Generic RCLs (1) GW / Non-Ind / Ind	NR 746 Soil Screening Levels
	GF - 5	GF - 5	GF - 5	GF - 6	GF - 6	GF - 6		
	0 - 1	3 - 4	6 - 7	0 - 1	3 - 4	6 - 7		
PAHs (mg/kg)								
Acenaphthene	--	--	--	--	--	--	38 / 900 / 60,000	NL
Acenaphthylene	--	--	--	--	--	--	0.7 / 18 / 360	NL
Anthracene	--	--	--	0.184	--	--	3,000 / 5,000 / 300,000	NL
Benzo(a) Anthracene	--	--	--	0.559	--	--	17 / .088 / 3.9	NL
Benzo(a) Pyrene	0.0089 J	--	--	**0.633**	--	--	48 / .0088 / .39	NL
Benzo(b) Fluoranthene	0.00568 J	--	--	0.739	--	--	360 / .088 / 3.9	NL
Benzo(k) Fluoranthene	0.00418 J	--	--	0.284	--	--	870 / .88 / 39	NL
Benzo(g,h,i) Perylene	0.00432 J	--	--	0.554	--	--	6,800 / 1.8 / 39	NL
Chrysene	--	--	--	0.547	--	--	37 / 8.8 / 390	NL
Dibenzo(a,h) Anthracene	--	--	--	**0.669**	--	--	38 / .0088 / .39	NL
Fluoranthene	0.01	--	--	1.71	--	--	500 / 600 / 40,000	NL
Fluorene	--	--	--	0.0801	--	--	100 / 600 / 40,000	NL
Indeno (1,2,3-cd) Pyrene	0.00306 J	--	--	0.512	--	--	680 / .088 / 3.9	NL
1-Methyl Naphthalene	--	--	--	--	--	--	23 / 1,100 / 70,000	NL
2-Methyl Naphthalene	--	--	--	--	--	--	20 / 600 / 40,000	NL
Naphthalene	0.00234 J	--	0.00285 J	--	--	0.00419 J	0.4 / 20 / 110	2.7
Phenanthrene	0.0054 J	--	--	0.656	--	--	1.8 / 18 / 390	NL
Pyrene	0.0138	--	0.00252 J	1.60	--	--	8,700 / 500 / 30,000	NL

A-6 Continued . . :

	Sample Number						NR 720 RCLs[1]	NR 746 Soil Screening Levels
	GF - 7	GF - 7	GF - 7	GF - 8	GF - 8	GF - 8		
mple Depth (ft)	0 - 1	3 - 4	6 - 7	0 - 1	3 - 4	9 - 10	GW / Non-Ind / Ind.	
Metals (mg/kg)								
Arsenic	NA	NA	NA	NA	NA	NA	NS/ 0.039 / 1.6	NL
Lead	NA	NA	NA	NA	NA	NA	NS / 50 / 500	NL
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	--	0.0055 / 1.1 / 1.1	8.5
n -Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
sec-Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Ethylbenzene	--	--	--	--	--	--	2.9 / NS / NS	4.6
Isopropylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
p-Isopropyltoluene	--	--	--	--	--	--	NS / NS / NS	NL
Naphthalene	--	--	--	--	--	--	0.4 / 20 / 110	2.7
n-Propylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Toluene	--	--	--	--	--	--	1.5 / NS / NS	38
Trimethylbenzenes	--	--	--	--	--	--	NS / NS / NS	94
Xylenes	--	--	--	--	--	--	4.1 / NS / NS	42

Sample Depth (ft)	Sample Number						Suggested Generic RCLs (1) GW / Non-Ind / Ind	NR 746 Soil Screening Levels
	GF - 7	GF - 7	GF - 7	GF - 8	GF - 8	GF - 8		
	0 - 1	3 - 4	6 - 7	0 - 1	3 - 4	9 - 10		
PAHs (mg/kg)								
Acenaphthene	--	--	--	--	--	--	38 / 900 / 60,000	NL
Acenaphthylene	--	--	--	--	--	--	0.7 / 18 / 360	NL
Anthracene	0.148	--	--	0.122	--	--	3,000 / 5,000 / 300,000	NL
Benzo(a) Anthracene	0.435	--	--	0.400	--	--	17 / .088 / 3.9	NL
Benzo(a) Pyrene	**0.476**	--	--	**0.429**	--	--	48 / .0088 / .39	NL
Benzo(b) Fluoranthene	0.552	--	--	0.523	0.00386 J	--	360 / .088 / 3.9	NL
Benzo(k) Fluoranthene	0.212	--	--	0.196	--	--	870 / .88 / 39	NL
Benzo(g,h,i) Perylene	0.422	--	--	0.283	0.00283 J	--	6,800 / 1.8 / 39	NL
Chrysene	0.402	--	--	0.398	--	--	37 / 8.8 / 390	NL
Dibenzo(a,h) Anthracene	**0.527**	--	--	0.211	0.00375 J	--	38 / .0088 / .39	NL
Fluoranthene	1.25	--	--	1.25	0.00677	--	500 / 600 / 40,000	NL
luorene	0.0447	--	--	--	--	--	100 / 600 / 40,000	NL
deno (1,2,3-cd) Pyrene	0.383	--	--	0.269	--	--	680 / .088 / 3.9	NL
Methyl Naphthalene	--	--	--	--	--	--	23 / 1,100 / 70,000	NL
Methyl Naphthalene	--	--	--	--	--	--	20 / 600 / 40,000	NL
phthalene	--	0.0019 J	--	--	--	--	0.4 / 20 / 110	2.7
nanthrene	0.522	--	--	0.596	0.00509 J	--	1.8 / 18 / 390	NL
ne	1.19	--	--	1.19	0.00662	--	8,700 / 500 / 30,000	NL

Table A-6 Continued . . .

	Sample Number						NR 720 RCLs[1]	NR 746 Soil Screening Levels
	GF - 9	GF - 9	GF - 9	GF - 10	GF - 10	GF - 10		
Sample Depth (ft)	0 - 1	3 - 4	9 - 10	0 - 1	3 - 4	9 - 10		
Metals (mg/kg)							**GW / Non-Ind / Ind.**	
Arsenic	NA	NA	NA	4.37	2.44	3.00	NS/ 0.039 / 1.6	NL
Lead	NA	NA	NA	15.5	5.22	4.53	NS / 50 / 500	NL
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	--	0.0055 / 1.1 / 1.1	8.5
n -Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
sec-Butylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Ethylbenzene	--	--	--	--	--	--	2.9 / NS / NS	4.6
Isopropylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
p-Isopropyltoluene	--	--	--	--	--	--	NS / NS / NS	NL
Naphthalene	0.0358	--	--	--	--	--	0.4 / 20 / 110	2.7
n-Propylbenzene	--	--	--	--	--	--	NS / NS / NS	NL
Toluene	--	--	--	--	--	--	1.5 / NS / NS	38
Trimethylbenzenes	--	--	--	--	--	--	NS / NS / NS	94
Xylenes	--	--	--	--	--	--	4.1 / NS / NS	42

Table A-6 Continued . . .

Sample Depth (ft)	Sample Number GF - 9 0 - 1	GF - 9 3 - 4	GF - 9 9 - 10	GF - 10 0 - 1	GF - 10 3 - 4	GF - 10 9 - 10	Suggested Generic RCLs [1] GW / Non-Ind / Ind	NR 746 Soil Screening Levels
PAHs (mg/kg)								
Acenaphthene	--	--	--	0.0185	--	--	38 / 900 / 60,000	NL
Acenaphthylene	--	--	--	--	--	--	0.7 / 18 / 360	NL
Anthracene	0.132	--	0.150	0.0621	--	0.0054	3,000 / 5,000 / 300,000	NL
Benzo(a) Anthracene	0.408	--	0.423	0.163	--	0.0159	17 / .088 / 3.9	NL
Benzo(a) Pyrene	**0.421**	--	**0.465**	0.168	--	0.0221	48 / .0088 / .39	NL
Benzo(b) Fluoranthene	0.477	--	0.497	0.197	--	0.0231	360 / .088 / 3.9	NL
Benzo(k) Fluoranthene	0.182	--	0.204	0.0757	--	--	870 / .88 / 39	NL
Benzo(g,h,i) Perylene	0.304	--	0.368	0.113	--	0.0155	6,800 / 1.8 / 39	NL
Chrysene	0.341	--	0.349	0.158	--	0.0163	37 / 8.8 / 390	NL
Dibenzo(a,h) Anthracene	0.219	--	0.215	0.134	0.00675	--	38 / .0088 / .39	NL
Fluoranthene	1.15	0.00533 J	1.14	0.519	--	0.0439	500 / 600 / 40,000	NL
Fluorene	0.0321	--	0.425	0.0194	--	--	100 / 600 / 40,000	NL
Indeno (1,2,3-cd) Pyrene	0.301	--	0.344	0.119	--	--	680 / .088 / 3.9	NL
1-Methyl Naphthalene	--	--	--	0.0192	--	--	23 / 1,100 / 70,000	NL
2-Methyl Naphthalene	--	--	--	0.0168	--	--	20 / 600 / 40,000	NL
Naphthalene	--	--	--	--	--	--	0.4 / 20 / 110	2.7
Phenanthrene	0.377	0.00395 J	0.376	0.240	--	0.0157	1.8 / 18 / 390	NL
Pyrene	1.00	0.00297 J	1.03	0.473	--	0.0393	8,700 / 500 / 30,000	NL

Table A-3 Continued . . .

	Sample Number						NR 720 RCLs	NR 746 Soil Screening Levels
	GF - 85	GF - 85	GF - 85	GF - 86	GF - 86	GF - 86		
Sample Depth (ft)	0 - 1	3 - 4	9 - 10	0.5 - 1.5	3 - 4	9 - 10		
Metals (mg/kg)							**GW / Non-Ind / Ind.**	
Arsenic	2.70	3.92	3.16	2.61	4.04	2.42	NL/ 0.039 / 1.6	NL
Lead	6.47	6.50	5.53	6.16	7.08	5.44	NL / 50 / 500	NL
Chromium	20.5	15.3	22.1	26.2	19.9	20.0	NL / 16,000 / NL	NL
VOCs[2] (mg/kg)								
Benzene	--	--	--	--	--	--	0.0055 / 1.1 / 1.1	8.5
n -Butylbenzene	--	–	0.0586	--	--	0.0333	NL / NL / NL	NL
sec-Butylbenzene	--	–	--	–	--	–	NL / NL / NL	NL
Ethylbenzene	--	–	--	–	--	–	2.9 / NL / NL	4.6
Isopropylbenzene	–	--	–	--	–	--	NL / NL / NL	NL
p-Isopropyltoluene	--	–	--	–	--	–	NL / NL / NL	NL
Naphthalene	--	--	0.0405	--	--	--	0.400 / 20 / 110	2.7
n-Propylbenzene	--	–	--	–	--	–	NL / NL / NL	NL
Toluene	--	--	--	--	--	--	1.5 / NL / NL	38
Trimethylbenzenes	–	--	–	--	–	–	NL / NL / NL	94
Xylenes	–	--	–	--	–	--	4.1 / NL / NL	42

Table A-3 Continued . . .

	Sample Number						100 / 250 (10)	NL
	GF - 85	GF - 85	GF - 85	GF - 86	GF - 86	GF - 86		
Sample Depth (ft)	0 - 1	3 - 4	9 - 10	0.5 - 1.5	3 - 4	9 - 10		
PAHs (mg/kg)								
Acenaphthene	--	--	--	--	--	--	38 / 900 / 60,000	NL
Acenaphthylene	--	--	--	--	--	--	0.7 / 18 / 360	NL
Anthracene	--	0.201	--	--	--	--	3,000 / 5,000 / 300,000	NL
Benzo(a) Anthracene	--	1.50	--	--	--	--	17 / .088 / 3.9	NL
Benzo(a) Pyrene	0.00601 J	**1.63**	--	--	--	0.00321 J	48 / .0088 / .39	NL
Benzo(b) Fluoranthene	0.00763 J	2.06	--	--	--	0.00285 J	360 / .088 / 3.9	NL
Benzo(k) Fluoranthene	--	0.698	--	--	--	0.00899 J	870 / .88 / 39	NL
Benzo(g,h,i) Perylene	0.00356 J	0.909	--	--	--	--	6,800 / 1.8 / 39	NL
Chrysene	0.00397 J	1.19	--	--	--	--	37 / 8.8 / 390	NL
Dibenzo(a,h) Anthracene	0.0094	**1.43**	--	--	--	--	38 / .0088 / .39	NL
Fluoranthene	0.0115	3.44	--	--	--	0.0155	500 / 600 / 40,000	NL
Fluorene	--	0.0491	--	--	--	--	100 / 600 / 40,000	NL
Indeno (1,2,3-cd) Pyrene	0.00783	0.956	--	--	--	0.00317	680 / .088 / 3.9	NL
1-Methyl Naphthalene	--		--	--	--	--	23 / 1,100 / 70,000	NL
2-Methyl Naphthalene	--		--	--	--	--	20 / 600 / 40,000	NL
Naphthalene	--		--	--	--	--	0.4 / 20 / 110	2.7
Phenanthrene	0.00564 J	0.33	--	--	--	0.0116	1.8 / 18 / 390	NL
Pyrene	0.00962	3.92	--	--	--	0.00448	8,700 / 500 / 30,000	NL

Table B-2 Continued . . .

NOTES:

-- = Not detected at or above the detection limit.
* = Proposed standard.
NS = No NR 140 standard.
NA = Not analyzed.
PAL = Preventive action limit.
ES = Enforcement standard.
FP = Free-phase product.
VOCs = Volatile organic compounds.
PAHs = Polycyclic aromatic hydrocarbons.
PCBs = Polychlorinated biphenyls.
J = Estimated concentration below laboratory quantitation level.

Values that exceed the PALs are underlined; values that exceed the ESs are bold.

FOOTNOTES:

(1) A full EPA SW-846 Method 8021 volatile screen was run. Only compounds detected in one or more samples are shown.
(2) Duplicate sample collected on date indicated. The highest value for each compound are listed in the table.
(3) This sample also contains 0.46 J $\mu g/\ell$ of tert-butylbenzene and 0.327 J of chloromethane.
(4) This sample also contains 0.917 $\mu g/\ell$ of vinyl chloride.
(5) This sample also contains 0.89 $\mu g/\ell$ of vinyl chloride.
(6) The chromatogram is characteristic for a fuel oil/diesel (i.e., #1 or #2 diesel, jet fuel, kerosene, aged or degraded diesel, etc.)
(7) The chromatogram is not characteristic for diesel. It has the characteristics of a product which has significant peaks within the DRO window.
(8) The chromatogram contained significant peaks outside the DRO window.
(9) The chromatogram contained significant peaks and a raised baseline outside the DRO window.
(10) The chromatogram has characteristics of an aged gasoline sample.
(11) The chromatogram is not characteristic for either gas or aged gas. It has a reportable concentration of peaks/area within the GRO window.
(12) The chromatogram contains a significant number of peaks outside the GRO window.
(13) The chromatogram contained significant peaks and a raised baseline outside the GRO window.
(14) The chromatogram is characteristic for aged gasoline, however, either additional peaks are present or PVOC peaks are not proportional to aged gasoline indicating the presence of additional compounds.

RHI HOLDINGS, INC.
WEST MILWAUKEE CENTER

TABLE B-3

ANALYTICAL RESULTS FOR GROUNDWATER SAMPLES (ug/ℓ)
AREA 2

	Sample Number													NR 140	
	MW-1				MW-2				MW-3			GF-33	GF-36	PAL	ES
Date of Sample	**5/93**	**4/02**	**8/02**	**1/03**	**5/93**	**4/02**	**8/02**	**1/03**	**4/02**	**8/02**	**1/03**	**4/02**	**4/03**		
Metals (μg/ℓ)															
Arsenic	NA	2.33 J	NA	NA	NA	<1.30	NA	NA	1.86 J	NA	NA	6.40	20.0	5	50
Lead	1.0	<1.00	NA	NA	2.0	<1.00	NA	NA	<1.00	NA	NA	4.49	<1.00	1.5	15
Chromium	NA	<1.00	NA	NA	NA	<1.00	NA	NA	1.70 J	NA	NA	5.60	<1.00	10	100
VOCs[(1)(2)] (μg/ℓ)															
Benzene	--	--	--	--	--	--	--	--	--	--	--	--	--	0.5	5
n -Butylbenzene	–	--	NA	NA	–	--	NA	NA	–	NA	NA	4.04	--	NS	NS
sec-Butylbenzene	–	--	NA	NA	–	--	NA	NA	–	NA	NA	--	–	NS	NS
Ethylbenzene	–	--	--	--	–	--	--	--	–	--	--	2.73	--	140	700
Isopropylbenzene	–	--	NA	NA	–	--	NA	NA	–	NA	NA	--	–	NS	NS
p-Isopropyltoluene	–	--	NA	NA	–	--	NA	NA	–	NA	NA	3.75	--	NS	NS
Naphthalene	--	--	1.53	--	--	--	--	--	--	--	--	32.6	--	8	40
n-Propylbenzene	–	--	NA	NA	–	--	NA	NA	–	NA	NA	2.20	--	NS	NS
Toluene	--	--	--	--	--	--	--	--	--	--	--	--	--	200	1,000
Trimethylbenzenes	–	--	--	--	–	--	--	--	–	--	--	12.19	--	96	480
Xylenes	–	--	--	--	–	--	--	--	–	--	--	--	--	1,000	10,000

Table B-2 Continued . . .

	Sample Number								NR 140	
	MW-3				MW-20				PAL	ES
Date of Sample	4/02	8/02	1/03	4/03	5/93	4/02	8/02	4/03		
Gasoline Range Organics	NA	--	--	--	NA	NA	NA	NA	NS	NS
Metals										
Arsenic	1.86 J	NA	NA	NA	NA	1.56 J	NA	NA	5	50
Lead	<1.00	NA	NA	NA	1.3	<1.00	NA	NA	1.5	15
Chromium	1.70 J	NA	NA	NA	NA	NA	NA	NA	10	100
VOCs[1]										
Benzene	--	--	--	--	--	--	--	NA	0.5	5
n -Butylbenzene	--	NA	NA	NA	2.0	--	NA	NA	NS	NS
sec-Butylbenzene	--	NA	NA	NA	--	--	NA	NA	NS	NS
Ethylbenzene	--	--	--	--	--	--	--	NA	140	700
Isopropylbenzene	--	NA	NA	NA	--	--	NA	NA	NS	NS
p-Isopropyltoluene	--	NA	NA	NA	--	--	NA	NA	NS	NS
Naphthalene	--	--	--	--	--	--	--	NA	8	40
n-Propylbenzene	--	NA	NA	NA	--	--	NA	NA	NS	NS
Toluene	--	--	--	--	--	0.33 J	--	NA	200	1,000
Trimethylbenzenes	--	--	--	--	2.9	--	--	NA	96	480
Xylenes	--	--	--	--	--	--	--	NA	1,000	10,000

Table B-2 Continued . . .

	Sample Number								NR 140	
	MW-3				MW-20				PAL	ES
Date of Sample	4/02	8/02	1/03	4/03	5/93	4/02	8/02	4/03		
PAHs										
Acenaphthene	--	--	NA	--	--	--	--	NA	NS	NS
Acenaphthylene	--	--	NA	--	--	--	--	NA	0.5*	5*
Anthracene	--	--	NA	--	0.16	--	--	NA	600	3,000
Benzo(a) Anthracene	--	--	NA	--	0.01	--	--	NA	NS	NS
Benzo(a) Pyrene	--	--	NA	--	0.02	0.107	0.066	NA	0.02	0.2
Benzo(b) Fluoranthene	0.056 J	--	NA	--	0.02	0.166	--	NA	0.02	0.2
Benzo(k) Fluoranthene	0.16	--	NA	--	0.01	--	--	NA	NS	NS
Benzo(g,h,i) Perylene	--	--	NA	--	0.02	0.823	--	NA	NS	NS
Chrysene	--	--	NA	--	--	--	0.2	NA	0.02	0.2
Dibenzo(a,h) Anthracene	--	--	NA	--	--	0.714	0.34	NA	NS	NS
Fluoranthene	--	--	NA	--	0.36	--	--	NA	80	400
Fluorene	--	--	NA	--	1.78	--	--	NA	80	400
Indeno (1,2,3-cd) Pyrene	--	--	NA	--	--	0.297	0.1J	NA	NS	NS
1-Methyl Naphthalene	0.258 J	--	NA	--	2.77	0.162	--	NA	NS	NS
2-Methyl Naphthalene	0.413	--	NA	--	2.11	0.216	--	NA	NS	NS
Naphthalene	--	--	--	--	--	--	--	NA	8	40
Phenanthrene	--	--	NA	--	6.20	--	--	NA	NS	NS
Pyrene	0.113 J	--	NA	--	--	--	--	NA	50	250

RHI HOLDINGS, INC.
WEST MILWAUKEE CENTER

TABLE B-5

ANALYTICAL RESULTS FOR GROUNDWATER SAMPLES (ug/l)
AREA 20

	Sample Number									NR 140	
	MW-20			GF-1	GF-4	GF-8	GF-12	GF-13	GF-16	PAL	ES
Date of Sample	5/93[2]	4/02	8/02	4/02	4/02	4/02	4/02	4/02	4/02		
Metals											
Arsenic	NA	1.56 J	NA	2.54 J	9.35	6.74	5.53	7.85	7.50	5	50
Lead	1.3	<1.00	NA	<1.00	<1.00	13.0	<1.00	<1.00	<1.00	1.5	15
VOCs[1]											
Benzene	--	--	--	0.369 J	--	--	--	--	--	0.5	5
n -Butylbenzene	2.0	--	NA	--	--	--	--	--	--	NS	NS
sec-Butylbenzene	--	--	NA	--	--	--	--	--	--	NS	NS
Ethylbenzene	--	--	--	0.530 J	--	--	--	--	--	140	700
Isopropylbenzene	--	--	NA	--	--	--	--	--	--	NS	NS
p-Isopropyl Toluene	--	--	NA	--	--	--	--	--	--	NS	NS
Naphthalene	--	--	--	--	--	--	--	--	--	8	40
n-Propylbenzene	--	--	NA	--	--	--	--	--	--	NS	NS
Toluene	--	0.33 J	--	0.436 J	--	--	--	--	0.432 J	200	1,000
Trimethylbenzenes	2.9	--	--	0.328 J	--	--	0.408 J	--	--	96	480
Xylenes	--	--	--	--	--	--	--	--	--	1,000	10,000

Table B-5 Continued . . .

	Sample Number									NR 140	
	MW-20			GF-1	GF-4	GF-8	GF-12	GF-13	GF-16	PAL	ES
Date of Sample	5/93(2)	4/02	8/02	4/02	4/02	4/02	4/02	4/02	4/02		
PAHs											
Acenaphthene	--	--	--	--	--	--	--	--	--	NS	NS
Acenaphthylene	--	--	--	--	--	--	--	--	--	0.5*	5*
Anthracene	0.16	--	--	--	--	--	--	--	--	600	3,000
Benzo(a) Anthracene	0.01	--	--	--	--	--	--	0.105 J	0.130 J	NS	NS
Benzo(a) Pyrene	0.02	0.107	0.066	--	--	--	--	0.098	0.092	0.02	0.2
Benzo(b) Fluoranthene	0.02	0.166	--	--	--	--	--	0.105 J	0.174	0.02	0.2
Benzo(k) Fluoranthene	0.01	--	--	--	--	--	--	--	0.290	NS	NS
Benzo(g,h,i) Perylene	0.02	0.823	--	--	--	--	--	--	--	NS	NS
Chrysene	--	--	0.2	--	--	--	--	0.095	0.111 J	0.02	0.2
Dibenzo(a,h) Anthracene	--	0.714	0.34	--	--	--	--	--	--	NS	NS
Fluoranthene	0.36	--	--	--	0.142 J	--	--	0.159 J	0.231 J	80	400
Fluorene	1.78	--	--	0.314	--	--	--	--	--	80	400
Indeno (1,2,3-cd) Pyrene	--	0.297	0.1J	--	--	--	--	--	--	NS	NS
1-Methyl Naphthalene	2.77	0.162	--	3.59	0.478	--	--	--	--	NS	NS
2-Methyl Naphthalene	2.11	0.216	--	5.13	0.443	--	--	--	--	NS	NS
Naphthalene	--	--	--	1.21	--	--	--	--	--	8	40
Phenanthrene	6.20	--	--	0.647	--	--	--	0.177 J	0.245 J	NS	NS
Pyrene	--	--	--	--	--	--	--	--	--	50	250

Table B-5 Continued . . .

NOTES:

--	=	Not detected at or above the detection limit.
*	=	Proposed standard.
NS	=	No NR 140 standard.
NA	=	Not analyzed.
PAL	=	Preventive action limit.
ES	=	Enforcement standard.
VOCs	=	Volatile organic compounds.
PAHs	=	Polycyclic aromatic hydrocarbons.

Values that exceed the PALs are underlined; values that exceed the ESs are bold.

FOOTNOTES:

(1) A full EPA SW-846 Method 8021 volatile screen was run. Only compounds detected in one or more samples are shown.
(2) Duplicate sample collected on date indicated. The highest value for each compound are listed in the table.

RHI HOLDINGS, INC.
WEST MILWAUKEE, WISCONSIN

TABLE B-1

DEPTH TO GROUNDWATER AND GROUNDWATER TABLE ELEVATION - ALL SITES

	Date	MW-1	MW-2	MW-3	MW-20	MW-27	GW-4	GW-5	GW-6	GW-7	GW-8
Elevation of top of casing (Ft MSL)	--	648.44	648.01	647.78	646.24	653.20	654.05	654.05	650.46	650.17	650.42
Screen top (Ft MSL)	--	--	--	--	--	638.20	637.34	637.45	636.56	635.97	636.42
Screen bottom (Ft MSL)	--	630.14	631.61	633.48	629.41	628.20	627.34	627.45	626.56	620.97	621.42
Depth to Water (ft)	05/21/02	6.56	5.77	4.67	12.34	22.74	22.40	22.69	17.39	19.08	19.24
	06/04/02	NM	NM	NM	NM	23.28*	22.52	22.65	17.35	19.10	19.22
	07/25/02	NM	NM	NM	NM	24.42*	23.50*	22.72*	17.42	19.02	19.17
	08/23/02	3.81	5.13	2.65	8.63	23.55*	22.29*	22.33	16.92	18.59*	18.73
	01/28/03	6.97	7.00	6.49	>16.62	25.37*	24.58*	23.89	18.61	20.12	20.25
	04/02/03	4.45	6.02	4.52	16.76	24.98*	24.97*	24.48	19.17	20.60	20.74
Groundwater elevation (ft MSL)	05/21/02	641.88	642.21	643.11	633.90	630.46	631.65	631.36	633.07	631.09	631.18
	06/04/02	NM	NM	NM	NM	629.92*	631.53	631.40	633.11	631.07	631.20
	07/25/02	NM	NM	NM	NM	628.78*	630.55*	631.33*	633.04	631.15	631.25
	08/23/02	644.63	642.88	645.13	637.61	629.65*	631.76*	631.72	633.54	631.58	631.69
	01/28/03	641.47	641.01	641.29	<629.62	627.83*	629.47*	630.16	631.85	630.05	630.17
	04/02/03	643.99	641.99	643.26	629.48	628.22*	629.08*	629.57	631.29	629.57	629.68

Table B-1 Continued . . .

	Date	GW-9	GW-10	GW-11	GW-12	A	B
Elevation of top of casing (Ft MSL)	--	651.74	652.09	654.34	652.16	646.58	646.70
Screen top (Ft MSL)	--	634.54	634.09	639.44	637.96	--	--
Screen bottom (Ft MSL)	--	624.54	624.09	624.44	622.96	631.77	625.46
Depth to Water (ft)	05/21/02	19.44	20.58	23.58	19.22	Dry	16.40
	06/04/02	19.41	20.60*	23.61	19.54	NM	NM
	07/25/02	19.31	19.55*	23.72	19.87	NM	NM
	08/23/02	18.93	20.11	22.38	19.24	NM	NM
	01/28/03	20.50	21.63	24.83	21.32	NM	NM
	04/02/03	21.03	22.14	25.37	22.02	NM	NM
Groundwater elevation (ft MSL)	05/21/02	632.30	631.51	630.76	632.94	Dry	630.30
	06/04/02	632.33	631.49*	630.73	632.62	NM	NM
	07/25/02	632.43	632.54*	630.62	632.29	NM	NM
	08/23/02	632.81	631.98	631.96	632.92	NM	NM
	01/28/03	631.24	630.46	629.51	630.84	NM	NM
	04/02/03	630.71	629.97	628.97	630.14	NM	NM

NOTES:

* = Free-phase petroleum product in well at the time of measurement. The groundwater elevation is based on the depth measured to groundwater, not the depth to free-product, which is shallower.
– = Not applicable or "unknown".
NM = Not measured
MSL = Mean sea level
The fire hydrant near well MW-27 was used as a benchmark with a top-of-nut elevation of 648.35.