

GIS REGISTRY
Cover Sheet

March, 2010
(RR 5367)

Source Property Information

BRRTS #: 02-41-555222
ACTIVITY NAME: Auto Source Motors
PROPERTY ADDRESS: 3210 E. Layton Avenue
MUNICIPALITY: Cudahy
PARCEL ID #: 590-9994-003

CLOSURE DATE: Nov 11, 2010
FID #: 341151690
DATCP #:
COMM #:

***WTM COORDINATES:**

X: 693772 Y: 278511

**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" form)
- Soil Contamination > *RCL or **SSRCL (232)
 - Contamination in ROW
 - Off-Source Contamination
(note: for list of off-source properties see "Impacted Off-Source Property" form)

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 unit or economic development corporation was directed to take a response action)

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 #: 02-41-555222

PARCEL ID #: 590-9994-003

ACTIVITY NAME: Auto Source Motors

WTM COORDINATES: X: 693772 Y: 278511

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

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:**

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 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: Site Location Map

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 Layout

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 #: 2 Title: Site Layout with Residual Soil Impacts

BRRTS #: 02-41-555222

ACTIVITY NAME: Auto Source Motors

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 #: 3 Title: Cross Section A-A' Transect

Figure #: 4 Title: Cross Section B-B' Transect

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 #: 5 Title: Groundwater Elevation Contour - 12/12/07

Figure #: 6 Title: Groundwater Elevation Contour - 4/16/08

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 and 2 Title: Soil Sample Analytical Results and UST Closure Sample 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 #: 3 Title: Summary of Groundwater Sample Analytical Results

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 #: 4 Title: Groundwater Level Data Sheet

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 #: 02-41-555222

ACTIVITY NAME: Auto Source Motors

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:



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-3128
FAX 414-263-8606
Telephone 414-263-8500
TTY Access via relay - 711

November 11, 2010

Mr. Rory Oppenheimer
Layton Avenue, LLC
1500 W. Stillwater Court
Mequon, WI 53092

SUBJECT: Final Case Closure with Continuing Obligations
Auto Source Motors, former 500 gallon waste oil underground storage tank (UST),
3210 E. Layton Avenue, Cudahy, WI
WDNR BRRTS Activity #: 02-41-555222 FID#341151690

Dear Mr. Oppenheimer:

The Wisconsin Department of Natural Resources (Department) has received a request for closure of the above-referenced case, submitted on your behalf by Konicek Environmental. The Department reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. Based on review of the case closure request and previously submitted information, it appears that this 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
- 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 are met.

Residual Soil Contamination/Cover or Barrier

Residual soil contamination remains in the location of the former waste oil UST and other locations on the property as indicated on the attached map and in the information submitted to the Department of Natural Resources. Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement 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 in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present, the property owner at the time of excavation will need to determine whether the material is 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. 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.

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:

Mr. Rory Oppenheimer
Layton Ave. LLC
November 11, 2010
Page 3

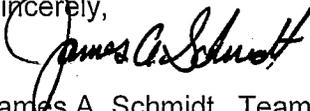
- Disturbance, construction on, change or removal in whole or part of pavement, an engineered cover or a soil barrier that must be maintained over contaminated soil

Please send written notifications in accordance with the above requirements to the attention of the Environmental Program Assistant, Remediation and Redevelopment Program, at the letterhead address.

The following DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain a copy at <http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf>.

The Department appreciates the efforts you have taken to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Nancy Ryan at (414) 263-8533.

Sincerely,



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

Attachments

cc: SER case file
Greg Konicek, electronic copy
Shawn Wenzel, Department of Commerce, electronic copy

PARAMETERS	MW-1
Date Collected	11/27/07
Depth (feet/ft)	2.4
PAH (ug/g)	
1-Methylanthracene	<1.8
2-Methylanthracene	<1.7
Acenaphthene	1.20
Acenaphthylene	6.50
Anthracene	14
Benzo(a)anthracene	13
Benzo(a)fluorene	12
Benzo(b)fluorene	7.00
Benzo(k)fluorene	16
Chrysene	16
Dibenz(a,h)anthracene	2.30
Fluorene	38
Indeno(1,2,3-cd)perylene	1.60
Phenanthrene	5.70
Pyrene	19
System	31

PARAMETERS	P-5
Date Collected	6/15/07
Depth (feet/ft)	6.5
PAH (ug/g)	
1-Methylanthracene	11
2-Methylanthracene	21
Acenaphthene	<6.6
Acenaphthylene	<3.7
Anthracene	<1.8
Benzo(a)anthracene	<4.5
Benzo(b)fluorene	<3.9
Chrysene	<5.6
Dibenz(a,h)anthracene	3.8
Fluorene	17
Indeno(1,2,3-cd)perylene	<3.2
Phenanthrene	<3.8
Pyrene	<3.1

PARAMETERS	GP-9	GP-9
Date Collected	5/28/10	5/28/10
Depth (feet/ft)	0.4	7.9
PAH (ug/g)		
1-Methylanthracene	3.6 J	3.6 J
2-Methylanthracene	<2.5	5.1 J
Acenaphthene	<2.8	<2.9
Acenaphthylene	<3.1	<3.2
Anthracene	<4.6	<4.9
Benzo(a)anthracene	<2.8	6.1 J
Benzo(a)fluorene	<3.2	7.4 J
Benzo(b)fluorene	<3.4	8.4 J
Benzo(k)fluorene	<2.6	4.7 J
Chrysene	<3.8	7.2 J
Dibenz(a,h)anthracene	<3.8	9.7 J
Fluorene	<5.3	<5.7
Indeno(1,2,3-cd)perylene	<3.8	18.1
Phenanthrene	<4.9	<5.2
Pyrene	<3.4	11.3 J
Indeno(1,2,3-cd)perylene	<2.8	4.1 J
Phenanthrene	<4.3	13.1 J
Pyrene	<3.8	16.2 J

PARAMETERS	GP-8	GP-8
Date Collected	5/28/10	5/28/10
Depth (feet/ft)	0.4	6.3
PAH (ug/g)		
1-Methylanthracene	6.6 J	<5.9
2-Methylanthracene	4.2 J	<5.9
Acenaphthene	23.1	15.2 J
Acenaphthylene	118	166.3
Anthracene	159	124
Benzo(a)anthracene	479	344
Benzo(a)fluorene	615	334
Benzo(b)fluorene	515	337
Benzo(k)fluorene	415	216
Chrysene	601	381
Dibenz(a,h)anthracene	531	412
Fluorene	165	85.3
Indeno(1,2,3-cd)perylene	484	812
Phenanthrene	31.2	27.7 J
Pyrene	148.3	12.1
Indeno(1,2,3-cd)perylene	385	275
Phenanthrene	301	352
Pyrene	719	645

PARAMETERS	GP-7	GP-7
Date Collected	5/28/10	5/28/10
Depth (feet/ft)	0.4	8-10
PAH (ug/g)		
1-Methylanthracene	13.5 J	31.4
2-Methylanthracene	10.8 J	45.3
Acenaphthene	121	<25
Acenaphthylene	48.6	34.4
Anthracene	211	144.3
Benzo(a)anthracene	193	49.7
Benzo(a)fluorene	374	57.5
Benzo(b)fluorene	160	53
Benzo(k)fluorene	102	35.8
Chrysene	159	92.7
Dibenz(a,h)anthracene	221	62.6
Dibenz(a,i)perylene	37.8	19.7 J
Fluorene	531	163
Indeno(1,2,3-cd)perylene	101	<5.2
Phenanthrene	16.0 J	205
Pyrene	97.1	26.9
System	413	16.1
System	335	61.6

PARAMETERS	MW-4
Date Collected	11/27/07
Depth (feet/ft)	2.4
PAH (ug/g)	
1-Methylanthracene	6.4
2-Methylanthracene	7.8
Acenaphthene	17
Acenaphthylene	33
Anthracene	61
Benzo(a)anthracene	210
Benzo(a)fluorene	210
Benzo(b)fluorene	310
Benzo(k)fluorene	110
Chrysene	150
Dibenz(a,h)anthracene	210
Fluorene	35
Indeno(1,2,3-cd)perylene	470
Phenanthrene	22
Pyrene	14
Indeno(1,2,3-cd)perylene	100
Phenanthrene	192
Pyrene	410

PARAMETERS	P-6
Date Collected	6/16/07
Depth (feet/ft)	7
PAH (ug/g)	
1-Methylanthracene	<3.6
2-Methylanthracene	<3.7
Acenaphthene	6.9
Acenaphthylene	9.9
Anthracene	8.9
Benzo(a)anthracene	6.6
Benzo(a)fluorene	11
Chrysene	14
Dibenz(a,h)anthracene	22
Fluorene	<4.8
Indeno(1,2,3-cd)perylene	5.1
Phenanthrene	10
Pyrene	18

S. Nicholson Avenue

E. Layton Ave

Note: Soil removed from P3 location during UST removal

Key:

-  Groundwater Monitoring Well
-  Existing Building
-  overhead utility
-  gas line
-  buried electric

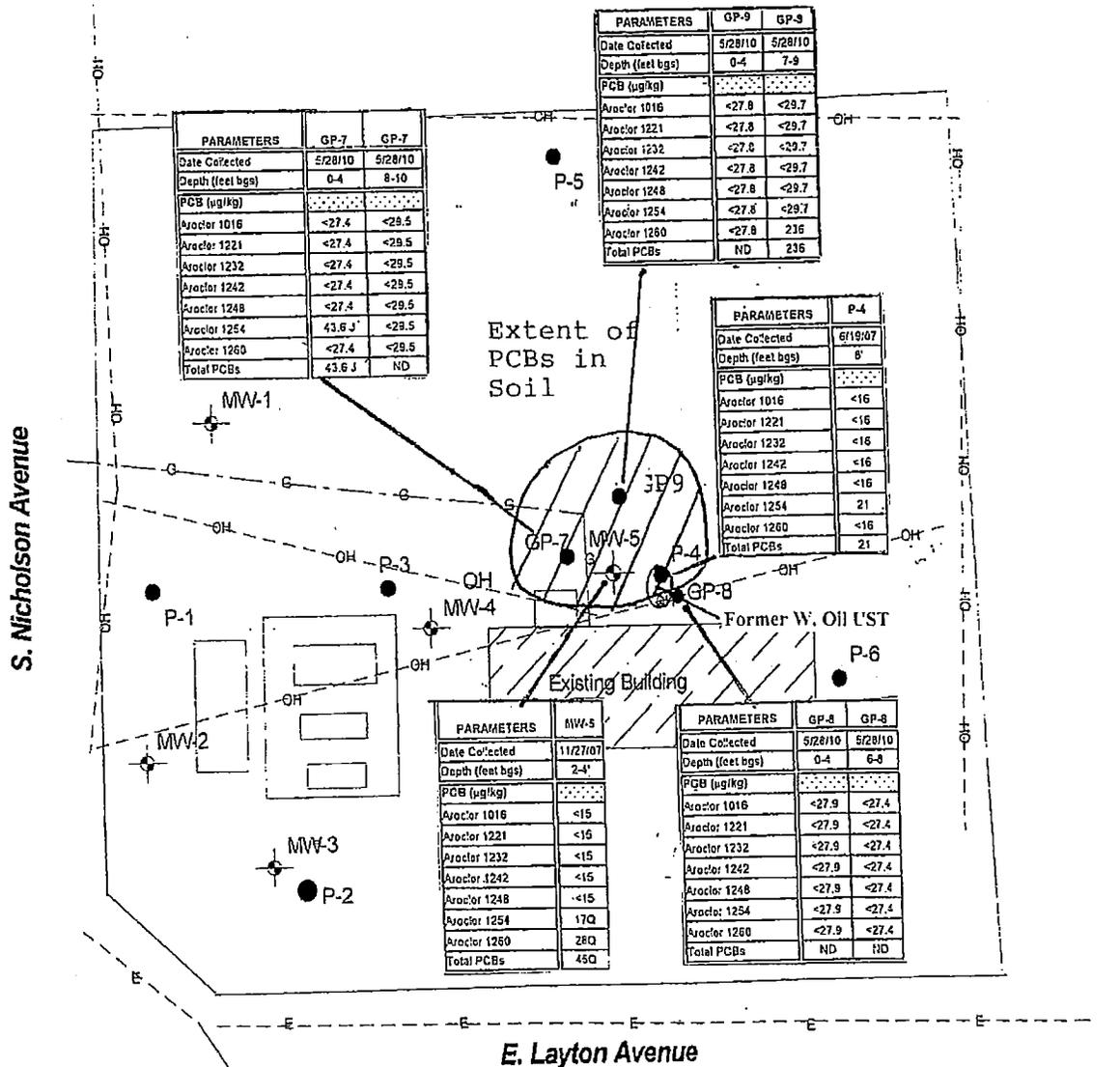
Konicek Environmental Consulting, LLC



Scale: 1"=40'

PAH Concentrations
Above Interim Non-Industrial RCLs
Auto Source Motors
3210 East Layton Avenue
Cudahy, WI

Date: 8/16/08
Rev: 5/8/09
2nd Rev: 3/31/10
By: JMG



PARAMETERS	GP-7	GP-7
Date Collected	5/28/10	5/28/10
Depth (feet bgs)	0-4	8-10
PCB (µg/kg)		
Aroclor 1016	<27.4	<29.5
Aroclor 1221	<27.4	<29.5
Aroclor 1232	<27.4	<29.5
Aroclor 1242	<27.4	<29.5
Aroclor 1248	<27.4	<29.5
Aroclor 1254	43.6 J	<29.5
Aroclor 1260	<27.4	<29.5
Total PCBs	43.6 J	ND

PARAMETERS	GP-9	GP-9
Date Collected	5/28/10	5/28/10
Depth (feet bgs)	0-4	7-9
PCB (µg/kg)		
Aroclor 1016	<27.8	<29.7
Aroclor 1221	<27.8	<29.7
Aroclor 1232	<27.8	<29.7
Aroclor 1242	<27.8	<29.7
Aroclor 1248	<27.8	<29.7
Aroclor 1254	<27.8	<29.7
Aroclor 1260	<27.8	216
Total PCBs	ND	236

PARAMETERS	P-4
Date Collected	6/19/07
Depth (feet bgs)	6"
PCB (µg/kg)	
Aroclor 1016	<16
Aroclor 1221	<16
Aroclor 1232	<16
Aroclor 1242	<16
Aroclor 1248	<16
Aroclor 1254	21
Aroclor 1260	<16
Total PCBs	21

PARAMETERS	MW-5
Date Collected	11/27/07
Depth (feet bgs)	2-4'
PCB (µg/kg)	
Aroclor 1016	<15
Aroclor 1221	<16
Aroclor 1232	<15
Aroclor 1242	<15
Aroclor 1248	<15
Aroclor 1254	17Q
Aroclor 1260	28Q
Total PCBs	45Q

PARAMETERS	GP-8	GP-8
Date Collected	5/28/10	5/28/10
Depth (feet bgs)	0-4	6-9
PCB (µg/kg)		
Aroclor 1016	<27.9	<27.4
Aroclor 1221	<27.9	<27.4
Aroclor 1232	<27.9	<27.4
Aroclor 1242	<27.9	<27.4
Aroclor 1248	<27.9	<27.4
Aroclor 1254	<27.9	<27.4
Aroclor 1260	<27.9	<27.4
Total PCBs	ND	ND

Note: Soil removed from P3 location during UST removal

Key:

- Groundwater Monitoring Well
- Existing Building
- overhead utility
- gas line
- buried electric

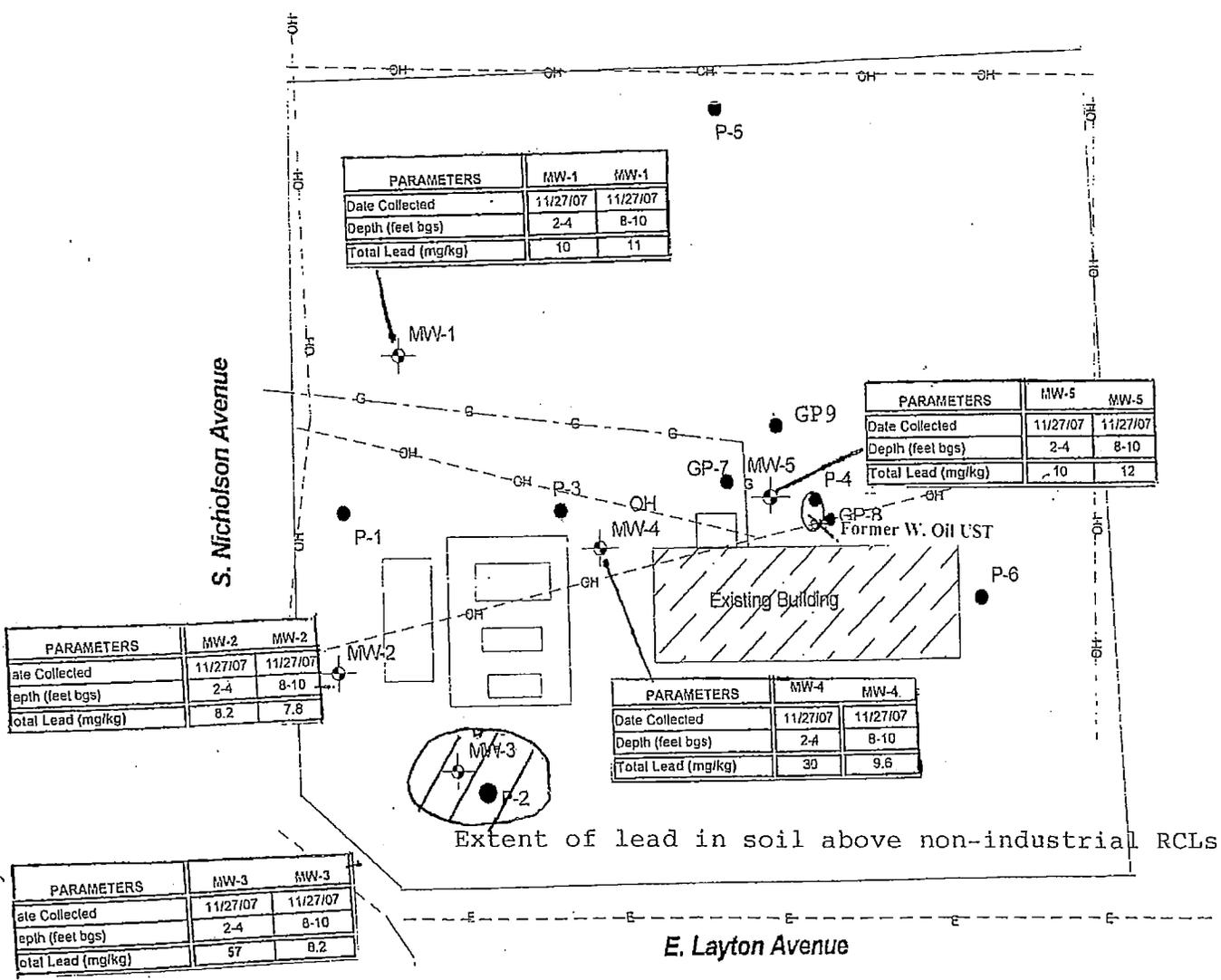
Konicek Environmental Consulting, LLC

Extent of PCB Concentrations

Auto Source Motors
3210 East Layton Avenue
Cudahy, WI

Scale: 1"=40'

Date: 8/16/08
Rev: 5/8/09
2nd Rev: 3/31/10
By: JMG



Note: Soil removed from P3 location during UST removal

Key:

- Groundwater Monitoring Well
- Existing Building
- overhead utility
- gas line
- buried electric

Konicek Environmental Consulting, LLC

NORTH

Scale: 1"=40'

Lead Concentrations

Auto Source Motors
3210 East Layton Avenue
Cudahy, WI

Date: 8/16/08
Rev: 5/8/09
2nd Rev: 3/31/10
By: JMG

PAVEMENT COVER MAINTENANCE PLAN

November 10, 2010

Property Located at:

3210 East Layton Avenue, Cudahy, Wisconsin

WDNR BRRTS Nos. 02-41-555222 & 03-41-550226

Parcel ID #: 5909994003

Introduction

This document is the Maintenance Plan for a pavement cover at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the paved surface occupying the area over the contaminated soil on-site. The contaminated soil is impacted by polynuclear aromatic hydrocarbons and polychlorinated biphenyls (as well as petroleum constituents associated with the PECFA portion of this site). The location of the paved surfaces to be maintained in accordance with this Maintenance Plan is identified in the attached map (Exhibit A).

Additional information about this property can be obtained from the Southeast Region Office of the Wisconsin Department of Natural Resources (WDNR) Tracking Number 02-41-555222 and the Madison Office of the Wisconsin Department of Commerce (DCOMM) Commerce Number 53110-1403-10.

Cover and Building Barrier Purpose

The paved surfaces over the contaminated soil serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The paved surfaces also act as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

Annual Inspection

The paved surfaces overlying the contaminated soil and as depicted in Exhibit A will be inspected once a year by the property owner, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into and exposure to underlying soils. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included as Exhibit B, Cap Inspection Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. The inspection log will be kept on site by the property owner and made immediately available for review by the Wisconsin Department of Natural Resources (WDNR), its successor, and/or other state agency. Copies of the log are not scheduled to be submitted to WDNR unless specifically requested.

Maintenance Activities

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

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

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

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover or Cap

The following are prohibited on a property where (pavement, a building foundation, soil cover, engineered cap or 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.

Amendment or Withdrawal of Maintenance Plan

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

Contact Information

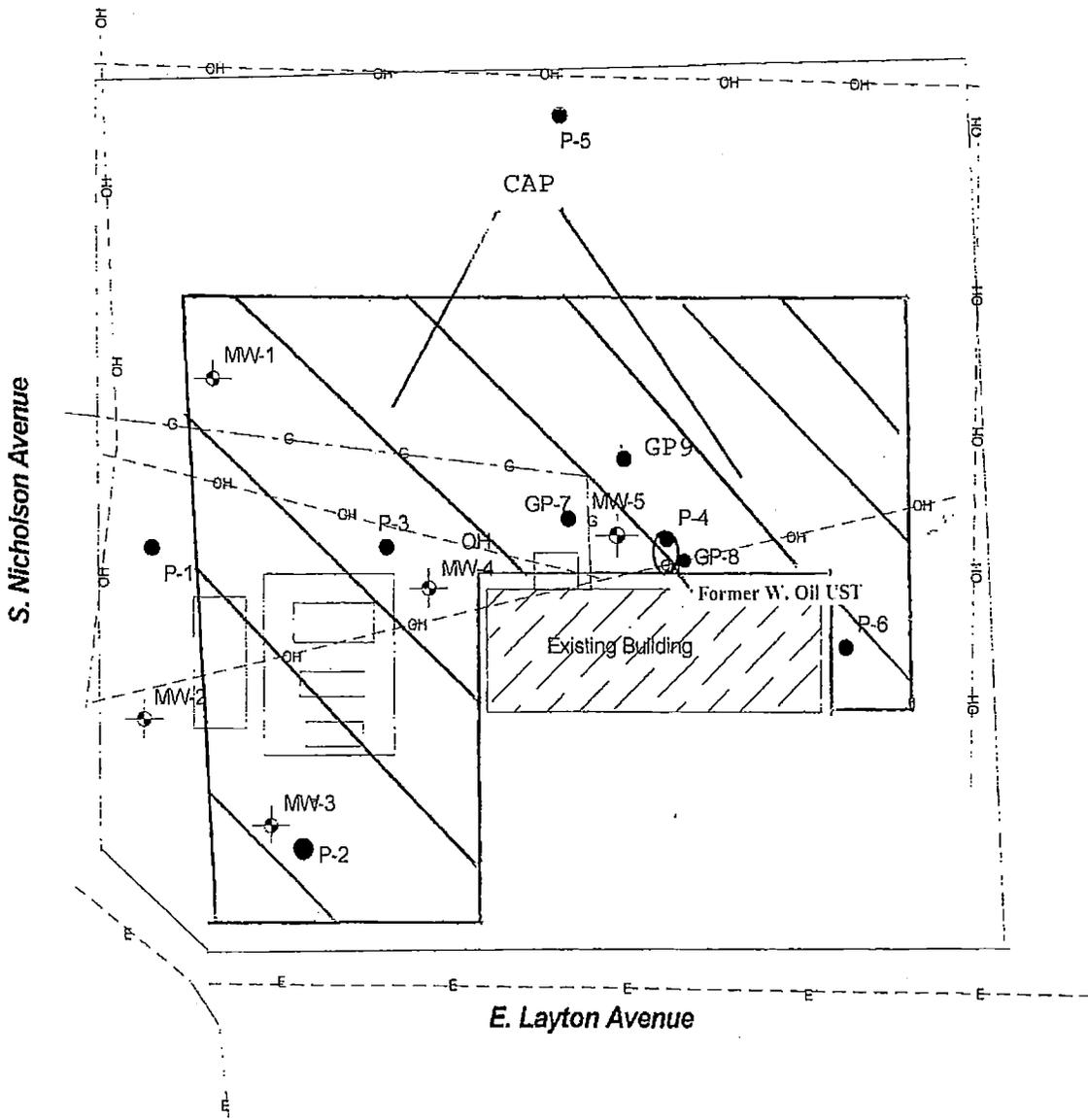
Site Owner and Operator:
Layton Ave LLC (Rory Oppenheimer)
1500 W Stillwater Ct
Mequon, WI 53092
414-788-2002

WDNR:
PROJECT MANAGER
Nancy Ryan
WDNR
2300 North Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53222
414-263-8533

Inspector/Consultant:
Konicek Environmental Consulting LLC
1032 S. Spring Street.
Port Washington, WI 53074
262-284-2557

DCOMM:
PROJECT MANAGER
Shawn Wenzel
DCOMM
PO Box 8044
Madison, WI 53708-8044
608-261-5401

EXHIBIT A



<p>Key:</p> <ul style="list-style-type: none">  Groundwater Monitoring Well  Existing Building  overhead utility  gas line  buried electric 	<h2 style="margin: 0;">Konicek Environmental Consulting, LLC</h2> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>NORTH</p> <p>Scale: 1"=40'</p> </div> <div style="text-align: center;"> <p>Auto Source Motors 3210 East Layton Avenue Cudahy, WI</p> </div> <div style="text-align: right; font-size: small;"> <p>Date: 8/16/08 Rev: 5/8/09 2nd Rev: 3/31/10 By: JMG</p> </div> </div>
---	--

* 0 9 5 5 3 6 5 3 *

State Bar of Wisconsin Form 1-2003
WARRANTY DEED

DOC.# 09553653

Document Number

Document Name

THIS DEED, made between
EARL J. MULQUEEN

REGISTER'S OFFICE | SS
Milwaukee County, WI

RECORDED 01/30/2008 01:32PM

("Grantor," whether one or more), and
TRRRBO, LLC, a Wisconsin limited liability company

JOHN LA FAVE
REGISTER OF DEEDS
AMOUNT: 11.00
TRANSFER FEE: 1192.50

("Grantee," whether one or more)
Grantor, for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in **MILWAUKEE** County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

Recording Area
Name and Return Address
Ruby Oppenheimer
1500 W. Stillwater Ct
MEQUON WI 53092

Lot 1 of Certified Survey Map No. 404, recorded on July 22, 1965, Reel 258, Images 1820 to 1821 as Document No. 4193576, of a part of the Southwest 1/4 of Section 23, Township 6 North, Range 22 East, in the City of Cudahy, County of Milwaukee, State of Wisconsin.

590-9994-003

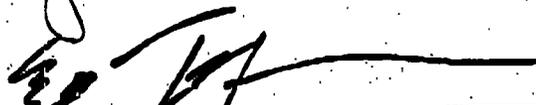
Excepting therefrom that part thereof described in Warranty Deed recorded as Document No. 7061267

Parcel Identification Number (PIN)
This is not homestead property
(is)(is not)

TRANSFER
\$ 1192.50
FEE

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

Dated Jan 24, 2008



Earl J. Mulqueen (SEAL)

(SEAL)

AUTHENTICATION

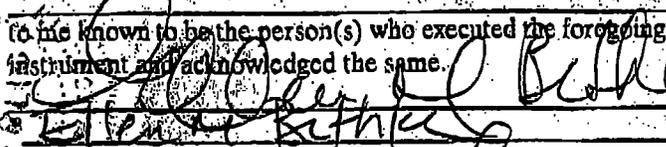
ACKNOWLEDGMENT

Signature(s) _____
authenticated on _____

STATE OF WISCONSIN
Waukesha COUNTY } ss.

Personally came before me on 1/24/2008
the above named Earl J. Mulqueen

TITLE: **MEMBER STATE BAR OF WISCONSIN**
(If not, _____
authorized by Wis. Stat. S706.06)

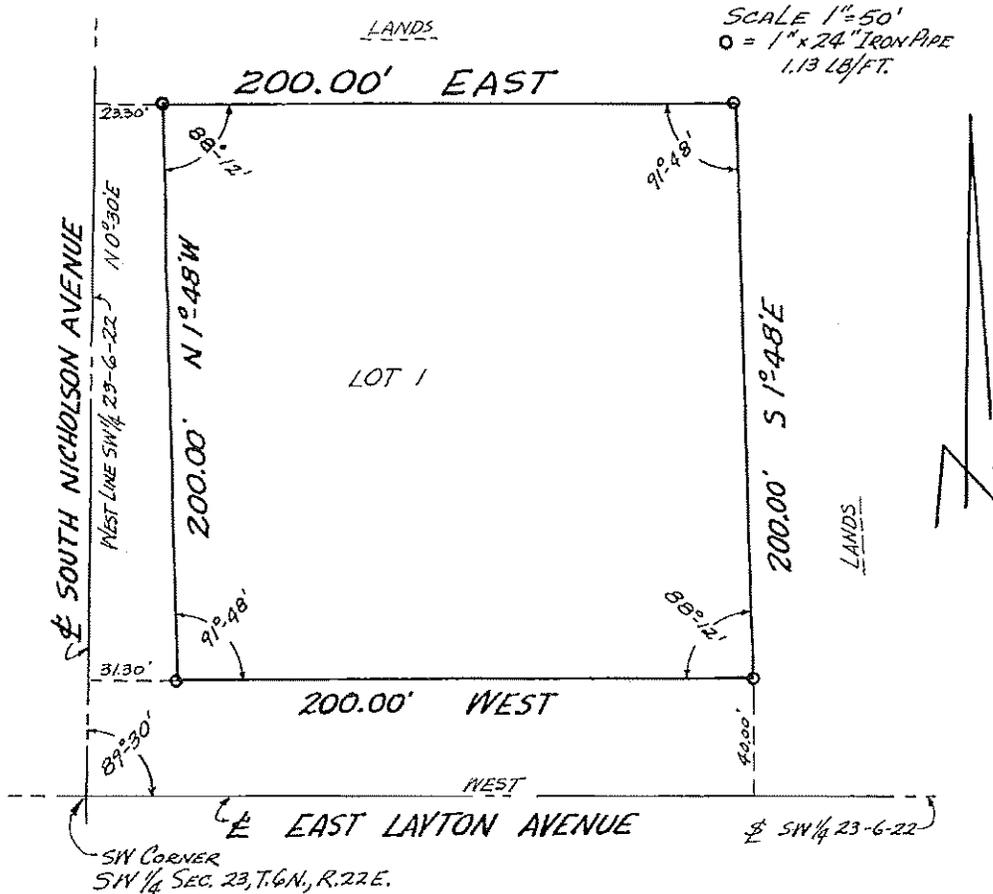
(to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.)


THIS INSTRUMENT DRAFTED BY:
Jeffrey P. Patterson

Notary Public, State of Wisconsin
My commission (is permanent)(expires: 1/24/2011)

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

CERTIFIED SURVEY MAP
 OF A PART OF THE SOUTHWEST 1/4 SECTION 23, TOWN 6 NORTH, RANGE 22 EAST
 IN THE CITY OF CUDAHY, MILWAUKEE COUNTY, WISCONSIN



SURVEYOR'S CERTIFICATE

I, Donald C. Haarmann, registered land surveyor, hereby certify that I have surveyed, divided and mapped part of the southwest 1/4 Section 23, Town 6 North, Range 22 East, in the City of Cudahy, Milwaukee County, Wisconsin, bounded and described as follows:

Commencing at a point which is 40.00 feet north and 31.30 feet east of the southwest corner of said SW 1/4 23; running thence North 1° 48' West, on and along the east line of South Nicholson Avenue, 200.00 feet to a point, said point being 23.30 feet east of said west line of the SW 1/4 23; running thence East and parallel to the south line of said SW 1/4 23, 200.00 feet to a point; thence South 1° 48' East, and parallel to the easterly line of South Nicholson Avenue, 200.00 feet to a point, said point being 40.00 feet north of the south line of said SW 1/4 23; thence West and parallel to said south line of said SW 1/4 23, 200.00 feet to the place of beginning.

That I have made such survey, land division, and this map by order and direction of the Geo. J. Meyer Foundation, Inc., owner of said land. That this map is a correct representation of the exterior boundaries of the land surveyed and of the division made thereof.

That I have fully complied with the provisions of Chapter 236.34 of the Wisconsin Statutes, and of Chapter 13.24 (2) (c), of the City of Cudahy code, Planning and Zoning.

July 12, 1965

RECORDED AT 1130A

JUL 17 1965

Book 258, Lines 1820, 1821

REGISTERED LAND SURVEYOR

WISCONSIN

DONALD C. HAARMANN

REGISTERED LAND SURVEYOR S-698

Page 1 of 2

Services Offered

Commercial Site Development
 Subdivision Design and Plotting
 Planning and Plan Review
 Streets and Highway Design
 Drainage Studies
 Water Distribution Systems
 Sewer Collection Systems
 Construction Surveying and Stake-out
 Services
 Structures



5417 North 118th Court
 (414) 616-4880

McClure
 Engineering Associates, Inc.

Milwaukee, Wisconsin 53225
 FAX (414) 616-4885

PROJECT NO: 08-13-08-002
 DRAWING: 08002T1.DWG

PLAT OF SURVEY

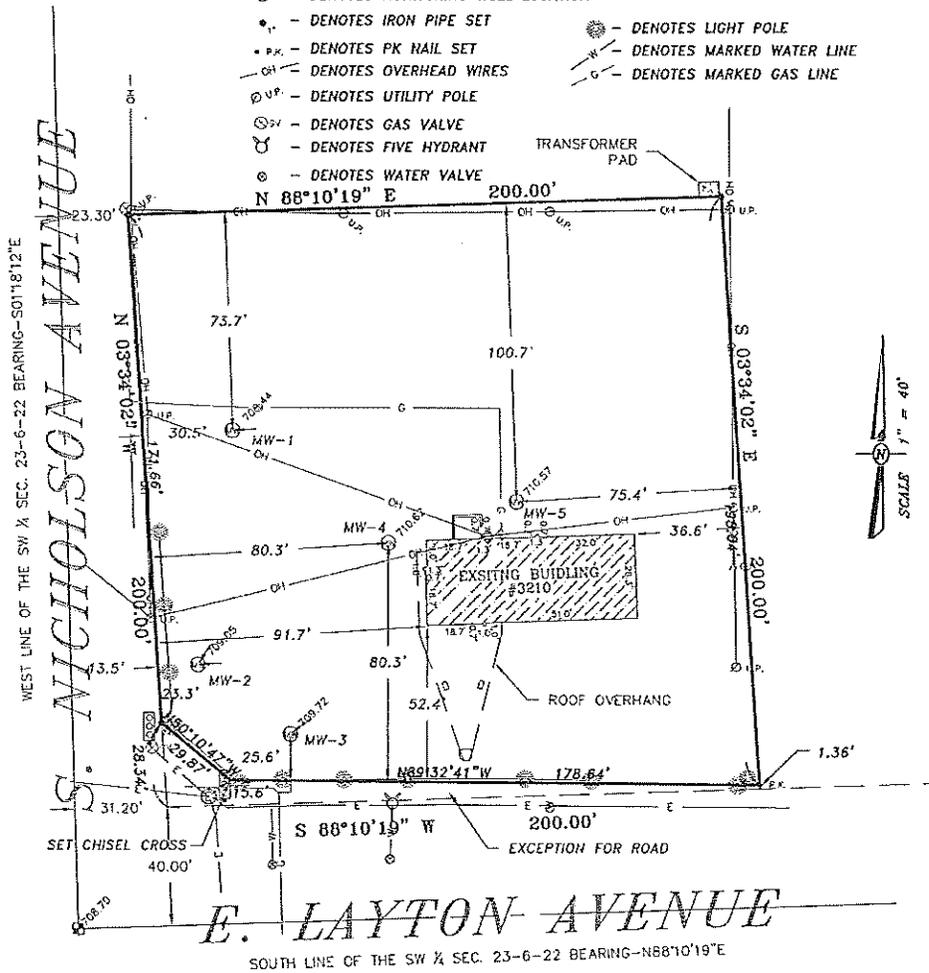
PREPARED FOR: KONICEK ENVIRONMENTAL CONSULTING

LEGAL DESCRIPTION:

LOT 1, CERTIFIED SURVEY MAP NO. 404, BEING A PART OF THE SOUTHWEST 1/4 OF SECTION 23, TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF CUDAHY, MILWAUKEE COUNTY, WISCONSIN.

BEARINGS BASED ON THE WISCONSIN STATE PLANE COORDINATE SYSTEM, SOUTH ZONE.

- ⊙ - DENOTES MONITORING WELL LOCATION
- - DENOTES IRON PIPE SET
- P.K. - DENOTES PK NAIL SET
- OH — DENOTES OVERHEAD WIRES
- ⊙ U.P. - DENOTES UTILITY POLE
- ⊙ G.V. - DENOTES GAS VALVE
- ⊙ F.H. - DENOTES FIRE HYDRANT
- ⊙ W.V. - DENOTES WATER VALVE
- ⊙ - DENOTES LIGHT POLE
- M.W.L. - DENOTES MARKED WATER LINE
- M.G.L. - DENOTES MARKED GAS LINE



STATE OF WISCONSIN }
 MILWAUKEE COUNTY }

I hereby certify that I have surveyed the above described property and the above map is a true representation thereof and shows the size and location of the property, its exterior boundaries, the location of all visible structures and dimensions of all principal buildings thereon, boundary fences, apparent easements, roadway and visible encroachments, if any.

This survey is made for the present owners of the property, and also those who purchase, mortgage, or guarantee, the title thereto within (1) year from date hereof.

Dated at MILWAUKEE, this 11TH day of DECEMBER 20 07

Recertified _____
 Surveyor *[Signature]*

REVISED 7-9-08 - ADD UTILITIES AND BUILDING



DRAWN BY: MDN
 CHECKED BY: _____

Re: Case Closure Submittal
Auto Source Motors
3210 E. Layton Ave
Milwaukee, WI
Commerce# 53110-1403-10

To whom it may concern:

The attached deed and legal description for the subject site is to the best of my knowledge true and correct.

Responsible Party:

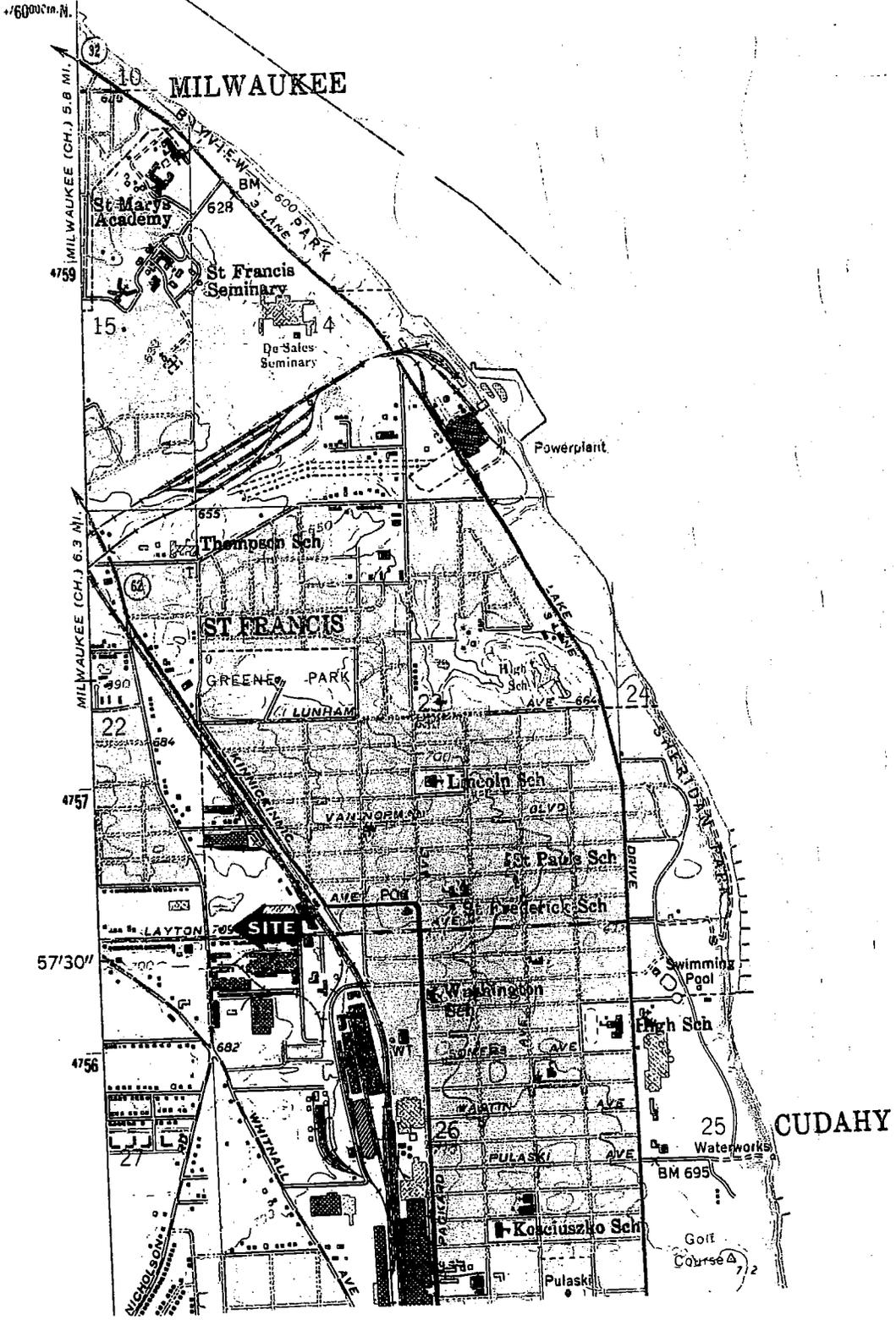
Layton Avenue LLC
1500 Stillwater Ct
Mequon, WI 53092



Rory Oppenheimer

02/09/2010-

Date

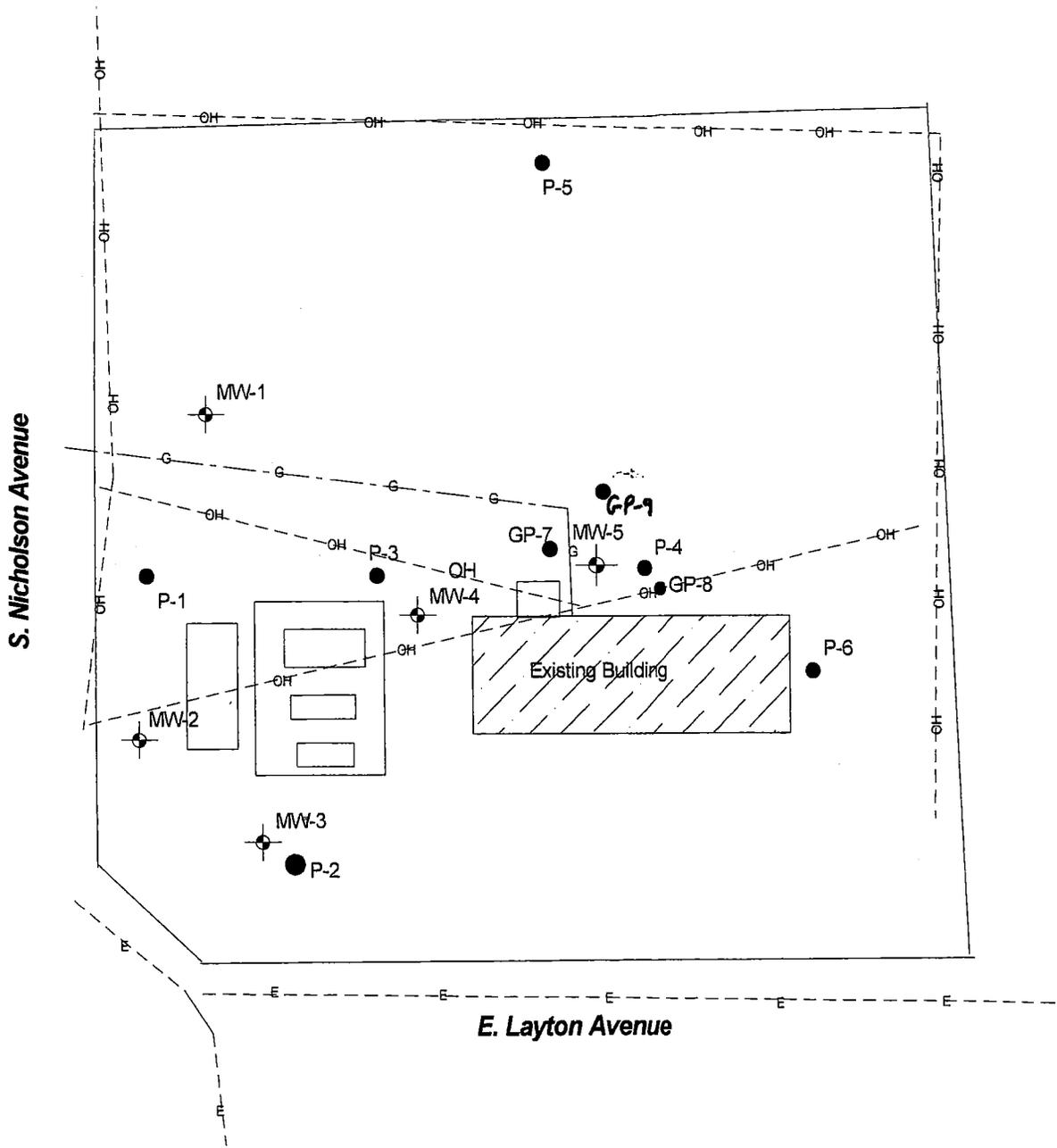


SOURCE:
 USGS
 South Milwaukee, Wisconsin
 Quadrangle Map 1958, Photorevised 1971, Minor revision 1994

DESIGNED BY	DATE
ZB	9/30/09
DRAWN BY	PROJECT
	0710055
APPROVED BY	SHEET NO.
KEK	1

FIGURE 1
 SITE LOCATION MAP
 AUTO SOURCE MOTORS
 3210 EAST LAYTON AVENUE
 CUDAHY, WISCONSIN

KONICEK
 ENVIRONMENTAL
 CONSULTING LLC



Key:

-  Groundwater Monitoring Well
-  Existing Building
-  overhead utility
-  gas line
-  buried electric

Konicek Environmental Consulting, LLC



NORTH

Scale: 1"=40'

Auto Source Motors
3210 East Layton Avenue
Cudahy, WI

Date: 8/16/08
Rev: 5/8/09
2nd Rev: 3/31/10
By: JMG

PARAMETERS	MW-1
Date Collected	11/27/07
Depth (feet/bp)	2-4
PAH (ug/g)	
1-Methylphenanthrene	<1.6
2-Methylphenanthrene	<1.7
Acenaphthene	3.20
Acenaphthylene	4.50
Benzo(a)pyrene	14
Benzo(b)fluoranthene	12
Benzo(k)fluoranthene	12
Benzo(a)anthracene	7.00
Benzo(a)pyrene	10
Chrysene	16
Diene(a)anthracene	2.30
Fluorene	36
Naphthalene	160
Indeno(1,2,3-cd)pyrene	6.70
Phenanthrene	19
Pyrene	31

PARAMETERS	P-5
Date Collected	6/15/07
Depth (feet/bp)	6-9
PAH (ug/g)	
1-Methylphenanthrene	11
2-Methylphenanthrene	21
Acenaphthene	<4.6
Acenaphthylene	<3.7
Benzo(a)pyrene	<1.6
Benzo(b)fluoranthene	<4.6
Benzo(k)fluoranthene	<4.6
Benzo(a)anthracene	<3.6
Chrysene	<5.6
Diene(a)anthracene	3.8
Fluorene	17
Indeno(1,2,3-cd)pyrene	<3.2
Phenanthrene	<3.1
Pyrene	<3.1

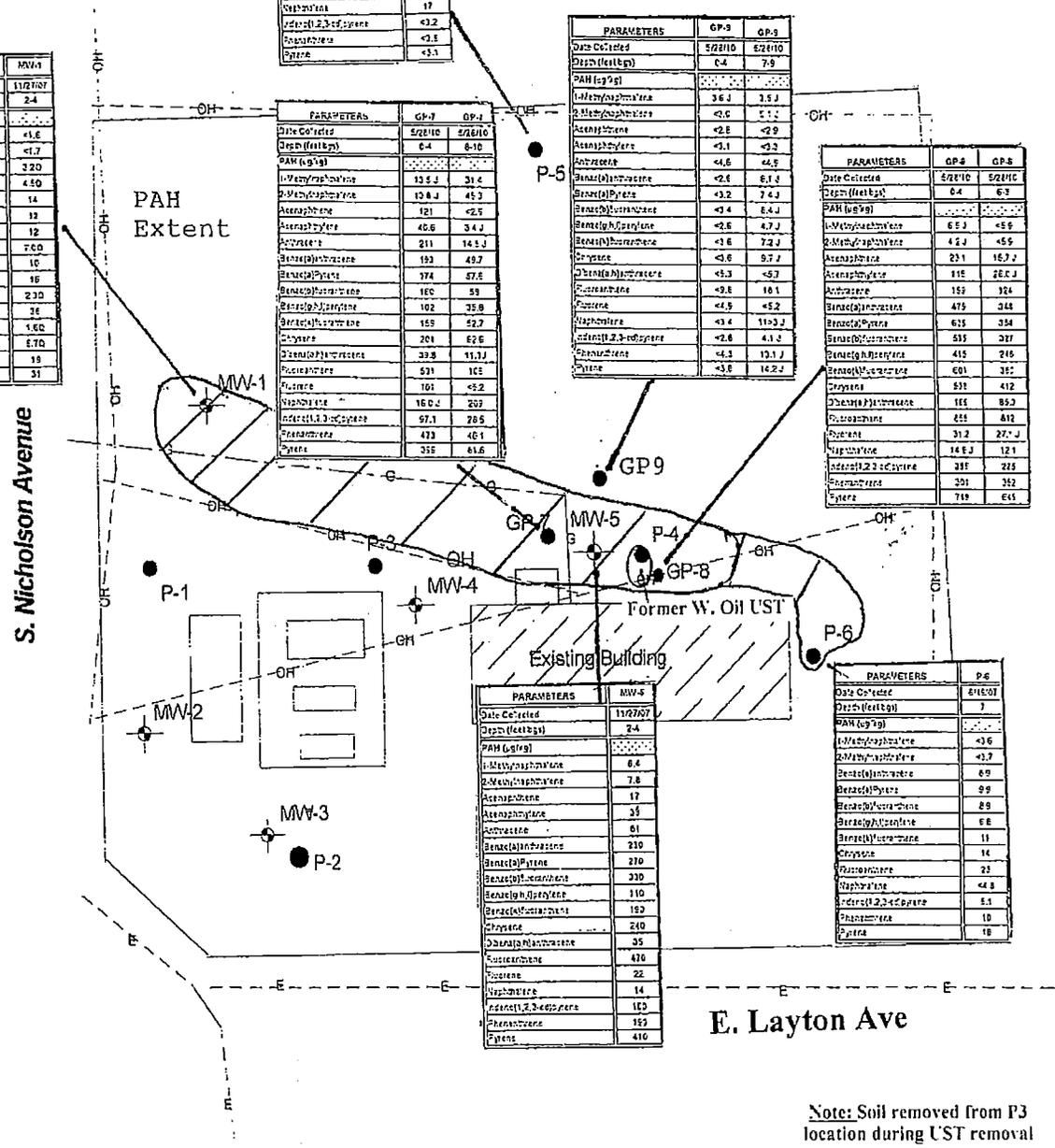
PARAMETERS	GP-3	GP-3
Date Collected	5/28/10	5/28/10
Depth (feet/bp)	0-4	7-9
PAH (ug/g)		
1-Methylphenanthrene	36.4	25.4
2-Methylphenanthrene	<1.6	5.1
Acenaphthene	<2.8	<2.9
Acenaphthylene	<3.1	<3.2
Anthracene	<4.6	<4.5
Benzo(a)pyrene	<2.6	6.1
Benzo(b)fluoranthene	<3.2	7.4
Benzo(k)fluoranthene	<3.4	6.4
Benzo(a)anthracene	<2.6	4.7
Benzo(a)pyrene	<3.6	7.2
Chrysene	<3.6	9.7
Diene(a)anthracene	<3.3	<5.7
Fluorene	<3.8	10.1
Naphthalene	<4.9	<5.2
Indeno(1,2,3-cd)pyrene	<2.6	4.1
Phenanthrene	<4.3	12.1
Pyrene	<3.6	16.2

PARAMETERS	GP-8	GP-8
Date Collected	5/28/10	5/28/10
Depth (feet/bp)	0-4	6-9
PAH (ug/g)		
1-Methylphenanthrene	65.3	<6.6
2-Methylphenanthrene	42.4	<5.9
Acenaphthene	25.1	16.7
Acenaphthylene	31.6	26.2
Anthracene	15.9	12.6
Benzo(a)pyrene	4.75	34.8
Benzo(b)fluoranthene	6.15	35.8
Benzo(k)fluoranthene	5.15	20.7
Benzo(a)anthracene	4.15	21.6
Benzo(a)pyrene	6.01	35.2
Chrysene	5.91	41.2
Diene(a)anthracene	1.65	85.2
Fluorene	4.65	41.2
Naphthalene	31.2	27.4
Indeno(1,2,3-cd)pyrene	14.6	12.1
Phenanthrene	28.5	22.8
Pyrene	20.1	35.2
Pyrene	7.19	64.4

PARAMETERS	GP-7	GP-7
Date Collected	5/28/10	5/28/10
Depth (feet/bp)	0-4	6-10
PAH (ug/g)		
1-Methylphenanthrene	13.5	31.4
2-Methylphenanthrene	12.8	45.2
Acenaphthene	1.01	<2.7
Acenaphthylene	46.6	34.4
Anthracene	2.11	14.5
Benzo(a)pyrene	1.93	49.7
Benzo(b)fluoranthene	1.74	57.6
Benzo(k)fluoranthene	1.60	5.9
Benzo(a)anthracene	1.02	35.8
Benzo(a)pyrene	1.55	52.7
Chrysene	2.01	62.6
Diene(a)anthracene	33.9	11.3
Fluorene	5.31	10.2
Naphthalene	1.01	<5.2
Indeno(1,2,3-cd)pyrene	16.0	25.2
Phenanthrene	67.1	28.5
Pyrene	4.33	46.1
Pyrene	3.55	81.6

PARAMETERS	MW-8
Date Collected	11/27/07
Depth (feet/bp)	2-4
PAH (ug/g)	
1-Methylphenanthrene	6.4
2-Methylphenanthrene	7.8
Acenaphthene	17
Acenaphthylene	35
Anthracene	61
Benzo(a)pyrene	210
Benzo(b)fluoranthene	270
Benzo(k)fluoranthene	230
Benzo(a)anthracene	110
Benzo(a)pyrene	192
Chrysene	240
Diene(a)anthracene	35
Fluorene	470
Naphthalene	22
Indeno(1,2,3-cd)pyrene	14
Phenanthrene	160
Pyrene	352
Pyrene	410

PARAMETERS	P-6
Date Collected	6/15/07
Depth (feet/bp)	7
PAH (ug/g)	
1-Methylphenanthrene	<3.6
2-Methylphenanthrene	<3.7
Acenaphthene	6.9
Acenaphthylene	9.9
Anthracene	8.9
Benzo(a)pyrene	6.8
Benzo(b)fluoranthene	11
Chrysene	14
Diene(a)anthracene	22
Fluorene	44.8
Indeno(1,2,3-cd)pyrene	5.1
Phenanthrene	10
Pyrene	18



Note: Soil removed from P3 location during UST removal

Key:

- Groundwater Monitoring Well
- Existing Building
- overhead utility
- gas line
- buried electric

Konicek Environmental Consulting, LLC

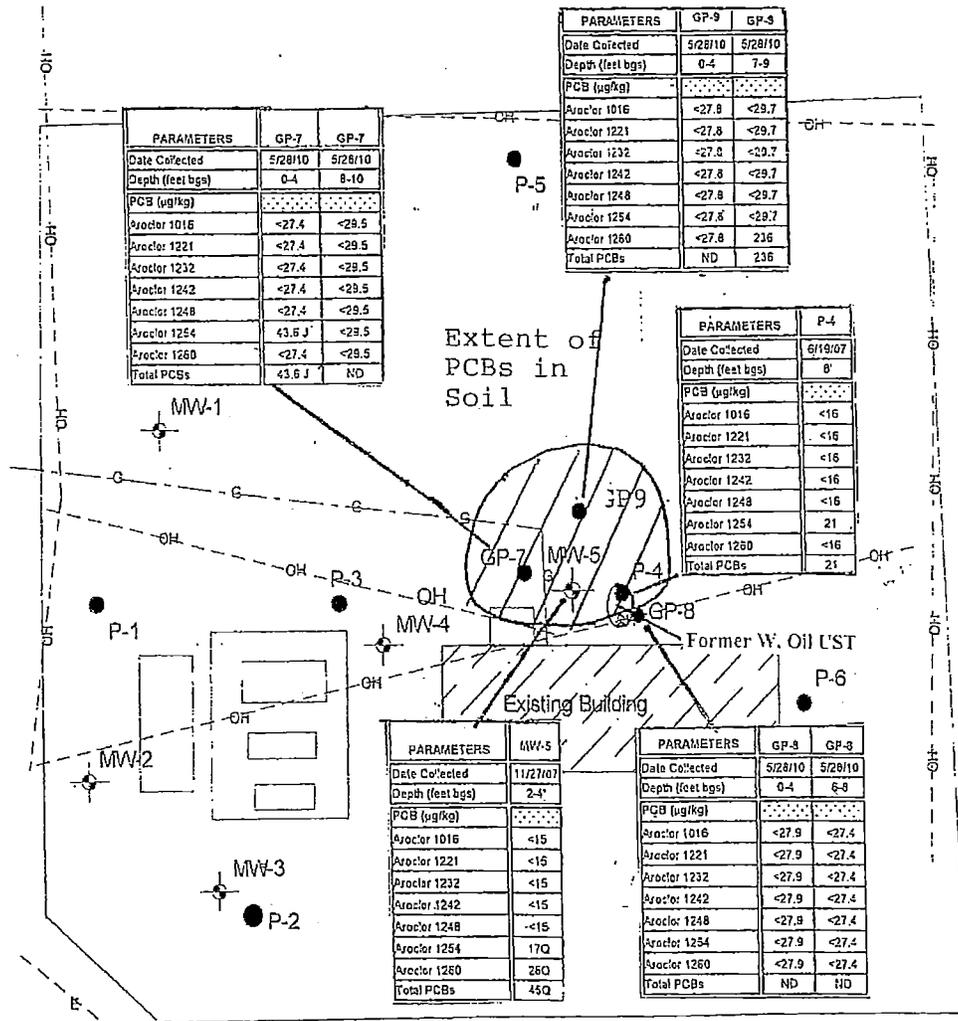
PAH Concentrations
Above Interim Non-Industrial RCLs
Auto Source Motors
3210 East Layton Avenue
Cudahy, WI

Scale: 1"=40'

Date: 8/16/08
Rev: 5/8/09
2nd Rev: 3/31/10
By: JMG

S. Nicholson Avenue

E. Layton Avenue



Note: Soil removed from P3 location during UST removal

Key:

- Groundwater Monitoring Well
- Existing Building
- overhead utility
- gas line
- buried electric

Konicek Environmental Consulting, LLC

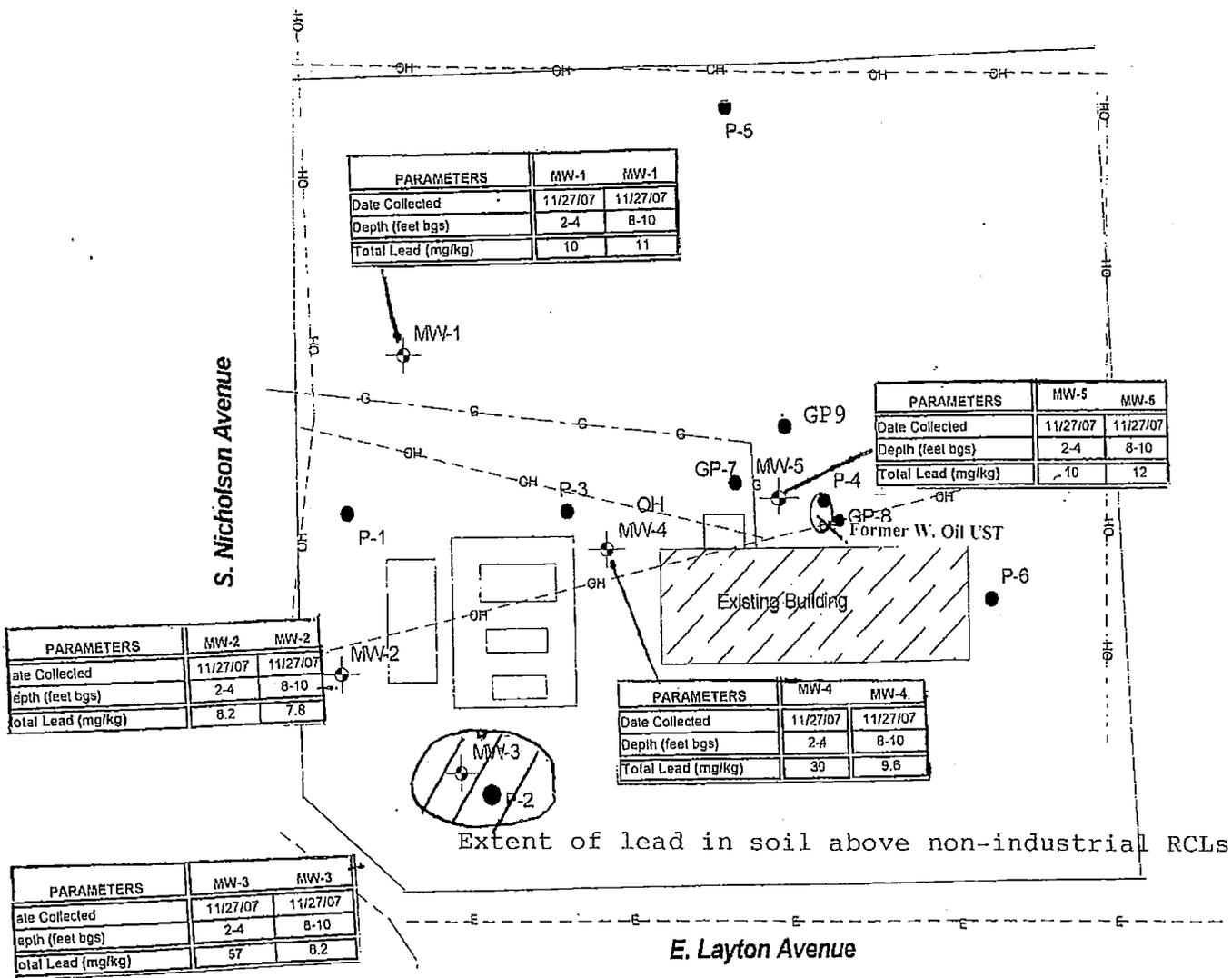


Scale: 1"=40'

Extent of PCB Concentrations

Auto Source Motors
3210 East Layton Avenue
Cudahy, WI

Date: 8/16/08
Rev: 5/8/09
2nd Rev: 3/31/11
By: JMG



Note: Soil removed from P3 location during UST removal

Key:

- Groundwater Monitoring Well
- Existing Building
- overhead utility
- gas line
- buried electric

Konicek Environmental Consulting, LLC

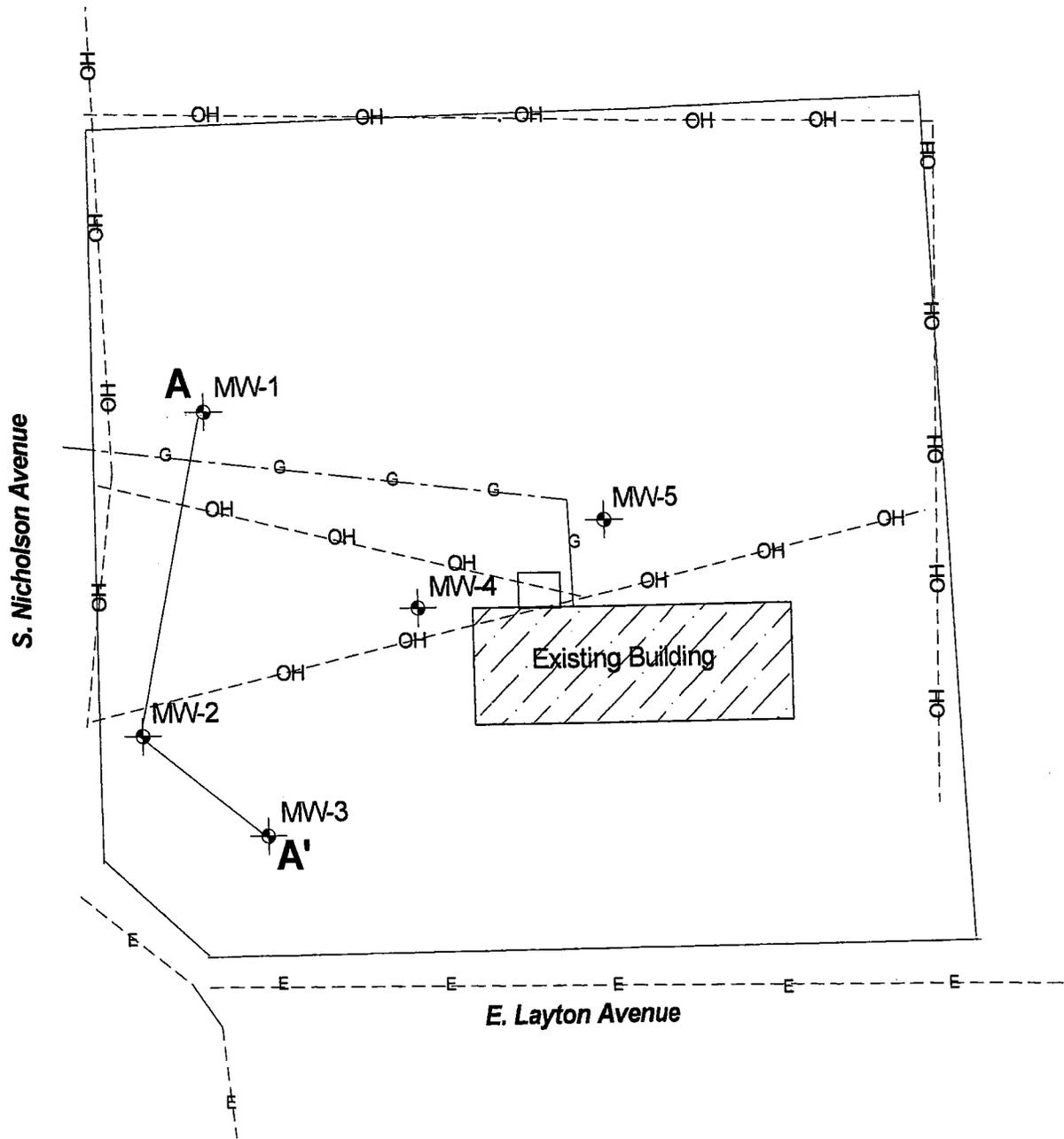


Scale: 1"=40'

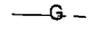
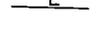
Lead Concentrations

Auto Source Motors
3210 East Layton Avenue
Cudahy, WI

Date: 8/16/08
Rev: 5/8/09
2nd Rev: 3/31/10
By: JMG



Key:

-  Groundwater Monitoring Well
-  Existing Building
-  overhead utility
-  gas line
-  buried electric

Konicek Environmental Consulting, LLC

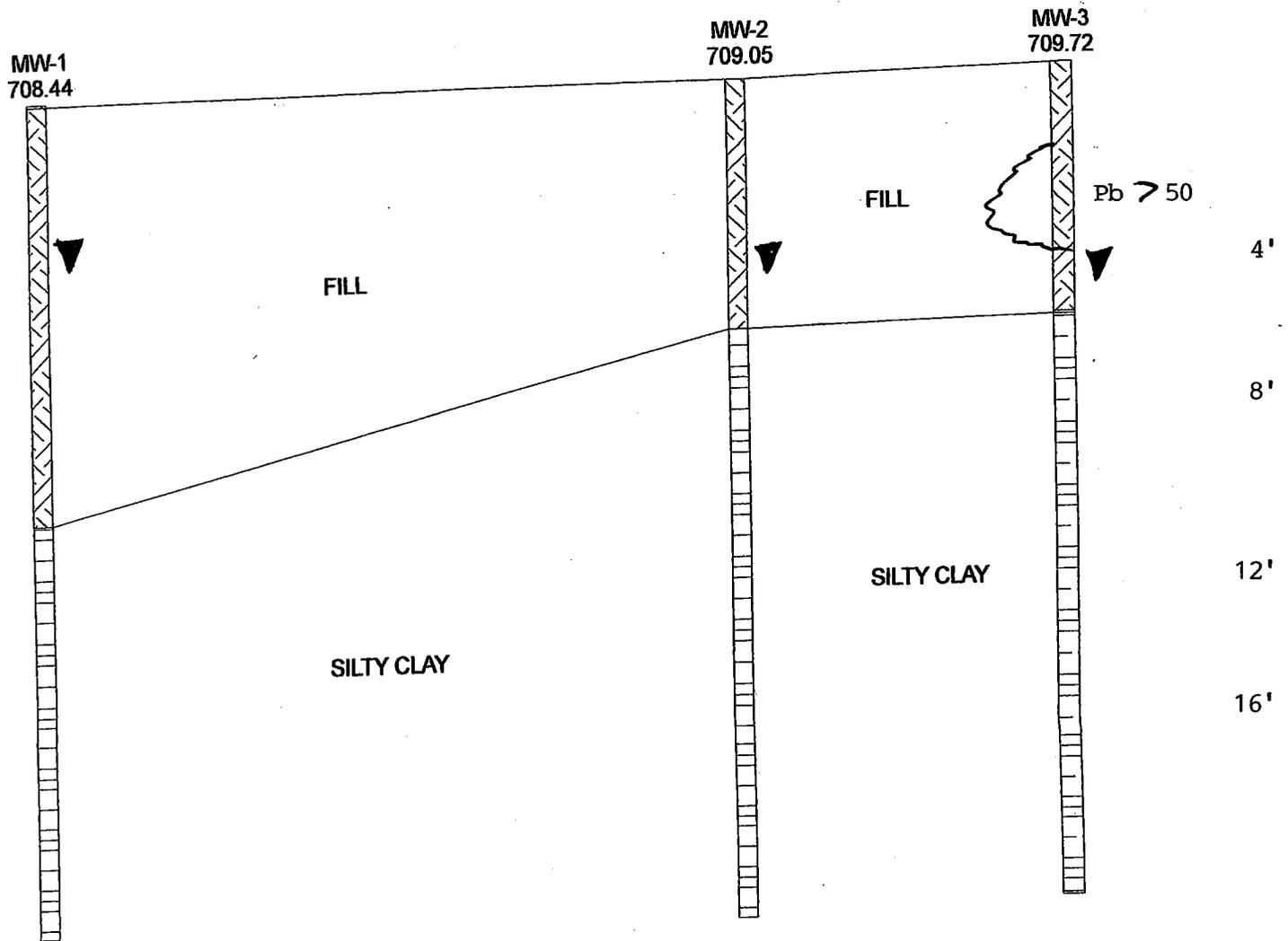


Scale: 1"=40'

Figure 3: Cross Section A-A' Transect

Auto Source Motors
 3210 East Layton Avenue
 Cudahy, WI

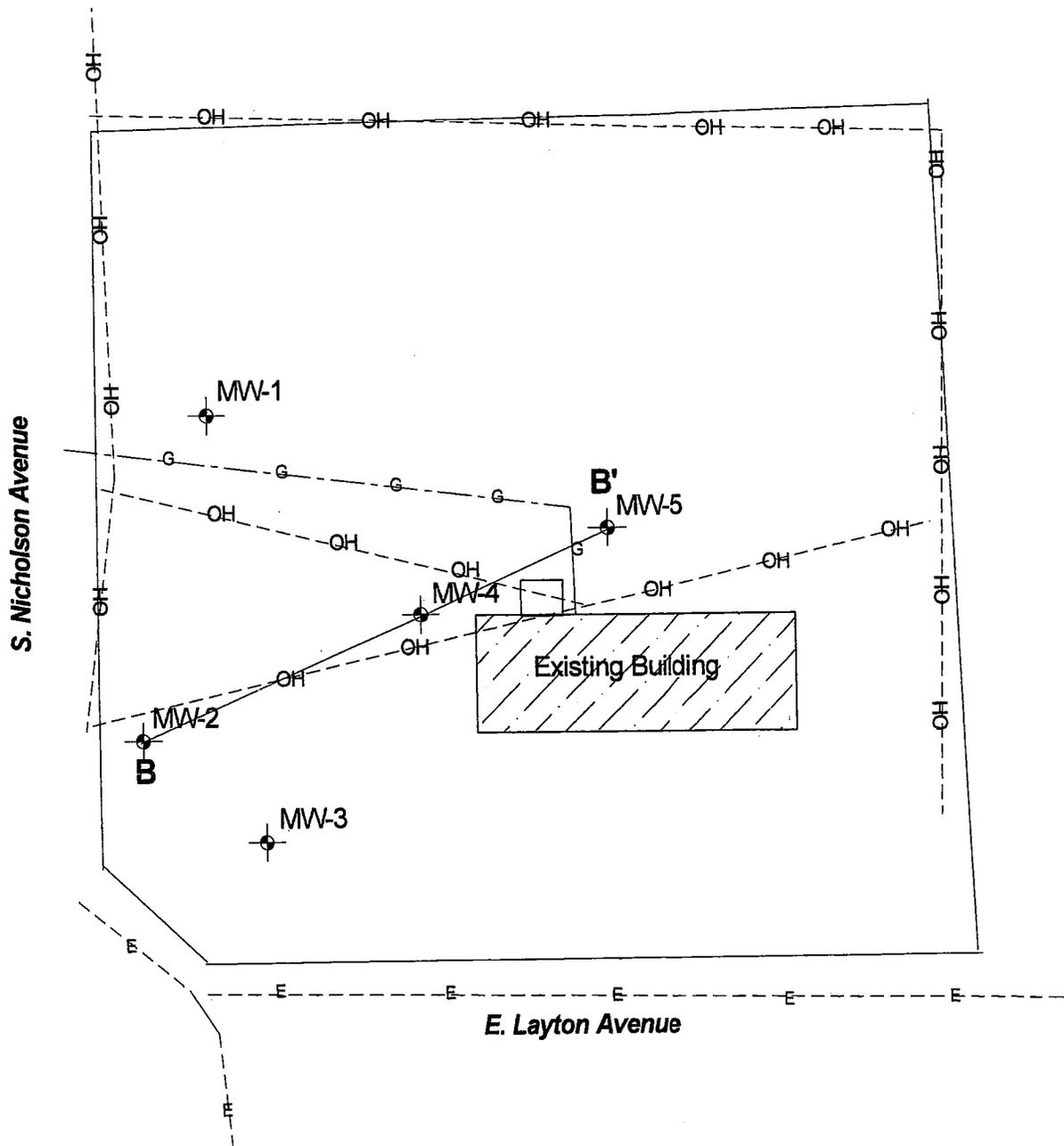
Date: 8/16/08
 Rev: 5/8/09
 By: JMG



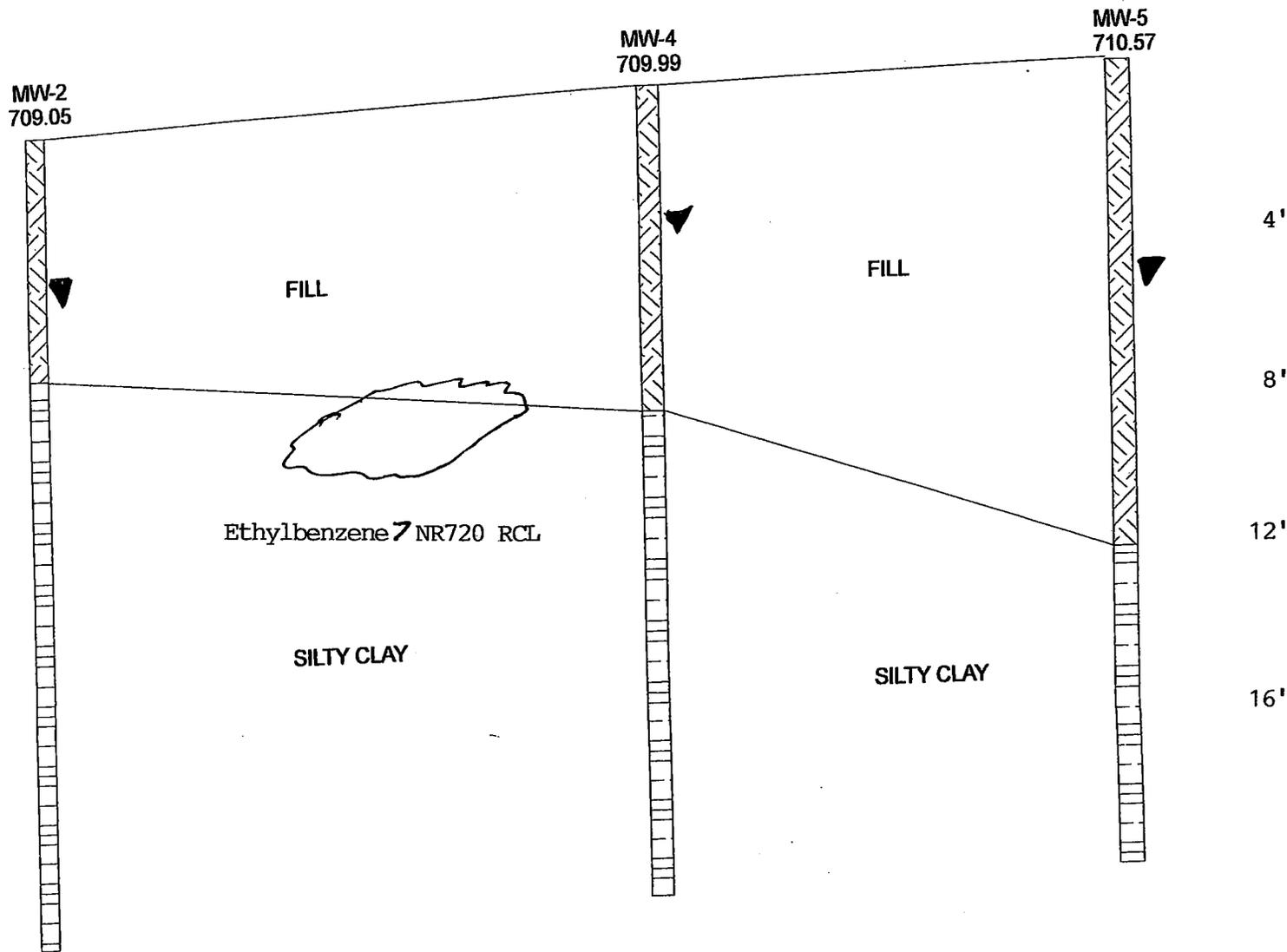
Scale:
 Vertical: 1"=4'
 Horizontal: 1"=20'

▼ - Groundwater

Cross Section A-A'
Auto Source Motors
3210 E. Layton Ave
Milwaukee, WI



<p>Key:</p> <ul style="list-style-type: none">  Groundwater Monitoring Well  Existing Building  overhead utility  gas line  buried electric 	<h2>Konicek Environmental Consulting, LLC</h2>
 <p>NORTH</p> <p>Scale: 1"=40'</p>	<p>Figure 4: Cross Section B-B' Transect</p> <p>Auto Source Motors 3210 East Layton Avenue Cudahy, WI</p> <p style="text-align: right;">Date: 8/16/08 Rev: 5/8/09 By: JMG</p>



Scale:
 Vertical: 1"=4'
 Horizontal: 1"=20'
 ▼ - Groundwater

Cross Section B-B'
Auto Source Motors
3210 E. Layton Ave
Milwaukee, WI

TABLE 1
SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS
AUTOSOURCE MOTORS
 3210 E Layton Ave.
 Cudahy, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION: KEY						NR 720 Generic RCLs Protection of Groundwater	NR 746		Soil Cleanup Levels for PAHs DNR Interim Guidance		
	GP-7		GP-8		GP-9			Table 1	Table 2	Groundwater Pathway	Direct Contact Pathway	
	0-4	8-10	0-4	6-8	0-4	7-9					Non-Industrial	Industrial
Date Collected	5/28/10	5/28/10	5/28/10	5/28/10	5/28/10	5/28/10	---	---	---	---	---	---
Depth (feet below ground surface)	0-4	8-10	0-4	6-8	0-4	7-9	---	---	---	---	---	---
PCB (µg/kg)												
Aroclor 1016	<27.4	<29.5	<27.9	<27.4	<27.8	<29.7	---	---	---	---	---	---
Aroclor 1221	<27.4	<29.5	<27.9	<27.4	<27.8	<29.7	---	---	---	---	---	---
Aroclor 1232	<27.4	<29.5	<27.9	<27.4	<27.8	<29.7	---	---	---	---	---	---
Aroclor 1242	<27.4	<29.5	<27.9	<27.4	<27.8	<29.7	---	---	---	---	---	---
Aroclor 1248	<27.4	<29.5	<27.9	<27.4	<27.8	<29.7	---	---	---	---	---	---
Aroclor 1254	43.6 J	<29.5	<27.9	<27.4	<27.8	<29.7	---	---	---	---	---	---
Aroclor 1260	<27.4	<29.5	<27.9	<27.4	<27.8	236	---	---	---	---	---	---
Total PCBs	43.6 J	ND	ND	ND	ND	236	---	---	---	---	---	---
PAH (µg/kg)												
1-Methylnaphthalene	13.5 J	31.4	6.9 J	<5.9	3.6 J	3.5 J	---	---	23,000	1,100,000	70,000,000	---
2-Methylnaphthalene	13.8 J	45.3	4.2 J	<5.9	<3.0	5.1 J	---	---	20,000	600,000	40,000,000	---
Acenaphthene	121	<2.9	23.1	15.7 J	<2.8	<2.9	---	---	38,000	900,000	60,000,000	---
Acenaphthylene	40.8	3.4 J	118	26.0 J	<3.1	<3.3	---	---	700	18,000	360,000	---
Anthracene	211	14.5 J	199	124	<4.6	<4.9	---	---	3,000,000	5,000,000	300,000,000	---
Benzo(a)anthracene	193	49.7	479	344	<2.8	8.1 J	---	---	17,000	88	3,900	---
Benzo(a)Pyrene	174	57.6	636	354	<3.2	7.4 J	---	---	48,000	8.8	390	---
Benzo(b)fluoranthene	160	59	595	327	<3.4	8.4 J	---	---	360,000	88	3,900	---
Benzo(g,h,i)perylene	102	35.8	415	246	<2.6	4.7 J	---	---	6,800,000	1,800	39,000	---
Benzo(k)fluoranthene	159	52.7	601	380	<3.6	7.2 J	---	---	870,000	880	39,000	---
Chrysene	204	62.6	538	412	<3.6	9.7 J	---	---	37,000	8,800	390,000	---
Dibenz(a,h)anthracene	39.8	11.3 J	166	85.3	<5.3	<5.7	---	---	38,000	8.8	390	---
Fluoroanthene	531	108	868	812	<9.8	18.1	---	---	500,000	600,000	40,000,000	---
Fluorene	101	<5.2	31.2	27.1 J	<4.9	<5.2	---	---	100,000	600,000	40,000,000	---
Naphthalene	16.0 J	209	14.8 J	12.1	<3.4	11>3 J	---	---	400	20000	110,000	---
Indeno(1,2,3-cd)pyrene	97.1	28.5	395	225	<2.8	4.1 J	---	---	680,000	88	3,900	---
Phenanthrene	473	46.1	301	352	<4.3	13.1 J	---	---	1,800	18,000	390,000	---
Pyrene	396	81.6	719	645	<3.6	14.2 J	---	---	8,700,000	500,000	30,000,000	---

Notes:
 Bold concentrations exceed NR 746 Table 1 values or Interim Guidance Based on Direct Contact
 Boxed concentrations exceed NR 746 Table 2 values
 Underlined concentrations exceed NR 720 Generic RCLs
 --- - not analyzed or no standard established
 µg/kg - micrograms per kilogram
 PVOCs - petroleum volatile organic compounds
 PAHs- Polycyclic Aromatic Hydrocarbons
 PCBs - Polychlorinated biphenyls
 ND - Not detected

TABLE 1
SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS
AUTOSOURCE MOTORS
 3210 E Layton Ave.
 Cudahy, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION: KEY						NR 720 Generic RCLs Protection of Groundwater	NR 746		Soil Cleanup Levels for PAHs DNR Interim Guidance		
	P-1	P-2	P-3	P-4	P-5	P-6		Table 1	Table 2	Groundwater Pathway	Direct Contact Pathway	
Date Collected	6/19/07	6/19/07	6/19/07	6/19/07	6/19/07	6/19/07	---	---	---	---	---	---
Depth (feet below ground surface)	7-feet	10-feet	10-feet	8-feet	8.5-feet	7-feet	---	---	---	---	---	---
Detected VOCs/PVOCs (µg/kg)												
Benzene	34	40	340	<25	<25	<25	5.5	8,500	1,100	---	---	---
Ethylbenzene	110	<25	11000	<25	<25	<25	2,900	4,600	---	---	---	---
Methyl tert-butyl Ether	81	<25	1000	<25	<25	<25	---	---	---	---	---	---
Toluene	<25	<25	<120	<25	<25	<25	1,500	38,000	---	---	---	---
1,2,4-Trimethylbenzene	130	<25	1300	<25	<25	<25	---	83,000	---	---	---	---
1,3,5-Trimethylbenzene	79	<25	5100	<25	<25	<25	---	11,000	---	---	---	---
Xylenes	460	<50	4600	<50	<50	<50	4,100	42,000	---	---	---	---
PCB (µg/kg)												
Aroclor 1016	---	---	---	<16	---	---	---	---	---	---	---	---
Aroclor 1221	---	---	---	<16	---	---	---	---	---	---	---	---
Aroclor 1232	---	---	---	<16	---	---	---	---	---	---	---	---
Aroclor 1242	---	---	---	<16	---	---	---	---	---	---	---	---
Aroclor 1248	---	---	---	<16	---	---	---	---	---	---	---	---
Aroclor 1254	---	---	---	21	---	---	---	---	---	---	---	---
Aroclor 1260	---	---	---	<16	---	---	---	---	---	---	---	---
Total PCBs	---	---	---	21	---	---	---	---	---	---	---	---
PAH (µg/kg)												
1-Methylnaphthalene	---	---	---	---	11	<3.6	---	---	---	23,000	1,100,000	70,000,000
2-Methylnaphthalene	---	---	---	---	21	<3.7	---	---	---	20,000	600,000	40,000,000
Benzo(a)anthracene	---	---	---	---	<6.8	8.9	---	---	---	17,000	88	3,900
Benzo(a)Pyrene	---	---	---	---	<3.7	9.9	---	---	---	48,000	8.8	390
Benzo(b)fluoranthene	---	---	---	---	<3.6	8.9	---	---	---	360,000	88	3,900
Benzo(g,h,i)perylene	---	---	---	---	<4.6	6.8	---	---	---	6,800,000	1,800	39,000
Benzo(k)fluoranthene	---	---	---	---	<3.9	11	---	---	---	870,000	880	39,000
Chrysene	---	---	---	---	<3.9	11	---	---	---	37,000	8,800	390,000
Fluoroanthene	---	---	---	---	<5.6	14	---	---	---	500,000	600,000	40,000,000
Naphthalene	---	---	---	---	3.8	23	---	---	---	400	20,000	110,000
Indeno(1,2,3-cd)pyrene	---	---	---	---	17	<4.8	---	---	---	400	20,000	110,000
Phenanthrene	---	---	---	---	<3.2	5.1	---	---	---	680,000	88	3,900
Pyrene	---	---	---	---	<3.2	5.1	---	---	---	1,800	18,000	390,000
Pyrene	---	---	---	---	<3.1	18	---	---	---	8,700,000	500,000	30,000,000

Notes:

- Bold concentrations exceed NR 746 Table 1 values
- Boxed concentrations exceed NR 746 Table 2 values
- Underlined concentrations exceed NR 720 Generic RCLs
- not analyzed or no standard established
- µg/kg - micrograms per kilogram
- PVOCs - petroleum volatile organic compounds
- PAHs- Polycyclic Aromatic Hydrocarbons

TABLE 1
SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS
AUTOSOURCE MOTORS
 3210 E Layton Ave.
 Cudahy, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION: KEY						NR 720 Generic RCLs Protection of Groundwater	NR 746		Soil Cleanup Levels for PAHs DNR Interim Guidance		
	MW-1			MW-2				Table 1	Table 2	Groundwater Pathway	Direct Contact Pathway	
	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07					Non-Industrial	Industrial
Date Collected	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07	---	---	---	---	---	---
Depth (feet below ground surface)	2-4	8-10	12-14	2-4	8-10	12-14	---	---	---	---	---	---
Detected VOCs (µg/kg)												
Methylene Chloride	320	<25	---	<25	<25	---	1,500	38,000	---	---	---	---
Toluene	180	<25	<25	<25	<25	<25	50	---	---	---	---	---
Total Lead (mg/kg)	10	11	---	8.2	7.8	---	---	---	---	---	---	---
PCB (µg/kg)												
Aroclor 1016	---	---	---	---	---	---	---	---	---	---	---	---
Aroclor 1221	---	---	---	---	---	---	---	---	---	---	---	---
Aroclor 1232	---	---	---	---	---	---	---	---	---	---	---	---
Aroclor 1242	---	---	---	---	---	---	---	---	---	---	---	---
Aroclor 1248	---	---	---	---	---	---	---	---	---	---	---	---
Aroclor 1254	---	---	---	---	---	---	---	---	---	---	---	---
Aroclor 1260	---	---	---	---	---	---	---	---	---	---	---	---
Total PCBs	---	---	---	---	---	---	---	---	---	---	---	---
PAH (µg/kg)												
1-Methylnaphthalene	<1.6	---	---	---	---	---	---	---	---	23,000	1,100,000	70,000,000
2-Methylnaphthalene	<1.7	---	---	---	---	---	---	---	---	20,000	600,000	40,000,000
Acenaphthene	3.2 Q	---	---	---	---	---	---	---	---	38,000	900,000	60,000,000
Anthracene	4.5 Q	---	---	---	---	---	---	---	---	3,000,000	5,000,000	300,000,000
Benzo(a)anthracene	14	---	---	---	---	---	---	---	---	17,000	88	3,900
Benzo(a)Pyrene	12	---	---	---	---	---	---	---	---	48,000	8.8	390
Benzo(b)fluoranthene	12	---	---	---	---	---	---	---	---	360,000	88	3,900
Benzo(g,h,i)perylene	7.0 Q	---	---	---	---	---	---	---	---	6,800,000	1,800	39,000
Benzo(k)fluoranthene	10	---	---	---	---	---	---	---	---	870,000	880	39,000
Chrysene	16	---	---	---	---	---	---	---	---	37,000	8,800	390,000
Dibenz(a,h)anthracene	2.3 Q	---	---	---	---	---	---	---	---	38,000	8.8	390
Fluoranthene	38	---	---	---	---	---	---	---	---	500,000	600,000	40,000,000
Naphthalene	1.6 Q	---	---	---	---	---	---	---	---	400	20,000	110,000
Indeno(1,2,3-cd)pyrene	5.7 Q	---	---	---	---	---	---	---	---	680,000	88	3,900
Phenanthrene	19	---	---	---	---	---	---	---	---	1,800	18,000	390,000
Pyrene	31	---	---	---	---	---	---	---	---	8,700,000	500,000	30,000,000

Notes:
 Bold concentrations exceed NR 746 Table 1 values or Interim Guidance Based on Direct Contact
 Boxed concentrations exceed NR 746 Table 2 values
 Underlined concentrations exceed NR 720 Generic RCLS
 --- - not analyzed or no standard established
 µg/kg - micrograms per kilogram
 PVOCs - petroleum volatile organic compounds
 PAHs - Polycyclic Aromatic Hydrocarbons

TABLE 1
SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS
AUTOSOURCE MOTORS
3210 E Layton Ave.
Cudahy, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION: KEY								NR 720 Generic RCLs Protection of Groundwater	NR 746		Soil Cleanup Levels for PAHs DNR Interim Guidance		
	MW-3		MW-4			MW-5		Table 1		Table 2	Groundwater Pathway	Direct Contact Pathway		
	MW-3	MW-3	MW-4	MW-4	MW-4	MW-5	MW-5					Non-Industrial	Industrial	
Date Collected	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07	11/27/07	---	---	---	---	---	---
Depth (feet below ground surface)	2-4	8-10	2-4	8-10	12-14	2-4	8-10	---	---	---	---	---	---	---
Detected VOCs/PVOCs (µg/kg)														
Methylene Chloride	<25	<25	99	<25	<25	<25	<25	---	---	---	---	---	---	---
Toluene	<25	<25	45 Q	<25	<25	<25	<25	1,500	38,000	---	---	---	---	---
Total Lead (mg/kg)	57	8.2	30	9.6	---	10	12	50	---	---	---	---	---	---
PCB (µg/kg)														
Aroclor 1016	---	---	---	---	---	<15	---	---	---	---	---	---	---	---
Aroclor 1221	---	---	---	---	---	<15	---	---	---	---	---	---	---	---
Aroclor 1232	---	---	---	---	---	<15	---	---	---	---	---	---	---	---
Aroclor 1242	---	---	---	---	---	<15	---	---	---	---	---	---	---	---
Aroclor 1248	---	---	---	---	---	<15	---	---	---	---	---	---	---	---
Aroclor 1254	---	---	---	---	---	17 Q	---	---	---	---	---	---	---	---
Aroclor 1260	---	---	---	---	---	28 Q	---	---	---	---	---	---	---	---
Total PCBs	---	---	---	---	---	45 Q	---	---	---	---	---	---	---	---
PAH (µg/kg)														
1-Methylnaphthalene	---	---	---	---	---	6.4	---	---	---	---	23,000	1,100,000	70,000,000	---
2-Methylnaphthalene	---	---	---	---	---	7.8	---	---	---	---	20,000	600,000	40,000,000	---
Acenaphthene	---	---	---	---	---	17	---	---	---	---	38,000	900,000	60,000,000	---
Acenaphthylene	---	---	---	---	---	33	---	---	---	---	700	18,000	360,000	---
Anthracene	---	---	---	---	---	81	---	---	---	---	3,000,000	5,000,000	300,000,000	---
Benzo(a)anthracene	---	---	---	---	---	230	---	---	---	---	17,000	88	3,900	---
Benzo(a)Pyrene	---	---	---	---	---	270	---	---	---	---	48,000	8.8	390	---
Benzo(b)fluoranthene	---	---	---	---	---	330	---	---	---	---	360,000	88	3,900	---
Benzo(g,h,i)perylene	---	---	---	---	---	110	---	---	---	---	6,800,000	1,800	39,000	---
Benzo(k)fluoranthene	---	---	---	---	---	190	---	---	---	---	870,000	880	39,000	---
Chrysene	---	---	---	---	---	240	---	---	---	---	37,000	8,800	390,000	---
Dibenz(a,h)anthracene	---	---	---	---	---	35	---	---	---	---	38,000	8.8	390	---
Fluoroanthene	---	---	---	---	---	470	---	---	---	---	500,000	600,000	40,000,000	---
Fluorene	---	---	---	---	---	22	---	---	---	---	100,000	600,000	40,000,000	---
Naphthalene	---	---	---	---	---	14	---	---	---	---	400	20000	110,000	---
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	100	---	---	---	---	680,000	88	3,900	---
Phenanthrene	---	---	---	---	---	190	---	---	---	---	1,800	18,000	390,000	---
Pyrene	---	---	---	---	---	410	---	---	---	---	8,700,000	500,000	30,000,000	---

Notes:
Bold concentrations exceed NR 746 Table 1 values or Interim Guidance Based on Direct Contact
Boxed concentrations exceed NR 746 Table 2 values
Underlined concentrations exceed NR 720 Generic RCLs
--- - not analyzed or no standard established
µg/kg - micrograms per kilogram
PVOCs - petroleum volatile organic compounds

RCLs for PAHs Based on Direct Contact

Determination of Soil Cleanup Levels for PAHs Using the benzo(a)pyrene - Equivalent Concentration Approach Under Non-Industrial Scenario

Auto Source Motors, Cudahy, Wisconsin

Compound	Relative Potency Factor	Detected B(a)P (equiv) Concentrations		Detected B(a)P (equiv) Concentrations	
		Concentration GP-8 (0-4) (mg/kg)	All Detected PAHs	Concentration GP-8 (6-8) (mg/kg)	All Detected PAHs
Acenaphthene	0.001	0.023	0.000023	0.016	0.000016
Acenaphthylene	0.001	0.118	0.000118	0.026	0.000026
Anthracene	0.01	0.199	0.00199	0.124	0.00124
Benzo(a)anthracene	0.1	0.479	0.0479	0.344	0.0344
Benzo(a)pyrene	1	0.636	0.636	0.354	0.354
Benzo(b)fluoranthene	0.1	0.595	0.0595	0.327	0.0327
Benzo(g,h,i)perylene	0.01	0.415	0.00415	0.246	0.00246
Benzo(k)fluoranthene	0.01	0.601	0.00601	0.38	0.0038
Chrysene	0.001	0.538	0.000538	0.412	0.000412
Dibenz(a,h)anthracene	1	0.166	0.166	0.085	0.085
Fluoranthene	0.001	0.868	0.000868	0.812	0.000812
Fluorene	0.001	0.031	0.000031	0.027	0.000027
Fluorene	0.1	0.395	0.0395	0.225	0.0225
Indeno(1,2,3-cd)pyrene	0.001	0.069	0.000069	0.03	0.00003
1 - methyl naphthalene	0.001	0.042	0.000042	0.03	0.00003
2-methyl naphthalene	0.001	0.015	0.000015	0.012	0.000012
Naphthalene	0.001	0.301	0.000301	0.352	0.000352
Phenanthrene	0.001	0.719	0.000719	0.645	0.000645
Pyrene					
TOTAL BaP-EQUIVALENT			0.963774		0.538462
B(a)P RCL-DIRECT INGESTION (NON-INDUSTRIAL SCENARIO)⁽²⁾			0.70⁽¹⁾		0.70⁽¹⁾

Notes:

B(a)P - benzo(a)pyrene

(1) Utilized a combined target cancer risk of 1.8 E-06 (in situ soil)

(2) Value derived from Equation 4, Attachment D of WDNR Publication RR-519-97

RCLs for PAHs Based on Direct Contact

Determination of Soil Cleanup Levels for PAHs Using the benzo(a)pyrene - Equivalent Concentration Approach Under Non-Industrial Scenario

Auto Source Motors, Cudahy, Wisconsin

Compound	Relative Potency Factor	B(a)P (equiv) Concentrations		B(a)P (equiv) Concentrations	
		Detected Concentration GP-7 (0-4) (mg/kg)	All Detected PAHs	Detected Concentration GP-7 (8-10) (mg/kg)	All Detected PAHs
Acenaphthene	0.001	0.121	0.000121	0.001	0.000001
Acenaphthylene	0.001	0.041	0.000041	0.003	0.000003
Anthracene	0.01	0.211	0.00211	0.015	0.00015
Benzo(a)anthracene	0.1	0.193	0.0193	0.05	0.005
Benzo(a)pyrene	1	0.174	0.174	0.058	0.058
Benzo(b)fluoranthene	0.1	0.16	0.016	0.059	0.0059
Benzo(g,h,i)perylene	0.01	0.102	0.00102	0.036	0.00036
Benzo(k)fluoranthene	0.01	0.159	0.00159	0.053	0.00053
Chrysene	0.001	0.204	0.000204	0.063	0.000063
Dibenz(a,h)anthracene	1	0.04	0.04	0.011	0.011
Fluoranthene	0.001	0.531	0.000531	0.108	0.000108
Fluorene	0.001	0.101	0.000101	0.026	0.000026
Indeno(1,2,3-cd)pyrene	0.1	0.097	0.0097	0.029	0.0029
1-methyl naphthalene	0.001	0.014	0.000014	0.031	0.000031
2-methyl naphthalene	0.001	0.014	0.000014	0.045	0.000045
Naphthalene	0.001	0.016	0.000016	0.209	0.000209
Phenanthrene	0.001	0.473	0.000473	0.046	0.000046
Pyrene	0.001	0.396	0.000396	0.082	0.000082
TOTAL BaP-EQUIVALENT			0.265631		0.084454
B(a)P RCL-DIRECT INGESTION (NON-INDUSTRIAL SCENARIO)⁽²⁾			0.70⁽¹⁾		0.70⁽¹⁾

Notes:

B(a)P - benzo(a)pyrene

(1) Utilized a combined target cancer risk of 1.8 E-06 (in situ soil)

(2) Value derived from Equation 4, Attachment D of WDNR Publication RR-519-97

RCLs for PAHs Based on Direct Contact

Determination of Soil Cleanup Levels for PAHs Using the benzo(a)pyrene - Equivalent Concentration Approach Under Non-Industrial Scenario

Auto Source Motors, Cudahy, Wisconsin

Compound	Relative Potency Factor	Detected	B(a)P (equiv) Concentrations	Detected	B(a)P (equiv) Concentrations
		Concentration MW-1 (2 to 4) (mg/kg)	All Detected PAHs	Concentration MW-5 (2 to 4) (mg/kg)	All Detected PAHs
Acenaphthene	0.001	0.032	0.000032	0.017	0.000017
Acenaphthylene	0.001	0.002	0.000002	0.033	0.000033
Anthracene	0.01	0.045	0.00045	0.081	0.00081
Benzo(a)anthracene	0.1	0.014	0.0014	0.23	0.023
Benzo(a)pyrene	1	0.012	0.012	0.27	0.27
Benzo(b)fluoranthene	0.1	0.012	0.0012	0.33	0.033
Benzo(b)fluoranthene	0.01	0.007	0.00007	0.11	0.0011
Benzo(g,h,i)perylene	0.01	0.01	0.0001	0.19	0.0019
Benzo(k)fluoranthene	0.001	0.016	0.000016	0.24	0.00024
Chrysene	1	0.023	0.023	0.035	0.035
Dibenzo(a,h)anthracene	0.001	0.038	0.000038	0.47	0.00047
Fluoranthene	0.001	0.002	0.000002	0.022	0.000022
Fluorene	0.1	0.006	0.0006	0.1	0.01
Indeno(1,2,3-cd)pyrene	0.001	0.002	0.000002	0.0064	0.0000064
1 - methyl naphthalene	0.001	0.002	0.000002	0.0078	0.0000078
2-methyl naphthalene	0.001	0.002	0.000002	0.014	0.000014
Naphthalene	0.001	0.019	0.000019	0.19	0.00019
Phenanthrene	0.001	0.031	0.000031	0.41	0.00041
Pyrene					
TOTAL BaP-EQUIVALENT			0.038966		0.3762202
B(a)P RCL-DIRECT INGESTION (NON-INDUSTRIAL SCENARIO)⁽²⁾			0.70⁽¹⁾		0.70⁽¹⁾

Notes:

B(a)P - benzo(a)pyrene

(1) Utilized a combined target cancer risk of 1.8 E-06 (in situ soil)

(2) Value derived from Equation 4, Attachment D of WDNR Publication RR-519-97