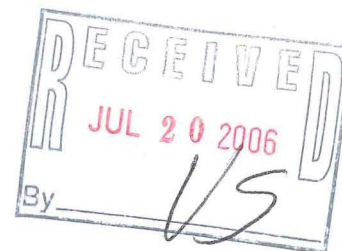


TEMCO

THE ENVIRONMENTAL MANAGEMENT COMPANY LLC



July 19, 2006

Ms. Victoria Stovall
Environmental Program Associate
Wisconsin Department of Natural Resources
2300 North Martin Luther King Drive
Milwaukee, WI 53212

RE: Addendum To Request For Approval For Off-site Disposal of Contaminated Soil From The "700 Series" Properties (FID #341117040, BRRTS #02-41-544080) At A Response Action Site (Lime Pit Property - FID #241222520, BRRTS #02-41-184802) ~ West Allis, Wisconsin

Dear Ms. Stovall:

The above referenced request for disposal of soil excavated during redevelopment of the "700 Series" Properties in West Allis at the Lime Pit property, also in West Allis, was approved in your letter of May 16, 2006, with the exception of soil located in the Building N footprint, where a soil sample with a high level of lead was identified (soil boring SB-3 (#704), 1'-2' below ground surface (bgs)).

THE ENVIRONMENTAL MANAGEMENT COMPANY LLC (TEMCO) has completed additional sampling and analysis of shallow soils within the Building N footprint. The data indicates the area containing soil with high levels of lead is very limited (see Figure 4.3 and Table 4 attached) TEMCO estimates the maximum area of high lead levels in shallow soil is approximately 500 square feet, with a maximum depth of 4 feet bgs. The estimated maximum amount of shallow soil contaminated with high lead levels is therefore approximately 100 tons.

Preparatory to redevelopment of this site, shallow soil samples will be collected from the impacted area for TCLP analysis for lead. Depending on the results of analysis, the impacted soils will be directly landfilled at an off-site commercial facility, or stabilized prior to landfilling.

The remaining soil in the Building N footprint contains lead at levels similar to those identified in soil at the Lime Pit Site (see Figure 3.1 and Table 4, attached). Approval of disposal of these soils at the Lime Pit site is therefore requested.

Ms. Victoria Stovall
July 19, 2006
Page 2

A copy of Table 6 from the original request for off-site soil disposal is attached. The revised table shows an estimated 100 cubic yards of soil from the Building N footprint designated for off-site disposal at a commercial landfill.

Please contact the undersigned if further information is needed at (262) 675-6206.

THE ENVIRONMENTAL MANAGEMENT COMPANY LLC



Jeffrey L. Hosler
Senior Hydrogeologist
Principal

Enclosures

cc: Mr. John F. Stibal - City of West Allis
Mr. Patrick Schloss - City of West Allis
Mr. Scott Post - City of West Allis
Mr. Thomas P. McElligot - Quarles & Brady LLP
Mr. Michael S. Maierle, PE - Arcadis
Mr. Helmut Toldt - Toldt Development
Mr. Mark C. Treter, Esq. - Treter Law Office

Table 1.4
THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
Novak Property (Lime Pit)
West Allis, Wisconsin
Soil Analytical Results Table: Metals
All contaminants shown in mg/kg (milligrams per kilogram)

Sample ID	Sample Date	Depth (feet bgs)	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
SB-6	02/20/04	0 - 4	<3	69	<0.6	19.6	62.4	0.080	<3	<3
SB-7	02/20/04	0 - 4	3.06	42.6	<0.6	8.99	32.1	0.137	<3	<3
SB-8	02/20/04	0 - 4	<3	34.3	<0.6	9.95	41.3	0.1957	<3	<3
SB-9	02/20/04	0 - 4	3.18	54.2	<0.6	16.8	65.4	0.047	<3	<3
SB-12	05/27/04	0 - 4	4.0	42	0.67	10.0	19	0.031	<0.5	<0.25
SB-18	05/27/04	4 - 8	1.1	1.1	<0.25	2.6	<0.25	<0.02	0.84	<0.25
SB-22	05/27/04	4 - 8	7.1	36	0.95	8.2	26	0.055	<0.5	<0.25
Residual Contaminant Levels		Industrial	1.6	---	510	---	500	---	---	---

Outlined = Exceeds Residual Contaminant Level

March 7, 2006

Table 4
THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
700 Properties ~ Six Points / Farmers Market ~ West Allis, Wisconsin ~ Soil Analytical Results Table: Metals
All contaminants shown in mg/kg (milligrams per kilogram)

Sample ID	Sample Date	Depth (feet bgs)	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
Property #704										
SB-3 ⁽¹⁾	9/12/01	1 - 2	3.4	589	<1.2	13	484	0.092	3.6 ^J	<3.0
Property #705										
SB-19	06/20/02	1 - 2	<0.6	88	<0.7	21	31	0.037	<2.5	5.6
SB-20	10/19/04	5 - 6	1.9	120	1.2	32	14	0.039	<0.72	0.36
SB-22	10/23/04	1 - 4	<0.60	120	1.0	41	2.0	<0.024	6.0	<0.30
SB-26	03/13/06	4 - 5	<0.015	NA	NA	NA	14	NA	NA	NA
SB-26	03/13/06	5.5 - 6.5	<0.015	NA	NA	NA	17	NA	NA	NA
SB-27	03/13/06	5.5 - 6.5	4.9	NA	NA	NA	8.4	NA	NA	NA
SB-33	03/13/06	7 - 8	1.6^J	NA	NA	NA	19	NA	NA	NA
SB-34	03/13/06	4 - 5	1.2	NA	NA	NA	17	NA	NA	NA
SB-37	03/13/06	5.5 - 6.5	3.1	NA	NA	NA	7.6	NA	NA	NA
SB-40	03/13/06	7 - 8	2.3	NA	NA	NA	13	NA	NA	NA
SB-42	03/13/06	3 - 4	5.9	NA	NA	NA	29	NA	NA	NA
SB-46	04/04/06	2 - 4	4.7^J	NA	NA	NA	17	NA	NA	NA
SB-47	04/04/06	1.5 - 2.5	5.1	NA	NA	NA	17	NA	NA	NA
Residual Contaminant Levels		NI I	0.039 1.6	---	8 510	16,000 ---	50 500	---	---	---

NI = non-industrial I = industrial NA = not analyzed Bold & Outlined = Exceeds RCL
⁽¹⁾ From Phase II ESA of property no. 704. Location is inside building footprint of Building N in the site redevelopment plan.

Table 4
THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
700 Properties ~ Six Points / Farmers Market ~ West Allis, Wisconsin ~ Soil Analytical Results Table: Metals
All contaminants shown in mg/kg (milligrams per kilogram)

Sample ID	Sample Date	Depth (feet bgs)	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
SB-48	0 - 4	05/24/06	<2.5	NA	NA	NA	<5	NA	NA	NA
SB-48	4 - 8	05/24/06	5.3	NA	NA	NA	80	NA	NA	NA
SB-49	0 - 4	05/24/06	3.3	NA	NA	NA	<5	NA	NA	NA
SB-49	4 - 8	05/24/06	<2.5	NA	NA	NA	<5	NA	NA	NA
SB-50	0 - 4	05/24/06	<2.5	NA	NA	NA	<5	NA	NA	NA
SB-50	4 - 8	05/24/06	4.7	NA	NA	NA	<5	NA	NA	NA
SB-51	0 - 4	05/24/06	<2.5	NA	NA	NA	7.0	NA	NA	NA
SB-51	4 - 8	05/24/06	<2.5	NA	NA	NA	8.8	NA	NA	NA
SB-52	0 - 4	05/24/06	3.1	NA	NA	NA	31	NA	NA	NA
SB-52	4 - 8	05/24/06	4.2	NA	NA	NA	23	NA	NA	NA
Residual Contaminant Levels		NI I	0.039 1.6	---	8 510	16,000 ---	50 500	---	---	---

NI = non-industrial

I = industrial

NA = not analyzed

Bold & Outlined = Exceeds RCL

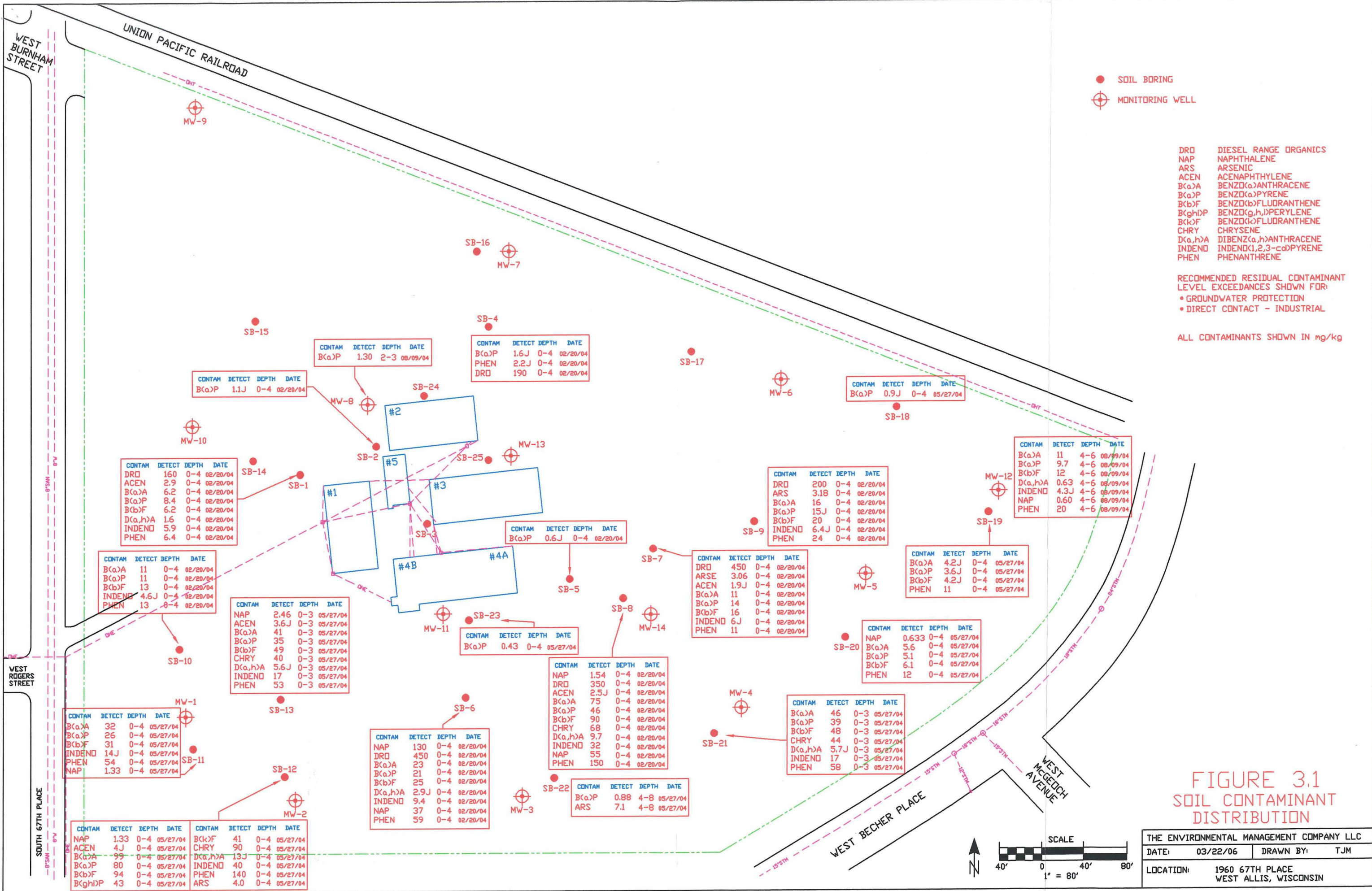
⁽¹⁾ From Phase II ESA of property no. 704. Location is inside building footprint of Building N in the site redevelopment plan.

July 17, 2006

Table 6
THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
City of West Allis
Six Points / Farmers Market Redevelopment Project
Phase II (700 Properties)
Estimated Volumes of Excess Fill ⁽¹⁾ and Excess Native Soil (Cubic Yards)
March 2006

Location ⁽²⁾	Contaminated Fill Volume (Lime Pit Placement)	Contaminated Fill Volume (Landfill Disposal)	Clean Soil Volume (Unrestricted Disposal)
Building N Area	2,320	100	2,420
Building P Area	0	100	7,600
Building Q Area	3,460	0	3,460
Building R ⁽³⁾ Area	4,160	50	2,770
Building T Area	3,460	0	3,460
Totals	13,400	250	19,710

- ⁽¹⁾ Excess fill/soil volume estimates do not include any allowance for areas between building excavations. It is assumed inter-building areas will be capped by pavement or landscaping.
- ⁽²⁾ See attached Figure 6.
- ⁽³⁾ Estimated volumes are the remaining soil in the building excavation footprint (southern part of building) following completion of excavation of petroleum contaminated soil on 705 property (northern part of building).



- DRO DIESEL RANGE ORGANICS
- NAP NAPHTHALENE
- ARS ARSENIC
- ACEN ACENAPHTHYLENE
- B(a)A BENZO(a)ANTHRACENE
- B(a)P BENZO(a)PYRENE
- B(b)F BENZO(b)FLUORANTHENE
- B(ghi)P BENZO(g,h,i)PERYLENE
- B(k)F BENZO(k)FLUORANTHENE
- CHRY CHRYSENE
- D(a,h)A DIBENZ(a,h)ANTHRACENE
- INDENO INDENO(1,2,3-cd)PYRENE
- PHEN PHENANTHRENE

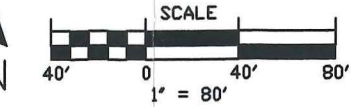
RECOMMENDED RESIDUAL CONTAMINANT LEVEL EXCEEDANCES SHOWN FOR:

- GROUNDWATER PROTECTION
- DIRECT CONTACT - INDUSTRIAL

ALL CONTAMINANTS SHOWN IN mg/kg

FIGURE 3.1
SOIL CONTAMINANT
DISTRIBUTION

THE ENVIRONMENTAL MANAGEMENT COMPANY LLC	
DATE: 03/22/06	DRAWN BY: TJM
LOCATION: 1960 67TH PLACE WEST ALLIS, WISCONSIN	



CONTAM	DETECT	DEPTH	DATE
B(a)P	1.1J	0-4	02/20/04

CONTAM	DETECT	DEPTH	DATE
B(a)P	1.30	2-3	08/09/04

CONTAM	DETECT	DEPTH	DATE
B(a)P	1.6J	0-4	02/20/04
PHEN	2.2J	0-4	02/20/04
DRD	190	0-4	02/20/04

CONTAM	DETECT	DEPTH	DATE
B(a)P	0.9J	0-4	05/27/04

CONTAM	DETECT	DEPTH	DATE
DRD	160	0-4	02/20/04
ACEN	2.9	0-4	02/20/04
B(a)A	6.2	0-4	02/20/04
B(a)P	8.4	0-4	02/20/04
B(b)F	6.2	0-4	02/20/04
D(a,h)A	1.6	0-4	02/20/04
INDENO	5.9	0-4	02/20/04
PHEN	6.4	0-4	02/20/04

CONTAM	DETECT	DEPTH	DATE
B(a)A	11	0-4	02/20/04
B(a)P	11	0-4	02/20/04
B(b)F	13	0-4	02/20/04
INDENO	4.6J	0-4	02/20/04
PHEN	13	0-4	02/20/04

CONTAM	DETECT	DEPTH	DATE
NAP	2.46	0-3	05/27/04
ACEN	3.6J	0-3	05/27/04
B(a)A	41	0-3	05/27/04
B(a)P	35	0-3	05/27/04
B(b)F	49	0-3	05/27/04
CHRY	40	0-3	05/27/04
D(a,h)A	5.6J	0-3	05/27/04
INDENO	17	0-3	05/27/04
PHEN	53	0-3	05/27/04

CONTAM	DETECT	DEPTH	DATE
B(a)P	0.6J	0-4	02/20/04

CONTAM	DETECT	DEPTH	DATE
B(a)P	0.43	0-4	05/27/04

CONTAM	DETECT	DEPTH	DATE
NAP	1.54	0-4	02/20/04
DRD	350	0-4	02/20/04
ACEN	2.5J	0-4	02/20/04
B(a)A	75	0-4	02/20/04
B(a)P	46	0-4	02/20/04
B(b)F	90	0-4	02/20/04
CHRY	68	0-4	02/20/04
D(a,h)A	9.7	0-4	02/20/04
INDENO	32	0-4	02/20/04
NAP	55	0-4	02/20/04
PHEN	150	0-4	02/20/04

CONTAM	DETECT	DEPTH	DATE
B(a)A	46	0-3	05/27/04
B(a)P	39	0-3	05/27/04
B(b)F	48	0-3	05/27/04
CHRY	44	0-3	05/27/04
D(a,h)A	5.7J	0-3	05/27/04
INDENO	17	0-3	05/27/04
PHEN	58	0-3	05/27/04

CONTAM	DETECT	DEPTH	DATE
NAP	0.633	0-4	05/27/04
B(a)A	5.6	0-4	05/27/04
B(a)P	5.1	0-4	05/27/04
B(b)F	6.1	0-4	05/27/04
PHEN	12	0-4	05/27/04

CONTAM	DETECT	DEPTH	DATE
B(a)A	32	0-4	05/27/04
B(a)P	26	0-4	05/27/04
B(b)F	31	0-4	05/27/04
INDENO	14J	0-4	05/27/04
PHEN	54	0-4	05/27/04
NAP	1.33	0-4	05/27/04

CONTAM	DETECT	DEPTH	DATE
B(a)A	41	0-4	05/27/04
B(a)P	90	0-4	05/27/04
B(b)F	13J	0-4	05/27/04
INDENO	40	0-4	05/27/04
PHEN	140	0-4	05/27/04
ARS	4.0	0-4	05/27/04

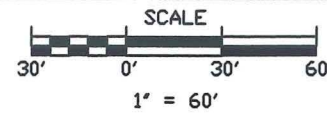
CONTAM	DETECT	DEPTH	DATE
NAP	130	0-4	02/20/04
DRD	450	0-4	02/20/04
B(a)A	23	0-4	02/20/04
B(a)P	21	0-4	02/20/04
B(b)F	25	0-4	02/20/04
D(a,h)A	2.9J	0-4	02/20/04
INDENO	9.4	0-4	02/20/04
NAP	37	0-4	02/20/04
PHEN	59	0-4	02/20/04

CONTAM	DETECT	DEPTH	DATE
B(a)P	0.88	4-8	05/27/04
ARS	7.1	4-8	05/27/04

CONTAM	DETECT	DEPTH	DATE
B(a)A	32	0-4	05/27/04
B(a)P	26	0-4	05/27/04
B(b)F	31	0-4	05/27/04
INDENO	14J	0-4	05/27/04
PHEN	54	0-4	05/27/04
NAP	1.33	0-4	05/27/04

LEGEND

- PROPERTY LINES
- SOIL BORING
- ⊕ MONITORING WELL
- ⊗ REMOVED MONITORING WELL



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
 DATE: 07/18/06 DRAWN BY: TJM
 LOCATION: 6633-39 W. NATIONAL AVE
 WEST ALLIS, WISCONSIN

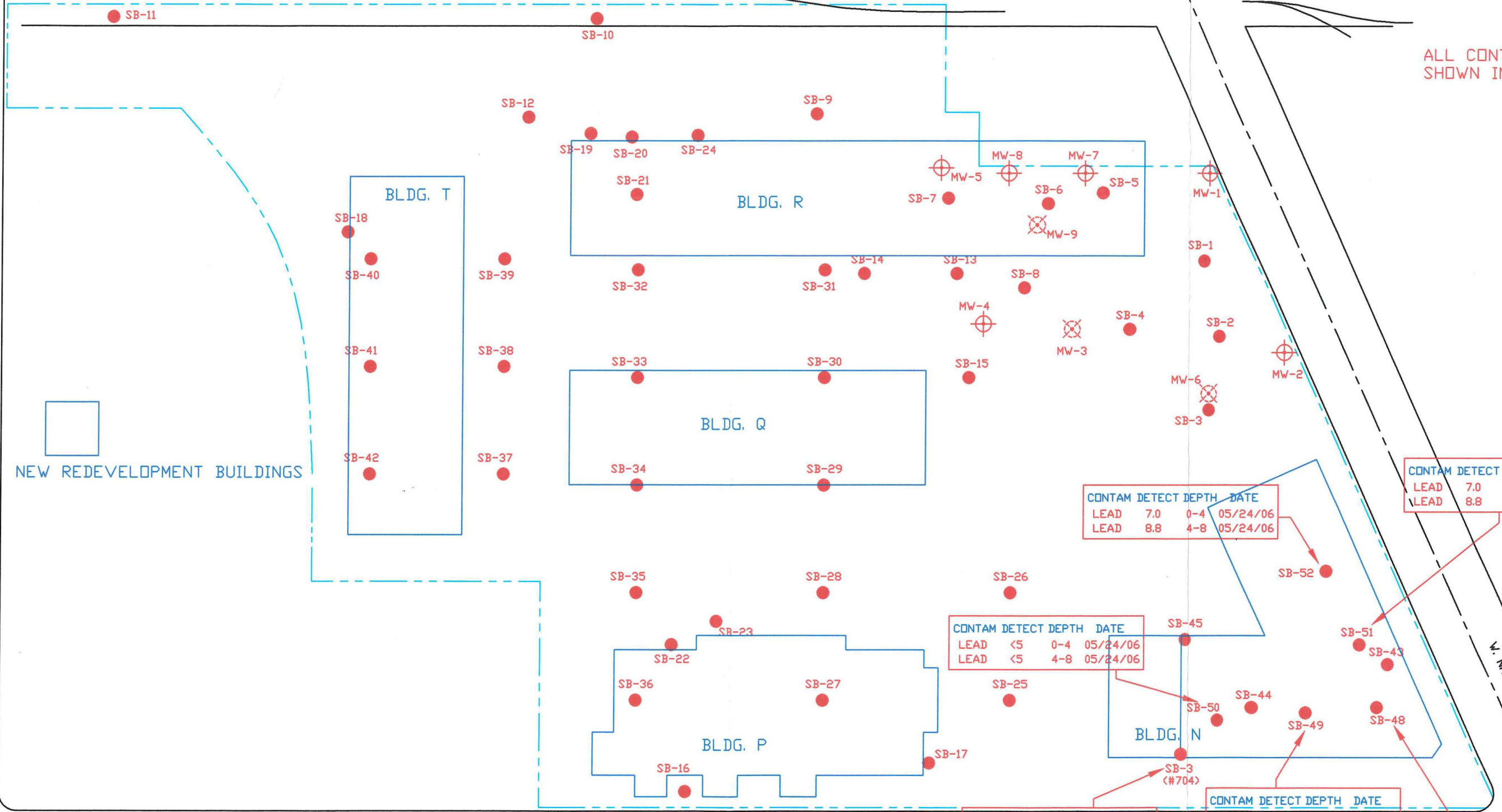
FIGURE 4.3
 SOIL CONTAMINANT
 DISTRIBUTION

ALL CONTAMINANTS
 SHOWN IN mg/kg

W. MITCHELL STREET

W. NATIONAL AVE

SOUTH 66TH STREET



CONTAM	DETECT	DEPTH	DATE
LEAD	7.0	0-4	05/24/06
LEAD	8.8	4-8	05/24/06

CONTAM	DETECT	DEPTH	DATE
LEAD	7.0	0-4	05/24/06
LEAD	8.8	4-8	05/24/06

CONTAM	DETECT	DEPTH	DATE
LEAD	<5	0-4	05/24/06
LEAD	<5	4-8	05/24/06

CONTAM	DETECT	DEPTH	DATE
LEAD	484	1-2	09/12/01

CONTAM	DETECT	DEPTH	DATE
LEAD	<5	0-4	05/24/06
LEAD	<5	4-8	05/24/06

CONTAM	DETECT	DEPTH	DATE
LEAD	<5	0-4	05/24/06
LEAD	80	4-8	05/24/06