



**October 6, 2017**

Mr. Lee Delcore  
Wisconsin Department of Natural Resources  
1155 Pilgrim Road  
Plymouth, WI 53073

RE: Non-Petroleum Compound Discovery and PECFA Cost Segregation  
Suggar Property  
3301 – 60<sup>th</sup> Street  
Kenosha, WI 53144  
BRRTS#: 03-30-0-04964 & 03-30-556490  
PECFA#: 53144-4143-05

Mr. Delcore:

Site investigation activities conducted by Midwest Environmental Consulting (MEC) have revealed the presence of a non-petroleum contaminant at the above-referenced site. Specifically, tetrachloroethene (PCE) was present in soil sample DP-6 (3'-4') at a concentration of 50.5 ug/kg, exceeding the residual contaminant level (RCL) for the protection of groundwater.

Costs for activities associated with the investigation and cleanup of non-petroleum related contamination, such as PCE are not eligible for reimbursement by the Petroleum Environmental Cleanup Fund (PECFA) and often require the establishment of a cost segregation method approved by PECFA. However, it is MEC's opinion that development of a cost segregation method is not warranted at this time as discussed below.

To date, a total of 20 soil samples from 12 onsite soil borings have been analyzed for full volatile organic compounds (VOCs), including soil sample DP-6 (11'-12'), collected below the sample exhibiting the presence of PCE. None of the other samples have exhibited the presence of PCE or any other chlorinated/non-petroleum VOCs. The sampling locations are illustrated on Figure 1. The soil sample analytical results are summarized on Tables 1 and 2.

Twelve groundwater samples collected onsite were analyzed for VOCs. In addition, monitoring well MW-8, likely located downgradient from the Suggar Property site and associated with the Mueller's Auto site to the north, was also sampled for VOCs. None of these groundwater samples, including that from boring DP-6, exhibited the presence of PCE or any other chlorinated/non-petroleum VOC. The groundwater sample analytical results are summarized on Tables 3 and 4.

The exception to the above with respect to groundwater is the presence of chloromethane in samples DP-1W and DP-2W at concentrations exceeding the preventive action limit (PAL). Unlike the other groundwater samples associated with the site, these were the only groundwater samples collected and analyzed together during a 2010 Phase II Environmental Site



Assessment of the site. Chloromethane is not a degradation daughter product of PCE and the soil boring DP1 is not located in proximity to DP-6. Furthermore, chloromethane is a common laboratory contaminant and is also known to form when chlorine, such as that in municipal water supplies, combines with decomposing organic material. Consequently, the presence of chloromethane is not related to the PCE identified in sample DP-6 (3'-4') and its actual presence in the subsurface is suspect.

In light of the site data discussed above, the presence of PCE appears to be an isolated outlier, confined to one sample at the site. Furthermore, although its concentration exceeded the RCL for protection of groundwater, PCE was not detected in the groundwater sample from DP-6 or any other samples collected at the site. As a consequence, the presence of chloromethane has not had a material impact at the site or on the activities necessary to move the petroleum investigation forward at this time, which will involve the installation and sampling of an NR141 compliant groundwater monitoring well network to complete definition of the downgradient petroleum soil and groundwater contamination. Therefore, it is the opinion of MEC that establishment of a cost segregation methodology is also not necessary at this time and may in fact be premature.

Based on the acquisition of additional site investigation data, activities may be required in the future to specifically address the presence of the identified PCE, which may not be needed to address the petroleum contamination or may be needed to address a combination of both. Such activities may include the performance of additional sampling activities related to the PCE or the analysis of VOCs when petroleum VOCs (PVOCs) would otherwise only be necessary. At such time, development of a cost segregation method may be necessary. MEC would then notify the responsible party of the requirement for cost segregation and need for approval by the Wisconsin Department of Natural Resources (WDNR) PECFA Program staff. The Responsible Party would then incur the costs, or portion thereof, for any non-petroleum related activities performed in accordance with the approved cost segregation method.

I look forward to a response from the Department regarding MEC's opinion that establishment of a cost segregation method is warranted at this time so that investigation activities can continue. Please let me know if you have any questions.

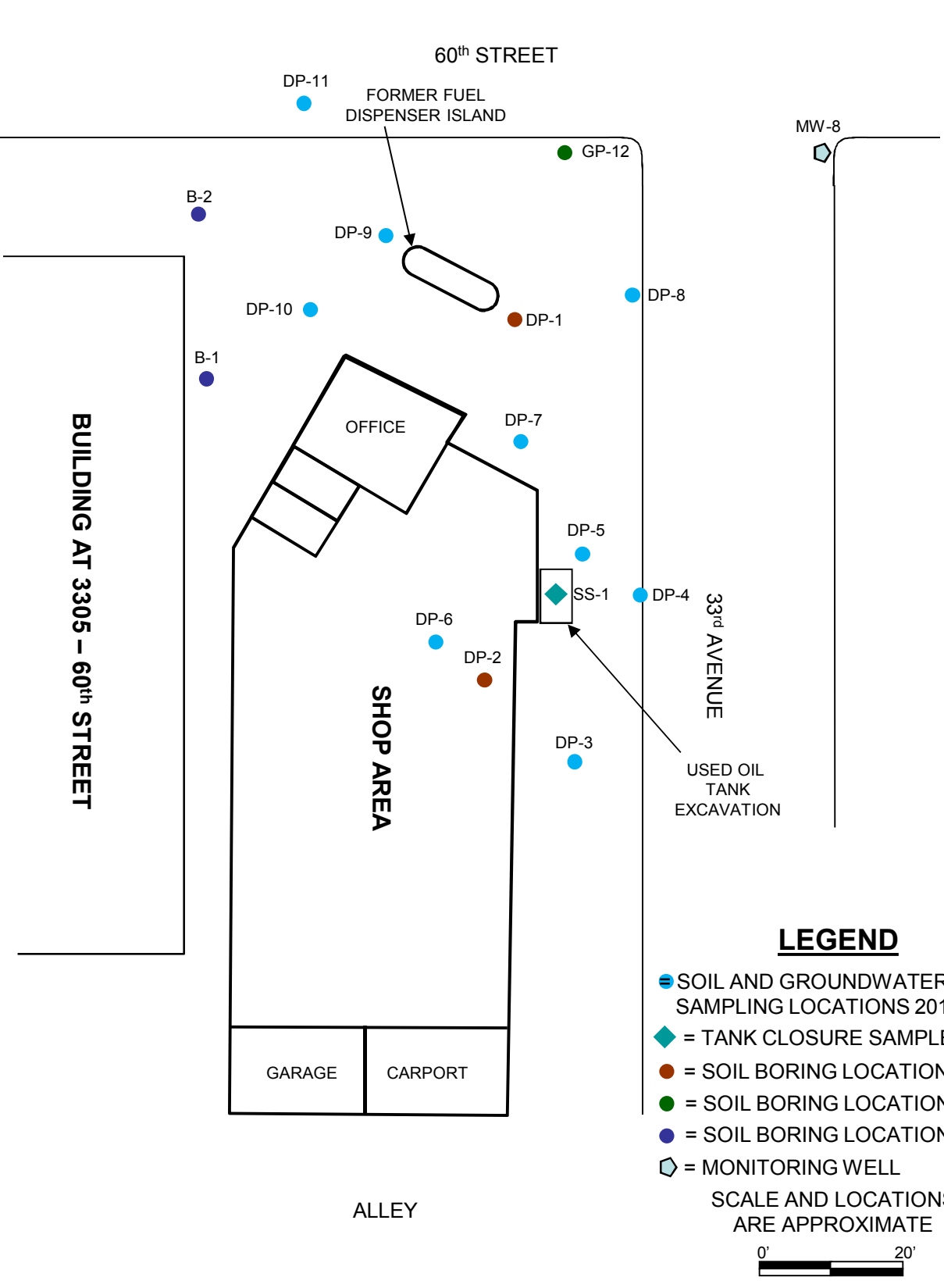
Sincerely,  
**MIDWEST ENVIRONMENTAL CONSULTING**

A handwritten signature in blue ink that reads 'Sean Cranley'. The signature is written in a cursive style and is positioned above a horizontal line.

---

Sean Cranley, P.G.  
Principal Hydrogeologist  
(262) 237-4351

CC: Jose Ochoa – A1 Auto Repair



Approved By: Sean Cranley	Figure: <b>1</b>
Date Approved: 2/9/17	
Date Drawn: 2/9/17	1 of 1
Drawn By: Sean Cranley	

**FIGURE 1**  
**SAMPLING LOCATIONS**  
**SUGGAR PROPERTY**  
**3301 - 60th STREET**  
**KENOSHA, WI**



**Table 1 (Page 1 of 2)**  
**Historical Soil Analytical Summary**  
**Suggar Property**  
**3100 60th Street**  
**Kenosha, WI**

Parameters	Sample Information / Results				Residual Contaminant Levels	
<b>Sample ID</b>	<b>B-1</b>	<b>B-2</b>	<b>GP-12</b>	<b>GP-12</b>		
<b>Sample Depth (ft/bls)</b>	<b>9-11</b>	<b>11-13</b>	<b>7-8</b>	<b>11-12</b>	<b>Groundwater</b>	<b>Not to Exceed</b>
<b>Saturation Depth (ft/bls)</b>	<b>14</b>	<b>14</b>	<b>11.5</b>	<b>11.5</b>	<b>Protection</b>	<b>Non-Industrial</b>
<b>Saturated / Unsaturated</b>	<b>Unsaturated</b>	<b>Unsaturated</b>	<b>Unsaturated</b>	<b>Unsaturated</b>		<b>Direct Contact</b>
<b>Sample Date</b>	<b>04/13/95</b>	<b>04/13/95</b>	<b>04/25/06</b>	<b>04/25/06</b>		
<b>VOCs (ug/kg)</b>					ug/kg	ug/kg
Benzene	NA	NA	<25.0	<25.0	5.1	1,490
Ethylbenzene	NA	NA	114	33.8	1,570	7,470
Naphthalene	NA	NA	NA	NA	658.2	5,150
Toluene	NA	NA	29.7	<25.0	1,107.20	818,000
1,2,4-Trimethylbenzene	NA	NA	145	<25.0	1,382.1 (1)	89,800
1,3,5-Trimethylbenzene	NA	NA	58.4	<25.0	1,382.1 (1)	182,000
Xylenes	NA	NA	229	49.1	3,960	260,000
n-Butylbenzene	NA	NA	NA	NA	NS	108,000
n-Propylbenzene	NA	NA	NA	NA	NS	264,000
sec-Butylbenzene	NA	NA	NA	NA	NS	145,000
Isopropylbenzene	NA	NA	NA	NA	NS	268,000
p-Isopropyltoluene	NA	NA	NA	NA	NS	162,000
<b>GRO/DRO (mg/kg)</b>						
GRO	3.5	22	43.4		NS	NS
DRO	NA	NA	NA		NS	NS

**Notes:**

Table includes detected analytes only, which are right justified in the columns.

**Bold type** indicates concentration within the upper 4 feet of the subsurface exceeds the non-industrial direct contact RCL and, if applicable, the background level, thus constituting a soil standard exceedance.

*Italic type* indicates a concentration exceeds the groundwater protection RCL and, if applicable the background level, thus constituting a soil standard exceedance.

**RCL** - Residual Contaminant Level

**VOCs** - Volatile Organic Compounds

**GRO** = Gasoline Range Organics

**DRO** = Diesel Range Organics

**NA** = Not Analyzed

**NS** = No Standard

(1) The groundwater protection RCL applies to combined trimethylbenzenes.

**Table 1 (Page 2 of 2)**  
**Historical Soil Analytical Summary**  
**Suggar Property**  
**3100 60th Street**  
**Kenosha, WI**

Parameters	Sample Information / Results					Residual Contaminant Levels	
Sample ID	MW-8	MW-8	DP-1	DP-2	SS-1	Groundwater Protection	Not to Exceed Non-Industrial Direct Contact
Sample Depth (ft/bls)	8.5-10	16-17.5	14-15	13-14	4		
Saturation Depth (ft/bls)	11	11	12.5	12.5	14.5		
Saturated / Unsaturated	Unsaturated	Saturated	Saturated	Saturated	Unsaturated		
Sample Date	04/03/08	04/03/08	08/05/10	08/05/10	11/09/10		
<b>VOCs (ug/kg)</b>						ug/kg	ug/kg
Benzene	<29	<30	<500	<1,000	<b><i>743</i></b>	5.1	1,490
Ethylbenzene	<29	<30	<500	<1,000	<b><i>3,860</i></b>	1,570	7,470
Naphthalene	190	<61	<500	<1,000	<b><i>7,370</i></b>	658.2	5,150
Toluene	<29	<30	<500	<1,000	<b><i>7,860</i></b>	1,107.20	818,000
1,2,4-Trimethylbenzene	<29	42	<500	<1,000	<b><i>16,300</i></b>	1,382.1 (1)	89,800
1,3,5-Trimethylbenzene	<29	<30	<500	<b><i>59,600</i></b>	<b><i>5,210</i></b>	1,382.1 (1)	182,000
Xylenes	120	<91	<500	<b><i>12,300</i></b>	<b><i>20,780</i></b>	3,960	260,000
n-Butylbenzene	NA	NA	3,700	<1,620	NA	NS	108,000
n-Propylbenzene	NA	NA	2,040	28,000	NA	NS	264,000
sec-Butylbenzene	NA	NA	3,150	7,690	NA	NS	145,000
Isopropylbenzene	NA	NA	<500	4,310	NA	NS	268,000
p-Isopropyltoluene	NA	NA	<500	4,560	NA	NS	162,000
<b>GRO/DRO (mg/kg)</b>							
GRO	120	<6.1	NA	NA	188	NS	NS
DRO	9.0	<4.6	NA	NA	2,130	NS	NS

**Notes:**

Table includes detected analytes only, which are right justified in the columns.

**Bold type** indicates concentration within the upper 4 feet of the subsurface exceeds the non-industrial direct contact RCL and, if applicable, the background level, thus constituting a soil standard exceedance.

*Italic type* indicates a concentration exceeds the groundwater protection RCL and, if applicable the background level, thus constituting a soil standard exceedance.

**RCL** - Residual Contaminant Level

**VOCs** - Volatile Organic Compounds

**GRO** = Gasoline Range Organics

**DRO** = Diesel Range Organics

**NA** = Not Analyzed

**NS** = No Standard

**(1)** The groundwater protection RCL applies to combined trimethylbenzenes.

**Table 2 (Page 1 of 3)**  
**Soil Analytical Summary**  
**Suggar Property**  
**3100 60th Street**  
**Kenosha, WI**

Parameters	Sample Information / Results						Residual Contaminant Levels			
	DP-3 Sample Depth (ft/bls) Saturation Depth (ft/bls) Saturated / Unsaturated Sample Date	DP-3 11.5-12 11.5 Unsaturated 12/12/16	DP-4 3-4 12 Unsaturated 12/12/16	DP-4 11.5-12 12 Unsaturated 12/12/16	DP-5 3-4 14.5 Unsaturated 01/10/17	DP-5 7-8 14.5 Unsaturated 01/10/17	Groundwater Protection	Not to Exceed Non-Industrial Direct Contact	Not to Exceed Industrial Direct Contact	
<b>VOCs (ug/kg)</b>							ug/kg	ug/kg	ug/kg	
1,2,4-Trimethylbenzene	105	<25.0	<25.0	<b>14,900</b>	<25.0	<b>21,500</b>	1,382.1*	89,800	219,000	
1,3,5-Trimethylbenzene	50.1	<25.0	<25.0	<125.0	<25.0	<b>6,060</b>	1,382.1*	182,000	182,000	
Ethylbenzene	<25.0	<25.0	<25.0	521	<25.0	290	1,570	7,470	37,000	
Isopropylbenzene (Cumene)	<25.0	<25.0	<25.0	1,940	<25.0	514	NS	268,000	268,000	
Naphthalene	<40.0	<40.0	<40.0	<200.0	<40.0	<b>8,520</b>	658.2	5,150	26,000	
Tetrachloroethene	<25.0	<25.0	<25.0	<125.0	<25.0	<100	4.5	30,700	153,000	
Toluene	<25.0	<25.0	<25.0	<125.0	<25.0	<100	1,107.2	818,000	818,000	
Xylenes	<b>260.3</b>	<75.0	<75.0	513	<75.0	<b>17,820</b>	3,940	260,000	260,000	
n-Butylbenzene	<25.0	<25.0	<25.0	7,040	<25.0	<100	NS	108,000	108,000	
n-Propylbenzene	<25.0	<25.0	<25.0	11,600	<25.0	2,270	NS	264,000	264,000	
p-Isopropyltoluene	<25.0	<25.0	<25.0	1,340	<25.0	230	NS	162,000	162,000	
sec-Butylbenzene	<25.0	<25.0	<25.0	2,210	<25.0	402	NS	145,000	145,000	
tert-Butylbenzene	<25.0	<25.0	<25.0	<125.0	<25.0	<100	NS	183,000	183,000	
<b>PAHs (ug/kg)</b>							ug/kg	ug/kg	Ug/kg	
Acenaphthene	<4.8	<4.4	<4.5	<36.2	<4.8	18.1	NS	3,440,000	33,000,000	
Acenaphthylene	<4.1	<3.7	<3.8	<30.7	<4.0	<14.7	NS	NS	NS	
Anthracene	<7.1	<6.5	<6.6	<53.2	<7.0	<25.5	196,949.2	17,200,000	100,000,000	
Benzo(a)anthracene	<4.0	<3.6	<3.7	<29.6	<3.9	34.6	NS	147	2,100	
Benzo(a)pyrene	<3.1	<2.9	<2.9	<23.4	<3.1	<11.2	470	15	211	
Benzo(b)fluoranthene	<b>5.3</b>	<3.2	<3.3	<26.3	<3.5	13.1	479.3	148	2,110	
Benzo(g,h,i)perylene	<2.5	<2.3	<2.4	<18.9	<2.5	11.5	NS	NS	NS	
Chrysene	<4.2	<3.8	<3.9	<31.4	<4.1	22.4	144.6	14,800	211,000	
Dibenz(a,h)anthracene	<2.8	<2.5	<2.6	<20.8	<2.7	<10	NS	15	211	
Fluoranthene	<6.5	<5.9	<6.1	<48.6	<6.4	<23.3	88,877.8	2,290,000	22,000,000	
Fluorene	<5.2	<4.7	<4.8	<38.6	<5.1	22.4	14,802.7	2,290,000	22,000,000	
Indeno(1,2,3-cd)pyrene	<2.7	<2.5	<2.6	<20.5	<2.7	<9.8	NS	148	2,110	
1-Methylnaphthalene	<5.0	<4.6	<4.7	3,020	<4.9	675	NS	15,600	53,100	
2-Methylnaphthalene	<6.2	<5.7	<5.8	<46.6	<6.1	1,310	NS	229,000	2,200,000	
Naphthalene	<10.5	<9.6	<9.8	462	<10.3	<b>1,100</b>	658.2	5,150	26,000	
Phenanthrene	<14.5	<13.2	<13.5	<109	<14.3	58.0	NS	NS	NS	
Pyrene	<5.6	<5.1	<5.2	<42.1	<5.5	41.1	54,545.5	1,720,000	16,500,000	
<b>RCRA Metals (mg/kg)</b>							mg/kg	mg/kg	mg/kg	<b>Background</b>
Cadmium	<0.15	<0.15	<0.14	<0.28	<0.15	<0.15	0.752	70	799	1
Lead	28.3	7.5	8.3	3.8	13.8	21.9	27	400	800	52

**Notes:**

Table includes detected analytes only.

**Bold type** indicates concentration within the upper 4 feet of the subsurface exceeds the non-industrial direct contact RCL and, if applicable, the background level, thus constituting a soil standard exceedance.

**Italic type** indicates a concentration exceeds the groundwater protection RCL and, if applicable the background level, thus constituting a soil standard exceedance.

**RCL** - Residual Contaminant Level

**VOCs** - Volatile Organic Compounds

**PAHs** - Polynuclear Aromatic Hydrocarbons

**RCRA** - Resource Conservation & Recovery Act

**NS** - No Standard

**NA** - Not Applicable/Not Analyzed

(1) The groundwater protection RCL applies to combined trimethylbenzenes.

**Table 2 (Page 2 of 3)  
Soil Analytical Summary  
Suggar Property  
3100 60th Street  
Kenosha, WI**

Parameters	Sample Information / Results							Residual Contaminant Levels			
	DP-6 3-4	DP-6 11-12	DP-7 3-4	DP-7 7-8	DP-7 8-9	DP-8 3-4	DP-8 7-8	Groundwater Protection	Not to Exceed Non-Industrial Direct Contact	Not to Exceed Industrial Direct Contact Protection	
Sample ID											
Sample Depth (ft/bls)	3-4	11-12	3-4	7-8	8-9	3-4	7-8				
Saturation Depth (ft/bls)	14.5	14.5	12	12	11.5	11.5	11.5				
Saturated / Unsaturated	Unsaturated	Unsaturated	Unsaturated	Unsaturated	Unsaturated	Unsaturated	Unsaturated				
Sample Date	01/10/17	01/10/17	12/12/16 & 01/10/17*	01/10/17*	12/12/16*	01/10/17	01/10/17				
<b>VOCs (ug/kg)</b>								ug/kg	ug/kg	ug/kg	
1,2,4-Trimethylbenzene	<25.0	49.0	52.0	<b>62,600</b>	NA	<25.0	399	1,382.1*	89,800	219,000	
1,3,5-Trimethylbenzene	<25.0	47.7	<25.0	<b>17,500</b>	NA	<25.0	44.2	1,382.1*	182,000	182,000	
Ethylbenzene	<25.0	<25.0	<25.0	<b>11,800</b>	NA	<25.0	<25.0	1,570	7,470	37,000	
Isopropylbenzene (Cumene)	<25.0	<25.0	<25.0	3,260	NA	<25.0	443	NS	268,000	268,000	
Naphthalene	<40.0	<40.0	<40.0	<b>17,200</b>	NA	<40.0	<40.0	658.2	5,150	26,000	
Tetrachloroethene	<b>50.5</b>	<25.0	<25.0	<312	NA	<25.0	<25.0	4.5	30,700	153,000	
Toluene	<25.0	<25.0	<25.0	<b>1,140</b>	NA	<25.0	<25.0	1,107.2	818,000	818,000	
Xylenes	<75.0	<75.0	<b>64.5</b>	<b>45,400</b>	NA	<75.0	<75.0	3,960	260,000	260,000	
n-Butylbenzene	<25.0	<b>56.6</b>	<25.0	10,100	NA	<25.0	438	NS	108,000	108,000	
n-Propylbenzene	<25.0	<25.0	<25.0	12,300	NA	<25.0	403	NS	264,000	264,000	
p-Isopropyltoluene	<25.0	<25.0	<25.0	1,480	NA	<25.0	<25.0	NS	162,000	162,000	
sec-Butylbenzene	<25.0	<25.0	<25.0	2,050	NA	<25.0	533	NS	145,000	145,000	
tert-Butylbenzene	<25.0	<25.0	<25.0	<312	NA	<25.0	39.6	NS	183,000	183,000	
<b>PAHs (ug/kg)</b>								ug/kg	ug/kg	Ug/kg	
Acenaphthene	<5.2	<4.1	<4.7	NA	<23.3	NA	NA	NS	3,440,000	33,000,000	
Acenaphthylene	5.3	<3.5	<4.0	NA	<19.8	NA	NA	NS	NS	NS	
Anthracene	57.8	<6.0	<6.9	NA	<34.2	NA	NA	196,949.2	17,200,000	100,000,000	
Benzo(a)anthracene	23.1	<3.3	<3.8	NA	<19.0	NA	NA	NS	147	2,100	
Benzo(a)pyrene	4.7	<2.7	<3.0	NA	<15.1	NA	NA	470	15	211	
Benzo(b)fluoranthene	11.4	<3.0	<3.4	NA	<16.9	NA	NA	479.3	148	2,110	
Benzo(g,h,i)perylene	4.8	4.1	<2.5	NA	<12.2	NA	NA	NS	NS	NS	
Chrysene	25.5	5.8	<4.1	NA	<20.2	NA	NA	144.6	14,800	211,000	
Dibenz(a,h)anthracene	3.0	<2.4	<2.7	NA	<13.4	NA	NA	NS	15	211	
Fluoranthene	26.1	<5.5	<6.3	NA	<31.2	NA	NA	88,877.8	2,290,000	22,000,000	
Fluorene	<5.5	<4.4	<5.0	NA	<24.8	NA	NA	14,802.7	2,290,000	22,000,000	
Indeno(1,2,3-cd)pyrene	3.1	<2.3	<2.7	NA	<13.2	NA	NA	NS	148	2,110	
1-Methylnaphthalene	221	<4.2	7.7	NA	613	NA	NA	NS	15,600	53,100	
2-Methylnaphthalene	278	<5.3	10.8	NA	1,360	NA	NA	NS	229,000	2,200,000	
Naphthalene	54.2	<8.9	17.7	NA	<b>2,040</b>	NA	NA	658.2	5,150	26,000	
Phenanthrene	68.7	<12.3	<14.1	NA	<69.8	NA	NA	NS	NS	NS	
Pyrene	50.8	<4.8	<5.5	NA	<27.0	NA	NA	54,545.5	1,720,000	16,500,000	
<b>RCRA Metals (mg/kg)</b>								mg/kg	mg/kg	mg/kg	<b>Background</b>
Cadmium	<0.17	0.64	<0.13	NA	<0.16	NA	NA	0.752	70	799	1
Lead	19.4	7.4	23.8	NA	2.9	28.5	17.7	27	400	800	52

**Notes:**

Table includes detected analytes only, which are right justified in the columns.

**Bold type** indicates concentration within the upper 4 feet of the subsurface exceeds the non-industrial direct contact RCL and, if applicable, the background level, thus constituting a soil standard exceedance.

**Italic type** indicates a concentration exceeds the groundwater protection RCL and, if applicable the background level, thus constituting a soil standard exceedance.

**RCL** - Residual Contaminant Level

**VOCs** - Volatile Organic Compounds

**PAHs** - Polynuclear Aromatic Hydrocarbons

**RCRA** - Resource Conservation & Recovery Act

**NS** - No Standard

**NA** - Not Applicable/Not Analyzed

(1) The groundwater protection RCL applies to combined trimethylbenzenes.

\* The VOC aliquotes for DP-7 collected on 12/12/16 broke and additional samples were collected on 01/10/17

**Table 2 (Page 3 of 3)  
Soil Analytical Summary  
Suggar Property  
3100 60th Street  
Kenosha, WI**

Parameters	Sample Information / Results						Residual Contaminant Levels			
	DP-9 3-4	DP-9 12-13	DP-10 3-4	DP-10 11.5-12	DP-11 3-4	DP-11 7-8	Groundwater Protection	Not to Exceed Non-Industrial Direct Contact	Not to Exceed Industrial Direct Contact Protection	
Sample ID	DP-9 3-4	DP-9 12-13	DP-10 3-4	DP-10 11.5-12	DP-11 3-4	DP-11 7-8				
Sample Depth (ft/bls)	15	15	11.5	11.5	11.5	11.5				
Saturation Depth (ft/bls)	Unsaturated	Unsaturated	Unsaturated	Saturated	Unsaturated	Unsaturated				
Saturated / Unsaturated	12/12/16	12/12/16	12/12/16	12/12/16	01/10/17	01/10/17				
Sample Date										
<b>VOCs (ug/kg)</b>							ug/kg	ug/kg	ug/kg	
1,2,4-Trimethylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	1,382.1*	89,800	219,000	
1,3,5-Trimethylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	1,382.1*	182,000	182,000	
Ethylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	1,570	7,470	37,000	
Isopropylbenzene (Cumene)	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	NS	268,000	268,000	
Naphthalene	<40.0	<40.0	<40.0	<40.0	<40.0	<40.0	658.2	5,150	26,000	
Tetrachloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	4.5	30,700	153,000	
Toluene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	1,107.2	818,000	818,000	
Xylenes	<75.0	<75.0	<75.0	<75.0	<75.0	<75.0	3,940	260,000	260,000	
n-Butylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	NS	108,000	108,000	
n-Propylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	NS	264,000	264,000	
p-Isopropyltoluene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	NS	162,000	162,000	
sec-Butylbenzene	<25.0	<25.0	<25.0	39.7	<25.0	<25.0	NS	145,000	145,000	
tert-Butylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	NS	183,000	183,000	
<b>PAHs (ug/kg)</b>							ug/kg	ug/kg	Ug/kg	
Acenaphthene	NA	NA	NA	NA	NA	NA	NS	3,440,000	33,000,000	
Acenaphthylene	NA	NA	NA	NA	NA	NA	NS	NS	NS	
Anthracene	NA	NA	NA	NA	NA	NA	196,949.2	17,200,000	100,000,000	
Benzo(a)anthracene	NA	NA	NA	NA	NA	NA	NS	147	2,100	
Benzo(a)pyrene	NA	NA	NA	NA	NA	NA	470	15	211	
Benzo(b)fluoranthene	NA	NA	NA	NA	NA	NA	479.3	148	2,110	
Benzo(g,h,i)perylene	NA	NA	NA	NA	NA	NA	NS	NS	NS	
Chrysene	NA	NA	NA	NA	NA	NA	144.6	14,800	211,000	
Dibenz(a,h)anthracene	NA	NA	NA	NA	NA	NA	NS	15	211	
Fluoranthene	NA	NA	NA	NA	NA	NA	88,877.8	2,290,000	22,000,000	
Fluorene	NA	NA	NA	NA	NA	NA	14,802.7	2,290,000	22,000,000	
Indeno(1,2,3-cd)pyrene	NA	NA	NA	NA	NA	NA	NS	148	2,110	
1-Methylnaphthalene	NA	NA	NA	NA	NA	NA	NS	15,600	53,100	
2-Methylnaphthalene	NA	NA	NA	NA	NA	NA	NS	229,000	2,200,000	
Naphthalene	NA	NA	NA	NA	NA	NA	658.2	5,150	26,000	
Phenanthrene	NA	NA	NA	NA	NA	NA	NS	NS	NS	
Pyrene	NA	NA	NA	NA	NA	NA	54,545.5	1,720,000	16,500,000	
<b>RCRA Metals (mg/kg)</b>							mg/kg	mg/kg	mg/kg	Background
Cadmium	NA	NA	NA	NA	NA	NA	0.752	70	799	1
Lead	6.8	8.0	10.7	5.0	3.1	7.7	27	400	800	52

**Notes:**

Table includes detected analytes only, which are right justified in the columns.

**Bold type** indicates concentration within the upper 4 feet of the subsurface exceeds the non-industrial direct contact RCL and, if applicable, the background level, thus constituting a soil standard exceedance.

*Italic type* indicates a concentration exceeds the groundwater protection RCL and, if applicable the background level, thus constituting a soil standard exceedance.

**RCL** - Residual Contaminant Level

**VOCs** - Volatile Organic Compounds

**PAHs** - Polynuclear Aromatic Hydrocarbons

**RCRA** - Resource Conservation & Recovery Act

**NS** - No Standard

**NA** - Not Applicable/Not Analyzed

(1) The groundwater protection RCL applies to combined trimethylbenzenes.



**Table 3 (Page 1 of 1)**  
**Historical Groundwater Sample Analytical Results Summary**  
**Suggar Property**  
**Kenosha, WI**  
**ChemReport, Inc.**  
**April 2006 to July 2010**

Parameters	Sample Information / Results				Groundwater Quality Standards	
Sample ID	GP-12W	DP-1W	DP-2W	MW-8	PAL	ES
Sample Date	4/25/06	8/5/10	8/5/10	7/14/10		
VOCs (ug/l)					ug/l	ug/l
n-Butylbenzene	NA	3.5	1.4	42.4	NS	NS
sec-Butylbenzene	NA	7.1	1.0	17.2	NS	NS
tert-Butylbenzene	NA	<0.97	<0.97	<9.7	NS	NS
Chloromethane	NA	0.37	0.54	<2.4	0.3	3
Ethylbenzene	<5.00	<0.54	<0.54	<b>774</b>	140	700
Isopropyltoluene (Cumene)	NA	4.5	1.1	149	NS	NS
p-Isopropyltoluene	NA	<0.67	<0.67	8.8	NS	NS
n-Propylbenzene	NA	4.9	4.7	480	NS	NS
1,2,4-Trimethylbenzene	<5.00	1.7	15.4	<b>1,140</b>	96 (1)	480 (1)
1,3,5-Trimethylbenzene	<5.00	<0.83	1.4	<8.3	96 (1)	480 (1)
Xylenes	<5.00	<1.63	<1.63	<b>473.5</b>	400	2000

**Notes:**

Table includes detected analytes only, which are right justified in the columns.

*Italic type* indicates concentration exceeds PAL.

**Bold type** indicates concentration exceeds ES.

**VOCs** - Volatile Organic Compounds

**PAL** - NR 140 Preventive Action Limit

**ES** - NR 140 Enforcement Standard

**NA** - Not analyzed or not applicable

(1) - The groundwater quality stanadards are applied to the combined concentrations of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene.

**Table 4 (Page 1 of 2)**  
**Groundwater Sample Analytical Results Summary**  
**Suggar Property**  
**Kenosha, WI**  
**Midwest Environmental Consulting**  
**December 2016 & January 2017**

Parameters	Sample Information / Results					Groundwater Quality Standards	
Sample ID	DP-3W	DP-4W	DP-5W	DP-6W	DP-7W	PAL	ES
Sample Date	6/16/16	6/16/16	6/16/16	6/17/16	6/17/16		
VOCs (ug/l)						ug/l	ug/l
n-Butylbenzene	<0.50	183	387	<0.50	57.2	NS	NS
sec-Butylbenzene	<2.2	<273	<219	<2.2	<43.7	NS	NS
tert-Butylbenzene	<0.18	<22.5	<18.0	<0.18	<3.6	NS	NS
Chloromethane	<0.50	<62.5	<0.50	<0.50	<10.0	0.3	3
Ethylbenzene	<0.50	<b>5,000</b>	<b>1,130</b>	<0.50	23.5	140	700
Isopropyltoluene (Cumene)	<0.14	219	326	<0.14	75.5	NS	NS
p-Isopropyltoluene	<0.50	102	63.4	<0.50	24.7	NS	NS
n-Propylbenzene	<0.50	785	1,350	<0.50	282	NS	NS
1,2,4-Trimethylbenzene	<0.50	<b>5,110</b>	<b>6,860</b>	<0.50	<b>1,310</b>	96 (1)	480 (1)
1,3,5-Trimethylbenzene	<0.50	<62.5	<b>65.4</b>	<0.50	<10.0	96 (1)	480 (1)
Xylenes	<1.50	<b>4,062.5</b>	<b>1,250</b>	<1.50	27.4	400	2000

**Notes:**

Table includes detected analytes only, which are right justified in the columns.

*Italic type* indicates concentration exceeds PAL.

**Bold type** indicates concentration exceeds ES.

**VOCs** - Volatile Organic Compounds

**PAL** - NR 140 Preventive Action Limit

**ES** - NR 140 Enforcement Standard

**NA** - Not analyzed or not applicable

(1) - The groundwater quality standards are applied to the combined concentrations of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene.

**Table 4 (Page 2 of 2)**  
**Groundwater Sample Analytical Results Summary**  
**Suggar Property**  
**Kenosha, WI**  
**Midwest Environmental Consulting**  
**December 2016 & January 2017**

Parameters	Sample Information / Results				Groundwater Quality Standards	
Sample ID	DP-8W	DP-9W	DP-10W	DP-11W	PAL	ES
Sample Date	6/16/16	6/16/16	6/16/16	6/17/16		
VOCs (ug/l)					ug/l	ug/l
n-Butylbenzene	42.1	183	<0.50	<0.50	NS	NS
sec-Butylbenzene	22.7	<2.2	<2.2	<2.2	NS	NS
tert-Butylbenzene	3.1	<0.18	<0.18	<0.18	NS	NS
Chloromethane	<5.0	<0.50	<0.50	<0.50	0.3	3
Ethylbenzene	16.4	<b>5,000</b>	<0.50	<0.50	140	700
Isopropyltoluene (Cumene)	62.1	219	<0.14	<0.14	NS	NS
p-Isopropyltoluene	9.0	102	<0.50	<0.50	NS	NS
n-Propylbenzene	182	785	<0.50	<0.50	NS	NS
1,2,4-Trimethylbenzene	<b>520</b>	<b>5,110</b>	<0.50	<0.50	96 (1)	480 (1)
1,3,5-Trimethylbenzene	<b>21.2</b>	<0.42	<0.50	<0.50	96 (1)	480 (1)
Xylenes	20.6	<b>4,062.5</b>	<1.50	<1.50	400	2000

**Notes:**

Table includes detected analytes only, which are right justified in the columns.

*Italic type* indicates concentration exceeds PAL.

**Bold type** indicates concentration exceeds ES.

**VOCs** - Volatile Organic Compounds

**PAL** - NR 140 Preventive Action Limit

**ES** - NR 140 Enforcement Standard

**NA** - Not analyzed or not applicable

(1) - The groundwater quality standards are applied to the combined concentrations of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene.