

**GIS REGISTRY INFORMATION**

**SITE NAME:** 2127 W. National Ave.  
**BRRTS #:** 02-41-000887/06-41-144308 **FID # (if appropriate):** 241458910  
**COMMERCE # (if appropriate):** 53204-1160-27  
**CLOSURE DATE:** 4/12/04  
**STREET ADDRESS:** 2127 W. National Ave.  
**CITY:** Milwaukee

**SOURCE PROPERTY GPS COORDINATES** (meters in WTM91 projection): X= 687880 Y= 285357

**CONTAMINATED MEDIA:** Groundwater  Soil  Both

**OFF-SOURCE GW CONTAMINATION >ES:**  Yes  No

**IF YES, STREET ADDRESS 1:** \_\_\_\_\_

**GPS COORDINATES** (meters in WTM91 projection): X= \_\_\_\_\_ Y= \_\_\_\_\_

**OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL):**  Yes  No

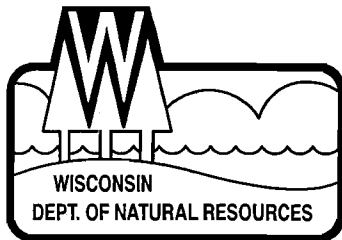
**IF YES, STREET ADDRESS 1:** \_\_\_\_\_

**GPS COORDINATES** (meters in WTM91 projection): X= \_\_\_\_\_ Y= \_\_\_\_\_

**CONTAMINATION IN RIGHT OF WAY:**  Yes  No

**DOCUMENTS NEEDED:**

- Closure Letter, and any conditional closure letter issued
- Copy of most recent deed, including legal description, for all affected properties
- Certified survey map or relevant portion of the recorded plat map (if referenced in the legal description) for all affected properties
- County Parcel ID number, if used for county, for all affected properties
- Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.
- Detailed Site Map(s) for all affected properties, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.
- Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)
- Tables of Latest Soil Analytical Results (no shading or cross-hatching)
- Isoconcentration map(s), if required for site investigation (SI) (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. If not available, include the latest extent of contaminant plume map.
- GW: Table of water level elevations, with sampling dates, and free product noted if present
- GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)
- SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour
- Geologic cross-sections, if required for SI. (8.5x14" if paper copy)
- RP certified statement that legal descriptions are complete and accurate
- Copies of off-source notification letters (if applicable)
- Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW)
- Copy of (soil or land use) deed restriction(s) or deed notice if any required as a condition of closure



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Scott Hassett, Secretary  
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters  
2300 N. Dr. Martin Luther King, Jr. Drive  
P.O. Box 12436  
Milwaukee, Wisconsin 53212-0436  
Telephone 414-263-8500  
FAX 414-263-8716  
TTY 414-263-8713

April 12, 2004

Mr. Paul Karlen, First Vice President  
Bank One, NA Mail Code W11-2064  
111 E. Wisconsin Ave.  
Milwaukee, WI 53202

Subject: *Certificate of Completion* for 2127 W. National Ave., Milwaukee  
FID# 241458910 BRRTS# 06-41-144308

Dear Mr. Karlen:

The Department of Natural Resources ("the Department") has received your request for issuance of a *Certificate of Completion* for the environmental investigation and cleanup of the property located at 2127 W. National Ave., Milwaukee, Wisconsin, which will be referred to in this letter as "the Property". You have requested that the Department determine whether Bank One has met the requirements under s. 292.15(2), Wis. Stats., for issuance of a *Certificate of Completion*.

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

You have paid to the Department of Natural Resources (WDNR) the appropriate insurance fee and have submitted a complete insurance application form to obtain coverage under the state's master insurance contract in accordance with s 292.15(2)(ae)3m., Wis. Stats.; and ch. NR 754, Wis. Adm. Code. Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the registry. To review the sites on the GIS Registry web page, visit:  
<http://gomapout.dnr.state.wi.us/org/at/et/geo/gwur/index.htm>

The Department appreciates the work undertaken by Bank One to investigate and cleanup contamination associated with the Property. The exemption provided by the *Certificate of Completion* applies to any successor or assignee of Bank One if the successor or assignee complies with the appropriate conditions, pursuant to s. 292.15(3), Wis. Stats. If you have any questions or concerns regarding this letter or the *Certificate of Completion*, please call me at (414)263-8557 or attorney Judy Ohm at (608)266-9972.

Sincerely,

Margaret M. Brunette, P.G.  
Hydrogeologist  
Remediation and Redevelopment Program

*State of Wisconsin*  
*Department of Natural Resources*

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

*Whereas*, Bank One, NA (“Bank One”) has applied for an exemption from liability under s. 292.15, Wis. Stats., for the property located at 2127 W. National Ave., Milwaukee, Wisconsin, further described in the legal description found on Attachment A (“the Property”);

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

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

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

*Whereas*, Bank One has filed with the Register of Deeds of Milwaukee County a deed restriction (Attachment C) on the Property which declares that the Property is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitations and restrictions:

The building that existed on the above-referenced property on the date that this restriction was signed forms a barrier that must be maintained in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. The building is also required in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in the Wisconsin Administrative Code Chapter NR 140. The building shall be maintained on the above-described property in the location shown on the attached certified survey map, unless another barrier with an infiltration rate of  $10^{-7}$  cm/sec or less is installed and maintained in its place. The existing building and any selected replacement barrier with an infiltration rate of  $10^{-7}$  cm/sec or less shall be maintained on the above-described property in compliance with the “2127 West

National Avenue Property Operation and Maintenance Plan" dated October 24, 2003, that was submitted to the Department of Natural Resources for review and approval as required by section NR 724.13(2), Wis. Adm. Code (1997).

Therefore, the following activities are prohibited on that portion of the property described above where the building or any selected replacement barrier with an infiltration rate of  $10^{-7}$  cm/sec or less exists, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Excavating or grading of the land surface; (2) Filling on the capped area; (3) Plowing for agricultural cultivation; and (4) Construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. (File references: Commerce # 53202-1123-01, FID 3 241458910, and BRRTS # 02-41-000887/06-41-144308).

*Whereas*, Bank One has paid to WDNR the appropriate insurance fee and has submitted a complete insurance application form to obtain coverage under the state's master insurance contract in accordance with s. 292.15(2)(ae)3m., Wis. Stats., and ch. NR 754, Wis. Adm. Code;

*Whereas*, each property where there are ch. NR 140 enforcement standard exceedances will be included on the department's geographic information system registry of closed remediation sites and the voluntary party has submitted all the information to the department necessary to be included on this registry pursuant to s. NR 726.05(3)(a)4., Wis. Adm. Code, including copies of letters to all landowners whose property has groundwater contamination that exceeds ch. NR 140 Enforcement Standards; and

*Whereas*, on June 5, 2002, WDNR determined that response actions necessary to restore the environment to the extent practicable with respect to the discharges and minimize the harmful effects from the discharges to the air, land, and waters of the state were completed except with respect to 1,2-DCA, TCE, Vinyl Chloride, PERC, and Chloroform-contaminated groundwater above ch. NR 140, Wis. Adm. Code, enforcement standards that WDNR has determined will be brought into compliance through natural attenuation, in accordance with rules promulgated by WDNR.

*Therefore*, based upon the information that has been submitted to the WDNR, the WDNR hereby certifies that the response actions set forth in the WDNR approved remedial action plan for the Property and any other necessary response actions have been completed, except with respect to 1,2-DCA, TCE, Vinyl Chloride, PERC, and Chloroform-contaminated groundwater above ch. NR 140, Wis. Adm. Code, enforcement standards that WDNR has determined will be brought into compliance through natural attenuation, in accordance with rules promulgated by WDNR.

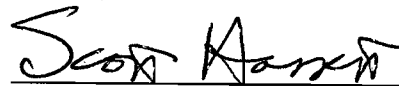
Upon issuance of this Certificate, Bank One and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats.,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

If natural attenuation fails, the insurance coverage which Bank One obtained under s. 292.15(2)(ae)3m., Wis. Stats., may be used to cover the costs of complying with s. 292.11(2), Wis. Stats., with respect to 1,2-DCA, TCE, Vinyl Chloride, PERC, and Chloroform - contaminated groundwater above ch. NR 140, Wis. Adm. Code, enforcement standards.

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

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

SIGNED AND CERTIFIED this 7<sup>th</sup> day of APRIL, 2004.



Scott Hassett, Secretary

Wisconsin Department of Natural Resources

ATTACHMENT A  
LEGAL PROPERTY DESCRIPTION  
2127 W. National Ave. Property

Lots 4, 5, 6, 11 and 12, in Block 13, in Clark's Addition, excepting those portions of said Lots 4, 5 and 11 within the bounds of West National Avenue, and together with the North  $\frac{1}{2}$  of that portion of vacated Walker's Street adjoining said Lots 6 and 12 on the South; Also the North 22 feet of Lot 1, Block 16, in Clark's Addition, together with the South  $\frac{1}{2}$  of that portion of vacated Walker Street adjoining on the North, except the South 2 feet of the West 10 feet of said Lot 1 all in the South West  $\frac{1}{4}$  of Section 31, in Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.

ATTACHMENT B  
INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS  
2127 W. National Ave. Property

1. "Environmental Property Investigation, 2127 W. National Ave.", Foth and VanDyke and Associates, Inc., Jan. 1989
2. "Remedial Investigation Report", Drake Environmental, Inc., March, 1994
3. "Workplan for Soil Remediation at the 2127 W. National Ave. Property", Drake Environmental, Inc, Aug. 1995
4. "Soil Remediation Documentation/Additional Remedial Investigation", Drake Environmental, Inc., March, 1996
5. Purchaser Liability Exemption Application for the 2127 W. National Ave. Property, April, 1996
6. "Groundwater Monitoring at the National Ave. Property located at 2127 W. National Ave. in Milwaukee, WI", Drake Environmental, Inc., Sept., 1996
7. Property located at 2127 W. National Ave. in Milwaukee, WI Purchaser Liability Exemption Application, Feb., 1997
8. "Groundwater Monitoring at the Property located at 2127 W. National Ave.", Drake Environmental, Inc., Aug., 1997
9. "Groundwater Monitoring at the National Ave. Property", Drake Environmental, Inc., Nov., 1997
10. "Groundwater Monitoring and Closure Request", Drake Environmental, Inc., Nov., 2001
11. "Additional Closure Documentation", Drake Environmental, Inc., April, 2002
12. "Case Closure Form", Drake Environmental, Inc., April, 2002

**ATTACHMENT C  
DEED RESTRICTION  
2127 W. National Ave. Property**

**See Attached Deed Restriction**



DEED RESTRICTION

Document Number

DOC. #  
8680340

REGISTER'S OFFICE 1 SS  
Milwaukee County, WI

RECORDED AT 2:36 PM

11-13-2003

JOHN LA FAVE  
REGISTER OF DEEDS

AMOUNT 17.00

In Re: Property located in Milwaukee County, Wisconsin surveyed as Parcel 1 and described as: Lots 4, 5, 6, 11, and 12, in Block 13, in Clark's Addition, excepting those portions of said lots 4, 5, and 11 within the bounds of West National Avenue, and together with the North 1/2 of that portion of vacated Walker's Street adjoining said lots 6 and 12 on the south: Also the North 22 feet of Lot 1, Block 16, in Clark's Addition, together with the South 1/2 of that portion of vacated Walker Street adjoining on the North, except the South 2 feet of the West 10 feet of said Lot 1 all in the South West 1/4 of Section 31, in Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.

Recording Area

Name and Return Address

Bank One, NA

Mr. Paul Karlen

P.O. Box 2033

Milwaukee, WI 53201-2033

STATE OF WISCONSIN )

COUNTY OF MILWAUKEE )

)  
) ss  
)

434-0040-111-0

Parcel Identification Number (PIN)

Section 1. Bank One, NA, as successor to Bank One, Milwaukee, NA, is the owner of the property described above.

Section 2. One or more petroleum and chlorinated solvent discharges have occurred at this property. As of 1995 contaminants including, but not limited to, gasoline range organics (GRO), benzene, ethylbenzene, toluene, and xylenes remained in soils at the property in concentrations above Wisconsin Administrative Code Chapter NR 720 residual contaminant levels, beneath the eastern portion of the building as illustrated on the attached Figure 1.

Section 3. It is the desire and intention of the property owner to impose on the property restrictions, which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

Section 4. The owner hereby declares that all of the property described above is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitations and/or restrictions:

The building that existed on the above-referenced property on the date that this restriction was signed forms a barrier that must be maintained in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. The building is also required in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in the Wisconsin Administrative Code Chapter NR 140. The building shall be maintained on the above-described property in the location shown on the attached certified survey map, unless another barrier with an infiltration rate of 10<sup>-7</sup> cm/sec or less, is installed and maintained in its place. The existing building and any selected replacement barrier with an infiltration rate of 10<sup>-7</sup> cm/sec or less shall be maintained on the above-described property in compliance with the "2127 West National Avenue Property Operation and Maintenance Plan" dated

REEL

5710

IMAGE

4978

October 24, 2003, that was submitted to the Wisconsin Department of Natural Resources for review and approval as required by section NR 724.13(2), Wis. Adm. Code (1997).

Therefore, the following activities are prohibited on that portion of the property described above where the building or any selected replacement barrier with an infiltration rate of  $10^{-7}$  cm/sec or less exists, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Excavating or grading of the land surface; (2) Filling on the capped area; (3) Plowing for agricultural cultivation; and (4) Construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. (File references: Commerce # 53202-1123-01, FID # 241458910, and BRRTS # 02-41-000887 / 06-41-144308).

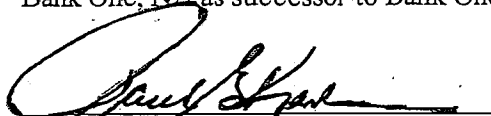
This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction inures to the benefit of and is enforceable by the Wisconsin Department of Natural Resources, its successors or assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that the restrictions set forth in this covenant are no longer required. That property owner shall provide any and all necessary information to the Department in order for the Department to be able to make a determination. Upon the receipt of such a request, the Department shall determine whether or not the restrictions contained herein can be extinguished. Conditions under which a restriction may be extinguished will be determined in accordance with the site specific standards, rules and laws for this property. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this restriction, or portions of this restriction, are no longer binding. Any restriction placed upon this property shall not be extinguished without the Department's written determination.

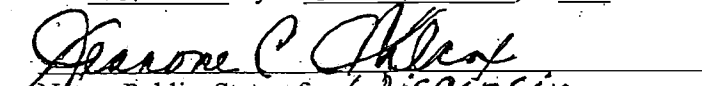
IN WITNESS WHEREOF, the owners of the property have executed this Declaration of Restrictions, this 27th day of October, 2003.

By signing this document, Paul G. Karlen acknowledges that he is duly authorized to sign this document on behalf of Bank One, NA.

Bank One, NA as successor to Bank One, Milwaukee, NA

  
Paul G. Karlen, First Vice President

Subscribed and sworn to before me  
this 27th day of October, 2003.

  
Notary Public, State of Wisconsin  
My commission expires 11-19-06

Richard W. Frieseke of

This document was drafted by Drake Environmental, Inc., based on information provided by the Wisconsin Department of Natural Resources.

REFL 5710 IMAGE 4979

**2127 WEST NATIONAL AVENUE PROPERTY  
OPERATION AND MAINTENANCE PLAN**

October 24, 2003

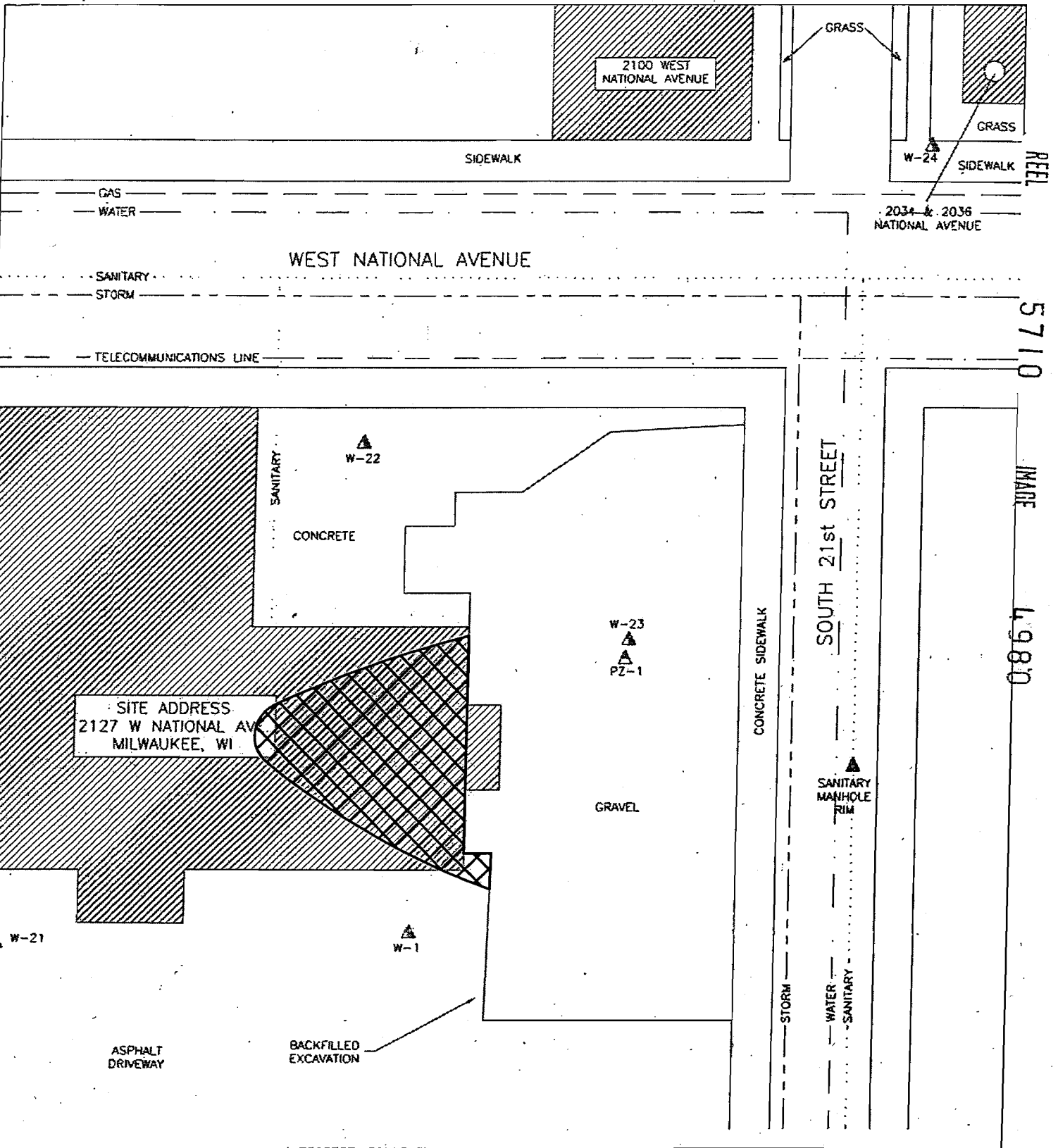
This Operation and Maintenance Plan has been prepared in accordance to Wis. Adm. Code Ch. NR 724.13(2) and shall be applicable to Parcel 1 of the Property depicted on the attached certified survey map.

A copy of this Operation and Maintenance Plan shall be kept on file in the offices of the owner of the Property. The Operation and Maintenance Plan has been developed to satisfy the requirements of the Wisconsin Department of Natural Resources (WDNR) Case Closure with a Performance Standard ("Cap") for the 2127 West National Avenue property letter dated June 5, 2002.

1. Current property owner. Bank One, NA, 111 East Wisconsin Avenue, Milwaukee, Wisconsin 53201.
2. Consultant. Drake Environmental, 6980 N. Teutonia Avenue, Milwaukee, Wisconsin 53209.
3. Site Location. The 2127 West National Avenue Property is surveyed as Parcel 1 and described as: Lots 4, 5, 6, 11, and 12, in Block 13, in Clark's Addition, excepting those portions of said lots 4, 5, and 11 within the bounds of West National Avenue, and together with the North ½ of that portion of vacated Walker's Street adjoining said lots 6 and 12 on the south: Also the North 22 feet of Lot 1, Block 16, in Clark's Addition, together with the South ½ of that portion of vacated Walker Street adjoining on the North, except the South 2 feet of the West 10 feet of said Lot 1 all in the South West ¼ of Section 31, in Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.
4. Nature and Extent of Contamination. Petroleum and chlorinated solvent contamination remaining on the Property as set forth on Figure 1 (attached).
5. Normal Operation and Maintenance – Ch. NR 724.13(2)(b). The area of the Property depicted on Figure 1 where contamination was left in place is capped

with a building. The area of the Property where contamination was left in place shall be inspected not less than annually by the property owner as part of normal operation and maintenance to ensure that integrity of the Cap is maintained. Any disturbances of the Cap, such as significant cracking or significant erosion, burrowing or other damage will be noted and damaged areas will be repaired within a reasonable period of time after discovery, not to exceed sixty (60) days subject to weather and seasons considerations. A copy of the Inspection Report shall be kept on file by the property owner with a copy of this Operation and Maintenance Plan and shall be made available for inspection by representatives of the WDNR upon reasonable requests during normal business hours of the property owner.

6. Cap Removal and Replacement. If it becomes necessary or desirable to remove or alter the existing Cap with the approval of the Department, the Cap so removed or altered shall be replaced with another barrier with an infiltration rate of  $10^{-7}$  cm/sec or less and maintained in its place. The existing building, and any replacement barrier with an infiltration rate of  $10^{-7}$  cm/sec or less, shall be maintained on the above-described property in compliance with this maintenance plan. Such replacement shall be carried out within a reasonable period of time not to exceed sixty (60) days subject to weather and seasons consideration. If contamination that is present on the Property is excavated, it will be handled and/or disposed of in accordance with the most current State of Wisconsin regulations.

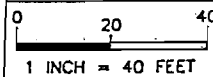


SITE ADDRESS  
2127 W NATIONAL AV  
MILWAUKEE, WI

**LEGEND**

- ▲ BORING/MONITORING WELL LOCATION
- ▲ BENCHMARK LOCATION
- ⊠ RESIDUAL SOIL CONTAMINATION

**DIAGRAM SCALE**



1 INCH = 40 FEET  
ALL DIMENSIONS ON THIS DIAGRAM ARE APPROXIMATE



NATIONAL AVENUE PROPERTY  
GROUNDWATER MONITORING

PROJECT NO: J93213 PM: TJO  
DRAWN BY: AKW DATE: 3/17/03  
CHECKED BY: *771* DATE: 3/17/03  
APPRVD BY: *770* DATE: 3/17/03  
FILE: J93213-A5

RESIDUAL SOIL CONTAMINATION  
DIAGRAM

FIGURE  
1.

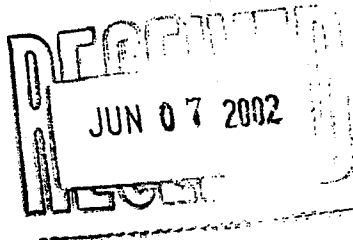


## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor  
Darrell Bazzell, Secretary  
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters  
2300 N. Dr. Martin Luther King, Jr. Drive  
P.O. Box 12436  
Milwaukee, Wisconsin 53212-0436  
Telephone 414-263-8500  
FAX 414-263-8716  
TTY 414-263-8713

June 5, 2002



Mr. Paul Karlen, Senior Vice President  
Bank One, Wisconsin  
P.O. Box 2033  
Milwaukee, WI 53201-2033

Subject: Conditional Case Closure and VPLE Status  
2127 W. National Ave. Milwaukee, Wisconsin  
WDNR BRRTS # 02-41-000887 / 06-41-144308

Dear Mr. Karlen:

On May 1, 2002, your request for closure of the case described above was reviewed by the Southeast Region closure committee. The Southeast Region closure committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the closure committee has determined that the Petroleum and chlorinated compound contamination on the site from the tank areas appears to have been investigated and remediated to the extent practicable under site conditions. Your case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code and will be closed if the following conditions are satisfied.

### **MONITORING WELL ABANDONMENT**

The monitoring wells at the site must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Documentation of well abandonment must be submitted to Victoria Stovall on Form 3300-5B found at [www.dnr.state.wi.us/org/water/dgw/gw/](http://www.dnr.state.wi.us/org/water/dgw/gw/) or provided by the Department of Natural Resources.

### **DEED RESTRICTION FOR CONTAMINATED SOIL**

To close this site, the Department requires that a deed restriction be signed and recorded to address the issue of the remaining soil contamination associated with the site. The purpose of the restriction is to maintain a surface barrier over the remaining soil contamination to prevent it from impacting human health and the environment.

You will need to submit a draft deed restriction to me before the document is signed and recorded. You may find a model deed restriction enclosed for your use or visit our web site at [www.dnr.state.wi.us/org/tr](http://www.dnr.state.wi.us/org/tr). To assist us in our review of the deed restriction, you should submit a copy of the property deed and a site map showing the estimated area (dashed line) of remaining soil contamination to me along with the draft document. After the Department of Natural

Resources has reviewed the draft document for completeness, you should sign it if you own the property, or have the appropriate property owner sign it, and have it recorded by the Milwaukee County Register of Deeds. Then you must submit a copy of the recorded document, with the recording information stamped on it, to me. Please be aware that if a deed restriction is recorded for the wrong property because of an inaccurate legal description that you have provided, you will be responsible for recording corrected documents at the Register of Deeds Office to correct the problem.

Since there is remaining soil contamination under the building, the building is considered a cap potentially limiting migration of contaminants to the groundwater. Therefore, the cap is a performance standard and must remain in place. There you must publish a public notice per NR 714 and submit either the actual entire page of the newspaper with the notice or a "Proof of Publication" from the newspaper publisher.

#### **RIGHT-OF-WAY SOIL AND/OR GROUNDWATER CONTAMINATION**

There is residual soil and/or groundwater contamination in a public street or highway right-of-way. Section NR 726.05(2)(b)4, Wis. Adm. Code, requires you to provide written notification of the presence of residual soil and/or groundwater contamination to the clerk of the town and county or municipality where the right-of-way is located and to the municipal department or state agency that maintains the right-of-way. Please provide me with a copy of the written notification.

#### **GIS REGISTRY OF CLOSED REMEDIATION SITES**

Since your site is being closed with a groundwater enforcement standard exceedence, you will need to submit to Victoria Stovall the information necessary and appropriate fee to list your site on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Please see Publications RR-688 and RR-690 for the GIS submittal requirements. To review the sites on the GIS Registry web page, visit <http://gomapout.dnr.state.wi.us/org/at/et/geo/gwur/index.htm>.

When the above conditions have been satisfied, please submit a letter to let me know that applicable conditions have been met, and your case will be closed.

#### **PECFA INFORMATION**

If this is a PECFA site, section 101.143, Wis. Stats., requires that PECFA claimants seeking reimbursement of interest costs, for sites with petroleum contamination, submit a final reimbursement claim within 120 days after they receive a closure letter on their site. For claims not received by the PECFA Program within 120 days of the date of this letter, interest costs after 60 days of the date of this letter will not be eligible for PECFA reimbursement.

Please be aware that the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment.

#### **VPLE INFORMATION**

To obtain a Certificate of Completion (COC) in the VPLE program for a site using natural attenuation as a remedy for a groundwater enforcement standard exceedence you must apply for insurance from the Department. Please see Publication RR-661 Insurance for Voluntary Party Liability Exemption (VPLE) Sites Using Natural Attenuation – Information and Fee Schedule (Fact Sheet 13) and the Voluntary Party Liability Exemption (VPLE) Environmental Insurance Application Form 4400-224. These documents are available on our web site.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (414)263-8557.

Sincerely,

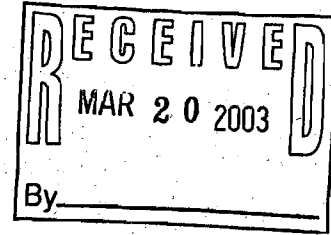
*Margaret M. Brunette*

Margaret M. Brunette, P.G.  
Hydrogeologist  
Remediation & Redevelopment Program

cc: Trenton Ott – Drake Environmental, Inc.  
Michael Prager – RR/3



March 14, 2003



Ms. Margaret Brunette  
Wisconsin Department of Natural Resources  
2300 N. Dr. Martin Luther King Jr. Drive  
P.O. Box 12436  
Milwaukee, WI 53212

**RE:** Documentation for GIS Registry for the Property Located at 2127 West National Avenue in Milwaukee, Wisconsin — Drake Project No. J93213; DNR File Reference Nos. 02-41-000887 / 06-41-144308; DNR FID No. 241458910; PECFA Claim No. 53204-1160-27

Dear Ms. Brunette:

The National Avenue property is owned by Bank One, NA and is located at 2127 West National Avenue in Milwaukee, Wisconsin. Conditional site closure was granted for the property in your letter dated June 5, 2002. A condition of closure was entry of the property on the Wisconsin Department of Natural Resources (DNR) geographic information system (GIS) registry. This letter presents the required documentation as outlined on the DNR, Bureau of Remediation and Redevelopment "Checklist of Documents for GIS Registry Packet" (PUB-RR-688). The one time fee of \$450 for soil and groundwater registration is attached.

A copy of the most recent deed including the legal description for the property and a copy of the certified survey map or relevant section of the recorded plat map for the property are attached.

The parcel identification number for the property is 434-0040-111-0 and the geographic position of the property is 687880, 285357 in WTM91 projection coordinates.

Location maps illustrating the location of all potable wells within 1200 feet of the site, buildings, roads, property boundaries, contaminant sources, utilities, and monitoring wells are attached.

6980 North Teutonia Avenue  
Milwaukee, WI 53209-2536

(414) 351-1440

1-800-853-8440

Fax:(414)351-1404

Maps illustrating the extent of groundwater contamination, and the extent of soil contamination exceeding ch. NR 720 generic residual contaminant levels (RCLs) are attached.

Tables of the groundwater analytical results, pre-remedial and post-remedial soil analytical results, and groundwater elevation data collected at the property are attached.

Geologic cross sections presenting the site geologic units and source area extent and location are attached.

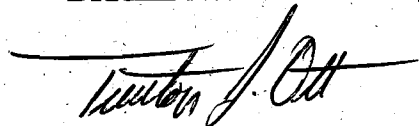
A statement signed by the responsible party indicating that the legal descriptions attached to the statement are complete and accurate is also included.

Copies of the written notifications provided to the City of Milwaukee and Wisconsin Department of Transportation, which are responsible for maintenance of West National Avenue (Highway 59) and North 21<sup>st</sup> Street and their respective right-of-ways, for possible contamination within the right-of-ways are also included.

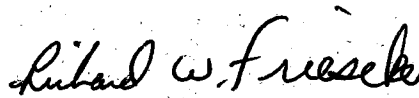
We appreciate your time and attention to this matter. If you have questions or concerns regarding this submittal, please contact us at (414) 351-1440.

Respectfully,

**DRAKE ENVIRONMENTAL, INC.**



Trenton J. Ott  
Associate Project Manager



Richard W. Frieseke, P.E.  
President

cc. Mr. Paul Karlen, Bank One, NA

Attachments  
J93213CM

89 APR 23 10 18

DEED

REEL 2325 67

W. J. ...

THIS INSTRUMENT WITNESSETH: that THE ELKIN COMPANY, a Wisconsin partnership, for and in consideration of the full release, cancellation and discharge of all obligations of whatsoever kind or character evidenced by or secured by (a) that certain Real Estate Mortgage dated February 28, 1979 and recorded on March 1, 1979, Reel 1186, Images 298 to 303, inclusive, as Document No. 5292842 in the office of the Register of Deeds for Milwaukee County, Wisconsin, (b) that certain Promissory note of The Elkin Company to Wisconsin Marine Bank dated February 28, 1979 in the original principal amount of \$1,200,000, and (c) the security interest and agreement evidenced and perfected by financing statement number 468299 on file in the office of the Wisconsin Secretary of State, receipt of which is hereby acknowledged, do hereby quitclaim, grant, bargain and convey to Bank One, Milwaukee, N.A., as successor to the interests of Wisconsin Marine Bank, the following described real property situated in the County of Milwaukee and State of Wisconsin, bounded and described as follows:

FEE  
# 7.75 (14)  
EXEMPT

"Lots 4, 5, 6, 11 and 12, in Block 13, in Clark's Addition, excepting those portions of said Lots 4, 5 and 11 within the bounds of West National Avenue, and together with the North 1/2 of that portion of vacated Walker's Street adjoining said Lots 6 and 12 on the South; Also the North 22 feet of Lot 1, Block 16, in Clark's Addition, together with the South 1/2 of that portion of vacated Walker Street adjoining on the North, except the South 2 feet of the West 10 feet of said Lot 1 all in the South West 1/4 of Section 31, in Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.

The real property conveyed hereunder is not homestead property. The tax key number for the real property conveyed hereunder is 434-0040-111-0.

The real property described above is conveyed hereunder together with any and all hereditaments and appurtenances thereto belonging or in any way appertaining, together with all right, title, interest or claim whatsoever which The Elkin Company has or may have, either in law or in equity, either in possession or expectancy of, in and to the above conveyed real property and its hereditaments and appurtenances. The real property described above together with its hereditaments and appurtenances is conveyed to Bank One, Milwaukee, N.A., its successors and assigns hereunder to have and to hold said real property, hereditaments and appurtenances forever.

The Elkin Company hereby warrants and represents that this Deed is, and is intended to be, an absolute conveyance of all of their right, title and interest in and to the above described real property in effect as well as in form and is not intended as a mortgage, conveyance in trust or hypothecation of any kind or character; that the possession of the above described property has been surrendered to and taken by Bank One, Milwaukee, N.A. subject to the tenancy of

FDL Foods, and that the undersigned have no option to purchase or any other right, title, interest or claim in or to said premises; that the consideration for this Deed as describe above was and is full, fair, just, adequate and reasonable, that this conveyance is not made in fraud upon the rights of any creditors of the undersigned or of any other person or persons whatsoever; and that each, all and every of the representations and warranties herein made are and each of them is made for the benefit of any person hereafter acquiring any right, title or interest in or to the above described property and of any title insurance company which may insure the right, title or interest of any such person, and each of such persons is, and all of them are, authorized to rely upon each, all and every of the foregoing representations and warranties, each of which is freely and fairly made without menace, fraud, duress or undue influence on the part of any person whatsoever.

IN WITNESS WHEREOF, The Elkin Company has executed this Deed on the 25th day of April, 1989.

THE ELKIN COMPANY

BY: Leigh Peterson  
Leigh Peterson, Managing Partner

BY: Timothy Meinerz  
Timothy Meinerz, Managing Partner

AUTHENTICATION

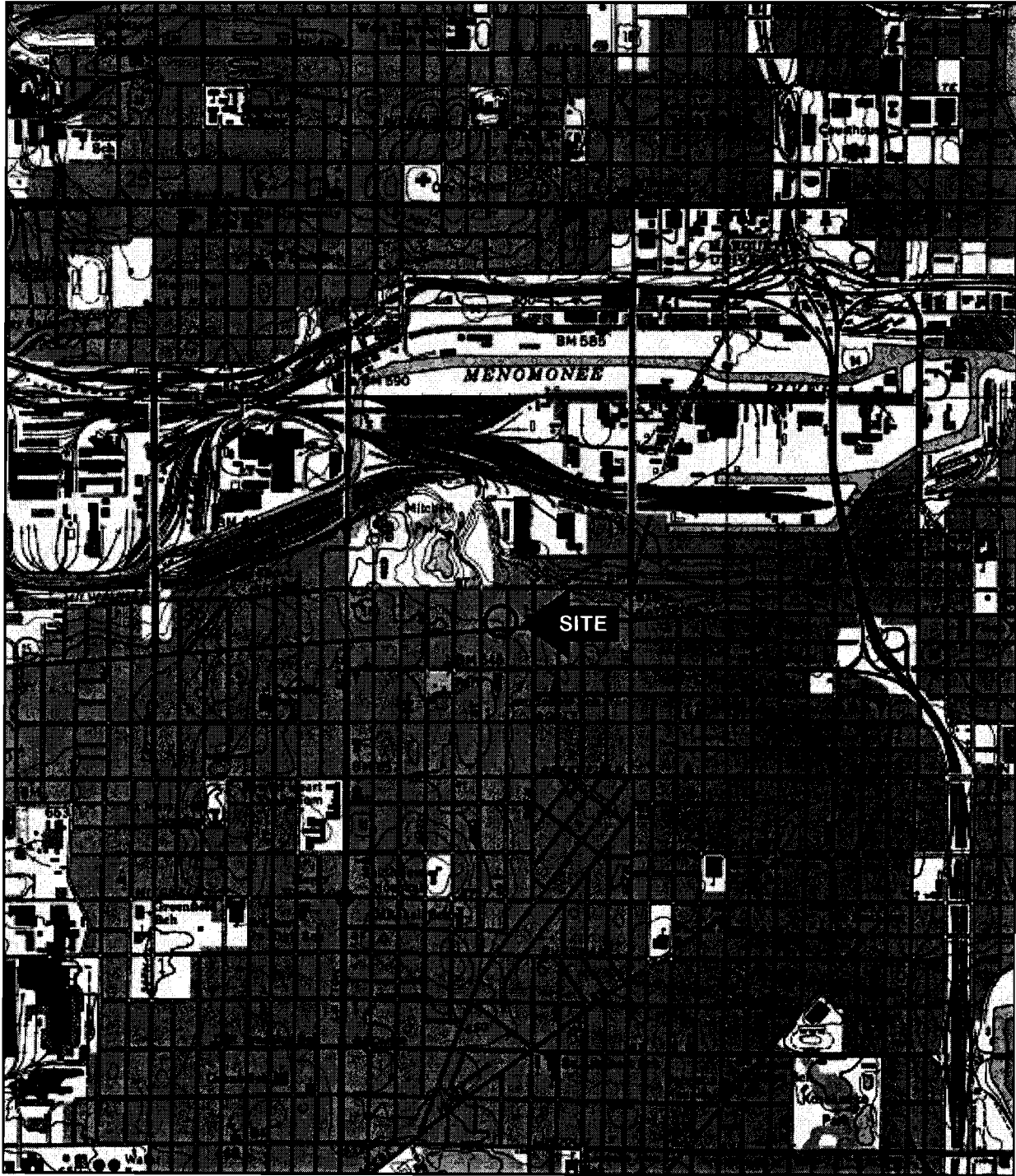
Signatures of Timothy Meinerz and Leigh Peterson authenticated this 25th day of April, 1989.

Thomas P. Shannon  
Thomas P. Shannon  
Member: State Bar of Wisconsin

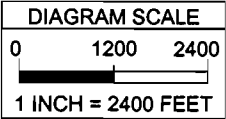
This instrument was drafted by:

Thomas P. Shannon, Esq. et to  
Fox, Carpenter, O'Neill & et to  
Shannon, S.C.  
322 N. Water Street  
Milwaukee, WI 53202  
(414) 273-3939





MILWAUKEE - WISCONSIN  
 USGS 7.5 MINUTE QUADRANGLE MAP  
 CREATED 1958, PHOTOREVISED 1971  
 NE 1/4 SW 1/4 SEC 31 T7N R22E

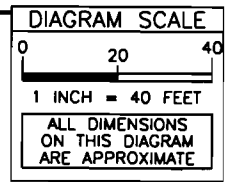
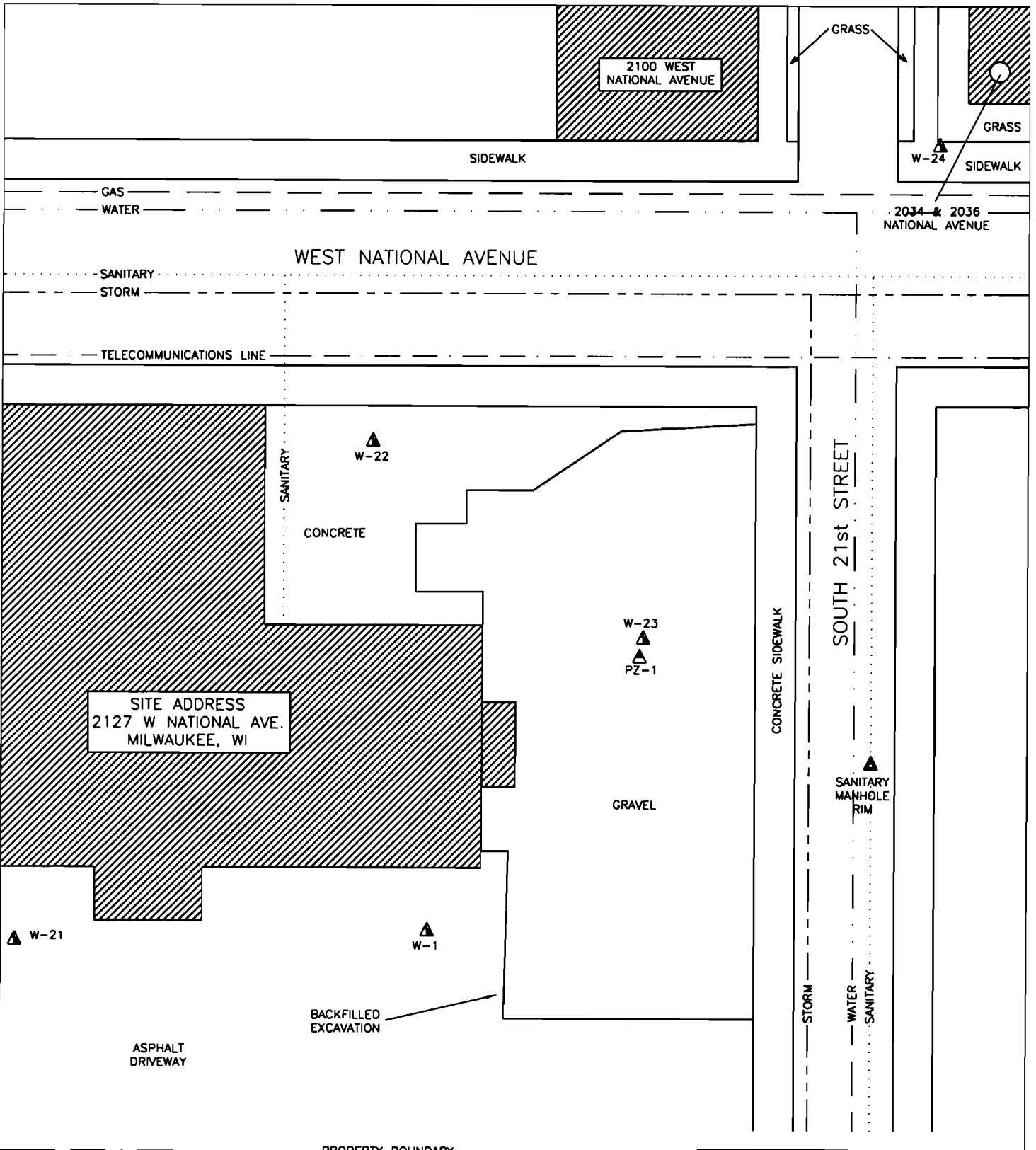


2127 W NATIONAL AVE  
 MILWAUKEE, WI

PROJECT NO: J93213	PM: TJO
DRAWN BY: AKW	DATE: 3/14/03
CHKD BY:	DATE:
APRVD BY:	DATE:

VICINITY  
 DIAGRAM

FIGURE  
 1



**LEGEND**

- ▲ BORING/MONITORING WELL LOCATION
- ▲ BENCHMARK LOCATION



NATIONAL AVENUE PROPERTY GROUNDWATER MONITORING	PROJECT NO: J93213 PM: DWF	SITE DIAGRAM	FIGURE 2
	DRAWN BY: AKW DATE: 9/28/01		
	CHECKED BY: <i>TD</i> DATE:		
	APPRVD BY: <i>TD</i> DATE:		
	FILE: J93213-A1		

**TABLE 2**  
**Groundwater Analytical Results**  
**National Avenue Property**  
**Milwaukee, Wisconsin**

Well ID	Sampling Date	Benzene (ppb)	Chloroethane (ppb)	Chloroform (ppb)	1,2-DCA (ppb)	1,2-Dichloropropane (ppb)	cis-1,2-DCE (ppb)	trans-1,2-DCE (ppb)	Ethylbenzene (ppb)	Naphthalene (ppb)	PERC (ppb)	Toluene (ppb)	TCE (ppb)	Chloride (ppb)	Methylene Chloride (ppb)	Vinyl Chloride (ppb)	Total Xylenes (ppb)	Combined TMBs (ppb)	1,1,1-TCA (ppb)
MW-1	11/16/93	13.6	<25	<25	36,700	<25	75.2	<25	<50	<50	<25	<100	30.6	NA	<25	12.4	<100	<100	<25
	8/21/96	<0.5	<0.5	20	5,000	0.99	100	4.1	<0.5	<8	8.9	1.4	56	NA	<0.5	21	<0.5	<2	<0.5
	1/16/97	<5.0	<5.5	<6.0	220	<6.5	16	<9	<5.5	<12	<8	<5	14	NA	<20	<10	<18	<12	<6
	10/14/97	<0.5	1.9	4.3	800	<0.5	70	2.2	<0.5	<8	4.3	2.9	24	NA	2.5	11	<0.5	<2	<0.5
	9/8/98	<13	<13	<3.5	1,400	<13	<13	<13	<13	<50	<13	<13	<13	230,000	<13	<13	<13	<52	<13
	3/15/01	<0.19	<0.28	2.2	1,790	0.78	6.6	2.6	<0.13	<0.082	0.31	<0.11	6.8	704,000	<0.12	<0.23	<0.3	<0.23	<0.13
	6/14/01	<0.19	4.2	1.5	2,520	<0.27	10	1.6	<0.13	<0.082	0.38	<0.11	6.2	573,000	1.5	3.7	<0.3	<0.23	<0.13
	3/5/02	<0.5	1.78	2.02	1,770	<0.5	10.7	2.11	<0.5	<2	1.98	<0.5	8.81	NA	0.745	5.5	<0.5	<2	<0.5
MW-21	1/29/96	<0.5	<0.5	<0.5	<0.5	<0.5	0.7	<0.5	<0.5	<8	2.2	<0.5	0.99	NA	<0.5	<0.2	<0.5	<2	1.2
	8/21/96	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<8	<0.5	<0.5	<0.5	NA	<0.5	<0.2	<0.5	<2	1.4
	1/16/97	<1	<1.1	<1.2	<1.4	<1.3	<3	<1.8	<1.1	<2.4	1.9	<1	1.6	NA	<4.1	<2.1	<3.6	<2.4	1.2
	10/14/97	<0.5	<0.5	<0.14	<0.5	<0.5	0.62	<0.5	<0.5	<8	2.3	<0.5	1.3	NA	<0.53	<0.17	<0.5	<2	1.4
	9/8/98	<0.5	<0.5	<0.14	<0.5	<0.5	<0.5	<0.5	<0.5	<2	2.3	<0.5	0.79	140,000	<0.5	<0.17	<0.5	<2	1.7
	3/15/01	<0.19	<0.28	<0.18	<0.35	<0.27	<0.19	<0.17	<0.13	<0.082	0.75	<0.11	0.18	56,000	<0.12	<0.23	<0.3	<0.23	0.78
	6/14/01	<0.19	<0.28	<0.18	<0.35	<0.26	<0.19	<0.17	<0.13	<0.082	0.61	<0.11	<0.098	56,000	<0.12	<0.23	<0.3	<0.23	0.53
	3/5/02	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<8	4.2	<0.5	<0.5	NA	<0.5	<0.2	<0.5	<1.5	<1
MW-22	1/29/96	0.52	<0.5	3.4	<0.5	<0.5	<0.5	<0.5	<0.5	<8	4.2	<0.5	<0.5	NA	<0.5	<0.2	<0.5	<1.5	<1
	8/21/96	<0.5	<0.5	5.8	<0.5	<0.5	<0.5	<0.5	<0.5	<8	8.8	<0.5	<0.5	NA	<0.5	<0.2	<0.5	<2	<0.5
	1/16/97	<1	<1.1	5.2	<1.4	<1.3	<3	<1.8	<1.1	<2.4	3.4	<10	<1.4	NA	<4.1	<2.1	<3.6	<2.4	<1.2
	10/14/97	1.2	<0.5	8.7	0.55	<0.5	1.9	<0.5	<0.5	<8	2.3	0.59	<0.5	NA	<0.53	<0.17	<0.5	<8	<0.5
	9/8/98	1.7	<0.5	10	1.1	<0.5	4.2	<0.4	0.63	30	3.9	1.0	0.13	200,000	4.6	<0.17	1.9	<2	<0.5
	3/15/01	0.76	<0.28	4	2	<0.27	6.3	<0.17	0.2	18	3.3	<0.11	1.4	147,000	2.4	1.6	0.56	0.48	<0.13
	6/14/01	1.2	<0.28	2.9	1.7	<0.27	6.0	<0.17	0.35	28	5.8	0.65	1.4	117,000	1.5	<0.23	<0.3	0.77	<0.13
	3/5/02	<0.5	<0.5	5.02	<0.5	<0.5	2.31	<0.5	<0.5	21.3	5.04	<0.5	1.19	NA	<0.53	<0.17	<0.5	<2	<0.5
MW-23	1/29/96	2.2	<0.5	10	<0.5	<0.5	2.8	<0.5	<0.5	<8	3	<0.5	<0.5	NA	<0.5	<0.2	<0.5	<2	<0.5
	8/21/96	<0.5	<0.5	6.2	<0.5	<0.5	<0.5	<0.5	<0.5	<8	<0.5	11	<0.5	NA	<0.5	10	<0.5	<2	<0.5
	1/16/97	5.5	<1.1	11	<1.4	<1.3	7.7	<1.8	<1.1	40	2.1	1.8	<1.4	NA	<4.1	4.9	2.6	2.8	<1.2
	3/15/01	2.7	<0.28	2	1.8	<0.27	6.9	<0.17	0.37	19	6.5	0.44	1.2	127,000	1.8	2.2	0.89	0.79	<0.13
	6/14/01	2.4	<0.28	0.54	1.1	<0.27	5.3	<0.17	<0.13	5.7	2.2	<0.11	<0.098	127,000	1.5	<0.23	<0.3	<0.23	<0.13
	3/5/02	2.28	<0.5	6.36	4.78	<0.5	7.11	<0.5	<0.5	6.61	12.5	<0.5	1.85	NA	1.93	<0.17	<0.5	<2	<0.5
MW-24	7/9/97	3.5	<0.5	0.15	<0.5	<0.5	<0.5	<0.5	2.7	<8	<0.5	19	<0.5	NA	<0.53	<0.17	12	0.5	<0.5
	10/14/97	<0.5	<0.5	<0.14	<0.5	<0.5	<0.5	<0.5	<0.5	<8	<0.5	<0.5	<0.5	NA	<0.53	<0.17	<0.5	<2	<0.5
	9/8/98	<0.5	<0.5	<0.14	<0.5	<0.5	<0.5	<0.5	<0.5	<2	<0.5	<0.5	<0.5	870,000	<0.53	<0.17	<0.5	<2	<0.5
	3/15/01	0.26	<0.28	0.51	<0.35	<0.27	<0.19	<0.17	<0.13	<0.082	0.45	0.35	<0.098	302,000	<0.12	<0.23	<0.3	<0.23	<0.13
	6/14/01	<0.19	<0.28	0.5	<0.35	<0.27	<0.19	<0.17	<0.13	<0.082	<0.14	<0.11	<0.098	172,000	<0.12	<0.23	<0.3	<0.23	<0.13
PZ-1	3/15/01	84	<2.8	<1.8	<3.5	<2.7	<1.9	<1.7	4.5	4	<1.4	26	<0.98	155,000	<1.2	<2.3	42	12.5	<1.3
	6/14/01	0.73	<0.28	<0.18	<0.35	<0.27	0.78	<0.17	<0.13	0.21	0.77	0.3	<0.098	161,000	<0.12	<0.23	<0.3	<0.23	<0.13
	3/5/02	<0.5	<0.5	<0.14	<0.5	<0.5	<0.5	<0.5	<0.5	<2	<0.5	<0.5	<0.5	NA	<0.53	<0.17	<0.5	<2	<0.5
ES (ppb)	-	5	400	6	5	5	70	100	700	40	5	1,000	5	250,000	5	0.2	10,000	480	200
PAL (ppb)	-	0.5	80	0.6	0.5	0.5	7	20	140	8	0.5	200	0.5	125,000	0.5	0.02	1,000	96	40

Note: Concentrations which exceed their respective WAC Chapter NR 140 ESs are in bold type.  
 Note: For a list of abbreviations used in this table, see the "Guide to Abbreviations in Laboratory Data Tables" provided at the beginning of this appendix.



**TABLE 3**  
**Natural Attenuation Results**  
**National Avenue Property**  
**Milwaukee, Wisconsin**

Well ID	Sampling Date	Nitrate (ppm)	Sulfate (ppm)	Alkalinity (ppm)	Chloride (ppm)	Dissolved Methane (ppb)	*DO (ppm)	*ORP (mV)	*Dissolved Iron (ppm)	*pH	*Conductivity (umhos/cm)	*Temperature (ppb)
MW-1	1/16/97	0.09	120	NA	NA	<40	2.89	196	4	9.25	820	NA
	10/14/97	<0.05	10.56	270	NA	385	0.60	115	1	7.37	465	17.9
	9/8/98	<0.05	9.5	230	230	97	0.53	68	2	8.65	1,400	18.52
	3/15/01	<0.11	98	352	704	492	6.18	153	3.6	7.28	2,321	7.75
	6/14/01	<0.11	128	353	573	146	1.56	112	4.1	7.57	2,252	14.05
	3/5/02	NA	NA	NA	NA	NA	1.13	103	NA	7.98	1,423	8.64
MW-21	1/16/97	7.0	130	NA	NA	<40	2.66	374	<1	5.99	1,482	NA
	10/14/97	8.0	110	470	NA	<1.2	2.80	179	<1	7.06	707	17.50
	9/8/98	4.6	90	480	140	<7.1	2.79	104	<1	8.29	1,413	17.20
	3/15/01	6.1	82	464	56	<7.2	8.59	487	<1	6.99	1,167	8.12
	6/14/01	4.6	72	446	56	<7.1	4.24	301	<1	7.53	1,158	14.52
	MW-22	1/16/97	1.4	950	NA	NA	<40	2.67	139	<1	7.59	1,120
10/14/97		0.54	21	120	NA	13	4.10	244	<1	10.09	537	17.40
9/8/98		0.15	16	280	200	11	4.00	80	<1	8.48	1,063	18.64
3/15/01		0.92	14	198	147	8.9	10.19	328	<1	11.85	1,361	6.84
6/14/01		1.7	17	236	117	17	5.64	92	<1	12.05	1,501	13.80
3/5/02		NA	NA	NA	NA	NA	8.49	186	NA	12.62	960	7.18
MW-23	1/16/97	0.13	42	NA	NA	320	1.90	37	4	11.90	916	NA
	3/15/01	0.45	9.6	431	127	<7.2	6.43	40	4	12.23	2,316	7.40
	6/14/01	0.78	8.4	361	127	37	4.05	46	<1	12.44	1,940	12.21
	3/5/02	NA	NA	NA	NA	NA	2.89	150	NA	13.00	1,961	8.09
MW-24	10/14/97	<0.05	150	520	NA	<1.2	1.40	284	<1	7.25	1,270	15.60
	9/8/98	<0.05	110	800	870	<7.1	4.68	159	<1	8.19	3,628	15.98
	3/15/01	0.32	45	298	302	<7.2	10.42	506	<1	7.12	1,559	9.20
	6/14/01	<0.11	40	289	172	<7.1	4.73	278	<1	7.92	1,152	12.49
PZ-1	3/15/01	0.80	76	25	155	<7.2	4.83	318	3.8	7.31	1,267	10.58
	6/14/01	<0.11	84	126	161	18	6.76	259	<1	8.74	1,089	13.01
	3/5/02	NA	NA	NA	NA	NA	6.30	304	NA	8.34	933	10.55

\*Field Measurement

Note: For a list of abbreviations used in this table, see the "Guide to Abbreviations in Laboratory Data Tables" provided at the beginning of this appendix.

**TABLE 3**  
**GRO Results — Soil Samples**

<u>Sample No.</u>	<u>Sample Depth (ft.)</u>	<u>PID Reading (no units)</u>	<u>GRO (ppm)</u>
B-1:S-3	5-6.5	88	<5
B-2:S-2	2.5-4	13	<5
B-3:S-4	7.5-9	469	<b>323</b>
B-4:S-4	7.5-9	653	<b>&gt;468</b>
B-5:S-2	2.5-4	357	<b>1,360</b>
B-6:S-2	2.5-4	294	<b>2,630</b>
B-7:S-4	7.5-9	<1	<5
B-8:S-4	7.5-9	993	<b>3,640</b>
B-9:S-2	2.5-4	382	<b>65.2</b>
HA-1:S-3	4.5	4	<5

ppm = parts per million

Note: GRO concentrations that exceed the DNR guideline limit of 10 ppm are in bold type.

**TABLE 4**  
**VOC and Total Lead Results — Soil Samples**  
(Only the detected parameters are listed.)

<u>Parameter</u>	<u>B-3:S-4 (ppm)</u>	<u>B-4:S-4 (ppm)</u>	<u>B-8:S-4 (ppm)</u>
PID Reading	469 (nu)	653 (nu)	993 (nu)
GRO	323	>468	3,640
Benzene	0.0061	0.374	<0.4
Chloroform	<0.0044	0.238	<1
1,2-Dichloroethane	<0.0044	0.0079	<1
cis-1,2-Dichloroethylene & 2,2-Dichloropropane	<0.0044	0.348	<1
trans-1,2-Dichloroethylene	<0.018		<4
1,2-Dichloropropane	<0.0044	0.0466	<1
Ethylbenzene	<0.0044	0.011	<1
Toluene	0.0093	<0.0086	<2
Trichloroethylene	0.0242	0.250	<4
Vinyl Chloride	<0.0017	0.0499	<0.4
o-Xylene	<0.0017	0.0181	<0.4
m- & p-Xylene	<0.0088	<0.0086	2.1
1,3,5-Trimethylbenzene	0.0106	<0.0086	<2.0
Isopropylbenzene	<0.0088	<0.0086	51.9
Naphthalene	<0.0088	<0.0086	3.1
n-Butylbenzene	<0.0088	<0.0086	10.8
1,2,4-Trimethylbenzene	<0.0088	<0.0086	98
sec-Butylbenzene	<0.0088	<0.0086	86.4
p-Isopropyltoluene	<0.0088	<0.0086	10.5
Total VOCs	<0.0088	<0.0086	7.4
	0.0502	1.3435	270.2
Total Lead	10.6	7.0	9.9

ppm = parts per million

nu = no units

**TABLE 4 (Page 1 of 7)**  
**GRO, VOC\*, and Total Lead Results — Soils Left in Place**  
**National Avenue Property**  
**Drake Project No. J93213**

Excavation Location Sample Depth (ft.)	Sample No. 13 Base	Sample No. 16 Base	Sample No. 17 Base	Sample No. 18 Base	Sample No. 230 Base	Sample No. 231 Base	Sample No. 232 Base	Sample No. 233 Base	Regulatory Standard
<b>Parameter</b>									
PID Reading (nu)	1	<1	<1	<1	<1	<1	<1	<1	
GRO (ppm)	3.0	3.5	<1.2	<1.2	1.8	1.6	1.3	2.0	100
<b>VOCs (ppb)</b>									
Benzene	<25	<25	<25	<25	<25	<25	<25	<25	5.5
n-Butylbenzene	<25	110	<25	<25	<25	<25	<25	<25	NS
sec-Butylbenzene	<25	<25	<25	<25	<25	<25	<25	<25	NS
tert-Butylbenzene	<25	<25	<25	<25	<25	<25	<25	<25	NS
Carbon tetrachloride	<25	<25	<25	<25	<25	<25	<25	<25	NS
Chloroform	<25	<25	<25	<25	<25	<25	<25	<25	NS
cis-1,2-Dichloroethene	89	<25	<25	<25	<25	<25	<25	<25	NS
Ethylbenzene	<25	<25	<25	<25	<25	<25	<25	<25	2,900
Isopropylbenzene	<25	<25	<25	<25	<25	<25	<25	<25	NS
p-Isopropyltoluene	<25	<25	<25	<25	<25	<25	<25	<25	NS
Napthalene	<25	100	<25	<25	<25	<25	<25	<25	NS
n-Propylbenzene	<25	28	<25	<25	<25	<25	<25	<25	NS
Tetrachloroethene (PERC)	<25	<25	<25	<25	<25	<25	<25	<25	NS
Toluene	<25	<25	<25	<25	<25	<25	<25	<25	1,500
Trichloroethene (TCE)	<25	<25	<25	<25	<25	<25	<25	<25	NS
1,2,4-Trimethylbenzene	<25	<25	<25	<25	<25	<25	<25	<25	NS
1,3,5-Trimethylbenzene	<25	30	<25	<25	<25	<25	<25	<25	NS
Total xylenes	<25	48	<25	<25	<25	<25	<25	<25	4,100
Total lead (ppm)	6.8	6.6	6.7	8.2	7.1	8.2	7.5	8.8	NS

\*Only the detected VOC parameters are presented.

nu = no unit of measurement

ppm = parts per million

ppb = parts per billion

NS = No standard has been established.

Note: Bold type indicates contaminant concentrations which exceed the regulatory standard.

**TABLE 4 (Page 2 of 7)**  
**GRO, VOC\*, and Total Lead Results — Soils Left in Place**  
**National Avenue Property**  
**Drake Project No. J93213**

Excavation Location Sample Depth (ft.)	Sample No. 306 South wall 6	Sample No. 309 Base 8	Sample No. 310 West wall 6	Sample No. 311 Base 8	Sample No. 312 North wall 6	Sample No. 313 West wall 6	Sample No. 314 Base 8	Sample No. 417 West wall 6	Sample No. 418 North wall 6	Regulatory Standard
<b>Parameter</b>										
PID Reading (nu)	<1	<1	<1	<1	6	<1	<1	6	<1	
GRO (ppm)	<1.1	1.3	<1.1	1.3	<1.1	<1.1	2.5	<1.1	3.3	100
<b>VOCs (ppb)</b>										
Benzene	<25	<25	<25	<25	<b>310</b>	<2.2	<25	<25	<25	5.5
n-Butylbenzene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
sec-Butylbenzene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
tert-Butylbenzene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
Carbon tetrachloride	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
Chloroform	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
cis-1,2-Dichloroethene	<25	<25	<25	<25	<25	<5.5	<25	48	<25	NS
Ethylbenzene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	2,900
Isopropylbenzene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
p-Isopropyltoluene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
Napthalene	<25	<25	<25	<25	<25	<28	<25	<25	<25	NS
n-Propylbenzene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
Tetrachloroethene (PERC)	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
Toluene	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	1,500
Trichloroethene (TCE)	<25	<25	<25	<25	<25	<5.5	<25	<25	<25	NS
1,2,4-Trimethylbenzene	<25	<25	<25	<25	<25	<11	<25	<25	<25	NS
1,3,5-Trimethylbenzene	<25	<25	<25	<25	<25	<11	<25	<25	<25	NS
Total xylenes	<25	<25	<25	<25	<25	<17	<25	<25	<25	4,100
Total lead (ppm)	9.3	9.5	9.0	8.3	9.6	8.3	9.1	9.5	8.5	50

\*Only the detected VOC parameters are presented.

nu = no unit of measurement

ppm = parts per million

ppb = parts per billion

NS = No standard has been established.

Note: Bold type indicates contaminant concentrations which exceed the regulatory standard.

**TABLE 4 (Page 3 of 7)**  
**GRO, VOC\*, and Total Lead Results — Soils Left in Place**  
**National Avenue Property**  
**Drake Project No. J93213**

Excavation Location	Sample No. 419 Base	Sample No. 439 West wall (Hand auger)	Sample No. 450 Base	Sample No. 451 Base	Sample No. 462 East wall	Sample No. 463 North wall	Sample No. 466 Base	Sample No. 467 East wall	Sample No. 468 East wall	Regulatory Standard
Sample Depth (ft.)	10	4.5	11	11	5.5	5.5	12	5.5	6	
<u>Parameter</u>										
PID Reading (nu)	<1	<1	<1	<1	647	28	2	12	<1	
GRO (ppm)	1.2	2.7	2.1	2.6	<b>520</b>	24	2.5	7.8	<1.1	100
<u>VOCs (ppb)</u>										
Benzene	<25	<25	<25	<25	<25	<25	<25	<25	<25	5.5
n-Butylbenzene	<25	<25	<25	<25	1,300	300	<25	<25	<25	NS
sec-Butylbenzene	<25	<25	<25	<25	490	170	<25	<25	<25	NS
tert-Butylbenzene	<25	<25	<25	<25	1,100	700	<25	<25	<25	NS
Carbon tetrachloride	<25	<25	<25	<25	<25	<25	<25	<25	<25	NS
Chloroform	<25	<25	<25	<25	<25	<25	<25	<25	<25	NS
cis-1,2-Dichloroethene	<25	<25	<25	<25	<25	<25	<25	<25	<25	NS
Ethylbenzene	<25	<25	<25	<25	630	140	<25	<25	<25	2,900
Isopropylbenzene	<25	<25	<25	<25	310	60	<25	<25	<25	NS
p-Isopropyltoluene	<25	<25	<25	<25	480	140	<25	<25	<25	NS
Napthalene	<25	<25	<25	<25	860	<25	<25	<25	<25	NS
n-Propylbenzene	<25	<25	<25	<25	1,400	290	<25	<25	<25	NS
Tetrachloroethene (PERC)	<25	<25	<25	<25	<25	<25	<25	<25	<25	NS
Toluene	<25	<25	<25	<25	<25	<25	<25	<25	<25	1,500
Trichloroethene (TCE)	<25	<25	<25	<25	<25	<25	<25	<25	<25	NS
1,2,4-Trimethylbenzene	<25	<25	<25	<25	570	330	<25	<25	<25	NS
1,3,5-Trimethylbenzene	<25	<25	<25	<25	1,300	110	<25	<25	<25	NS
Total xylenes	<25	<25	<25	<25	710	76	<25	<25	<25	4,100
Total lead (ppm)	7.3	9.6	8.0	7.5	5.2	7.5	7.5	7.8	8.1	50

\*Only the detected VOC parameters are presented.

nu = no unit of measurement

ppm = parts per million

ppb = parts per billion

NS = No standard has been established.

Note: Bold type indicates contaminant concentrations which exceed the regulatory standard.

**TABLE 4 (Page 4 of 7)**  
**GRO, VOC\*, and Total Lead Results — Soils Left in Place**  
**National Avenue Property**  
**Drake Project No. J93213**

Excavation Location	Sample No. 469 East wall	Sample No. 470 East wall	Sample No. 471 East wall	Sample No. 483 Base	Sample No. 484 Base	Sample No. 485 Base	Sample No. 486 Base	Sample No. 487 West wall (Hand auger)	Sample No. 511 West wall (Hand auger)	Regulatory Standard
Sample Depth (ft.)	5.5	6	5.5	10	10	10	10	5.5	4.5	
<u>Parameter</u>										
PID Reading (nu)	<1	<1	2	<1	<1	3	<1	46	52	
GRO (ppm)	3.2	<1.2	72	<1.2	4.8	5.6	1.8	2.9	13	100
<u>VOCs (ppb)</u>										
Benzene	<25	<25	<25	<b>65</b>	<25	<25	<25	<200	<25	5.5
n-Butylbenzene	40	<25	640	<25	<25	<25	<25	16,000	<25	NS
sec-Butylbenzene	<25	<25	320	<25	<25	<25	<25	<200	<25	NS
tert-Butylbenzene	<25	<25	630	<25	<25	<25	<25	<200	<25	NS
Carbon tetrachloride	<25	<25	<25	<25	<25	<25	<25	<200	<25	NS
Chloroform	<25	<25	<25	<25	<25	<25	320	9,300	<25	NS
cis-1,2-Dichloroethene	200	35	<25	<25	<25	<25	<25	<200	510	NS
Ethylbenzene	<25	<25	300	<25	<25	<25	<25	<200	<25	2,900
Isopropylbenzene	<25	<25	<25	<25	<25	<25	<25	<200	<25	NS
p-Isopropyltoluene	<25	<25	170	<25	<25	<25	<25	<200	<25	NS
Napthalene	<25	<25	<25	<25	<25	40	<25	13,000	<25	NS
n-Propylbenzene	<25	<25	330	<25	<25	<25	<25	<200	<25	NS
Tetrachloroethene (PERC)	<25	<25	<25	<25	<25	<25	1,200	19,000	97	NS
Toluene	<25	<25	<25	<25	<25	<25	<25	<200	<25	1,500
Trichloroethene (TCE)	<25	<25	<25	<25	<25	<25	<25	<200	580	NS
1,2,4-Trimethylbenzene	50	<25	<25	<25	<25	<25	<25	<200	<25	NS
1,3,5-Trimethylbenzene	31	<25	120	<25	<25	46	<25	<200	<25	NS
Total xylenes	<25	<25	<25	<25	<25	<25	<25	<200	<25	4,100
Total lead (ppm)	3.5	8.4	11	5.8	12	10	9.1	10	9.9	50

\*Only the detected VOC parameters are presented.

nu = no unit of measurement

ppm = parts per million

ppb = parts per billion

NS = No standard has been established.

Note: Bold type indicates contaminant concentrations which exceed the regulatory standard.

**TABLE 4 (Page 5 of 7)**  
**GRO, VOC\*, and Total Lead Results — Soils Left in Place**  
**National Avenue Property**  
**Drake Project No. J93213**

Excavation Location Sample Depth (ft.)	Sample No. 513 Base 10	Sample No. 515 Base 11	Sample No. 613 East wall 6	Sample No. 632 East wall 6	Sample No. 633 East wall 6	Sample No. 634 Base 11	**Sample No. 635 Base 11	Sample No. 636 South wall 5.5	Regulatory Standard
<b>Parameter</b>									
PID Reading (nu)	<1	<1	26	<1	<1	<1	<1	2	
GRO (ppm)	2.2	2.7	2.1	1.8	1.5	2.8	2.5	<1.1	100
<b>VOCs (ppb)</b>									
Benzene	<25	<25	<250	<25	<25	<25	<b>400/410</b>	<25	5.5
n-Butylbenzene	40	<25	<250	<25	<25	<25	<25/ <65	<25	NS
sec-Butylbenzene	<25	<25	<250	<25	<25	32	<25/ <65	<25	NS
tert-Butylbenzene	100	<25	<250	<25	<25	<25	<25/ <65	<25	NS
Carbon tetrachloride	80	34	2,400	<25	<25	<25	<25/ <65	<25	NS
Chloroform	<25	<25	1,400	<25	<25	<25	<25/ <65	<25	NS
cis-1,2-Dichloroethene	47	<25	<250	<25	<25	<25	<25/ <65	<25	NS
Ethylbenzene	32	<25	<250	<25	<25	<25	<25/ <65	<25	2,900
Isopropylbenzene	130	<25	<250	<25	<25	<25	<25/ <65	<25	NS
p-Isopropyltoluene	<25	<25	<250	<25	<25	<25	<25/ <65	<25	NS
Napthalene	<25	<25	<250	<25	<25	30	<25/ <330	<25	NS
n-Propylbenzene	72	<25	<250	<25	<25	<25	<25/ <65	<25	NS
Tetrachloroethene (PERC)	220	72	1,400	<25	<25	<25	<25/ <65	160	NS
Toluene	<25	<25	<250	<25	<25	<25	<25/ <65	<25	1,500
Trichloroethene (TCE)	64	<25	<250	<25	<25	<25	<25/ <65	<25	NS
1,2,4-Trimethylbenzene	<25	<25	<250	<25	<25	<25	<25/ <130	<25	NS
1,3,5-Trimethylbenzene	<25	<25	<250	<25	<25	<25	<25/ <130	<25	NS
Total xylenes	53	<25	<250	<25	<25	<25	<25/ <200	<25	4,100
Total lead (ppm)	11	9.1	6.6	8.0	6.9	9.0	8.7	6.9	50

\*Only the detected VOC parameters are presented.

\*\*The VOC analyses were rerun by EPA Method 8260 within the holding time.

nu = no unit of measurement

ppm = parts per million

ppb = parts per billion

NS = No standard has been established.

Note: Bold type indicates contaminant concentrations which exceed the regulatory standard.

**TABLE 4 (Page 6 of 7)**  
**GRO, VOC\*, and Total Lead Results — Soils Left in Place**  
**National Avenue Property**  
**Drake Project No. J93213**

Excavation Location	Sample No. 657	Sample No. 658	Sample No. 659	Sample No. 660	Sample No. 661	Sample No. 662	Sample No. 664	Regulatory Standard
Sample Depth (ft.)	Base	East wall	South wall	South wall	Base	West wall	West wall	
<u>Parameter</u>								
PID Reading (nu)	<1	<1	<1	<1	<1	<1	<1	
GRO (ppm)	2.1	<1.1	<1.2	<1.2	4.2	<1.1	<1.1	100
<u>VOCs (ppb)</u>								
Benzene	<25	<25	<25	<25	<25	<25	<25	5.5
n-Butylbenzene	<25	<25	<25	<25	<25	<25	<25	NS
sec-Butylbenzene	<25	<25	<25	<25	<25	<25	<25	NS
tert-Butylbenzene	<25	<25	<25	<25	<25	<25	<25	NS
Carbon tetrachloride	<25	<25	<25	<25	<25	<25	<25	NS
Chloroform	<25	<25	<25	<25	<25	<25	<25	NS
cis-1,2-Dichloroethene	<25	<25	<25	<25	<25	<25	<25	NS
Ethylbenzene	<25	<25	<25	<25	<25	<25	<25	2,900
Isopropylbenzene	<25	<25	<25	<25	<25	<25	<25	NS
p-Isopropyltoluene	<25	<25	<25	<25	<25	<25	<25	NS
Napthalene	<25	<25	<25	<25	<25	<25	<25	NS
n-Propylbenzene	<25	<25	<25	<25	<25	<25	<25	NS
Tetrachloroethene (PERC)	<25	<25	<25	<25	<25	<25	<25	NS
Toluene	<25	<25	<25	<25	<25	<25	<25	1,500
Trichloroethene (TCE)	<25	<25	<25	<25	<25	<25	<25	NS
1,2,4-Trimethylbenzene	<25	<25	<25	<25	<25	<25	<25	NS
1,3,5-Trimethylbenzene	<25	<25	<25	<25	<25	<25	<25	NS
Total xylenes	<25	<25	<25	<25	<25	<25	<25	4,100
Total lead (ppm)	5.8	7.8	5.0	4.6	7.1	8.9	7.3	50

\*Only the detected VOC parameters are presented.

nu = no unit of measurement

ppm = parts per million

ppb = parts per billion

NS = No standard has been established.

Note: Bold type indicates contaminant concentrations which exceed the regulatory standard.



**TABLE 4 (Page 7 of 7)**  
**GRO, VOC\*, and Total Lead Results — Soils Left in Place**  
**National Avenue Property**  
**Drake Project No. J93213**

Excavation Location Sample Depth (ft.)	Sample <u>No. 715</u> West wall 4.5	Sample No. 715 <u>by En Chem</u> West wall 4.5	Sample <u>No. 716</u> West wall 4.5	Sample No. 716 <u>by En Chem</u> West wall 4.5	Regulatory <u>Standard</u>
<u>Parameter</u>					
PID Reading (nu)	109	109	168	168	—
GRO (ppm)	<b>230</b>	78	42	26	100
<u>VOCs (ppb)</u>					
Benzene	< 10,000	< 130	< 10,000	< 250	5.5
n-Butylbenzene	< 10,000	< 130	< 10,000	< 250	NS
sec-Butylbenzene	< 10,000	< 130	< 10,000	< 250	NS
tert-Butylbenzene	< 10,000	< 130	< 10,000	< 250	NS
Carbon tetrachloride	< 10,000	< 130	< 10,000	< 250	NS
Chloroform	< 10,000	2,900	< 10,000	5,500	NS
cis-1,2-Dichloroethene	< 10,000	< 130	< 10,000	< 250	NS
Ethylbenzene	< 10,000	< 130	< 10,000	< 250	2,900
Isopropylbenzene	< 10,000	< 130	< 10,000	< 250	NS
p-Isopropyltoluene	< 10,000	< 130	< 10,000	< 250	NS
Methylene Chloride	< 40,000	230	< 40,000	360	
Napthalene	< 10,000	< 130	< 10,000	< 250	NS
n-Propylbenzene	< 10,000	< 130	< 10,000	< 250	NS
Tetrachloroethene (PERC)	63,000	41,000	92,000	66,000	NS
Toluene	< 10,000	< 130	< 10,000	< 250	1,500
Trichloroethene (TCE)	< 10,000	420	< 10,000	< 250	NS
1,2,4-Trimethylbenzene	< 10,000	< 130	< 10,000	< 250	NS
1,3,5-Trimethylbenzene	< 10,000	< 130	< 10,000	< 250	NS
Total xylenes	< 10,000	< 130	< 10,000	< 250	4,100
Total lead (ppm)	5.3		8.1		50

\*Only the detected VOC parameters are presented.

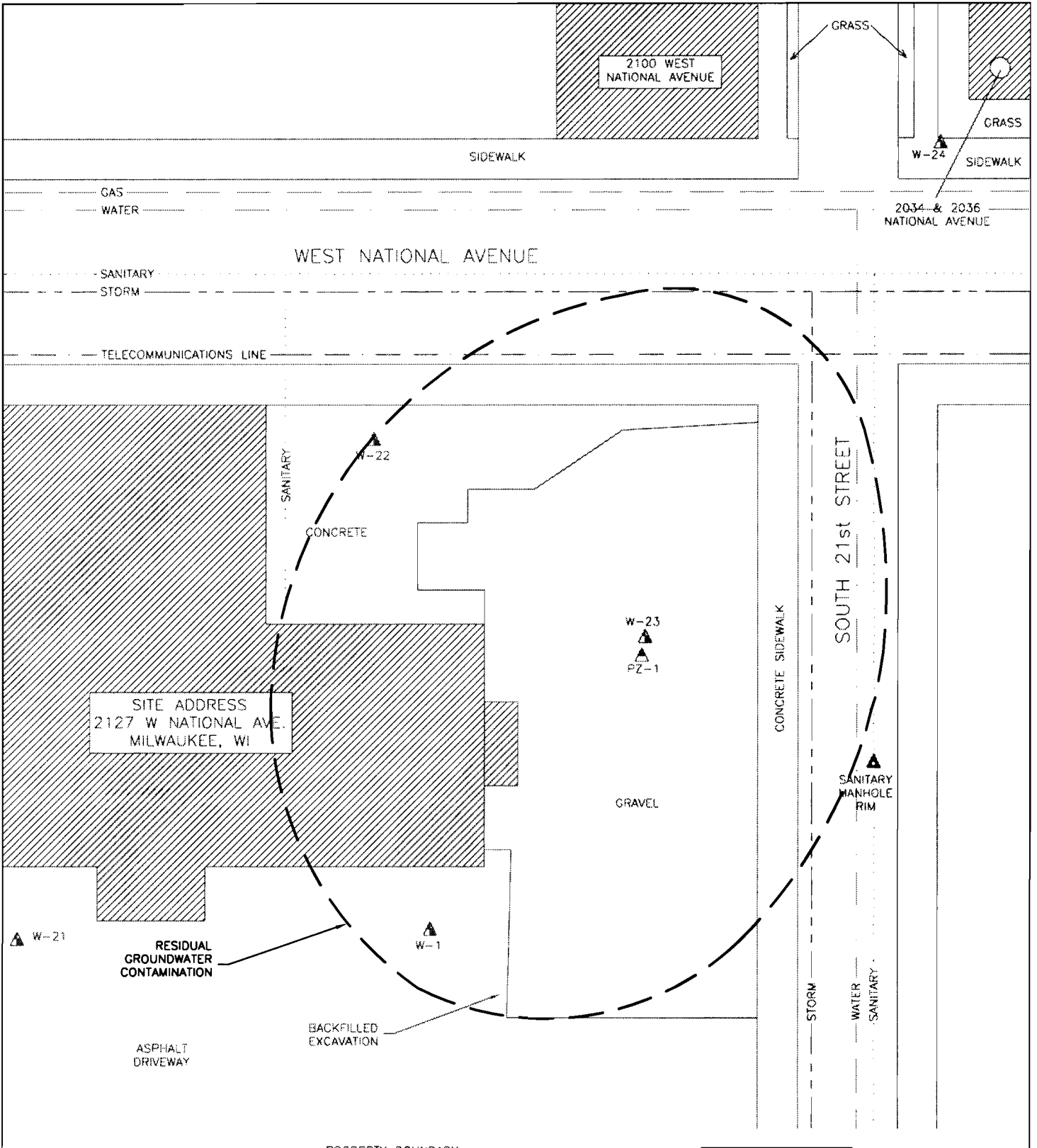
nu = no unit of measurement

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Note: Bold type indicates contaminant concentrations which exceed the regulatory standard.



SITE ADDRESS  
2127 W NATIONAL AVE.  
MILWAUKEE, WI

2100 WEST  
NATIONAL AVENUE

GAS  
WATER

WEST NATIONAL AVENUE

SANITARY  
STORM

TELECOMMUNICATIONS LINE

GRASS

2100 WEST  
NATIONAL AVENUE

GRASS

W-24

SIDEWALK

2034 & 2036  
NATIONAL AVENUE

SANITARY

W-22

CONCRETE

W-23

PZ-1

GRAVEL

SOUTH 21st STREET

CONCRETE SIDEWALK

SANITARY  
MANHOLE  
RIM

STORM

WATER

SANITARY

RESIDUAL  
GROUNDWATER  
CONTAMINATION

W-21

W-1

ASPHALT  
DRIVEWAY

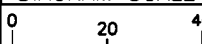
BACKFILLED  
EXCAVATION

PROPERTY BOUNDARY

**LEGEND**

- ▲ BORING/MONITORING WELL LOCATION
- ▲ BENCHMARK LOCATION

**DIAGRAM SCALE**



1 INCH = 40 FEET  
ALL DIMENSIONS  
ON THIS DIAGRAM  
ARE APPROXIMATE



NATIONAL AVENUE PROPERTY  
GROUNDWATER MONITORING

PROJECT NO: J93213 PM: TJO  
DRAWN BY: AKW DATE: 3/17/03  
CHECKED BY: TJO DATE:  
APPRVD BY: TJO DATE:  
FILE: J93213-A6

RESIDUAL GROUNDWATER  
CONTAMINATION  
DIAGRAM

FIGURE

4



**DIAGRAM SCALE**  
 0 15 30  
 1-INCH = 30-FEET  
 ALL DIMENSIONS ON THIS DIAGRAM ARE APPROXIMATE

WEST NATIONAL AVENUE

SIDEWALK

SOUTH 21st STREET

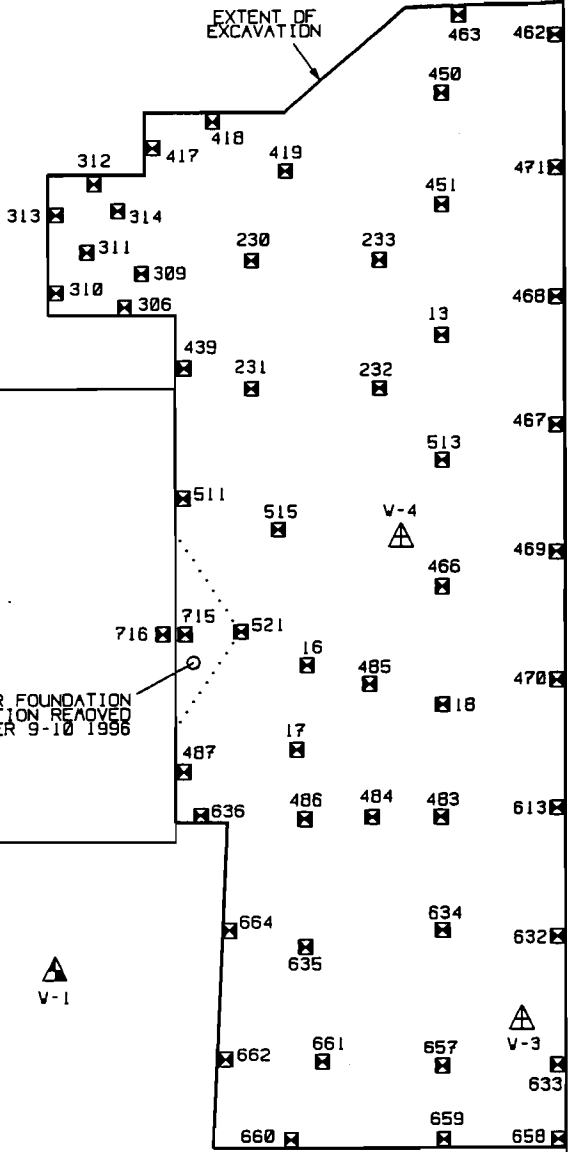
SIDEWALK

SITE ADDRESS  
 2127 W NATIONAL AVE  
 MILWAUKEE, WI

FORMER FOUNDATION  
 EXTENSION REMOVED  
 OCTOBER 9-10 1996

GRAVEL  
 PARKING  
 LOT

EXTENT OF  
 EXCAVATION

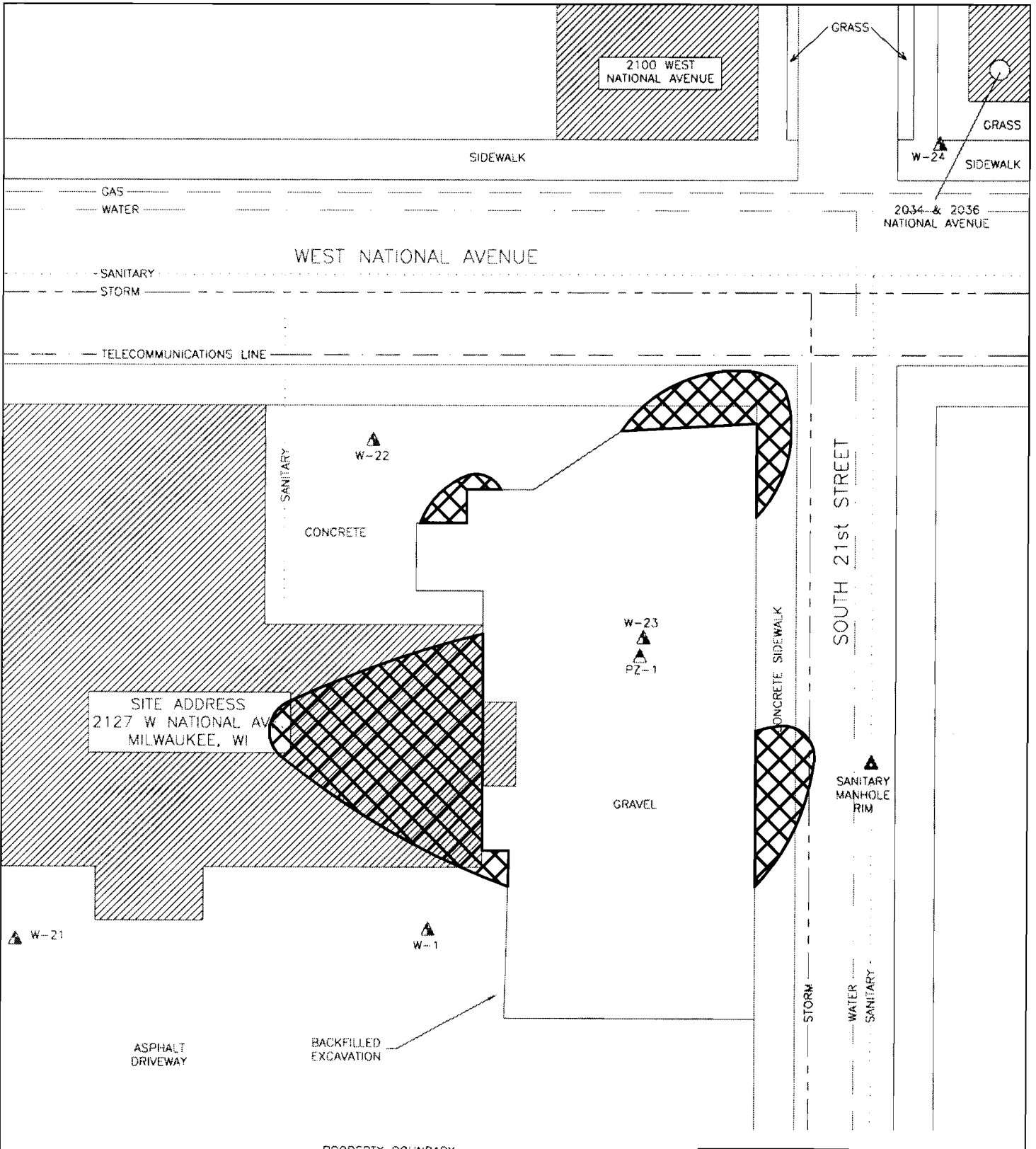


PROPERTY BOUNDARY

☒ - SAMPLE LOCATION (DIAGRAM ILLUSTRATES ONLY THE SAMPLES OF SOILS LEFT IN PLACE)



NATIONAL AVENUE REMEDATION	PROJECT NO. J93213 PA DSP	EXTENT OF EXCAVATION DIAGRAM	FIGURE
	DRAWN BY RJP DATE: 02/12/96		3
	CHECKED BY DATE:		
	APPRVD BY DATE:		



SITE ADDRESS  
2127 W NATIONAL AV  
MILWAUKEE, WI

2100 WEST  
NATIONAL AVENUE

GAS  
WATER

WEST NATIONAL AVENUE

SANITARY  
STORM

TELECOMMUNICATIONS LINE

SOUTH 21st STREET

2034 & 2036  
NATIONAL AVENUE

SANITARY

W-22

CONCRETE

W-23

PZ-1

GRAVEL

CONCRETE SIDEWALK

SANITARY  
MANHOLE  
RIM

W-21

W-1

ASPHALT  
DRIVEWAY

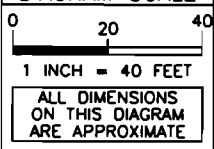
BACKFILLED  
EXCAVATION

PROPERTY BOUNDARY

**LEGEND**

- ▲ BORING/MONITORING WELL LOCATION
- ▲ BENCHMARK LOCATION
- ▣ RESIDUAL SOIL CONTAMINATION

**DIAGRAM SCALE**



NATIONAL AVENUE PROPERTY GROUNDWATER MONITORING	PROJECT NO: J93213	PM: TJO	<b>FIGURE</b> 3
	DRAWN BY: AKW	DATE: 3/17/03	
	CHECKED BY: TJO	DATE:	
	APPRVD BY: TJO	DATE:	
	FILE: J93213-A5		

RESIDUAL SOIL CONTAMINATION  
DIAGRAM

**Table 1  
Groundwater Elevations  
National Avenue Property  
Milwaukee, Wisconsin**

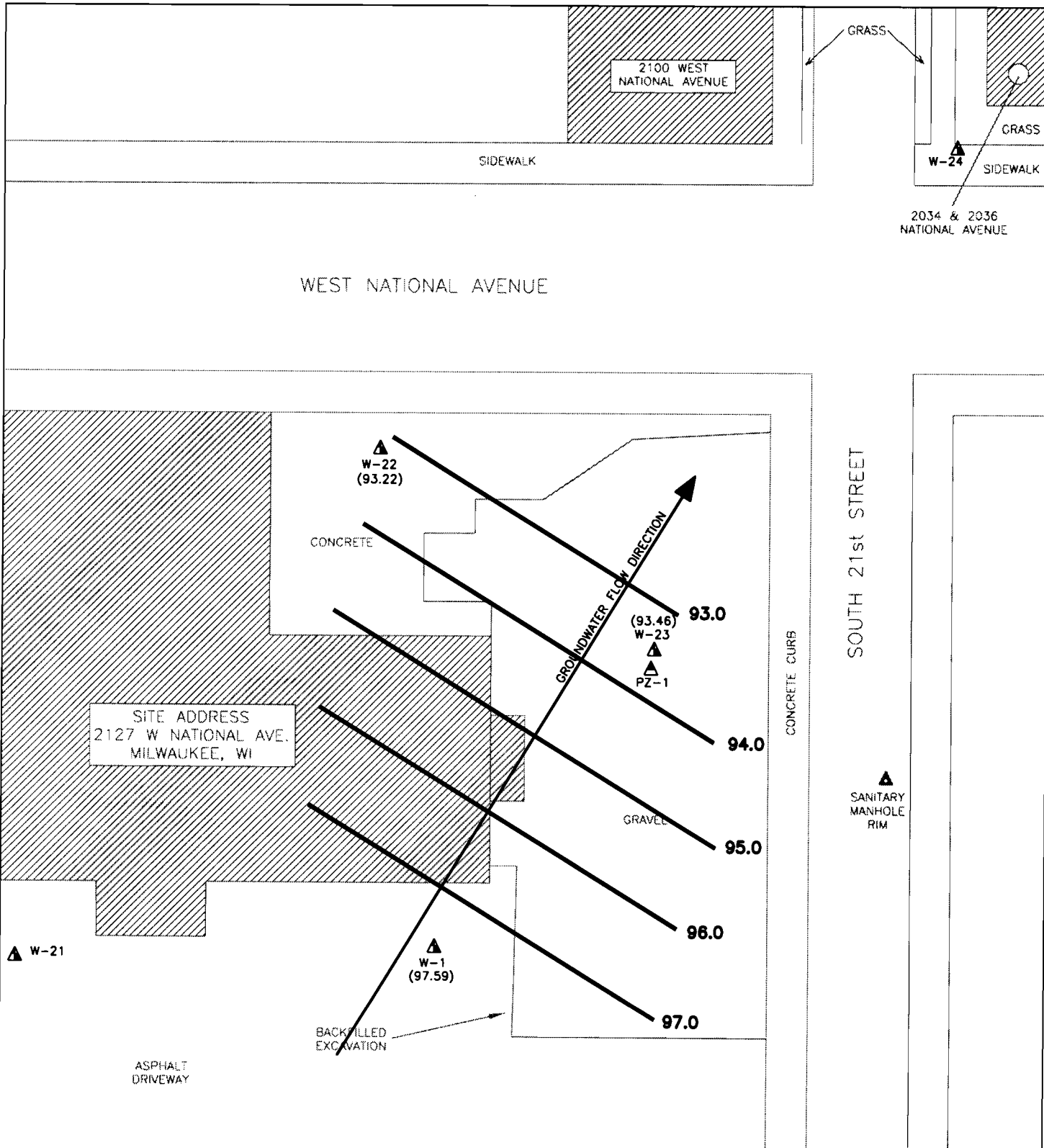
<b>Well Number</b>	<b>Date</b>	<b>Total Well Depth</b>	<b>Ground Surface Elevation</b>	<b>Top of Casing Elevation</b>	<b>*Depth to Water Below Casing</b>	<b>Depth to Water Below Ground</b>	<b>Groundwater Elevation</b>
<b>MW-1</b>	11/16/93	13.16	103.03	102.73	6.63	6.93	<b>96.10</b>
	12/17/93	13.16	103.03	102.73	6.63	6.93	<b>96.10</b>
	1/29/96	13.16	103.03	102.73	NM	NM	<b>NM</b>
	10/14/97	13.16	103.03	102.73	6.50	6.80	<b>96.23</b>
	9/8/98	13.16	103.03	102.73	6.23	6.53	<b>96.50</b>
	3/15/01	13.16	103.03	102.73	5.00	5.30	<b>97.73</b>
	6/14/01	13.16	103.03	102.73	4.23	4.53	<b>98.50</b>
	3/5/02	13.16	103.03	102.73	5.14	5.44	<b>97.59</b>
<b>MW-21</b>	1/29/96	14.89	104.72	104.44	8.90	9.18	<b>95.54</b>
	10/14/97	14.89	104.72	104.44	8.72	9.00	<b>95.72</b>
	9/8/98	14.89	104.72	104.44	8.39	8.67	<b>96.05</b>
	3/15/01	14.89	104.72	104.44	7.11	7.39	<b>97.33</b>
	6/14/01	14.89	104.72	104.44	6.95	7.23	<b>97.49</b>
<b>MW-22</b>	1/29/96	12.90	99.97	99.69	9.43	9.71	<b>90.26</b>
	10/14/97	12.90	99.97	99.69	6.58	6.86	<b>93.11</b>
	9/8/98	12.90	99.97	99.69	6.59	6.87	<b>93.10</b>
	3/15/01	12.90	99.97	99.69	6.21	6.49	<b>93.48</b>
	6/14/01	12.90	99.97	99.69	6.15	6.43	<b>93.54</b>
	3/5/02	12.90	99.97	99.69	6.47	6.75	<b>93.22</b>
<b>MW-23</b>	1/29/96	12.89	99.90	98.38	5.05	6.57	<b>93.33</b>
	10/14/97	12.89	99.90	98.38	NM	NM	<b>NM</b>
	9/8/98	12.89	99.90	98.38	NM	NM	<b>NM</b>
	3/15/01	12.89	99.90	98.38	4.59	6.11	<b>93.79</b>
	6/14/01	12.89	99.90	98.38	4.47	5.99	<b>93.91</b>
	3/5/02	12.89	99.90	98.38	4.92	6.44	<b>93.46</b>
<b>MW-24</b>	10/14/97	15.52	99.10	98.67	12.75	13.18	<b>85.92</b>
	9/8/98	15.52	99.10	98.67	12.92	13.35	<b>85.75</b>
	3/15/01	15.52	99.10	98.67	7.13	7.56	<b>91.54</b>
	6/14/01	15.52	99.10	98.67	6.86	7.29	<b>91.81</b>
<b>PZ-1</b>	3/15/01	30.42	99.68	99.16	16.44	16.96	<b>82.72</b>
	6/14/01	30.42	99.68	99.16	16.93	17.45	<b>82.23</b>
	3/5/02	30.42	99.68	99.16	11.52	12.04	<b>87.64</b>

\*Measured from the north rim of the top of well casing.

All measurements are presented in feet.

Benchmark: Elevations referenced to a benchmark assigned an arbitrary elevation of 100.00 feet.

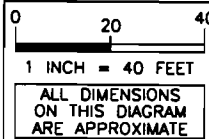
Note: For a list of abbreviations used in this table, see the "Guide to Abbreviations in Laboratory Data Tables" provided at the beginning of this appendix.



**LEGEND**

- BORING/MONITORING WELL LOCATION
- BENCHMARK LOCATION
- [XX.XX] MEASURED GROUNDWATER ELEVATION
- GROUNDWATER CONTOUR
- CONTOUR INTERVAL = 1 FOOT

**DIAGRAM SCALE**

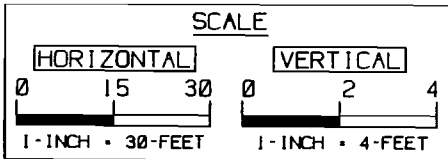


NATIONAL AVENUE PROPERTY  
GROUNDWATER MONITORING

PROJECT NO: J93213 PM: DWF  
DRAWN BY: AKW DATE: 9/28/01  
CHECKED BY: ~~TD~~ DATE:  
APPRVD BY: ~~TD~~ DATE:  
FILE: J93213-A1

GW ELEVATIONS AND CONTOURS  
DIAGRAM  
MARCH 2002

FIGURE  
1



⊕ - BORING LOCATION WITH  
 PTD READINGS

SOUTHWEST [ A' ]

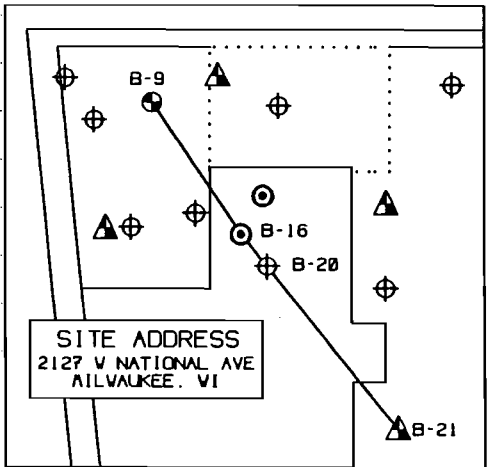
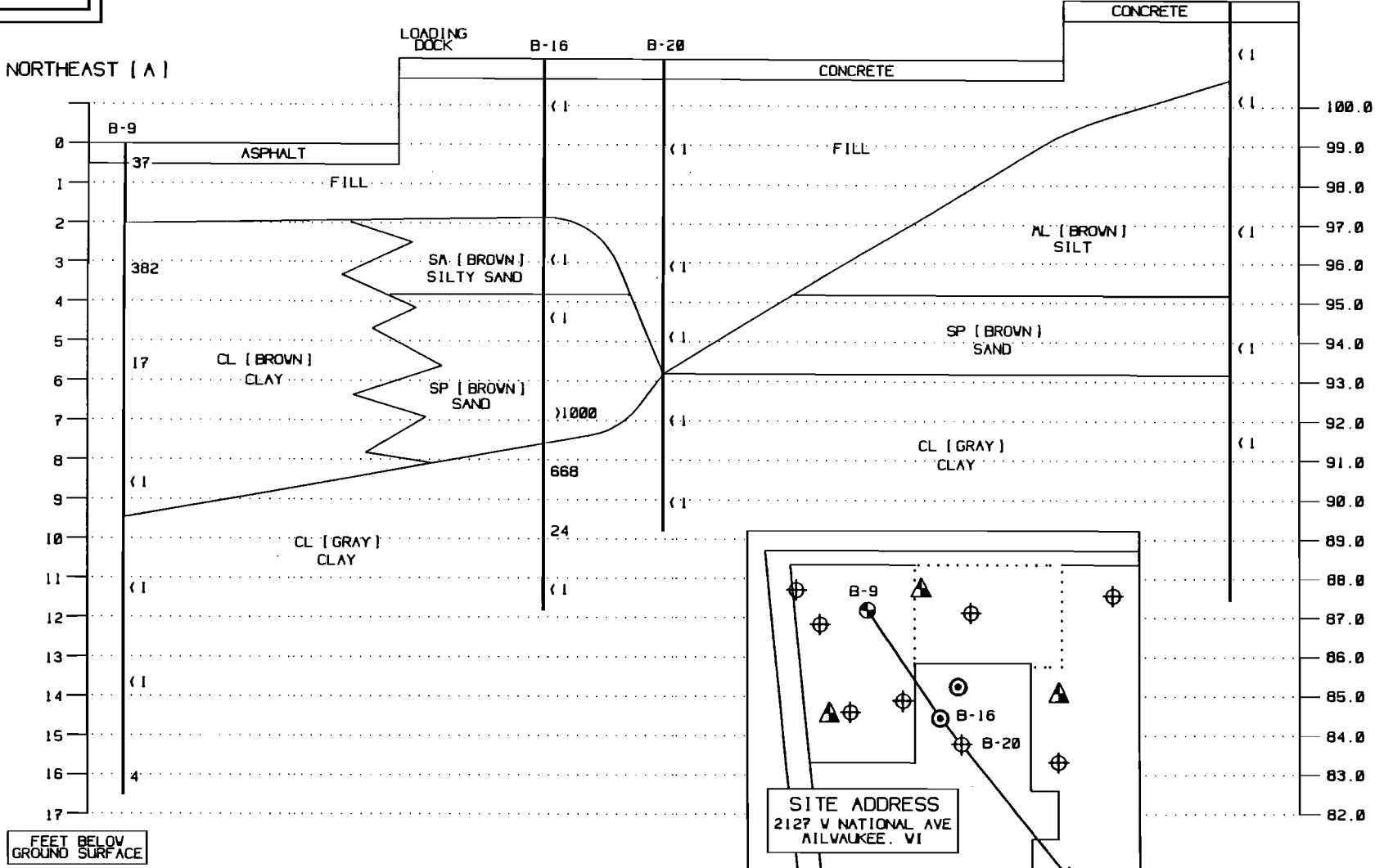
BUILDING WALL  
 B-21

NATIONAL AVENUE PROPERTY  
 ADDITIONAL REMEDIAL INVESTIGATION

PROJECT NUMBER J93213  
 DRAWN BY JJP  
 DATE: 03/06/96

GEOLOGIC CROSS-SECTION  
 NORTHEAST [ A ] - SOUTHWEST [ A' ]

FIGURE  
 8



FILE: J321308

**Bank One, NA**  
**Managed Assets Division**  
Mail Code W1-2064  
111 East Wisconsin Avenue  
Milwaukee, WI 53202

*fax 414 765 7153*



February 27, 2003

Ms. Margaret Brunette  
Wisconsin Department of Natural Resources  
2300 N. Dr. Martin Luther King Jr. Drive  
P. O. Box 12436  
Milwaukee, WI 53212

Re: Site Closure with GIS Registry for the Property Located at 2127 W. National Avenue in Milwaukee, Wisconsin – Drake Project No. J93213; DNR File Reference No. 02-41-000887 / 06-41-144308; DNR FID No. 241458910; PECFA Claim No. 53204-1160-27

Dear Ms. Brunette:

The subject property is located at 2127 West National Avenue in Milwaukee,, Wisconsin. I have provided the necessary information in order to obtain site closure with placement of the property on the DNR's soil and groundwater GIS registry. To the best of my knowledge, I believe that the legal descriptions attached to this statement are complete and accurate.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul G. Karlen".

Paul G. Karlen  
First Vice President

PGK/jcw  
Enc.



March 14, 2003



Mr. Jeffrey Polenske  
City Engineer  
Room 701  
841 North Broadway  
Milwaukee, WI 53202

**RE: Notification of Potential Petroleum Contamination Located Within the Public Right-Of-Way Along West National Avenue (State Highway 59) and South 21st Street. (File references: Commerce No. 53204-1160-27, DNR FID No. 241458910, and DNR BRRTS Nos. 02-41-000887 / 06-41-144308)**

Dear Mr. Polenske:

On behalf of Bank One, NA, Drake Environmental, Inc. is submitting this letter to notify the City of Milwaukee that petroleum contaminated soil and/or groundwater may be present within the public right-of-way adjacent to the property located at 2127 West National Avenue in the City of Milwaukee. The soil and/or groundwater contamination may extend across the north boundary of the above referenced property into the public right-of-way of West National Avenue (State Highway 59) and/or across the east boundary of the above referenced property into the public right-of-way of South 21<sup>st</sup> Street.

Petroleum and chlorinated solvent contamination associated with former underground storage tank (UST) systems was discovered at the property in October 1993. The Wisconsin Department of Natural Resources (DNR) was notified of the contamination and a site investigation and remedial action were conducted. The site was granted conditional closure, with no further action required, by the DNR on June 5, 2002.

The environmental reports concerning this site are available from the DNR under the file reference numbers listed above. Please contact Drake Environmental, Inc. at (800) 853-8440, or Mr. Paul Karlen of Bank One, NA at (414) 765-2589, if you have any questions.

Sincerely,

Trenton J. Ott  
Associate Project Manager  
Drake Environmental, Inc.

6980 North Teutonia Avenue  
Milwaukee, WI 53209-2536  
(414) 351-1440  
1-800-853-8440  
Fax: (414) 351-1404

Notification of Contamination within the Right of Way

City: Milwaukee

County: Milwaukee

Right-of-way(s): West National Avenue / State Highway 59 and South 21<sup>st</sup> Street

Site Name: National Avenue Property

Site Address: 2127 West National Avenue, Milwaukee, WI 53204

BRRTS Number: 02-41-000887 / 06-41-144308

PECFA Number: 53204-1160-27

FID Number: 241458910

Owner's Name: Bank One, NA

Owner's Contact: Mr. Paul G. Karlen, First Vice President

Owner's Address: 111 East Wisconsin Avenue, Milwaukee, WI 53202

Consulting Firm: Drake Environmental, Inc.

Consultant Contact: Mr. Trenton J. Ott

Consultant Address: 6980 North Teutonia Avenue, Milwaukee, WI 53209

Consultant Phone, Fax and E-mail: (414) 351-1440, (414) 351-1404,  
tott@drakeenviro.com

Soil contamination? Yes

Depth to contaminated soil: approximately six feet

Vertical extent of contaminated soil: (e.g. from six feet to ten feet below ground surface)

Groundwater contamination? Yes

Depth to water table: approximately seven feet

Describe the type(s) of contamination present. Petroleum and chlorinated solvents

Brief summary of cleanup activity: Excavation and groundwater monitoring with approval of remediation by natural attenuation for closure.

Attach a current plume map for groundwater contamination (Attached)

Attach a current plume map for soil contamination (Attached)

March 14, 2003



Ms. Sharlene TeBeest  
Wisconsin Department of Transportation  
Bureau of Environment  
P.O. Box 7965  
Madison, WI 53707-7965

RE: Notification of Potential Petroleum Contamination Located Within the Public Right-Of-Way Along West National Avenue (State Highway 59) and South 21st Street. (File references: Commerce No. 53204-1160-27, DNR FID No. 241458910, and DNR BRRTS Nos. 02-41-000887 / 06-41-144308)

Dear Ms. TeBeest:

On behalf of Bank One, NA, Drake Environmental, Inc. is submitting this letter to notify the Department of Transportation that petroleum contaminated soil and/or groundwater may be present within the public right-of-way adjacent to the property located at 2127 West National Avenue in the City of Milwaukee. The soil and/or groundwater contamination may extend across the north boundary of the above referenced property into the public right-of-way of West National Avenue (State Highway 59) and/or across the east boundary of the above referenced property into the public right-of-way of South 21<sup>st</sup> Street.

Petroleum and chlorinated solvent contamination associated with former underground storage tank (UST) systems was discovered at the property in October 1993. The Wisconsin Department of Natural Resources (DNR) was notified of the contamination and a site investigation and remedial action were conducted. The site was granted conditional closure, with no further action required, by the DNR on June 5, 2002.

The environmental reports concerning this site are available from the DNR under the file reference numbers listed above. Please contact Drake Environmental, Inc. at (800) 853-8440, or Mr. Paul Karlen of Bank One, NA at (414) 765-2589, if you have any questions.

Sincerely,

Trenton J. Ott  
Associate Project Manager  
Drake Environmental, Inc.

6980 North Teutonia Avenue  
Milwaukee, WI 53209-2536  
(414) 351-1440  
1-800-853-8440  
Fax: (414) 351-1404

**Notification of Contamination within the Right of Way**

**City: Milwaukee**

**County: Milwaukee**

**Right-of-way(s): West National Avenue / State Highway 59 and South 21<sup>st</sup> Street**

**Site Name: National Avenue Property**

**Site Address: 2127 West National Avenue, Milwaukee, WI 53204**

**BRRTS Number: 02-41-000887 / 06-41-144308**

**PECFA Number: 53204-1160-27**

**FID Number: 241458910**

**Owner's Name: Bank One, NA**

**Owner's Contact: Mr. Paul G. Karlen, First Vice President**

**Owner's Address: 111 East Wisconsin Avenue, Milwaukee, WI 53202**

**Consulting Firm: Drake Environmental, Inc.**

**Consultant Contact: Mr. Trenton J. Ott**

**Consultant Address: 6980 North Teutonia Avenue, Milwaukee, WI 53209**

**Consultant Phone, Fax and E-mail: (414) 351-1440, (414) 351-1404,  
tott@drakeenviro.com**

**Soil contamination? Yes**

**Depth to contaminated soil: approximately six feet**

**Vertical extent of contaminated soil: (e.g. from six feet to ten feet below  
ground surface)**

**Groundwater contamination? Yes**

**Depth to water table: approximately seven feet**

**Describe the type(s) of contamination present. Petroleum and chlorinated solvents**

**Brief summary of cleanup activity: Excavation and groundwater monitoring with  
approval of remediation by natural attenuation for closure.**

**Attach a current plume map for groundwater contamination (Attached)**

**Attach a current plume map for soil contamination (Attached)**

DEED RESTRICTION

Document Number

In Re: Property located in Milwaukee County, Wisconsin surveyed as Parcel 1 and described as: Lots 4, 5, 6, 11, and 12, in Block 13, in Clark's Addition, excepting those portions of said lots 4, 5, and 11 within the bounds of West National Avenue, and together with the North 1/2 of that portion of vacated Walker's Street adjoining said lots 6 and 12 on the south: Also the North 22 feet of Lot 1, Block 16, in Clark's Addition, together with the South 1/2 of that portion of vacated Walker Street adjoining on the North, except the South 2 feet of the West 10 feet of said Lot 1 all in the South West 1/4 of Section 31, in Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.

STATE OF WISCONSIN )  
 ) ss  
COUNTY OF MILWAUKEE )

DOC. #  
8880340

REGISTER'S OFFICE | SS  
Milwaukee County, WI

RECORDED AT 2:36 PM

11-13-2003

JOHN LA FAVE  
REGISTER OF DEEDS

AMOUNT 17.00

Recording Area

Name and Return Address  
Bank One, NA  
Mr. Paul Karlen  
P.O. Box 2033  
Milwaukee, WI 53201-2033

434-0040-111-0

Parcel Identification Number (PIN)

Section 1. Bank One, NA, as successor to Bank One, Milwaukee, NA, is the owner of the property described above.

Section 2. One or more petroleum and chlorinated solvent discharges have occurred at this property. As of 1995 contaminants including, but not limited to, gasoline range organics (GRO), benzene, ethylbenzene, toluene, and xylenes remained in soils at the property in concentrations above Wisconsin Administrative Code Chapter NR 720 residual contaminant levels, beneath the eastern portion of the building as illustrated on the attached Figure 1.

Section 3. It is the desire and intention of the property owner to impose on the property restrictions, which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

Section 4. The owner hereby declares that all of the property described above is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitations and/or restrictions:

The building that existed on the above-referenced property on the date that this restriction was signed forms a barrier that must be maintained in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. The building is also required in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in the Wisconsin Administrative Code Chapter NR 140. The building shall be maintained on the above-described property in the location shown on the attached certified survey map, unless another barrier with an infiltration rate of 10<sup>-7</sup> cm/sec or less, is installed and maintained in its place. The existing building and any selected replacement barrier with an infiltration rate of 10<sup>-7</sup> cm/sec or less shall be maintained on the above-described property in compliance with the "2127 West National Avenue Property Operation and Maintenance Plan" dated

REEL

5710

IMAGE

4978

4

October 24, 2003, that was submitted to the Wisconsin Department of Natural Resources for review and approval as required by section NR 724.13(2), Wis. Adm. Code (1997).

Therefore, the following activities are prohibited on that portion of the property described above where the building or any selected replacement barrier with an infiltration rate of  $10^{-7}$  cm/sec or less exists, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Excavating or grading of the land surface; (2) Filling on the capped area; (3) Plowing for agricultural cultivation; and (4) Construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. (File references: Commerce # 53202-1123-01, FID # 241458910, and BRRTS # 02-41-000887 / 06-41-144308).

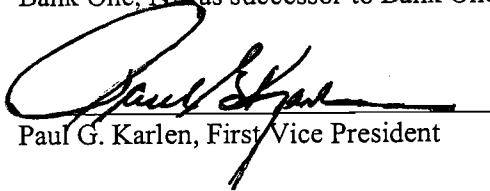
This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction inures to the benefit of and is enforceable by the Wisconsin Department of Natural Resources, its successors or assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that the restrictions set forth in this covenant are no longer required. That property owner shall provide any and all necessary information to the Department in order for the Department to be able to make a determination. Upon the receipt of such a request, the Department shall determine whether or not the restrictions contained herein can be extinguished. Conditions under which a restriction may be extinguished will be determined in accordance with the site specific standards, rules and laws for this property. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this restriction, or portions of this restriction, are no longer binding. Any restriction placed upon this property shall not be extinguished without the Department's written determination.

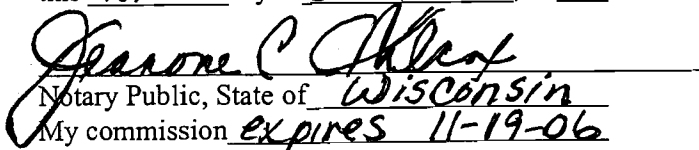
IN WITNESS WHEREOF, the owners of the property have executed this Declaration of Restrictions, this 27th day of October, 2003.

By signing this document, Paul G. Karlen acknowledges that he is duly authorized to sign this document on behalf of Bank One, NA.

Bank One, NA as successor to Bank One, Milwaukee, NA

  
Paul G. Karlen, First Vice President

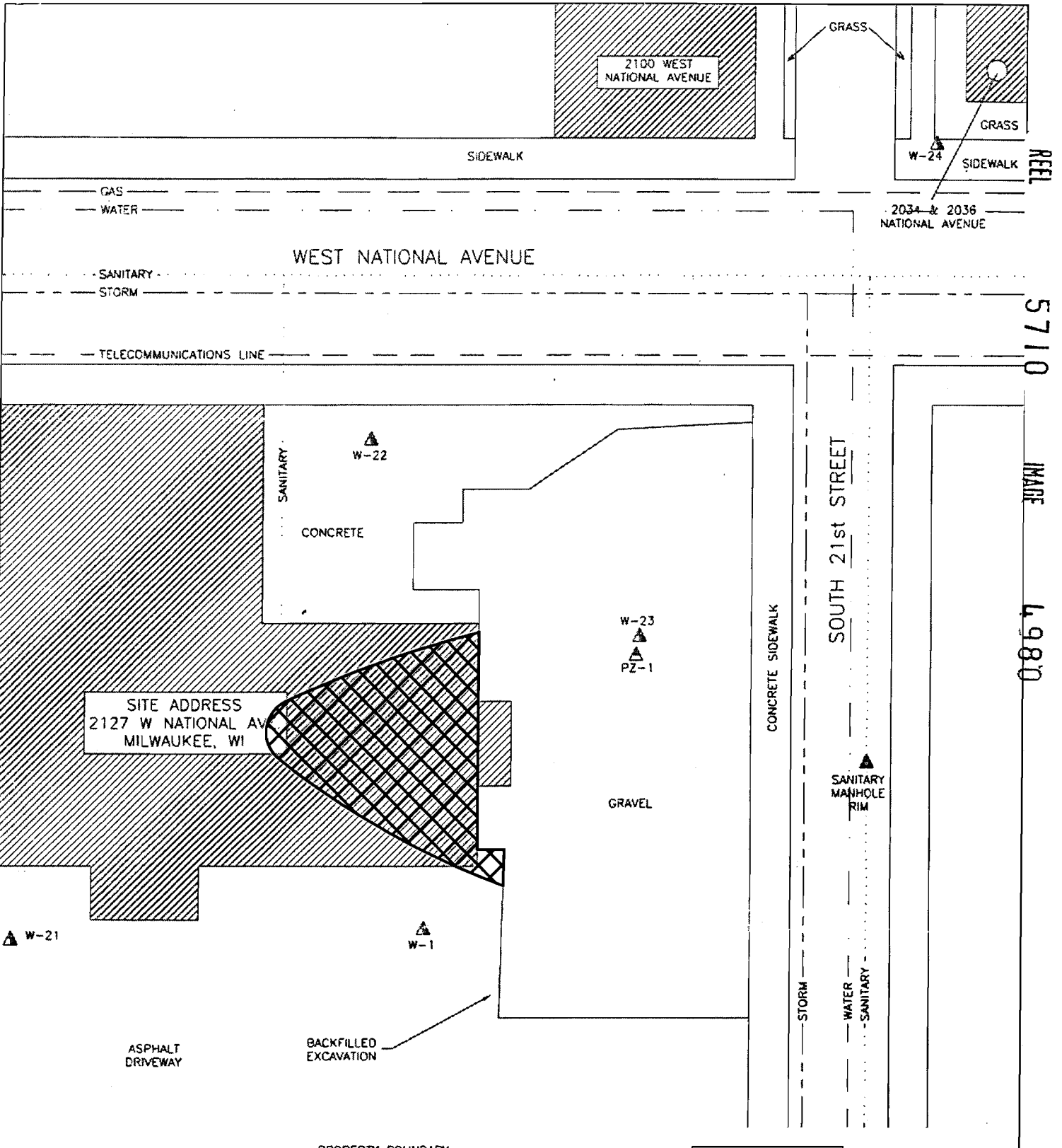
Subscribed and sworn to before me  
this 27th day of October, 2003.

  
Notary Public, State of Wisconsin  
My commission expires 11-19-06

Richard W. Friesseke of

This document was drafted by Drake Environmental, Inc., based on information provided by the Wisconsin Department of Natural Resources.

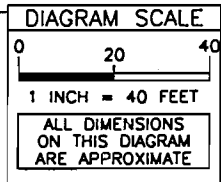
REFL 5710 IMAGE 4979



REEL 5710 INCH 498.0

**LEGEND**

- ▲ BORING/MONITORING WELL LOCATION
- ▲ BENCHMARK LOCATION
- ▣ RESIDUAL SOIL CONTAMINATION



NATIONAL AVENUE PROPERTY  
GROUNDWATER MONITORING

PROJECT NO: J93213 PM: TJO  
 DRAWN BY: AKW DATE: 3/17/03  
 CHECKED BY: *[Signature]* DATE: 3/17/03  
 APPRVD BY: *[Signature]* DATE: 3/17/03  
 FILE: J93213-A5

RESIDUAL SOIL CONTAMINATION  
DIAGRAM

FIGURE  
1







**2127 WEST NATIONAL AVENUE PROPERTY  
OPERATION AND MAINTENANCE PLAN**

**October 24, 2003**

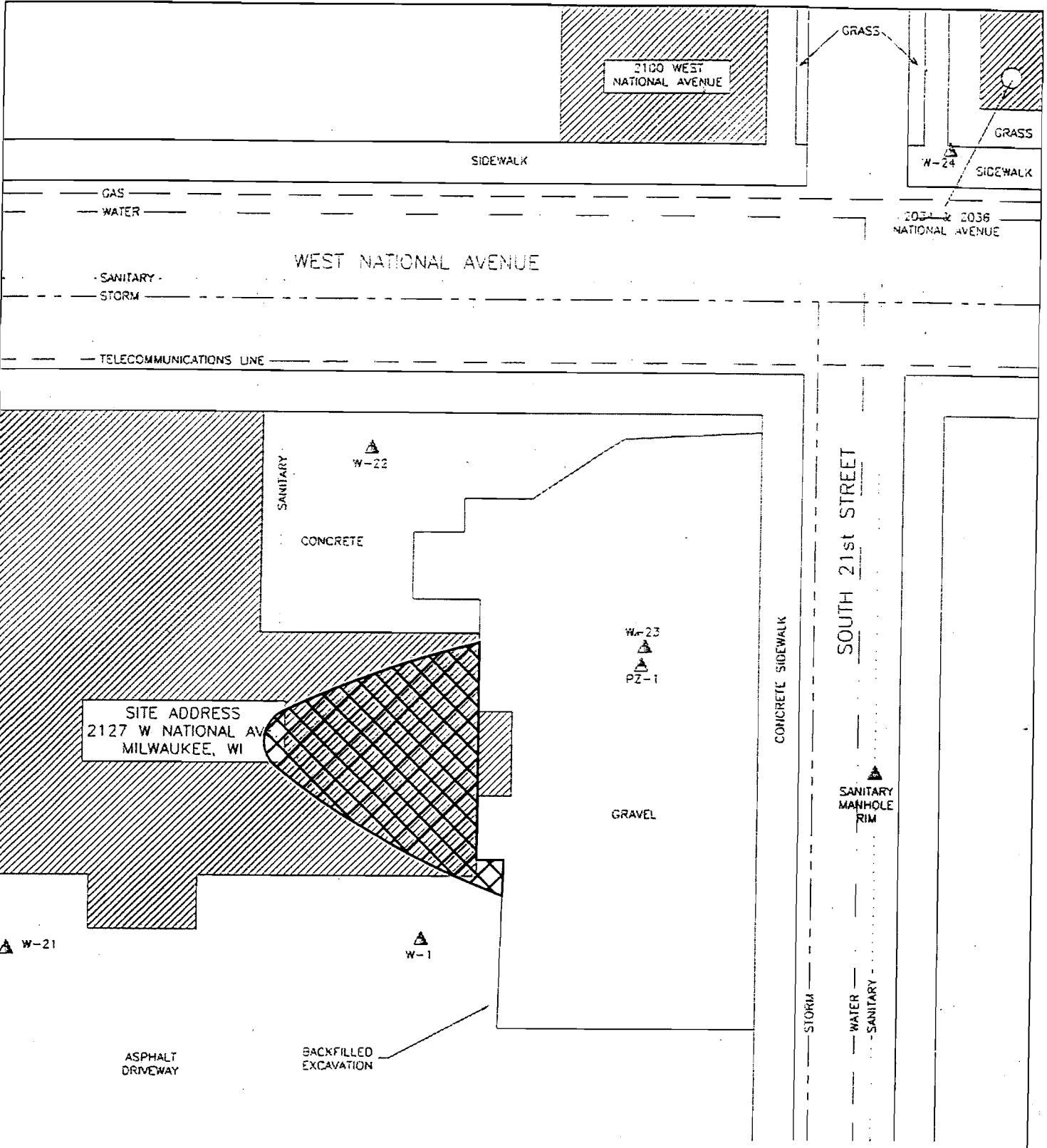
This Operation and Maintenance Plan has been prepared in accordance to Wis. Adm. Code Ch. NR 724.13(2) and shall be applicable to Parcel 1 of the Property depicted on the attached certified survey map.

A copy of this Operation and Maintenance Plan shall be kept on file in the offices of the owner of the Property. The Operation and Maintenance Plan has been developed to satisfy the requirements of the Wisconsin Department of Natural Resources (WDNR) Case Closure with a Performance Standard ("Cap") for the 2127 West National Avenue property letter dated June 5, 2002.

1. Current property owner. Bank One, NA, 111 East Wisconsin Avenue, Milwaukee, Wisconsin 53201.
2. Consultant. Drake Environmental, 6980 N. Teutonia Avenue, Milwaukee, Wisconsin 53209.
3. Site Location. The 2127 West National Avenue Property is surveyed as Parcel 1 and described as: Lots 4, 5, 6, 11, and 12, in Block 13, in Clark's Addition, excepting those portions of said lots 4, 5, and 11 within the bounds of West National Avenue, and together with the North ½ of that portion of vacated Walker's Street adjoining said lots 6 and 12 on the south: Also the North 22 feet of Lot 1, Block 16, in Clark's Addition, together with the South ½ of that portion of vacated Walker Street adjoining on the North, except the South 2 feet of the West 10 feet of said Lot 1 all in the South West ¼ of Section 31, in Town 7 North, Range 22 East, in the City of Milwaukee, County of Milwaukee, State of Wisconsin.
4. Nature and Extent of Contamination. Petroleum and chlorinated solvent contamination remaining on the Property as set forth on Figure 1 (attached).
5. Normal Operation and Maintenance – Ch. NR 724.13(2)(b). The area of the Property depicted on Figure 1 where contamination was left in place is capped

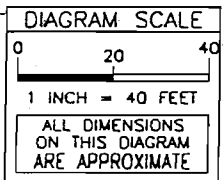
with a building. The area of the Property where contamination was left in place shall be inspected not less than annually by the property owner as part of normal operation and maintenance to ensure that integrity of the Cap is maintained. Any disturbances of the Cap, such as significant cracking or significant erosion, burrowing or other damage will be noted and damaged areas will be repaired within a reasonable period of time after discovery, not to exceed sixty (60) days subject to weather and seasons considerations. A copy of the Inspection Report shall be kept on file by the property owner with a copy of this Operation and Maintenance Plan and shall be made available for inspection by representatives of the WDNR upon reasonable requests during normal business hours of the property owner.

6. Cap Removal and Replacement. If it becomes necessary or desirable to remove or alter the existing Cap with the approval of the Department, the Cap so removed or altered shall be replaced with another barrier with an infiltration rate of  $10^{-7}$  cm/sec or less and maintained in its place. The existing building, and any replacement barrier with an infiltration rate of  $10^{-7}$  cm/sec or less, shall be maintained on the above-described property in compliance with this maintenance plan. Such replacement shall be carried out within a reasonable period of time not to exceed sixty (60) days subject to weather and seasons consideration. If contamination that is present on the Property is excavated, it will be handled and/or disposed of in accordance with the most current State of Wisconsin regulations.



**LEGEND**

- ▲ BORING/MONITORING WELL LOCATION
- ▲ BENCHMARK LOCATION
- ▣ RESIDUAL SOIL CONTAMINATION



NATIONAL AVENUE PROPERTY GROUNDWATER MONITORING	PROJECT NO: J93213	PM: TJO	RESIDUAL SOIL CONTAMINATION DIAGRAM 1
	DRAWN BY: AKW	DATE: 3/17/03	
	CHECKED BY: <i>AKW</i>	DATE: 3/17/03	
	APPRVD BY: <i>AKW</i>	DATE: 3/17/03	
	FILE: J93213-A5		