

**AAI PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**610 WEST RAWSON AVENUE & 7045 SOUTH 6<sup>th</sup> STREET  
OAK CREEK, WISCONSIN**

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**PROJECT REFERENCE #16366**

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## EXECUTIVE SUMMARY

Mr. Eric Ogden, on behalf of HSA Commercial Real Estate of Chicago, Illinois, retained The Sigma Group, Inc. (Sigma) of Milwaukee, Wisconsin to conduct an AAI Phase I Environmental Site Assessment (ESA) of property located at 610 West Rawson Avenue and 7045 South 6<sup>th</sup> Street in Oak Creek, Wisconsin (subject property). The purpose of the environmental assessment was to identify any recognized environmental conditions (RECs), as defined by ASTM in its Standard Practice for Environmental Site Assessments (E 1527-13), on the subject property. To perform the service, Sigma compiled a site history, reviewed available regulatory documents, reviewed area geology and hydrogeology and conducted limited site observations between July 23 and August 6, 2018.

RECs, as defined by ASTM, include the presence or likely presence of hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property. The term includes hazardous substances and petroleum products even under conditions in compliance with the law. This term is not intended to include de minimis conditions that do not generally present a material risk to human health or the environment and would not be the subject of an enforcement action if brought to the attention of the appropriate authorities. Conditions determined to be de minimis are not recognized environmental conditions.

The subject property is comprised of two adjacent parcels. An approximate 7.83-acre parcel located at 610 West Rawson Avenue and an approximate 2.57-acre parcel located at 7045 South 6<sup>th</sup> Street in the City of Oak Creek, Milwaukee County, Wisconsin. At the time of this assessment, the 7045 S. 6<sup>th</sup> Street parcel was improved with a 4,928 square-foot warehouse building constructed in 1973 and the 610 W. Rawson Ave. parcel was improved with a 2,688 square-foot office building constructed in 1975 with a building addition in 1978 and a 10,590 square-foot warehouse building constructed in 1960 with a building addition in 1982. Historically, the subject property was developed between 1955 and 1963 and historically occupied by a bulk fuel oil storage, mixing and distribution facility (Wisconsin Industrial Fuel Oil, Inc.). Additional historical occupants included a truck wash, a truck and trailer repair company and BioVersal, USA which operated a mobile soil/sediment washing treatment processes as well as manufactured chemicals for use in industrial cleaning, soil and sediment remediation. The subject property has been unoccupied since 2016.

A search of available environmental records was conducted by Environmental Data Resources Inc. (EDR). The subject property was identified in the Resource Conservation and Recovery Act (RCRA), Solid & Hazardous Waste Information Management System (SHWIMS), Facility Index System (FINDS), Enforcement and Compliance History Information (ECHO), Leaking Underground Storage Tank (LUST), Recovered Government Archive (RGA)–LUST, Historical Auto Station, Underground Storage Tank (UST), Wisconsin Environmental Repair Program (ERP), Wisconsin Remedial Response Site Evaluation Report (WRRSER), Leaking Aboveground Storage Tank (LAST), Aboveground Storage Tank (AST), Wisconsin Spills (Spills) and US Brownfields databases.

The subject property (610 W. Rawson Ave.) was identified in the RCRA, SHWIMS, FINDS and ECHO databases as a historical Conditionally Exempt Small Quantity Generator (CESQG) (generates 100 kg or less of hazardous waste per month) of lead and arsenic waste and petroleum refinery sludge. A written informal violation dated May 1, 1996 was on file for the property. Compliance with the violation was achieved on May 22, 1996.

The subject property (7045 S. 6<sup>th</sup> Street) was also identified in the SHWIMS database as a former transporter and storage facility of solid waste. No violations were on file for the property.

The subject property (610 W. Rawson Ave.) was identified in the LUST and RGA-LUST databases as a closed LUST site (BRRTS #03-41-001132) with soil and groundwater historically impacted with petroleum. The LUST case was opened on October 24, 1990 and closed by the Wisconsin Department of Natural Resources (WDNR) on July 23, 1996.

The subject property (610 W. Rawson Ave.) was identified in the Historical Auto Station and UST databases as a registered UST site with seven petroleum USTs closed/removed from the subject property in October of 1990. The removal of USTs led to the LUST case discussed above.

The subject property (610 W. Rawson Ave.) was identified in the ERP, WRRSER and LAST databases database as an open ERP site (BRRTS #02-41-107191) with soil impacted with petroleum and chlorinated solvents. The ERP case was opened on July 10, 1995. Sigma performed supplemental site investigation activities at the subject property to define the degree and extent of subsurface impacts identified during previously completed site investigation and evaluate potential sources of contamination associated with historic site use.

In summary, Sigma completed 14 test pit excavations and advanced 75 soil borings (SHA-1 through SHA-14, SGP-1 through SGP-58, SMW-2, SPZ-1 and SPZ-2) to further define the degree and extent of impacts identified by previously completed site investigation work and to evaluate potential source areas associated with historic site use. A total of 101 soil samples (one to two per test pit/boring) were collected for laboratory analysis of select parameters depending on the location and purposed of each soil boring. Sigma also installed 12 shallow groundwater monitoring wells and 2 piezometers and collected a round of groundwater samples from newly installed wells and the existing groundwater monitoring well network (MW102, MW103, MW104, TW103).

Soil sampling activities completed during previous site investigation work focused on the areas of the former ASTs, both north and south of the former rail siding and generally defined the degree and extent of petroleum impacts associated with the ASTs. The supplemental soil sampling completed by Sigma identified select areas of additional impact, including an area of chlorinated volatile organic compounds (CVOCs), petroleum and polychlorinated biphenyls (PCBs) in the southwest corner of the subject property and a separate area of PCB impact along the western boundary.

A review of groundwater sampling results at the subject property indicate impacts to shallow groundwater with reported concentrations of PVOC and CVOC constituents greater than ch. NR 140 Enforcement Standards (ES).

Based on the site investigation work completed to date, a conceptual remedial action plan that includes targeted remedial excavation of select source areas, soil management and capping through site redevelopment, and natural attenuation groundwater monitoring has been developed. Additionally, the potential vapor intrusion risk associated with the VOC impacts to soil and groundwater at the subject property will require evaluation and likely mitigation as part of site redevelopment.

The subject property (610 W. Rawson Ave.) was identified as a registered AST site with 39 petroleum ASTs historically closed/removed from the subject property. Any release associated with the ASTs would have been identified during Phase II ESA activities conducted at the subject property, which was discussed above.

The subject property (610 W. Rawson Ave.) was identified in the Spills database with three separate releases. The subject property was identified in the Spills database (BRRTS #04-41-039309) with a release of industrial fuel to surface water at the subject property on August 17, 1983. The spill was reportedly absorbed, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-039616) with a release of fuel oil to the subject property on March 20, 1984. The spill was reportedly contained/recovered, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-052705) with a release of petroleum at the subject property on June 27, 1984. The spill was reportedly absorbed, with the WDNR requiring no further action.

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. The subject property address of 610 W. Rawson Ave. (BRRTS #07-41-528856) and the subject property address of 7045 S. 6<sup>th</sup> Street (BRRTS #07-41-579077) were identified as US Brownfield sites.

In addition to the subject property, EDR identified several sites in the vicinity of the subject property on one or more of the environmental databases researched by EDR. Based on the relative distance between the reported sites and the subject property, the site status and/or Phase II Environmental activities that were completed at the subject property in 2017 and 2018, the identified sites are not expected to impact the subject property.

The Environmental Site Assessment has been performed in conformance with the scope and limitations of ASTM Practice E 1527-13. This assessment has not revealed evidence of recognized environmental conditions in connection with the subject property except for the following:

- The subject property is an open Wisconsin Environmental Repair Program (ERP) site (BRRTS #02-41-107191). Soil sampling activities completed during previous site investigation work generally defined the degree and extent of petroleum impacts associated with historical Aboveground Storage Tanks (ASTs). Supplemental soil sampling completed by Sigma in 2017 and 2018 identified select areas of additional impact, including an area of chlorinated volatile organic compounds (CVOCs), petroleum and polychlorinated biphenyls (PCBs) in the southwest corner of the

subject property and a separate area of PCB impact along the western boundary of the subject property. A review of groundwater sampling results indicates impacts to shallow groundwater with reported concentrations of PVOC and CVOC constituents greater than ch. NR 140 Enforcement Standards (ES).

Additionally, historical recognized environmental conditions (HRECs) were identified at the subject property which include the following:

- The subject property (610 W. Rawson Ave.) was identified in the Leaking Underground Storage Tank (LUST) and Recovered Government Archive (RGA)–LUST databases as a closed LUST site (BRRTS #03-41-001132) with soil and groundwater historically impacted with petroleum. The LUST case was opened on October 24, 1990 and closed by the Wisconsin Department of Natural Resources (WDNR) on July 23, 1996. Residual impacts from the LUST release could be encountered during redevelopment activities. Contaminated soil that is discovered would require appropriate management in accordance with applicable state and federal regulations.
- The subject property (610 W. Rawson Ave.) was identified in the Spills database with three separate releases. The spill cases were closed by the WDNR requiring no further action. Residual impacts from the releases could be encountered during redevelopment activities. Contaminated soil that is discovered would require appropriate management in accordance with applicable state and federal regulations.

With the exception of time constraints there were no limiting conditions to this report. Where observations were limited, Sigma renders no opinion as to the presence of hazardous substances, wastes or contamination potential.

The conclusions included in this assessment report should not be construed as legal advice. This practice is intended to reflect a commercially prudent and reasonable inquiry as no environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with the subject property. Performance of the ASTM E 1527-13 practice is intended to reduce, but not eliminate that uncertainty. Finally, even a finding of no recognized environmental conditions is not a warranty or guarantee that the property is free from contamination.



## 1.0 INTRODUCTION

### 1.1 Purpose

Mr. Eric Ogden, on behalf of HSA Commercial Real Estate of Chicago, Illinois, retained The Sigma Group, Inc. (Sigma) of Milwaukee, Wisconsin to conduct an AAI Phase I Environmental Site Assessment (ESA) of property located at 610 West Rawson Avenue and 7045 South 6<sup>th</sup> Street in Oak Creek, Wisconsin (subject property). The purpose of the environmental assessment was to identify any recognized environmental conditions (RECs), as defined by ASTM in its Standard Practice for Environmental Site Assessments (E 1527-13), on the subject property. To perform the service, Sigma compiled a site history, reviewed available regulatory documents, reviewed area geology and hydrogeology and conducted limited site observations between July 23 and August 6, 2018. The findings of the assessment are summarized in this report.

The ASTM Standard E 1527-13 defines a recognized environmental condition (REC) as:

“The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.” The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not recognized environmental conditions.”

The ASTM Standard E 1527-13 defines a controlled recognized environmental condition (CREC) as:

“A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

The ASTM Standard E 1527-13 defines a historical recognized environmental condition (HREC) as:

“A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

## **1.2 Methodology**

Research of the property evaluated its historical use and examined the generation, treatment, storage, and disposal of hazardous chemicals, materials, substances, and wastes for potential sources of environmental concern. Research included a review of reasonably ascertainable records, interviews of knowledgeable local and state officials, and a site reconnaissance.

## **1.3 Significant Assumptions**

This report was prepared under constraints of cost, time, and scope, and reflects a limited assessment and evaluation rather than a total, complete, or extensive assessment and evaluation. Sigma's review was performed using the degree of care and skill ordinarily exercised under similar localities. No other warranty or guarantee, expressed or implied, is made as to the conclusions and recommendations included in this report.

The findings of this report, to the best of our knowledge, are valid as of the date of this review. However, changes in the conditions of a property can occur with the passage of time, whether due to natural processes or the works of man on this or adjacent properties. In addition, changes in applicable or appropriate standards may occur, whether they result from legislation, from the broadening of knowledge, or from other reasons. Accordingly, the findings of this report may be invalidated wholly or partially by changes outside our control.

Specified information contained in this report has been obtained from publicly available sources and other secondary sources of information produced by entities other than Sigma. Although care has been taken by Sigma in compiling the information, Sigma disclaims any and all liability for any errors, omissions, or inaccuracies of the third parties in such information and data, and for any consequences arising there from.

The conclusions contained in this report are based upon information provided by the client, a limited on-site inspection, and our investigation of available public records and should not be considered legal advice. Latent conditions at the site are not known. The review did not include sampling of rock, soil, groundwater, surface water, air or all on-site substances or materials. It is, therefore, not possible to confirm the presence or absence of toxic or hazardous substances, wastes or materials in the environments associated with the site. Sigma makes no warranties, expressed or implied, as to marketability or fitness of the property for a particular purpose.

## **1.4 Limitations and Exceptions**

Conclusions in this report represent our professional judgment and are limited to those site conditions and potential impacts from neighboring properties that could be discovered under the scope of services authorized by the proposal. The conclusions presented were based on an inspection of the property and a review of relevant records.

Sigma attempted to review all reasonably ascertainable, practically reviewable information regarding the history of the subject property; however, data gaps were encountered during preparation of this report. It is Sigma's opinion that the data gaps do not significantly affect, as defined by ASTM E1527-13, the ability to identify recognized environmental conditions in connection with the subject property.

Additionally, Sigma attempted to review all pertinent regulatory agency files for the subject property and adjoining properties; however, time constraints limited the regulatory file review. Based on a review of on-line, historical and municipal records, user and owner provided information and regulatory information provided by Environmental Data Resources (EDR) it is Sigma's opinion that the regulatory file review constraints do not significantly affect, as defined by ASTM E1527-13, the ability to identify recognized environmental conditions in connection with the subject property.

The conclusions and interpretations of this report do not collectively define all the risks associated with purchase or other use of the property. Should you, our client, or other interested parties, wish to further reduce the risks associated with undiscovered or unquantified environmental impacts, you may want to consider having additional assessment activities performed such as collecting and analyzing soil, groundwater, or other appropriate samples for compounds of relevant and particular concern, or complete other investigation activities as appropriate.

This report does not address or include regulatory compliance issues, cultural or historic resources, industrial hygiene, health and safety issues, ecological resources, endangered species, mold or indoor air quality. Further this report does not purport to identify or quantify asbestos, radon, lead-based paint, lead in drinking water, extremely low frequency radiation (ELF) or electromagnetic frequency radiation (EMF) on-site.

### **1.5 Special Terms and Conditions**

No part of this document may be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopy, recording, or any information storage and retrieval system, without permission in writing from The Sigma Group, Inc.

### **1.6 User Reliance**

This document contains proprietary and confidential information, which is the sole and exclusive property of The Sigma Group, Inc. and HSA Commercial Real Estate. This document may not be used or duplicated by those other than HSA Commercial Real Estate in any manner without the express written consent of The Sigma Group, Inc. and HSA Commercial Real Estate. The environmental conditions of an operating facility change continuously. This report documents the status of environmental issues as of the date of the report. We caution reliance on this information as time progresses without an appropriate review and update to this environmental assessment.

## **2.0 SITE DESCRIPTION**

### **2.1 Location, Legal Description, and General Characteristics**

The subject property is comprised of two adjacent parcels. An approximate 7.83-acre parcel located at 610 West Rawson Avenue and an approximate 2.57-acre parcel located at 7045 South 6<sup>th</sup> Street in the City of Oak Creek, Milwaukee County, Wisconsin. Legal descriptions and GIS images of the subject property parcels, obtained from Milwaukee County, are included in **Appendix A** of this report. The subject property location is presented on **Figures 1 and 2**.

### **2.2 Current Use of the Property**

At the time of this assessment the subject property was unoccupied.

### **2.3 Site and Vicinity Characteristics**

The subject property is located on the northwest corner of West Rawson Avenue and South 6<sup>th</sup> Street, just east of Interstate I-94, within an area of Oak Creek that is mixed with industrial and commercial properties. The City of Oak Creek has included the subject property within an area that is zoned Manufacturing (M-1).

### **2.4 Descriptions of Structures, Roads, and Other Improvements on the Site**

At the time of this assessment, the 7045 S. 6<sup>th</sup> Street parcel was improved with a 4,928 square-foot warehouse building constructed in 1973 and the 610 W. Rawson Ave. parcel was improved with a 2,688 square-foot office building constructed in 1975 with a building addition in 1978 and a 10,590 square-foot warehouse building constructed in 1960 with a building addition in 1982. Access to the property is gained from South 6<sup>th</sup> Street from the east.

Utilities provided to the subject property include water, gas, electric, communications and sewer. The City of Oak Creek supplies water service in the area and the Milwaukee Metropolitan Sewerage District provides waste water service in the area.

### **2.5 Current Uses of the Adjoining Properties**

At the time of this assessment, adjoining properties included; a multi-tenant commercial building to the north of the subject property, South 6<sup>th</sup> Street then a fire station and a War Memorial to the east of the subject property, West Rawson Avenue then undeveloped land to the south of the subject property and railroad ROW then Herc Rentals to the west of the subject property. A Site Plan and Area Map are included as **Figure 2** of this report.

## **3.0 USER-PROVIDED INFORMATION**

### **3.1 Title Records**

Sigma attempted to review available current land title records for environmental cleanup liens and other activity and use limitations, such as engineering controls and institutional controls for the subject property parcels. Deed information was not available at the printing of this report. Although deed information was not available for review for the subject property, based on the information that was available for review, it is Sigma's opinion that the data gap does not significantly affect, as defined by ASTM E1527-13, the ability to identify recognized environmental conditions in connection with the property.

### **3.2 Environmental Liens or Activity and Use Limitations**

In accordance with the ASTM standard, Sigma requested information from HSA Commercial Real Estate, via Mr. Eric Ogden, regarding known environmental liens on the subject property. Mr. Ogden reported no knowledge of environmental liens.

### **3.3 Specialized Knowledge**

In accordance with the ASTM standard, Sigma requested information from Mr. Ogden regarding information about previous ownership or uses of the property that may be material to identifying recognized environmental conditions. Mr. Ogden reported that environmental assessment activities were completed at the property. Historical environmental activities are discussed in Section 3.5 of this report.

### **3.4 Valuation Reduction of Environmental Issues**

In accordance with the ASTM standard, Sigma requested information from Mr. Ogden regarding value reduction of the subject property to comparable properties. Mr. Ogden reported that the price being paid for the property is reflective of the known contamination at the site (discussed in Section 3.5).

### **3.5 Owner, Property Manager, and Occupant Information**

In lieu of interviews, Mr. Eric Ogden with HSA Commercial Real Estate, who owns the subject property, provided Sigma with a site investigation report; *SUMMARY OF SITE INVESTIGATION, WORK PLAN FOR ADDITIONAL INVESTIGATION & CONCEPTUAL REMEDIAL ACTION PLAN TO SUPPORT VOLUNTARY PARTY LIABILITY EXEMPTION APPLICATION FORMER BIOGENESIS ENTERPRISES INC 610 WEST RAWSON AVENUE & 7045 SOUTH 6<sup>th</sup> STREET OAK CREEK, WISCONSIN* that was prepared at the subject property. The report, which was prepared by The Sigma Group, Inc. (Sigma) is dated August 3, 2018.

In summary, Sigma performed supplemental site investigation activities at the properties located at 610 W. Rawson Avenue and 7045 S. 6<sup>th</sup> Street, Oak Creek, Wisconsin (the "Site") to define the degree and extent of subsurface impacts identified during previously completed site investigation and evaluate potential sources of contamination associated with historic site use. Two separate petroleum hydrocarbon releases associated with former fuel oil underground storage tanks (USTs) at the site received regulatory case closure from the Wisconsin Department of Natural Resources (WDNR) in 1996. A separate release associated with numerous aboveground storage tanks (ASTs) historically located at the Site and historical site use was opened by WDNR following a site inspection in 1995. This report has been prepared as part of the Site's enrollment in the Voluntary Party Liability Exemption (VPLE) program and the purpose of this report is to present and obtain WDNR concurrence for a summary of site investigation activities completed to date, a work plan for limited additional site investigation activities and a conceptual Remedial Action Plan (RAP) for the Site.

Sigma completed 14 test pit excavations and advanced 75 soil borings (SHA-1 through SHA-14, SGP-1 through SGP-58, SMW-2, SPZ-1 and SPZ-2) to further define the degree and extent of impacts identified by previously completed site investigation work and to evaluate potential source areas associated with historic site use. A total of 101 soil samples (one to two per test pit/boring) were collected for laboratory analysis of select parameters depending on the location and purposed of each soil boring. Sigma also installed 12 shallow groundwater monitoring wells and 2 piezometers and collected a round of groundwater samples from newly installed wells and the existing groundwater monitoring well network (MW102, MW103, MW104, TW103).

The Site is covered with approximately one foot of either topsoil or sand and gravel fill (depending on location within the Site). The surficial soil is generally underlain by apparently native lean clay/silty clay to the maximum depth investigation (30 feet below ground surface [bgs]).

Based on measurements from groundwater monitoring wells, static groundwater elevations indicate that shallow groundwater is generally located at depths between 6 to 8 feet below ground surface (bgs). The most recent static groundwater elevations indicate that shallow

groundwater generally flows radially out to the north, east and south from the south-central portion of the Site.

Soil sampling activities completed during previous site investigation work focused on the areas of the former ASTs, both north and south of the former rail siding and generally defined the degree and extent of petroleum impacts associated with the ASTs. The supplemental soil sampling completed by Sigma identified select areas of additional impact, including an area of chlorinated volatile organic compounds (CVOCs), petroleum and polychlorinated biphenyls (PCBs) in the southwest site corner and a separate area of PCB impact along the western Site boundary.

A review of groundwater sampling results completed at the site indicate impacts to shallow groundwater with reported concentrations of PVOC and CVOC constituents greater than ch. NR 140 Enforcement Standards (ES). The extent of shallow groundwater impacts at the site has been defined based on the completed groundwater sampling events and does not appear to be migrating off-site. The vertical extent of CVOC impacts within the southwest corner of the Site has been defined by the groundwater monitoring activities completed in this area.

A limited amount of additional sampling activities, primarily soil sampling to confirm/further define the extent of impacts identified to date or to evaluate select areas that have been inaccessible is proposed to be completed as waste removal ("mill scale" pile, drums/containers) and demolition activities allow.

Based on the site investigation work completed to date, a conceptual remedial action plan that includes targeted remedial excavation of select source areas, soil management and capping through site redevelopment, and natural attenuation groundwater monitoring has been developed.

**Appendix B** contains a copy of the text portion of the site investigation report.

### **3.6 Reasons for Performing Phase I**

The purpose of this report is to qualify for the innocent landowner defense to CERCLA liability and to assist the user in making business decisions in regard to the subject property

## **4.0 RECORDS REVIEW**

### **4.1 Standard Environmental Record Sources**

Sigma utilized the services of Environmental Data Resources (EDR) to provide regulatory data from Federal and State agencies to meet the ASTM Standard E 1527-13. The federal regulatory data includes: the National Priorities List (NPL); the Resource Conservation and Recovery Act (RCRA) notifiers; the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database; and the Emergency Response Notification System (ERNS) database. The state data includes the Leaking Underground Storage Tanks (LUST) list, the Registered Underground Storage Tank list, and the State Solid Waste Facilities/Landfill Sites list. In reviewing the data provided by EDR, Sigma focused on sites within a 1.0-mile radius or less of the property. **Appendix C** of this Phase I ESA includes the EDR summary report. The findings of select inventories are discussed below.

#### 4.1.1 National Priority List

The EPA publishes a National Priorities List (NPL) of sites included in the "Superfund" program as authorized by CERCLA and the Superfund Amendments and Reauthorization Act (SARA). EDR did not identify the subject property as a "Proposed" Superfund, Superfund or "Delisted" Superfund site, nor were "Proposed" Superfund, Superfund or "Delisted" Superfund sites identified within a 1.0-mile radius of the subject property.

#### 4.1.2 Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)

The CERCLIS list is a compilation of known or suspected uncontrolled or abandoned hazardous waste sites that are under investigation or have been investigated by the EPA to determine if the site(s) should be remediated under the Superfund program. EDR did not identify the subject property as a CERCLIS or CERCLIS-NFRAP site; however, two CERCLIS-NFRAP sites were identified with a 0.50-mile radius of the subject property. Based on the relative distance between the reported sites and the subject property and the site status, the sites are not expected to impact the subject property.

#### 4.1.3 Resource Conservation and Recovery Act Corrective Action Report (CORRACTS)

The United States EPA maintains the CORRACTS database. The database includes RCRA facilities, which are undergoing corrective action due to a release of hazardous waste or constituents into the environment. EDR did not identify the subject property as a CORRACTS site; however, four CORRACTS sites were identified within a 1.0-mile radius of the subject property. Based on the relative distance between the reported sites and the subject property and/or the site status, the sites are not expected to impact the subject property.

#### 4.1.4 Resource Conservation and Recovery Act (RCRA)

RCRA includes selective information compiled by the EPA on sites, which generate, store, transport, treat, and/or dispose of hazardous waste. The subject property (610 W. Rawson Ave.) was identified in the RCRA, Solid & Hazardous Waste Information Management System (SHWIMS), Facility Index System (FINDS) and Enforcement and Compliance History Information (ECHO) databases as a historical Conditionally Exempt Small Quantity Generator (CESQG) (generates 100 kg or less of hazardous waste per month) of lead and arsenic waste and petroleum refinery sludge. A written informal violation dated May 1, 1996 was on file for the property. Compliance with the violation was achieved on May 22, 1996.

The subject property (7045 S. 6<sup>th</sup> Street) was also identified in the Solid & Hazardous SHWIMS database as a former transporter and storage facility of solid waste. No violations were on file for the property.

In addition to the subject property, EDR identified four RCRA hazardous waste generators within a 0.25-mile radius of the subject property. Based on the relative distance between the reported sites and the subject property and/or the site status, the RCRA sites are not expected to impact the subject property.

EDR did not identify the subject property as an RCRA-Treatment, storage, or disposal facility (TSDF), nor were RCRA-TSDFs identified within a 0.50-mile radius of the subject property.

#### 4.1.5 Emergency Response Notification System (ERNS)

The ERNS list contains information on reported releases of oil and hazardous substances. EDR did not identify the subject property as an ERNS site.

#### 4.1.6 State Hazardous Waste (SHWS)

The state hazardous waste site record, the Hazard Ranking List, is compiled by the Wisconsin Department of Natural Resources (WDNR) and is generally the state's equivalent to the CERCLIS list. EDR did not identify the subject property as a state hazardous waste site, nor were state hazardous waste sites identified within a 1.0-mile radius of the subject property.

#### 4.1.7 State Landfill

The state landfill list, the Registry of Waste Disposal Sites, is compiled by the WDNR and includes an inventory of state landfills and solid waste disposal facilities. EDR did not identify the subject property as a state landfill or waste disposal site, nor were state landfill or waste disposal sites identified within a 0.50-mile radius of the subject property.

#### 4.1.8 Leaking Underground Storage Tank (LUST)

The LUST list is compiled by the WDNR and contains an inventory of reported LUST incidents. EDR identified the subject property (610 W. Rawson Ave.) in the LUST and Recovered Government Archive (RGA) – LUST databases as a closed LUST site (BRRTS #03-41-001132) with soil and groundwater historically impacted with petroleum. The LUST case was opened on October 24, 1990 and closed by the Wisconsin Department of Natural Resources (WDNR) on July 23, 1996. The site (610 W. Rawson Ave.) is also an open ERP site (BRRTS #02-41-107191). Site investigation activities are discussed in Section 3.5 of this report.

In addition to the subject property, EDR identified 14 LUST sites within a 0.50-mile radius of the subject property. Based on the relative distance between the reported sites and the subject property and/or the closed status, the LUST sites are not expected to impact the subject property.

#### 4.1.9 Underground Storage Tanks (USTs)

The list of registered USTs is compiled by the State of Wisconsin and contains information on the site name, location, and number of tanks. EDR identified the subject property (610 W. Rawson Ave.) in the UST and Historical Auto Station databases as a registered UST site with seven petroleum USTs closed/removed from the subject property in October of 1990. The removal of USTs led to the LUST case discussed above.

In addition to the subject property, EDR identified seven registered UST sites within a 0.25-mile radius of the subject property. Based on the relative distance between the reported sites and the subject property and/or the closed status, the UST sites are not expected to impact the subject property.

## **4.2 Additional Environmental Record Sources**

Sigma utilized EDR's services to provide regulatory data, exceeding the ASTM Standard E 1527-13, from Federal and State agencies. During review of the data provided by EDR, Sigma focused on sites within a 1.0-mile radius or less of the property.



#### 4.2.1 Wisconsin Environmental Repair Program (ERP)

The ERP program database is compiled by the WDNR and generally includes non-UST related spills. EDR identified the subject property (610 W. Rawson Ave.) in the ERP, Wisconsin Remedial Response Site Evaluation Report (WRRSER) and Leaking Aboveground Storage Tank (LAST) databases as an open ERP site (BRRTS #02-41-107191) with soil impacted with petroleum and chlorinated solvents. The ERP case was opened on July 10, 1995. Site investigation activities are discussed in Section 3.5 of this report.

EDR also identified the subject property address of 7045 S. 6<sup>th</sup> Street in the ERP, Closed Remediation Site (CRS) and Activity & Use Limitation (AUL) databases as a closed ERP site (BRRTS #02-41-246568) with soil and groundwater historically impacted with petroleum. However, the ERP release is not located at the subject property. Due to a parcel split, the closed ERP case is actually associated with the current 6925 S. 6<sup>th</sup> Street parcel.

In addition to the subject property, EDR identified three ERP sites within a 0.50-mile radius of the subject property. Based on the relative distance between the reported sites and the subject property, the closed status, and/or the perceived groundwater flow direction, the ERP sites are not expected to impact the subject property.

#### 4.2.2 Lists of Registered Aboveground Storage Tanks

The list of registered ASTs is compiled by the State of Wisconsin and contains information on the site name, location, and number of tanks. EDR identified the subject property (610 W. Rawson Ave.) as a registered AST site with 39 petroleum ASTs historically closed/removed from the subject property. Any release associated with the ASTs would have been identified during Phase II ESA activities conducted at the subject property in 2017 and 2018. Site investigation activities are discussed in Section 3.5 of this report.

#### 4.2.3 Local Land Records

Sigma used the Milwaukee County Assessor's office to verify current recorded ownership information on the subject property. Bioversal USA, Inc. is listed as owner of the subject property; however, the subject property was recently acquired by Oak Creek Rawson Industrial, LLC, and entity owned by HSA Commercial Real Estate.

#### 4.2.4 Emergency Release Reports

The WDNR spills inventory was checked by EDR. The subject property (610 W. Rawson Ave.) was identified in the Spills database with three separate releases.

The subject property was identified in the Spills database (BRRTS #04-41-039309) with a release of industrial fuel to surface water at the subject property on August 17, 1983. The spill was reportedly absorbed, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-039616) with a release of fuel oil to the subject property on March 20, 1984. The spill was reportedly contained/recovered, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-052705) with a release of petroleum at the subject property on June 27, 1984. The spill was reportedly absorbed, with the WDNR requiring no further action.

#### 4.2.5 RCRA Administration Action Tracking System (RAATS)

RAATS contains records based on the enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. EDR did not identify the subject property in the RAATS database.

#### 4.2.6 Hazardous Materials Incident Report System (HMIRS)

HMIRS contains a log of hazardous material spill incidents, which have been reported to the United States Department of Transportation. EDR did not identify the subject property in the HMIRS database.

#### 4.2.7 PCB Activity Database (PADS)

PADS identifies generators, transporters, commercial storers and/or brokers, and disposers of polychlorinated biphenyls (PCBs) who are required to notify the EPA of such activities. EDR did not identify the subject property in the PADS database.

#### 4.2.8 Facility Index System (FINDS)

The FINDS list contains facility information related to various environmental registrations and regulatory submissions performed by facilities including obtaining a hazardous waste generator number, annual reporting, etc. The subject property was identified in the FINDS database; however, inclusion in the database does not necessarily indicate any violations or improper activities.

#### 4.2.9 Toxic Release Inventory System (TRIS)

TRIS identifies facilities, which release toxic chemicals to the air, water, and land in "reportable quantities" under Title III of SARA. EDR did not identify the subject property in the TRIS database.

#### 4.2.10 Toxic Substance Control Act (TSCA)

TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. EDR did not identify the subject property in the TSCA database.

#### 4.2.11 US Brownfields

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. EDR identified the subject property address of 610 W. Rawson Ave. (BRRTS #07-41-528856) and the subject property address of 7045 S. 6<sup>th</sup> Street (BRRTS #07-41-579077) as US Brownfield sites. Site investigation activities are discussed in Section 3.5 of this report.

#### 4.2.12 Tier 2 Facility Listings (Tier 2)

The Tier 2 database includes listings of facilities which store or manufacture hazardous materials that submit an annual chemical inventory report. EDR did not identify the subject property in the Tier 2 database.

#### 4.2.13 Orphan Summary

Orphan sites are sites with incomplete addresses that could not be plotted on the EDR Radius Map. EDR reported three orphan sites in its Radius Map report. The orphan sites had some address information available. Based on a review of available address

information, the sites are not located at or adjacent to the subject property and are not expected to impact the subject property.

#### 4.2.14 Tier I Vapor Encroachment Screen

Sigma conducted a Tier I Vapor Encroachment Screen (VES) in general conformance with the *ASTM Standard 2600-10, Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, dated June 1, 2010.

The purpose of the Tier I VES is to conduct an initial screening to identify a potential vapor encroachment condition (VEC) in the area of concern (AOC). A VEC is defined as the presence or likely presence of chemical(s) of concern vapors in the subsurface of the subject property, caused by the release of vapors from contaminated soil or groundwater either on or near the subject property.

The Tier I VES is based on a review of regulatory databases, including but not limited to Federal, State, local, and tribal government records, as reported in the regulatory database report and based upon information obtained regarding historic and current use of the property. In addition, geographic location, distance, topography and hydrogeology, groundwater depth and flow information, local geology, and preferential migration pathways are reviewed and evaluated relative to the VES. Additionally, the Tier I VES was completed in general conformance with "Addressing Vapor Intrusion at Remediation & Redevelopment Sites Wisconsin" (RR-800) guidance published by the WDNR.

Based on a review of accumulated environmental assessment data, the potential vapor intrusion risk associated with the VOC impacts to soil and groundwater at the subject property will require evaluation and likely mitigation as part of site redevelopment. It should be noted that the Tier I Vapor Encroachment Screen is not a formal assessment of indoor air quality and did not include testing or sampling.

### **4.3 Physical Setting Sources**

#### 4.3.1 United States Geologic Survey Topographic Map

A United States Geological Survey (USGS) 7.5 Minute topographic map, designated as the Greendale, Wisconsin Quadrangle, was reviewed as part of this assessment (Figure 1). The subject property, which is located at an elevation of approximately 730 feet above mean sea level (MSL), is characterized by a relatively flat topography. The topography in the general vicinity of the subject property slopes toward the north northeast. Surface water was not identified on the subject property.

#### 4.3.2 Regional Geology and Hydrogeology

Sigma reviewed GeoScience Wisconsin (Vol. 7, 1983), and Soil Survey of Milwaukee and Waukesha Counties (July 1971), each prepared by the Wisconsin Geologic and Natural History Survey (WGNHS), for information concerning the geology and hydrogeology beneath the subject property.

The surficial deposits in Milwaukee County consist of till and outwash deposits interbedded with fine-grained and stratified lake sediments. Deposited by the glacial Lake Michigan Lobe (or a sublobe) and its associated meltwater streams, the till is generally represented by the Oak Creek Formation. The Oak Creek Formation includes fine-grained till; lacustrine clay, silt, and sand; and some glaciofluvial sand and gravel. Beneath the glacial deposits

lies undifferentiated dolomites which are underlain by a series of sedimentary rocks consisting largely of sandstones.

Hydrogeologically, Milwaukee County is included in District No. 4 (Eastern Drift Paleozoic), as designated by the WGNHS. The aquifers of this district are described as a thick, productive, multilayered complex of Paleozoic sandstone and dolomite, interbedded with non-productive layers and locally overlain by productive water-bearing sand and gravel. Groundwater in Milwaukee County moves within two (2) systems: a shallow water-table system and a deep artesian system. Regionally, within the shallow system (sand/gravel and Niagara), the groundwater flow is toward nearby lakes and streams. Groundwater flow within the deeper sandstone aquifer is generally from the west to east across the county.

A review of the most recent static groundwater elevations collected during Phase II ESA activities indicates that shallow groundwater generally flows radially out to the north, east and south from the south-central portion of the subject property.

#### **4.4 Historical Use Information on the Subject Property**

##### **4.4.1 Occupancy History**

Originally a list of residents, city directories provide the name of resident or business and the type of business (if unclear) in a business index, a resident index and a street index. Available city directories, dating from 1992 to 2014, were reviewed in approximately five-year increments by Environmental Data Resources (EDR) for the subject property. Historical occupants of the subject property included Bioversal USA, Inc. and its sub occupants (North American Fuel Company, Center Fuel Company, Cleansoils Wisconsin, Inc., Biogenesis Enterprises, Inc., Biocenter, Inc., Summit Environmental Corp., Inc., etc.) in 1992, 1995, 2000, 2005, 2010 and 2014. Based on Phase II Environmental activities that were completed at the subject property in 2017 and 2018, any potential release associated with historical use has been identified. A copy of the city directory report is included in **Appendix D**.

##### **4.4.2 Aerial Photographs**

Sigma reviewed aerial photographs for the subject property. Available photographs, obtained from EDR, were dated 1937, 1955, 1963, 1969, 1979, 1981, 1986, 1992, 2000, 2006, 2010 and 2013. The 1937 photograph is not representative of the area and appears to be incorrect. Based on the scale and general nature of the historical photographs, only major development or construction projects could be confirmed.

The 1955 photograph depicts the subject property as undeveloped. Beginning with the 1963 photograph, structures and ASTs are depicted on the subject property. The current office building, mixing building (east central building) and the warehouse building are depicted on the subject property beginning with the 1979 photograph. No significant changes are depicted to the subject property until the 1992 photograph, which no longer depicts several of the historical ASTs. ASTs are no longer depicted on the subject property in the 2006 photograph. No significant changes are depicted to the subject property in the remaining photographs. Based on Phase II Environmental activities that were completed at the subject property in 2017 and 2018, any potential release associated with historical use has been identified. **Appendix E** includes copies of the photographs.

#### 4.4.3 Fire Insurance Maps

Sigma contacted EDR for available Sanborn Fire Insurance maps depicting the subject property. Developed in the late 1800's, the maps were used until approximately the mid-1900s. EDR reported that Sanborn map coverage in the area of the subject property was not available. **Appendix F** contains a copy of the Sanborn Map report.

### **4.5 Historical Use Information on Adjoining Properties**

#### 4.5.1 Occupancy History

Originally a list of residents, city directories provide the name of resident or business and the type of business (if unclear) in a business index, a resident index and a street index. Available city directories, dating from 1992 to 2014, were reviewed in approximately five-year increments by Environmental Data Resources (EDR) for the adjoining properties. Historical occupants in the vicinity of the subject property included warehouses, a trucking terminal, Meyer Materials (concrete company), manufacturing companies, an equipment rental company and Blains Farm & Fleet (retail store). Based on Phase II Environmental activities that were completed at the subject property in 2017 and 2018, any potential release associated with off-site historical use would have been identified. A copy of the city directory report is included in **Appendix D**.

#### 4.5.2 Aerial Photographs

Sigma reviewed aerial photographs for the adjoining properties. Available photographs, obtained from EDR, were dated 1937, 1955, 1963, 1969, 1979, 1981, 1986, 1992, 2000, 2006, 2010 and 2013. The 1937 photograph is not representative of the area and appears to be incorrect. Based on the scale and general nature of the historical photographs, only major development or construction projects could be confirmed.

The 1955 photograph depicts the subject property adjoined by undeveloped land to the north, a farmstead further to the east, Rawson Ave. then undeveloped land to the south and railroad ROW then undeveloped land to the west. The property across Rawson Ave. to the south is depicted as utilized for surface operations beginning in the 1963 through 1986 photographs. Beginning with the 1969 photograph, the current structure is depicted across the railroad ROW to the west of the subject property. South 6<sup>th</sup> Street is depicted to the east of the subject property beginning with the 1986 photograph. Beginning with the 2006 photograph, the current fire station and War Memorial are depicted across South 6<sup>th</sup> Street. The current multi-tenant building is depicted to the north of the subject property in the 2010 photograph. No significant changes are depicted to the adjoining properties in the remaining photograph. Based on Phase II Environmental activities that were completed at the subject property in 2017 and 2018, any potential release associated with off-site historical use would have been identified. **Appendix E** includes copies of the photographs.

#### 4.5.3 Fire Insurance Maps

Sigma contacted EDR for available Sanborn Fire Insurance maps depicting the adjoining properties. Developed in the late 1800's, the maps were used until approximately the mid-1900s. EDR reported that Sanborn map coverage in the area of the subject property was not available. **Appendix F** contains a copy of the Sanborn Map report.

## 5.0 SITE RECONNAISSANCE

### 5.1 Methodology and Limiting Conditions

On July 31, 2018, Sigma conducted a limited inspection of the subject property to examine the site for visual signs of contamination. Observations of the subject property were made of readily accessible and visually apparent areas. The office building and mixing building (east central building) were locked at not accessible. Where observations were limited, Sigma renders no opinion as to the presence of hazardous substances, wastes or contamination potential. Conditions at the time of the visit included sunny skies with temperatures in the 70s (°F).

The 7045 S. 6<sup>th</sup> Street parcel was improved with a 4,928 square-foot warehouse building constructed in 1973 and the 610 W. Rawson Ave. parcel was improved with a 2,688 square-foot office building constructed in 1975 with a building addition in 1978 and a 10,590 square-foot warehouse building constructed in 1960 with a building addition 1982. At the time of this assessment, the subject property was unoccupied. **Appendix G** includes photographs from the subject property inspection.

### 5.2 Observations

#### 5.2.1 Hazardous Substances and Petroleum Products in Connection with Identified Uses

Miscellaneous sacks of chemicals and petroleum products were observed in and around the subject property buildings. The containers were in poor condition with solid contents spilled on the ground and/or the areas near the containers stained.

#### 5.2.2 Storage Tanks and Drums

Numerous 275-gallon totes with unknown contents were observed in and around the subject property buildings. The area near the totes was stained.

Numerous (hundreds) of 55-gallon drums with unknown contents were observed in and around the subject property buildings. The areas near the drums was stained.

Two 55-gallon drums containing purge water from Phase II ESA activities were observed outside of the subject property building. The drums were labeled and appeared to be in good condition. Staining was not observed near the drums.

Two pipes were observed on the east side of the office building. The pipes are associated with water service at the subject property.

#### 5.2.3 Odors, Pools of Liquids, Stained Soil or Pavement, Stressed Vegetation

Residual mill scale was observed in a containment area and portions of the exterior surface of the subject property.

#### 5.2.4 Hazardous Substances and Petroleum Products Not Necessarily Used in Connection with Identified Uses

Numerous drums and totes not associated with identified uses were observed on the subject property. The areas near the containers was stained.

#### 5.2.5 Unidentified Substance Containers

The contents of a majority of the totes, drums and chemical sacks located on the subject property were not identified.

#### 5.2.6 Polychlorinated Biphenyls (PCBs)

Not observed.

#### 5.2.7 Wastewater Pits, Ponds or Lagoons

Pits, ponds or lagoons associated with wastewater treatment were not observed.

#### 5.2.8 Wastewater

All wastewater generated at the subject property is discharged to the Milwaukee Metropolitan Sewerage District (MMSD).

#### 5.2.9 Solid Waste

Miscellaneous sacks of chemicals were observed in and around the subject property buildings. The containers were in poor condition with solid contents spilled on the ground.

#### 5.2.10 Heating

The office building was heated with natural gas.

#### 5.2.11 Emergency Generators

Not observed.

#### 5.2.12 Stains or Corrosion

The concrete floor in the warehouse building was stained.

#### 5.2.13 Drains or Sumps

A grated sewer was observed in one of the overhead door entrances to the warehouse building. Spilled solid material and mill scale was observed near the sewer.

Groundwater monitoring wells associated with the on-going subsurface investigation were observed on the subject property.

Additionally, from within the boundaries of the subject property, Sigma examined the adjoining properties for conditions that might indicate recognizable environmental conditions (RECs). Sigma did not identify RECs on the adjoining properties.

## 6.0 INTERVIEWS

### 6.1 Interviews with Site Owners

See Section 3.5 of this report.

### 6.2 Interviews with Local Government Officials

#### 6.2.1 City of Oak Creek Assessors Department

Representatives from the City of Oak Creek assessor's department with intimate historical knowledge of the subject property were not identified. In lieu of interviews, on August 2, 2018 Sigma reviewed available assessor records for the subject property at the Oak Creek

City Hall. A review of city assessor records indicated that the 7045 S. 6<sup>th</sup> Street parcel is improved with a 4,928 square-foot warehouse building constructed in 1973 and the 610 W. Rawson Ave. parcel is improved with a 2,688 square-foot office building constructed in 1975 with a building addition in 1978 and a 10,590 square-foot warehouse building constructed in 1960 with a building addition 1982.

#### 6.2.2 City of Oak Creek Building Inspection Department

Representatives from the City of Oak Creek building inspection department with intimate historical knowledge of the subject property were not identified. In lieu of interviews, on August 2, 2018 Sigma reviewed available building inspection records for the subject property at the Oak Creek City Hall. Records of environmental significance included references to historical occupancy of the subject property by Petro Products (warehouse operations), Industrial Fuel, Inc. (petroleum distributor), Bioversal USA, Inc., Metro Truck & Trailer Repair and Cleansoils, Inc. (soil cleaning), numerous permits for the installation and removal of petroleum ASTs and legal correspondence from the WDNR and the State of Wisconsin regarding site conditions and associated environmental violations. Based on Phase II Environmental activities that were completed at the subject property in 2017 and 2018, any potential release associated with historical use has been identified.

## 7.0 FINDINGS

The subject property is comprised of two adjacent parcels. An approximate 7.83-acre parcel located at 610 West Rawson Avenue and an approximate 2.57-acre parcel located at 7045 South 6<sup>th</sup> Street in the City of Oak Creek, Milwaukee County, Wisconsin. At the time of this assessment, the 7045 S. 6<sup>th</sup> Street parcel was improved with a 4,928 square-foot warehouse building constructed in 1973 and the 610 W. Rawson Ave. parcel was improved with a 2,688 square-foot office building constructed in 1975 with a building addition in 1978 and a 10,590 square-foot warehouse building constructed in 1960 with a building addition in 1982. Historically, the subject property was developed between 1955 and 1963 and historically occupied by a bulk fuel oil storage, mixing and distribution facility (Wisconsin Industrial Fuel Oil, Inc.). Additional historical occupants included a truck wash, a truck and trailer repair company and BioVersal, USA which operated a mobile soil/sediment washing treatment processes as well as manufactured chemicals for use in industrial cleaning, soil and sediment remediation. The subject property has been unoccupied since 2016.

A search of available environmental records was conducted by Environmental Data Resources Inc. (EDR). The subject property was identified in the Resource Conservation and Recovery Act (RCRA), Solid & Hazardous Waste Information Management System (SHWIMS), Facility Index System (FINDS), Enforcement and Compliance History Information (ECHO), Leaking Underground Storage Tank (LUST), Recovered Government Archive (RGA)–LUST, Historical Auto Station, Underground Storage Tank (UST), Wisconsin Environmental Repair Program (ERP), Wisconsin Remedial Response Site Evaluation Report (WRRSER), Leaking Aboveground Storage Tank (LAST), Aboveground Storage Tank (AST), Wisconsin Spills (Spills) and US Brownfields databases.

The subject property (610 W. Rawson Ave.) was identified in the RCRA, SHWIMS, FINDS and ECHO databases as a historical Conditionally Exempt Small Quantity Generator (CESQG) (generates 100 kg or less of hazardous waste per month) of lead and arsenic



waste and petroleum refinery sludge. A written informal violation dated May 1, 1996 was on file for the property. Compliance with the violation was achieved on May 22, 1996.

The subject property (7045 S. 6<sup>th</sup> Street) was also identified in the SHWIMS database as a former transporter and storage facility of solid waste. No violations were on file for the property.

The subject property (610 W. Rawson Ave.) was identified in the LUST and RGA-LUST databases as a closed LUST site (BRRTS #03-41-001132) with soil and groundwater historically impacted with petroleum. The LUST case was opened on October 24, 1990 and closed by the Wisconsin Department of Natural Resources (WDNR) on July 23, 1996.

The subject property (610 W. Rawson Ave.) was identified in the Historical Auto Station and UST databases as a registered UST site with seven petroleum USTs closed/removed from the subject property in October of 1990. The removal of USTs led to the LUST case discussed above.

The subject property (610 W. Rawson Ave.) was identified in the ERP, WRRSER and LAST databases database as an open ERP site (BRRTS #02-41-107191) with soil impacted with petroleum and chlorinated solvents. The ERP case was opened on July 10, 1995. Sigma performed supplemental site investigation activities at the subject property to define the degree and extent of subsurface impacts identified during previously completed site investigation and evaluate potential sources of contamination associated with historic site use.

In summary, Sigma completed 14 test pit excavations and advanced 75 soil borings (SHA-1 through SHA-14, SGP-1 through SGP-58, SMW-2, SPZ-1 and SPZ-2) to further define the degree and extent of impacts identified by previously completed site investigation work and to evaluate potential source areas associated with historic site use. A total of 101 soil samples (one to two per test pit/boring) were collected for laboratory analysis of select parameters depending on the location and purposed of each soil boring. Sigma also installed 12 shallow groundwater monitoring wells and 2 piezometers and collected a round of groundwater samples from newly installed wells and the existing groundwater monitoring well network (MW102, MW103, MW104, TW103).

Soil sampling activities completed during previous site investigation work focused on the areas of the former ASTs, both north and south of the former rail siding and generally defined the degree and extent of petroleum impacts associated with the ASTs. The supplemental soil sampling completed by Sigma identified select areas of additional impact, including an area of chlorinated volatile organic compounds (CVOCs), petroleum and polychlorinated biphenyls (PCBs) in the southwest corner of the subject property and a separate area of PCB impact along the western boundary.

A review of groundwater sampling results at the subject property indicate impacts to shallow groundwater with reported concentrations of PVOC and CVOC constituents greater than ch. NR 140 Enforcement Standards (ES).

Based on the site investigation work completed to date, a conceptual remedial action plan that includes targeted remedial excavation of select source areas, soil management and capping through site redevelopment, and natural attenuation groundwater monitoring has

been developed. Additionally, the potential vapor intrusion risk associated with the VOC impacts to soil and groundwater at the subject property will require evaluation and likely mitigation as part of site redevelopment.

The subject property (610 W. Rawson Ave.) was identified as a registered AST site with 39 petroleum ASTs historically closed/removed from the subject property. Any release associated with the ASTs would have been identified during Phase II ESA activities conducted at the subject property, which was discussed above.

The subject property (610 W. Rawson Ave.) was identified in the Spills database with three separate releases. The subject property was identified in the Spills database (BRRTS #04-41-039309) with a release of industrial fuel to surface water at the subject property on August 17, 1983. The spill was reportedly absorbed, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-039616) with a release of fuel oil to the subject property on March 20, 1984. The spill was reportedly contained/recovered, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-052705) with a release of petroleum at the subject property on June 27, 1984. The spill was reportedly absorbed, with the WDNR requiring no further action.

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. The subject property address of 610 W. Rawson Ave. (BRRTS #07-41-528856) and the subject property address of 7045 S. 6<sup>th</sup> Street (BRRTS #07-41-579077) were identified as US Brownfield sites.

In addition to the subject property, EDR identified several sites in the vicinity of the subject property on one or more of the environmental databases researched by EDR.

## **8.0 OPINIONS**

The subject property (610 W. Rawson Ave.) was identified in the LUST and RGA-LUST databases as a closed LUST site (BRRTS #03-41-001132) with soil and groundwater historically impacted with petroleum. The LUST case was opened on October 24, 1990 and closed by the Wisconsin Department of Natural Resources (WDNR) on July 23, 1996. The closed LUST case is considered a historical recognized environmental condition (HREC).

The subject property (610 W. Rawson Ave.) was also identified in the ERP, WRRSER and LAST databases database as an open ERP site (BRRTS #02-41-107191) with soil impacted with petroleum and chlorinated solvents. The ERP case was opened on July 10, 1995. Sigma performed supplemental site investigation activities at the subject property to define the degree and extent of subsurface impacts identified during previously completed site investigation and evaluate potential sources of contamination associated with historic site use.

In summary, Sigma completed 14 test pit excavations and advanced 75 soil borings (SHA-1 through SHA-14, SGP-1 through SGP-58, SMW-2, SPZ-1 and SPZ-2) to further define the degree and extent of impacts identified by previously completed site investigation work and to evaluate potential source areas associated with historic site use. A total of 101 soil samples (one to two per test pit/boring) were collected for laboratory analysis of select parameters depending on the location and purposed of each soil boring. Sigma also installed 12 shallow groundwater monitoring wells and 2 piezometers and collected a round of groundwater samples from newly installed wells and the existing groundwater monitoring well network (MW102, MW103, MW104, TW103).

Soil sampling activities completed during previous site investigation work focused on the areas of the former ASTs, both north and south of the former rail siding and generally defined the degree and extent of petroleum impacts associated with the ASTs. The supplemental soil sampling completed by Sigma identified select areas of additional impact, including an area of chlorinated volatile organic compounds (CVOCs), petroleum and polychlorinated biphenyls (PCBs) in the southwest corner of the subject property and a separate area of PCB impact along the western boundary.

A review of groundwater sampling results at the subject property indicate impacts to shallow groundwater with reported concentrations of PVOC and CVOC constituents greater than ch. NR 140 Enforcement Standards (ES).

Based on the site investigation work completed to date, a conceptual remedial action plan that includes targeted remedial excavation of select source areas, soil management and capping through site redevelopment, and natural attenuation groundwater monitoring has been developed. Additionally, the potential vapor intrusion risk associated with the VOC impacts to soil and groundwater at the subject property will require evaluation and likely mitigation as part of site redevelopment. The open ERP case is considered a recognized environmental condition (REC).

The subject property (610 W. Rawson Ave.) was identified in the Spills database with three separate releases. The subject property was identified in the Spills database (BRRTS #04-41-039309) with a release of industrial fuel to surface water at the subject property on August 17, 1983. The spill was reportedly absorbed, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-039616) with a release of fuel oil to the subject property on March 20, 1984. The spill was reportedly contained/recovered, with the WDNR requiring no further action.

The subject property was identified in the Spills database (BRRTS #04-41-052705) with a release of petroleum at the subject property on June 27, 1984. The spill was reportedly absorbed, with the WDNR requiring no further action. The spill cases are considered HRECs.

In addition to the subject property, EDR identified several sites in the vicinity of the subject property on one or more of the environmental databases researched by EDR. Based on the relative distance between the reported sites and the subject property, the site status and/or Phase II Environmental activities that were completed at the subject property in 2017 and 2018, the identified sites are not expected to impact the subject property.

## 9.0 CONCLUSIONS

Sigma has performed an Environmental Site Assessment, in conformance with the scope and limitations of ASTM Practice E 1527-13. Any exceptions to, or deletions from, this practice are described in Section 10 of this report. This assessment has not revealed evidence of recognized environmental conditions in connection with the property, except for the following:

- The subject property is an open Wisconsin Environmental Repair Program (ERP) site (BRRTS #02-41-107191). Soil sampling activities completed during previous site investigation work generally defined the degree and extent of petroleum impacts associated with historical Aboveground Storage Tanks (ASTs). Supplemental soil sampling completed by Sigma in 2017 and 2018 identified select areas of additional impact, including an area of chlorinated volatile organic compounds (CVOCs), petroleum and polychlorinated biphenyls (PCBs) in the southwest corner of the subject property and a separate area of PCB impact along the western boundary of the subject property. A review of groundwater sampling results indicates impacts to shallow groundwater with reported concentrations of PVOC and CVOC constituents greater than ch. NR 140 Enforcement Standards (ES).

Additionally, historical recognized environmental conditions (HRECs) were identified at the subject property which include the following:

- The subject property (610 W. Rawson Ave.) was identified in the Leaking Underground Storage Tank (LUST) and Recovered Government Archive (RGA)–LUST databases as a closed LUST site (BRRTS #03-41-001132) with soil and groundwater historically impacted with petroleum. The LUST case was opened on October 24, 1990 and closed by the Wisconsin Department of Natural Resources (WDNR) on July 23, 1996. Residual impacts from the LUST release could be encountered during redevelopment activities. Contaminated soil that is discovered would require appropriate management in accordance with applicable state and federal regulations.
- The subject property (610 W. Rawson Ave.) was identified in the Spills database with three separate releases. The spill cases were closed by the WDNR requiring no further action. Residual impacts from the releases could be encountered during redevelopment activities. Contaminated soil that is discovered would require appropriate management in accordance with applicable state and federal regulations.

The conclusions included in this assessment report should not be construed as legal advice. This practice is intended to reflect a commercially prudent and reasonable inquiry. No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with the subject property. Performance of the ASTM E 1527-13 practice is intended to reduce, but not eliminate that uncertainty. Finally, even a finding of no recognized environmental conditions is not a warranty or guarantee that the property is free from contamination.

## 10.0 DEVIATIONS

There were no intentional deviations from or additions to standard practices identified in the ASTM standard for Phase 1 Environmental Site Assessments ASTM-1527-13 except as noted within this report.

## 11.0 REFERENCES

Published referenced sources relied upon in preparing this Environmental Site Assessment are as noted in the body of the report.

## 12.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professional as defined in section 312.10 of 40 CFR 312 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquires in general conformance with the standards and practices set forth in 40 CFR Part 312.



Dale R. Palkowski  
Project Scientist



Randy E. Boness, P.G.  
Manager, Geosciences Group

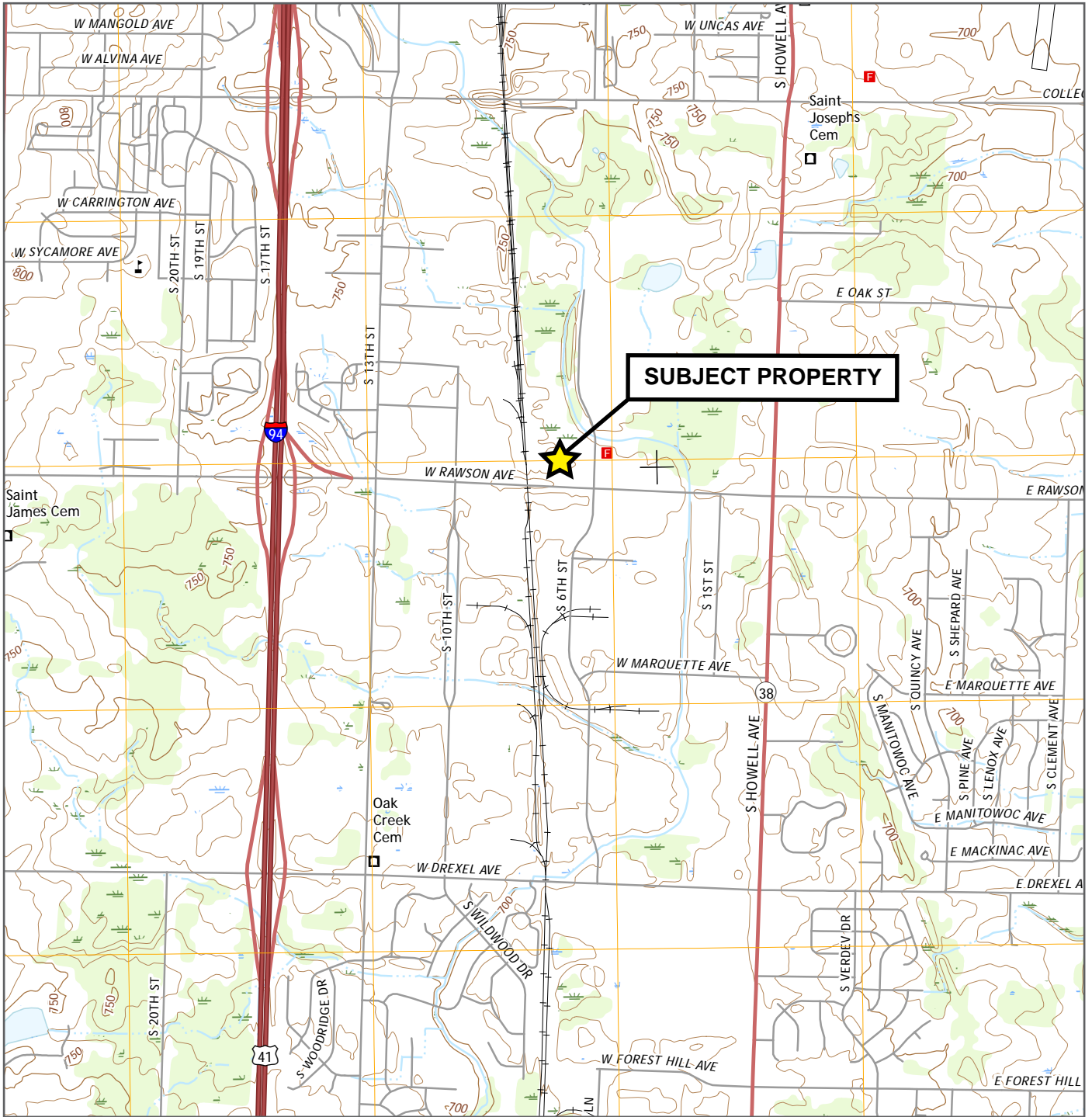
## 13.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

The Sigma Group, Inc. is a full-service environmental consulting and engineering firm located in Milwaukee, Wisconsin. Project team resumes are included in **Appendix H**.

## **FIGURES**

- 1 Site Location Map
- 2 Site Plan Map

Project: 16366 | Directory: CAD | Filename: 16366\_Fig 1\_SLM.pdf | Created By: CPT | Date: 07/23/2018



Located in the S 05, T 05N, R 22E  
Greendale Quadrangle (2016)  
7.5 minute, 1 : 24,000 Topographic Map Collection



# SITE LOCATION MAP

610 W RAWSON AVE & 7045 S 6TH ST  
OAK CREEK, WISCONSIN

FIGURE  
**1**



**SITE PLAN MAP**  
610 W RAWSON AVE & 7045 S 6TH ST  
OAK CREEK, WISCONSIN

FIGURE

**2**



## **APPENDIX A**

Subject Property Description

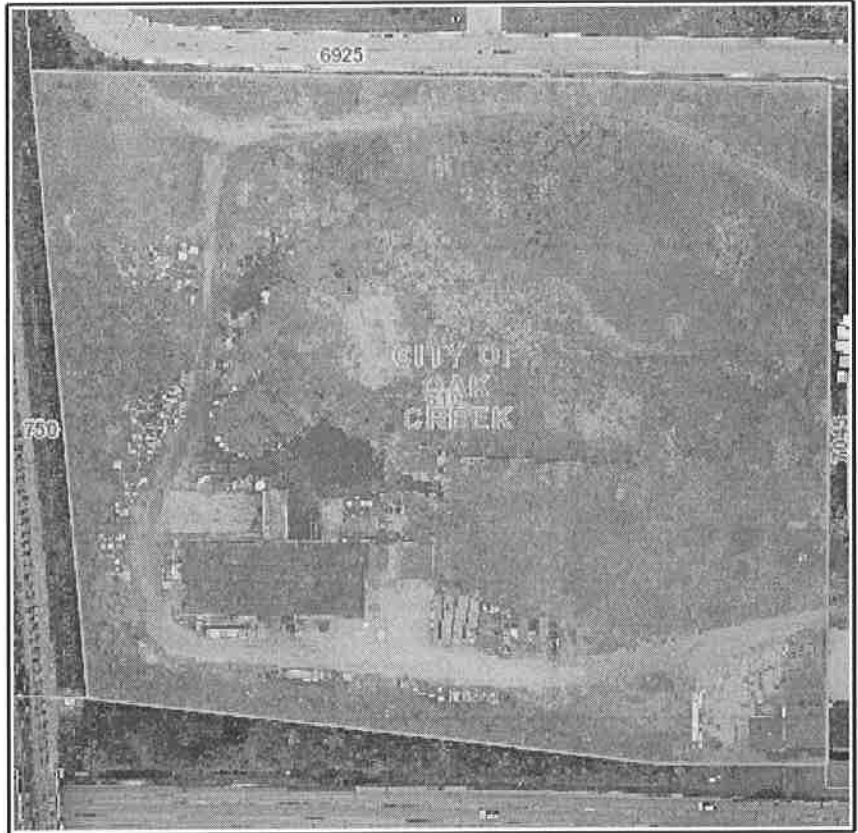
# Milwaukee County Land Information Parcel Report

TAXKEY: 7359990000

Report generated 7/23/2018 9:27:10 AM



Parcel location within Milwaukee County



Selected parcel highlighted

## Parcel Information

TAXKEY: 7359990000

Record Date: 12/31/2016

Owner(s): BIOVERSAL USA INC, AN IL CORP #B208

Address: 610 W RAWSON AVE

Municipality: Oak Creek

Acres: 7.83

Assessed Value: \$300,900

Land Value: \$136,000

Improvement Value: \$164,900

Parcel Description: COMMERCIAL

Zoning Description:

Legal Description: COM 70 FT N OF THE SE COR OF SW 1/4 SEC 5-5-22 TH W 600.58 FT NWLY ALG ELY ROW LI 599.25 FT TH E 652.93 FT TH S ALG E 1/4 SEC LI 596 FT TO BEG. EXC PART FOR ST. CONT. 7.832 ACS.

School District: OAK CREEK-FRANKLIN JOINT SCHOOL DISTRICT

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

# Milwaukee County Land Information Parcel Report

TAXKEY: 7349001002

Report generated 7/23/2018 9:27:58 AM



Parcel location within Milwaukee County



Selected parcel highlighted

## Parcel Information

**TAXKEY:** 7349001002

**Record Date:** 12/31/2016

**Owner(s):** BIOVERSAL USA INC, AN IL CORP #B208

**Address:** 7045 S 6TH ST

**Municipality:** Oak Creek

**Acres:** 2.57

**Parcel Description:** COMMERCIAL

**Zoning Description:**

**Legal Description:** CERTIFIED SURVEY MAP NO. 754 LOT 1 EXC PT CONVEYED IN DOC # 08883077 (2.565 ACS)

**School District:** OAK CREEK-FRANKLIN JOINT SCHOOL DISTRICT

**Assessed Value:** \$335,100

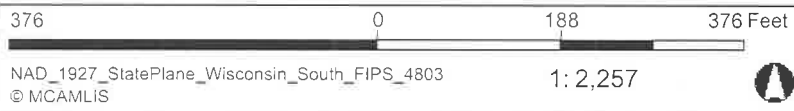
**Land Value:** \$301,100

**Improvement Value:** \$34,000

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# 610 W. Rawson Ave. & 7045 S. 6th St.



**DISCLAIMER:** This map is a user generated static output from the Milwaukee County Land Information Office Interactive Mapping Service website. The contents herein are for reference purposes only and may or may not be accurate, current or otherwise reliable. No liability is assumed for the data delineated herein either expressed or implied by Milwaukee County or its employees.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

| Notes |
|-------|
|       |