

Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do **not** use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 9/15)

Page 2 of 6

Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Monnat	First Bob	MI	Organization/ Business Name The Mandel Group
Mailing Address 330 East Kilbourn Avenue; Suite 600 South			City Milwaukee
			State WI
			ZIP Code 53202
Phone # (include area code) (414) 270-2741	Fax # (include area code)	Email rbmonnat@mandelgroup.com	

The requester listed above: (select all that apply)

- Is currently the owner
- Is currently considering selling the Property
- Is renting or leasing the Property
- Is considering acquiring the Property
- Is a lender with a mortgagee interest in the Property
- Other. Explain the status of the Property with respect to the applicant:

Contact Information (to be contacted with questions about this request) Select if same as requester

Contact Last Name Fricseke	First Rick	MI W	Organization/ Business Name Friess Environmental Consulting, Inc.
Mailing Address 6635 N. Sidney Place			City Milwaukee
			State WI
			ZIP Code 53209
Phone # (include area code) (414) 228-9815	Fax # (include area code) (414) 228-9816	Email rfricseke@fecinc.us	

Environmental Consultant (if applicable)

Contact Last Name Fricseke	First Rick	MI	Organization/ Business Name Friess Environmental Consulting, Inc.
Mailing Address 6635 N. Sidney Place			City Milwaukee
			State WI
			ZIP Code 53209
Phone # (include area code) (414) 228-9815	Fax # (include area code) (414) 228-9816	Email rfricseke@fecinc.us	

Property Owner (if different from requester)

Contact Last Name Schloss	First Patrick	MI	Organization/ Business Name City of West Allis Economic Development
Mailing Address 7525 W. Greenfield Avenue			City West Allis
			State WI
			ZIP Code 53214
Phone # (include area code) (414) 302-8468	Fax # (include area code)	Email pschloss@westalliswi.gov	

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

Form 4400-237 (R 9/15)

Page 3 of 6

Section 2. Property Information

Property Name 700 Series Properties		FID No. (if known) 341117040	
BRRTS No. (if known) 02-41-544080	Parcel Identification Number 454-0648, 454-0649, and 454-0650-000		
Street Address 6633-6709 West National Avenue	City West Allis	State WI	ZIP Code 53214
County Milwaukee	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of West Allis	Property is composed of: <input type="radio"/> Single tax parcel <input checked="" type="radio"/> Multiple tax parcels	Property Size Acres 7

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: 12/15/2021

Reason:

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

**Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request**

Form 4400-237 (R 9/15)

Page 4 of 6

Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/Igu.html#tabx4.

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description; and,
- (3) a draft 75.105 agreement based on the DNR's model (dnr.wi.gov/topic/brownfields/documents/mod75-105agrmt.pdf).

Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description; and,
- (3) a draft 75.105 agreement based on the DNR's model (dnr.wi.gov/topic/brownfields/documents/mod75-106agrmt.pdf).

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

Section 6. Other Information Submitted

Identify all materials that are included with this request.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

Phase I Environmental Site Assessment Report - Date: 08/20/2021

Phase II Environmental Site Assessment Report - Date: _____

Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater Soil Sediment Other medium - Describe: _____

Date of Collection: _____

A copy of the closure letter and submittal materials

Draft tax cancellation agreement

Draft agreement for assignment of tax foreclosure judgment

Other report(s) or information - Describe: RAP dated November 19, 2021; BRRTS # 02-41-560505

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

Yes - Date (if known): _____

No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at: dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf.

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

Form 4400-237 (R 9/15)

Page 7 of 8

Section 7. Certification by the Person who completed this form

I am the person submitting this request (requester)

I prepared this request for: The Mandel Group
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Rick Fucini
Signature

11/18/21
Date Signed

consultant
Title

(414) 228-9815
Telephone Number (include area code)



November 19, 2021

Mr. Greg Michael
Wisconsin Department of Natural Resources
1027 West St. Paul Avenue
Milwaukee, WI 53233

RE: Remedial Action Plan for the SoNa Property (6633-6639 W. National Avenue - Parcel 705) Located in West Allis, Wisconsin — FEC Project No. 210807; DNR BRRTS No. 02-41-544080

Dear Mr. Michael:

Friess Environmental Consulting, Inc. (FEC) submits this letter to present a remedial action plan (RAP) to achieve site closure for the proposed South of National Avenue (SoNa) Property in West Allis, Wisconsin (the Site). This letter briefly describes the project background and sampling activities, summarizes the results of field and analytical testing for the SI activities, and presents our planned remedial actions to achieve closure of the Site. The RAP includes the construction of a 110-unit apartment complex with first floor retail, underground parking, at grade parking and access drives, outdoor patio and pool, and retail terrace. Three other lots are proposed for future retail and commercial development.

Project Description

The Site is situated at the southwest corner of the intersection of West National Avenue and South 66th Street in the City of West Allis. The Site is approximately 6.53-acres and currently vacant with asphalt paved areas on the northeast, northwest, and southeast portions of the Site. The remainder of the Site consists of vacant grass covered land with fill piles on the north-central portion of the Site. Storm sewer manholes were observed on the southern portion of the Site. The grade of the subject property slopes downwards from the north to the south with the asphalt areas being of higher elevation. The Site is illustrated on Figures 1 and 2.

The Site appears to have been developed dating back to at least 1910. Historically the Site has been utilized as a lumber yard, a coal yard, salvage yard, bulk plant, filling station, concrete block factory, steel fabricator, and for grinding and machining. Approximately five buildings were present on the northeastern portion, three buildings on the northwestern portion, and three buildings and three railroad spurs on the south-central portion of the Site dating back to at least 1937. Additions to three existing buildings were constructed between 1937 and 1951

and portions of other buildings were removed between 1951 and 1971. The south-central buildings were removed and replaced with a large building between 1971 and 1976 with all the buildings having been removed from the Site by 2005, except for the northwestern building, which was removed between 2005 and 2010. A large excavation area was observed in the northwestern portion with filling and grading activities apparent across the southern portion of the Site in 2005. The western, east central, and northeastern portions of the site were graded and paved in 2013 with filling and grading activities apparent across the central portion of the Site in 2018-19.

The Site (6633 - 6639 W. National Avenue – Parcel 705) is listed as a DNR Brownfield site with an approved historic fill construction exemption, on the DNR AST/UST database as having had a 6,000-gallon fuel oil UST removed from the Site on June 17, 2004, two 300-gallon USTs and a 500-gallon UST removed from the Site on May 12, 2005, and as an open DNR ERP site having soil and groundwater impacts from chlorinated solvents, VOCs, and petroleum. In addition, the Site is also listed as having been utilized to manage materials from the north adjoining property in 2018-19. The Site (6616 W. Mitchell Street – Milwaukee Ductile Iron Parcel 4) is listed as a closed DNR ERP site having soil and groundwater impacts from VOCs, PAHs, and lead and closed on January 28, 2016, with continuing obligations.

Description of Site SI Sampling and Activities

Historical soil and groundwater sampling have been conducted on the site dating back to approximately 2000. A remedial action plan was reviewed and approved by the DNR in May 2012 for a project similar to the project now proposed. The approved RAP included on site management of the soil and subsequent capping as part of the development. As requested by the DNR, FEC has completed this updated RAP to re-evaluate the current site conditions and development plans including the historic SI results and soils management activities that have occurred on the site. The scope and timeline of the investigative and remedial activities taken at the Site is outlined below.

Initial Investigation and Remediation (Petroleum)

A service station and fuel storage and supply facility (Cities Fuel & Supply Company) was in the northwestern area of the site. Leakage from a closed in-place 8,000-gallon gasoline UST near the west side of the building formerly located at 6633 - 6639 West National Avenue was investigated and remediated between 2002 to 2006. The contaminant plume had extended to the south and west toward the railroad ROW.

The initial SI included collecting soil and groundwater samples from twenty-nine soil borings (SB-1 to SB-24 and E-1 to E-5) and the installation of nine groundwater monitoring wells (MW-1 to MW-9) that focused on the former petroleum area. Based on the site conditions and proposed site redevelopment plan at the time, excavation of contaminated soil with off-site disposal was selected as the most cost-effective remedial option for the northwestern area of the site. As such, the first phase of soil excavation and removal from the site was conducted in April 2005 concurrent with demolition of the buildings in the south-central part of the site. Approximately 10,077 tons of petroleum contaminated soil were excavated from the northwestern area of the site over a one-week period in late April 2005. Samples were collected from a depth of approximately 11 feet bgs at the base of the excavation in April and June 2005 ("Excavation Bottom" 1 and 2 samples, as well as "Mid, N. End, NE, and Mid S").

As part of the backfill for the excavation, a composite sample of soil fill from a construction project elsewhere in the City of West Allis was collected and analyzed for potential contaminants ("off-site" sample in Tables) prior to placement of the fill in the completed excavation. The analytical data indicates the fill contained low levels of several PAH compounds, arsenic, and lead. The quantity of this fill was approximately 300-400 tons (200-250 cubic yards). It was placed in the bottom of the south end of the excavation from approximately 8 to 10 feet bgs. The remainder of the excavation was backfilled with clean, imported fill.

In April and May 2006, the remaining buildings were demolished. Following demolition, the second phase of the soil excavation was completed. The excavation extended west from the west wall of the original excavation and was completed to remove the farthest downgradient residual petroleum soil contamination. Approximately 1,454 tons of petroleum impacted soil were removed and disposed of at a licensed sanitary landfill. Samples were collected from a depth of approximately eight feet bgs at the walls of the excavation (EX-1 to EX-9). The soil sampling confirmed that successful remediation was conducted. The results of the soil and groundwater sampling in the petroleum area are included on the Tables and sampling locations shown on Figure 3. The areas of excavation associated with these activities are shown on Figure 4.

Subsequent Investigation (Fill Material)

Shallow fill and native soils at the Site are primarily silty clay. Due to the industrial history of the Site, shallow fill is present across the Site. The fill typically consists of mixtures of clay, silt, and sand, and occasionally includes debris such as brick,

concrete, and wood. Slag and cinder-like materials, foundry sand, and fly ash are also present in some locations. The historic fill was investigated in 2006.

The SI associated with the historic fill and operations of the site included collecting soil and groundwater samples from twenty-eight additional soil borings (SB-25 to SB-52) across the Site.

Low level VOC impacts are limited (only two detections) in the fill material on the Site.

PAH contaminants in shallow soil fill are widely distributed throughout the site, except in the southeast corner of the site, and the area of the completed soil excavations (northwest area of the site), which were backfilled with clean, imported fill. PAH contamination is confined to the top five feet. This zone consists primarily of soil fill with varying amounts clay, silt, sand, gravel, and foundry sand.

The only RCL exceedances for metals remaining on the site are for arsenic and lead. The arsenic RCL exceedances are widespread throughout the shallow soil fill but are considered background (less than 8 mg/kg). Most of the exceedances of lead were detected on the northeast portion of the Site. The analytical results of the soil sampling for the historic fill are included on the Tables and sampling locations shown on Figure 3.

Proposed Redevelopment Sampling

Redevelopment of the property was originally planned to begin in 2012. In April 2012, four soil boring/temporary groundwater monitoring wells (TW-1 to TW-4) were drilled and installed to a depth of 15 feet bgs around the perimeter of the petroleum soil excavation in the northwest part of the site. Soil and groundwater samples were collected to determine residual contaminant levels around the perimeter of the excavation and to evaluate the need for any further groundwater monitoring at the site.

Depth to groundwater ranged between 2-7 ft bgs and generally flows to the southwest. Groundwater is likely perched in the fill soils present on the site. Low levels of residual petroleum impacts were noted in the soil and groundwater samples collected at TW-3. The analytical results of the soil and groundwater sampling are included on the Tables and sampling locations shown on Figure 3.

A remedial action plan (RAP) was submitted in May 2012 and conditionally approved by the DNR in July 2012 for a project similar to the project now proposed.

Redevelopment Soil Management

In 2012, as part of the proposed redevelopment and above-mentioned approved RAP, site grading and utility work was initiated that included defined areas of excavation for building pads, a retention basin, and utility installation on the central portion of the Site. These excavated soils were fully retained on the Site and placed under two separate asphalt parking lots on the east and west sides of the Site. The proposed redevelopment that was to make use of these improvements did not move forward, and no other soil disturbance occurred. No excess spoils were generated, and no soils were removed from or brought onto the Site in conjunction with this phase of activity. The areas of excavation and deposition associated with these activities are shown on Figure 5.

Off-site Investigative Sampling

A Phase I Environmental Site Assessment (ESA) of the south and west adjoining properties and southeast portion of the property was completed in September 2012 and indicated the southeast portion of the Site was first developed for manufacturing activities in about 1910. A subsequent Phase II ESA indicated impacts and the site was reported to the DNR (BRRTS No. 02-41-560505 – Ductile Iron Parcel 4). Additional site investigation was conducted in 2013 and 2015 that included six soil borings/temporary groundwater monitoring wells (GP-25 to GP-27 and GP-52 to GP-54) and installation of one groundwater monitoring well (MW-6).

Concentrations of PAHs were detected in shallow soil samples collected from GP-52 and GP-54, located on the southern property boundary of the Site, but were not detected in the deeper soil samples from these sampling locations. The shallow PAHs are anticipated to be associated with the fill materials encountered on the Site. In addition, VOC impacts were detected in deeper soil and groundwater samples collected from GP-25 and MW-6. The VOC constituents are likely migrating on to the Site from an off-site location. The former Ductile Iron Parcel 4 portion of the Site was submitted for closure in November 2015 and closed by the DNR with maintenance of the existing cap in January 2016. The analytical results of the soil and groundwater sampling are included on the Tables and sampling locations shown on Figure 3.

Imported Soil Management

As part of the remediation and redevelopment of the north adjoining former Pressed Steel property (BRRTS No. 02-41-385114) located across National Avenue, the Site was approved by the DNR to accept material generated during the construction project (BRRTS No. 15-41-580964). In 2018, approximately 10,225 cubic yards of soil were excavated from the former Pressed Steel property and stockpiled on the north-central portion of the Site. These soils were from areas with contaminant concentrations that did not exceed the non-industrial direct contact RCLs. Approximately 4,600 cubic yards of the stockpiled material was transported back to the former Pressed Steel property for use as cover material. As such, approximately 5,625 cubic yards of soil remain on the Site associated with these soil management activities. The area of soil deposition associated with these activities are shown on Figure 6.

Soil Sample Analytical Results

Subsurface information collected indicates that fill containing varying amounts of clay, silt, sand, gravel, wood, brick, concrete, slag, cinders, foundry sand, and fly ash extends to depths between 2 and 5 feet bgs. Beneath the fill is native silty clay. Soil samples were collected from across the Site and submitted for laboratory analysis of VOCs, PAHs, and RCRA metals.

The soil analytical results are discussed below and are summarized on Tables 1 through 3.

VOC Sampling

Sixty-five soil samples were collected and submitted for laboratory analysis of VOCs. The analytical results indicate that the highest VOC impacts were PVOCs located near the former petroleum USTs on the northwestern portion of the Site. PVOC impacts at SB-1 to SB-8, SB-13, E-2 and E-3, and MW-1 to MW-9 were removed to a depth of approximately 11 feet bgs during the remedial excavations. Based on the post-excavation sampling there are some residual PVOC impacts remaining (E-1, SB-24, Excav Bottom 1, EX-1, EX-3, EX-8, and TW-3) in and around the former excavation; however, none of the PVOCs exceed their NR 720 residual contaminant levels (RCLs) for direct contact. The CVOCs (PCE and TCE) were detected above their NR 720 RCLs for the protection of groundwater at SB-19 and SB-22; however, the concentrations are low and limited in area. In addition, 1,1,1-TCA was detected above its NR 720 RCLs for the protection of groundwater on the former Ductile Iron Parcel 4 portion of the Site at GP-25 and MW-6. The concentrations are present below the

water table and therefore would not be considered soil impacts, limited in area, and the DNR concurred are from an off-site source. The extent of the remaining VOC impacts is shown on Figure 7.

PAH Sampling

Fifty-five soil samples were collected and submitted for laboratory testing of PAHs. Several PAHs were detected above their NR 720 RCLs for non-industrial direct contact and the protection of groundwater at SB-24, SB-25, SB-33, SB-38, SB-40, SB-41, SB-44, SB-45, GP-52, and GP-54. Several PAHs were detected above their NR 720 RCLs for the protection of groundwater at SB-19, SB-31, SB-37, and SB-42. No PAHs were detected above their industrial direct contact RCLs. The PAH non-industrial direct contact RCLs were evaluated using the WDNR-approved cPAH calculator for the seven carcinogenic PAHs. This calculated risk is compared to a risk level of 5×10^{-6} ; if the calculated risk is less than 5×10^{-6} , these seven carcinogenic PAHs are considered to not pose a risk from non-industrial direct contact. The calculations are attached, and the extent of the remaining PAH impacts is shown on Figure 8.

RCRA Metals Sampling

Thirty soil samples were submitted for laboratory analyses of RCRA metals. Arsenic was detected above its NR 720 RCLs for direct contact and groundwater protection in soil samples collected from across the Site; however, the concentrations are all below the USGS background concentration and would be considered background. Barium was detected above its RCL for the protection of groundwater at only one location (SB-3-704). Cadmium was only detected above its RCL for the protection of groundwater at two locations (SB-20 and SB-22) with only the sample from SB-20 above the USGS background concentration. Lead was detected above its RCL for direct contact at one location (SB-3-704) and above its RCL for the protection of groundwater at SB-19, SB-42, SB-48, SB-52, GP-26, and GP-27; however, the concentrations are all below the USGS background concentration except for SB-48 and GP-26. Selenium was only detected above its NR 720 RCL for the protection of groundwater at SB-3-704 and SB-22. Silver was detected above its RCL for the protection of groundwater at only one location (SB-22). Chromium and mercury were not detected at concentrations above their RCLs. The extent of the remaining metals impacts is shown on Figure 9.

The soil analytical results indicate that the soil impacts are adequately defined in soil at the Site.

Groundwater Evaluation

To evaluate groundwater quality nine groundwater monitoring wells (MW-1 to MW-9) were installed in March 2003 that focused on the former petroleum area. Depth to groundwater ranged between 1.7 to 6.75 ft bgs and groundwater generally flows southwest. Elevated levels of PVOCs above enforcement standards (ESs) were detected in MW-3, MW-5, MW-6, MW-7, MW-8, and MW-9. PAHs above their preventive action limits (PALs) were detected in MW-4, MW-5, and MW-6. Dissolved metals above their PALs were detected in MW-1, MW-4, MW-5, and MW-6. As discussed above, in 2005-2006 approximately 11,500 tons of petroleum impacted soils were excavated and disposed of at a licensed landfill from this area. All the groundwater monitoring wells were removed during the excavation. In addition, approximately 3,000-gallons of groundwater was pumped and disposed in the sanitary sewer through an MMSD permit. Soil sampling confirmed that successful remediation was conducted.

Four temporary groundwater monitoring wells were subsequently installed in April 2012 at the perimeter of the former petroleum excavation to confirm successful source removal was accomplished. A low level of benzene (10.1 ppb) at TW-3 was the only PVOC detection above the DNR groundwater quality standards. Three PAHs were detected at TW-3 at levels above their DNR groundwater quality standards. The groundwater investigation was deemed to be complete, and the temporary wells were approved for abandonment as part of the remedial action plan approval in May 2012.

Additional site investigation was conducted on the south end of the Site associated with the former Ductile Iron Parcel 4 site in 2013 and 2015 that included six soil borings/temporary groundwater monitoring wells (GP-25 to GP-27 and GP-52 to GP-54) and installation of one groundwater monitoring well (MW-6).

Low concentrations of the VOCs 1,1-dichloroethylene (1,1-DCE) and 1,1,1-trichloroethane (1,1,1-TCA) were detected in groundwater samples collected from GP-25 and MW-6 at levels above their DNR groundwater quality standards. The VOC constituents were believed to be migrating on to the Site from an off-site location. The former Ductile Iron Parcel 4 portion of the Site was submitted for closure in November 2015 and closed by the DNR with maintenance of the existing cap in January 2016. The groundwater analytical results are summarized on Tables 4 through 6 and the extent of the remaining groundwater impacts is shown on Figure 10.

Based on the groundwater analytical results, the residual soil impacts are not adversely impacting the groundwater beneath the Site, and the groundwater investigation is complete. A NR 140 PAL/ES exemption will likely be required for closure of the Site. The areas of residual groundwater impacts are within the area proposed for site grading/capping and will present no risk to the Site.

SI Conclusions

Based on the field observations and available laboratory data, the soil impacts appear to be adequately defined and are not adversely impacting the perched water at the Site. Further, the detected concentrations are all relatively low, given the history of the Site.

Consistent with our previous discussions, the most feasible method to achieve closure for the Site includes installation of a cap to mitigate residual direct contact issues across the entire Site and limit precipitation infiltration through the impacts, registration on the soil and groundwater Geographic Information System (GIS) databases, and implementation of a cap maintenance plan (CMP). The following section identifies the proposed remedial action for the Site and closure strategy.

Remedial Action Plan

Phase I of the project will include the development of Lot 2 with the construction of a 110-unit apartment complex with underground parking, first floor retail, at grade parking and access drives, outdoor patio and pool, and retail terrace. Three other lots are proposed for future retail and commercial development. Information of the proposed development is included in Appendix D.

The majority of the soils management during development will occur with the construction of the underground parking lot, bioretention area and foundations for the future buildings. The impacted soils removed will be relocated on site and capped as part of the development. A copy of the grading plan is included in Appendix D.

This RAP includes construction of the buildings, underground parking and surface parking lots and access drives, the pool deck area, and landscaped areas to cap the entire Site and address potential risk. Clean soil and topsoil are present on the site and will be used as capping material. The RAP will be implemented under the Soils Management Plan (SMP) and Contingency Plan described in this section.

Post-closure Modification for BRRTS No. 02-41-560505

As discussed above, the investigation and closure were completed on the former Ductile Iron Parcel 4. As part of the former Ductile Iron Parcel 4 closure a CMP was prepared and approved by the DNR to maintain the existing asphalt cap. No disturbance of the underlying soil impacts is proposed as part of the redevelopment; however, the former Ductile Iron Parcel 4 site is being redeveloped as part of the larger overall Site. Per DNR guidance RR 987 this post-closure modification would appear to fall into Category 4, which involves combining multiple sites or properties. The Ductile Iron Parcel 4 site capped continuing obligation remains in effect, and we intend to replace the existing cover with no soil removal/disturbance. The proposed RAP involves capping the shallow impacts in place, and as such will require placement of the Site on the DNR's soil GIS and implementation of a CMP. Following completion of the redevelopment, a revised GIS Registry and CMP for the Site (including the former Ductile Iron Parcel 4 site) will be prepared and submitted to the WDNR. We trust the information provided herein is sufficient for the WDNR to approve the Post-Closure Modification request for the recapping with a future building and clean fill in the landscaped areas.

Construction Exemption (Ch. NR 506.085 Wisconsin Administrative Code)

The DNR previously provided an exemption per Ch. NR 506.085 Wisconsin Administrative Code (WAC) for development on a historic fill site ("construction exemption") for the Site (BRRTS No. 07-41-558710) in July 2012. The fill observed at the Site and documented on the boring logs is inert in composition and does not generate methane. As indicated earlier, the underground parking structure will be vented to comply with applicable regulations. FEC will be submitting an updated exemption to include current site conditions and development plans.

NR 718 Exemptions

FEC requests that the DNR grant a written exemption to the location criteria requirements of Ch. NR 718.12(1)(c)5 WAC regarding placement of contaminated soil within three feet of the high groundwater level. As indicated earlier, the depth to groundwater ranged between 2 to 7 ft bgs but likely represents perched water conditions. This exemption is requested to allow on-site placement of low-level impacted soil at or near the central portion of the site that is proposed for parking and landscaped areas. This request is based on the widespread shallow fill related impacts, including PAHs, lead, and arsenic, which exist throughout the Site and the proposed activities at the Site.

Soils Management Plan (SMP)/Capping

Erosion control consisting of the following will be implemented prior to and during soil excavation, handling, and management activities at the Site.

- Obtain all necessary City of West Allis permits relating to erosion control, and stormwater management.
- Erosion control measures will be implemented and maintained at the Site.
- In the unlikely event that conditions are encountered that may be uncharacteristic of those which have been previously documented at the Site, this SMP identifies a contingency protocol for additional evaluation outside the typical soils management procedures.
- Concrete or asphalt rubble, wood, and other miscellaneous debris that may be encountered and deemed unsuitable or non-recyclable will be transported off-site for proper disposal.

Based on the site characteristics, excavation is required at the Site for construction purposes for the proposed buildings at the Site. The excavation of building foundations and underground parking and general site grading will likely encounter historic fill, which will be managed on site by consolidation under drives, parking areas, or on the central portion of the property beneath the pool deck, landscaped areas, and the parking lot. The Site will be graded to direct storm water to stormwater collection basins and subsequently the stormwater retention area to be constructed in the southwestern portion of the site. Following placement of the soils to rough grades, the drives and parking areas will receive pavement, landscaped areas will receive approximately 18-inches of clean fill, topsoil, and landscaping. Figure 11 illustrates the development plan for the Site. As the figure indicates, the entire Site will be covered with either the buildings, paved parking areas, or landscaped grassy areas. Consolidation of materials and installation of the barrier(s) will be documented per the requirements of the construction exemption, and the applicable requirements of Ch. NR 718 WAC. Excavation within areas of known impacts will be conducted for cap installation purposes and contamination may remain in place after excavation.

Soil Disposal Contingency Plan

Off-site disposal of materials will be minimized. The paved areas will provide the necessary direct contact mitigation, and the landscaped areas will be capped by 18-inches of clean fill and imported clean topsoil. The proposed RAP involves capping the shallow impacts in place, and as such will require placement of the

site on the DNR's soil GIS and implementation of a CMP. The capping will be conducted to achieve closure for the Site immediately following construction.

Upon completion of Site grading activities, off-site disposal may be necessary as part of the development to balance the Site. As such, FEC requests that the DNR grant a Ch. NR 718.12 WAC approval for approximately 2,000 cubic yards (CY) of soil for potential removal from the Site for off-site disposal at a contractor's disposal site. The soils for potential removal are the capping soils that were reviewed by the DNR and approved to be placed on the SoNa property from the neighboring former Pressed Steel development (DNR BRRTS # 15-41-580964). As discussed above, approximately 5,625 cubic yards of soil remain on the Site associated with the former Pressed Steel soil management activities. If necessary, a portion of the remaining former Pressed Steel soils would be disposed of at the R&R excavating site located near the intersection of Highway 60 and Highway I in the Town of Cedarburg.

The R&R excavating site meets the locational criteria outlined in Ch. NR 718.12(1)(c) WAC. The soils placed at the R&R Excavating site have not been and will not be located within a floodplain; within 100 feet of any wetland or critical habitat area; within 300 feet of any navigable river, stream, lake, pond, or flowage; or within 100 feet of any on-site water supply well or 300 feet of any off-site water supply well. In addition, soils will not be placed within three feet of the groundwater table. Information related to the R&R excavating site as it relates to the Ch. NR 718.12 locational criteria has been previously provided to and approved by the DNR. Any off-site soil disposal will be fully manifested and documented.

Contingency Plan

The Site has been well characterized through the SI activities conducted within the area where excavation is planned, and there are no known USTs or buried drums located at the Site. In the unlikely event that conditions are encountered that may be uncharacteristic of those which have been previously documented at the Site, this SMP identifies a contingency protocol for additional evaluation outside the typical soils management procedures. The contingency procedures are designed to remain consistent with the RAP and closure approach, identify interim actions to be conducted to minimize delays in site work, and properly manage non-exempt solid wastes. The contingency procedures are designed to track the elements of an "interim action" under Wis. Adm. Code Ch. NR 708.11. The following procedures will be followed if the Contingency Plan is implemented:

A. USTs

- Contact and coordinate with a certified UST remover/cleaner.
- Assess whether a release has occurred.
- Inform the DNR in the event of a confirmed release.
- The certified remover/cleaner will conduct the closure of the UST in accordance with Wis. Adm. Code Ch. Comm 10:
 - Notify the appropriate agency for inspection.
 - Coordinate with a licensed subcontractor to remove, transport, and dispose surplus product or water contained within the UST.
 - Properly inert, remove, cut, clean, and dispose of the UST (recycle as scrap metal).
 - Coordinate with a licensed subcontractor to transport and dispose of tank sludges.
- Collect confirmation samples for PID or laboratory analyses as appropriate.
- Apply any additional laboratory results to this RAP to evaluate whether the area is required to be incorporated into the closure strategy.
- Register the UST with the Wisconsin Department of Commerce.

B. Drums

- The excavation contractor will remove any intact drums encountered and stage them on site pending laboratory analyses.
- Sample the drum contents for laboratory analyses at a Wisconsin-Certified laboratory for characterization.
- Collect confirmation samples for PID or laboratory analyses as appropriate.
- Amend landfill profiles as needed per the laboratory characterization.
- Coordinate proper disposal of the drum contents and any excavated materials associated with the drums per the laboratory characterization.

C. Additional Impacted Soils (Uncharacteristic of the SI)

- Characterize impacted soils based on field indications such as free product, obvious solvent odors, etc.
- Collect a sample of the impacted soils for characterization analyses, if necessary, based on the field analyses.
- Apply any additional laboratory results to this RAP to evaluate whether excavation is warranted or if the area can be incorporated into the closure strategy as is.
- If excavation is conducted, collect confirmation samples after completion of excavation.
- Incorporate excavated soils into development plan and closure strategy if possible.
- Update the landfill profile with new analytical results.
- Coordinate and document landfill disposal if warranted.

FEC will inform the DNR before any soils are removed, upon discovery of any drums or USTs, or if it becomes necessary to implement any part of the above contingency plan. The contingency plan includes characterizing the soils in place for additional parameters deemed necessary based on the field observations made at that time. The characterization may include field screening and additional laboratory analyses. Soils will require excavation based on the construction schedule and will be stockpiled on site in accordance with ch. NR 718 until construction is complete. Stockpile areas primarily include the areas in the southern and central portions of the Site as shown on Figure 12. If warranted, excavation may be conducted under item "C" of this Contingency Plan and confirmation samples will be collected; however, contamination may remain within the area following the excavation. The purpose of the confirmation samples will be to document the soil conditions at the time and obtain current information for the closure request. The impacts remaining on site will be capped and documented as part of the closure approach for the Site.

Vapor Intrusion

Vapor samples have not been collected from the Site to evaluate the potential for volatile vapors to collect. There are known areas of residual VOC soil impacts present beneath the proposed Phase I apartment complex that could potentially lead to the off gassing and accumulation of volatile vapors. The underground parking structure beneath the proposed Phase I apartment complex will be actively vented; therefore, a vapor barrier is not necessary beneath the parking structure. However, any stairwells and elevator shafts will be sealed with a vapor barrier to prevent potential vapors from migrating upward into the residential portion of the building. The proposed vapor barrier will consist of 30-mil thick polyethylene geomembrane or equivalent approved by the DNR. Filter fabric, fine sand, or other equivalent material shall be placed over the vapor barrier for protection. All penetrations and seams shall be sealed and/or welded, as necessary. The vapor barrier will not contain a passive venting system.

Case Closure

FEC will prepare the results of the capping and soil management activities in a RAP implementation report and subsequent closure request for DNR review and approval. The report and closure request will include a chronology of events, photographs of the development process, any updated analytical results, and appropriate information for closing the site with the proposed institutional controls (soil and groundwater GIS and CMP).

Conclusions and Recommendations

A comprehensive evaluation of the potential environmental issues and appropriate remedial actions for closure of the Site has been conducted. The remedial approach proposed in this report is consistent with the Site use and is protective of human health, welfare, and the environment.

Please review this report and provide your concurrence of the RAP, requested exemptions, and subsequent path to case closure for the Site contingent on the completion and documentation of the capping.

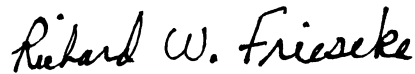
Thank you for your timely assistance with this project. The technical assistance form (4400-237) is included and the review fee of \$1,050 has been paid to the DNR. If you have any questions or comments regarding this report, please call us at (414) 228-9815.

Respectfully,

Friess Environmental Consulting, Inc.



Trenton J. Ott
Project Manager



Richard W. Frieseke, P.E.
President

Attachments

cc: Mr. Robert Monnat; Mandel Group
210807 RAP

Project Contacts

Development

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DNR BRRTS No. 02-41-544080

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Walbec Group
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Waukesha, WI 53188
(262) 442-1585

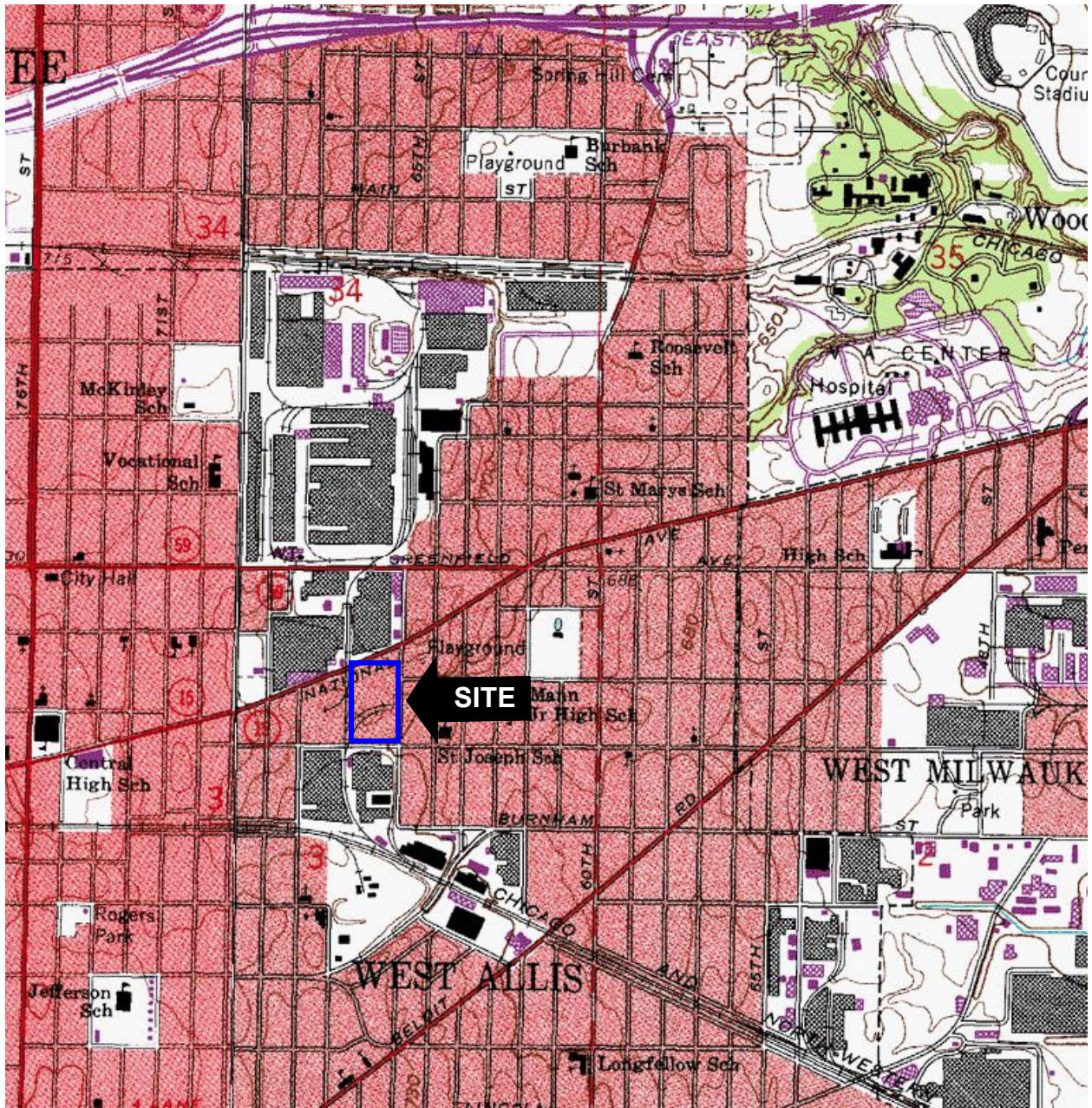
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Friess Environmental Consulting, Inc.
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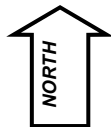
Mr. Greg Michael
Wisconsin Department of Natural Resources
1027 West St. Paul Avenue
Milwaukee, WI 53233
(414) 405-1203

APPENDIX A FIGURES

- 1.) Figure 1 – Vicinity Diagram
- 2.) Figure 2 – 2020 Site Aerial Diagram
- 3.) Figure 3 – Detailed Site Diagram
- 4.) Figure 4 – 2005 Excavation Diagram
- 5.) Figure 5 – 2012 Soil Excavation and Deposition Diagram
- 6.) Figure 6 – 2018 Soil Management Diagram
- 7.) Figure 7 – Extent of Residual VOC Soil Impacts Diagram
- 8.) Figure 8 - Extent of Residual PAH Soil Impacts Diagram
- 9.) Figure 9 - Extent of Residual Lead Soil Impacts Diagram
- 10.) Figure 10 – Extent of Residual Groundwater Impacts Diagram
- 11.) Figure 11 – Development Plan and Cap Diagram
- 12.) Figure 12 – Development and Soil Staging Diagram



<p>Approximate Scale</p> <p>1" = 1,650</p>	<p>United States Geologic Society Topographic Map Milwaukee Quadrangle</p> <p>NW & SW 1/4 of NE 1/4 of Sec 3, T6N, R21E</p>	
	<p>Vicinity Diagram South of National Avenue (SoNA) Property West Allis, WI</p>	<p>Figure 1</p>



2020 Site Aerial Diagram
 South of National Avenue (SoNA) Property
 West Allis, WI

Figure
 2

South 66th Street




West National Avenue

West Mitchell Street

Property Line

Property Line

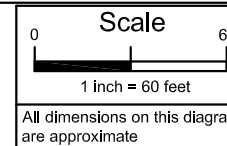
KEY

-  = SI monitoring well location
-  = SI boring location
-  = SI excavation sample location



File No.: 210807
 DWG Date: 10-24-21
 Rev Date:
 Drawn By: TJO
 Checked By (PM): TJO

Site Features Diagram
 Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin



Figure

3

South 66th Street

West National Avenue

West Mitchell Street




Property Line

Property Line

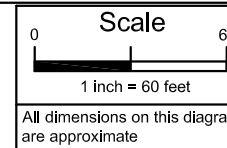
2005 and 2006
Soil Excavation
Area

2005 Soil Excavation Diagram
 Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin

KEY

-  = SI monitoring well location
-  = SI boring location
-  = SI excavation sample location

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Figure

4






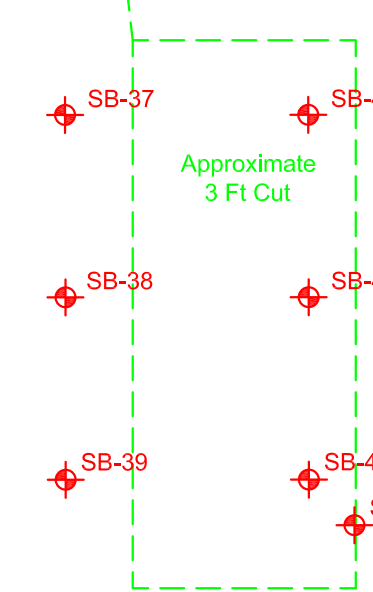
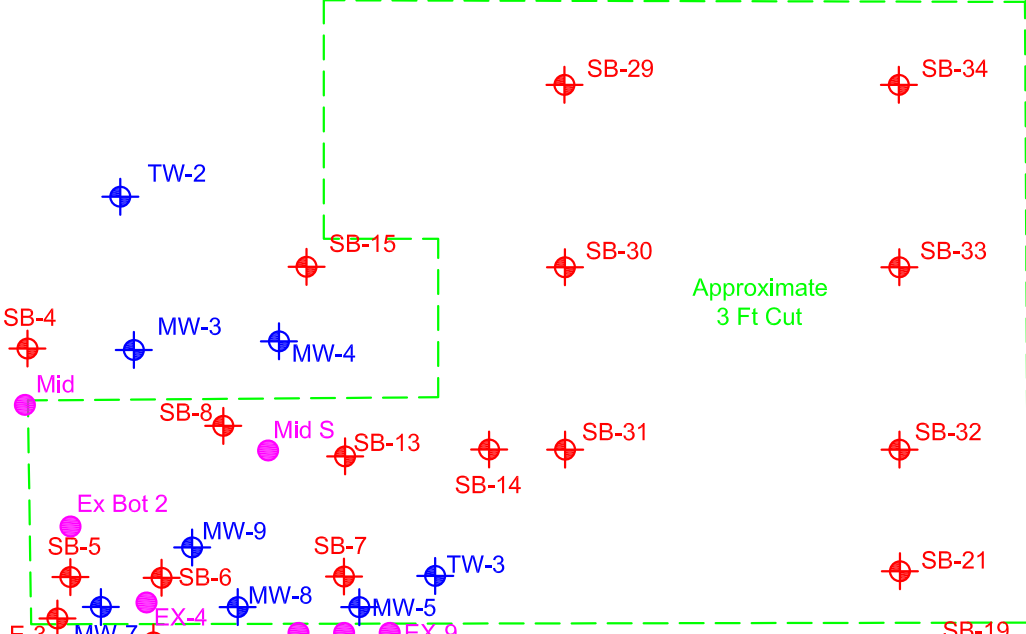
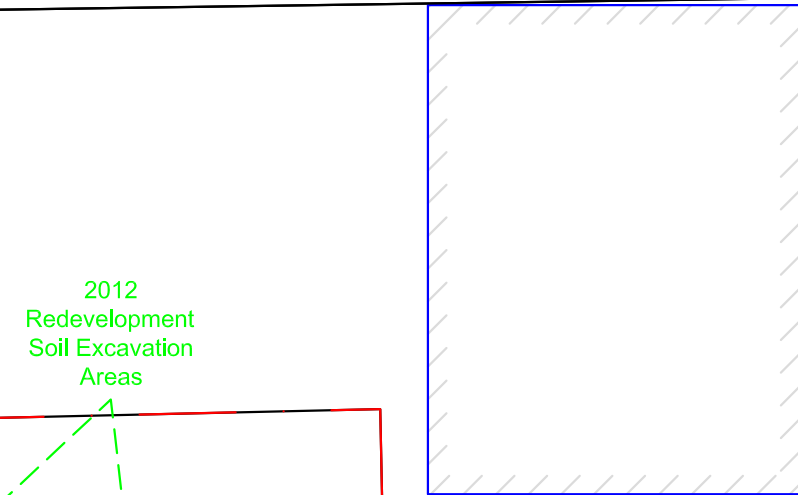
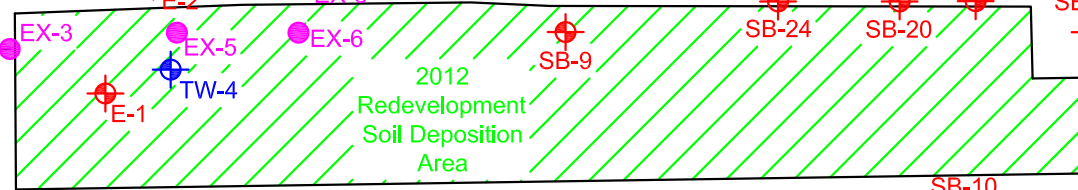
South 66th Street

West National Avenue

West Mitchell Street

KEY

-  = SI monitoring well location
-  = SI boring location
-  = SI excavation sample location



Property Line

Property Line



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2012 Soil Excavation and Deposition Diagram
 Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin

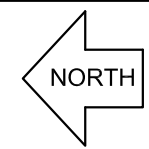
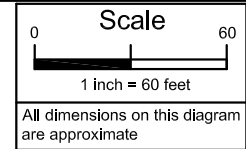


Figure
 5

South 66th Street




West National Avenue

West Mitchell Street

Property Line

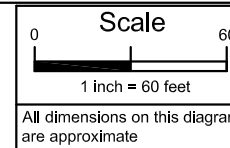
Property Line

KEY

-  = SI monitoring well location
-  = SI boring location
-  = SI excavation sample location

2018 Soil Deposition Area
Approximate 2 Ft. Lift

2018 Soil Management Diagram
 Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin



Figure

6



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South 66th Street

West National Avenue

West Mitchell Street

Property Line

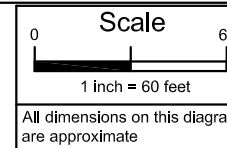
Property Line

KEY

- ▲ = SI monitoring well location
- ⊕ = SI boring location
- = Extent of residual VOCs

Extent of Residual VOC Soil Impacts Diagram

Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin



Figure

7



File No.: 210807
 DWG Date: 10-24-21
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South 66th Street




West National Avenue

West Mitchell Street

Property Line

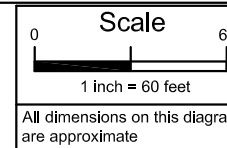
Property Line

KEY

-  = SI monitoring well location
-  = SI boring location
-  = Extent of residual PAHs

Extent of Residual PAH Soil Impacts Diagram

Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin



Figure

8



File No.: 210807
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South 66th Street




West National Avenue

West Mitchell Street

Property Line

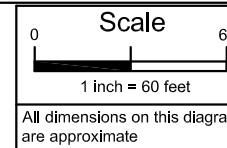
Property Line

KEY

-  = SI monitoring well location
-  = SI boring location
-  = Extent of residual Lead

Extent of Residual Lead Soil Impacts Diagram

Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin



Figure

9



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South 66th Street




West National Avenue

West Mitchell Street

Property Line

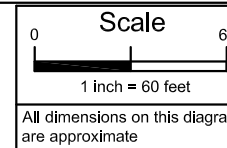
Property Line

KEY

-  = SI monitoring well location
-  = SI boring location
-  = Extent of residual GW Impacts

Extent of Residual Groundwater Impacts Diagram

Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin



Figure

10



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South 66th Street

West National Avenue

West Mitchell Street

Proposed Building






Proposed Building

Existing Building

Proposed Building

Proposed Building

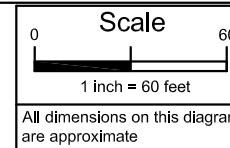
KEY

-  = SI monitoring well location
-  = SI boring location
-  = Concrete cap
-  = Asphalt cap
-  = Landscape cap



File No.: 210807
 DWG Date: 10-24-21
 Rev Date:
 Drawn By: TJO
 Checked By (PM): TJO

Development Plan and Cap Diagram
 Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin



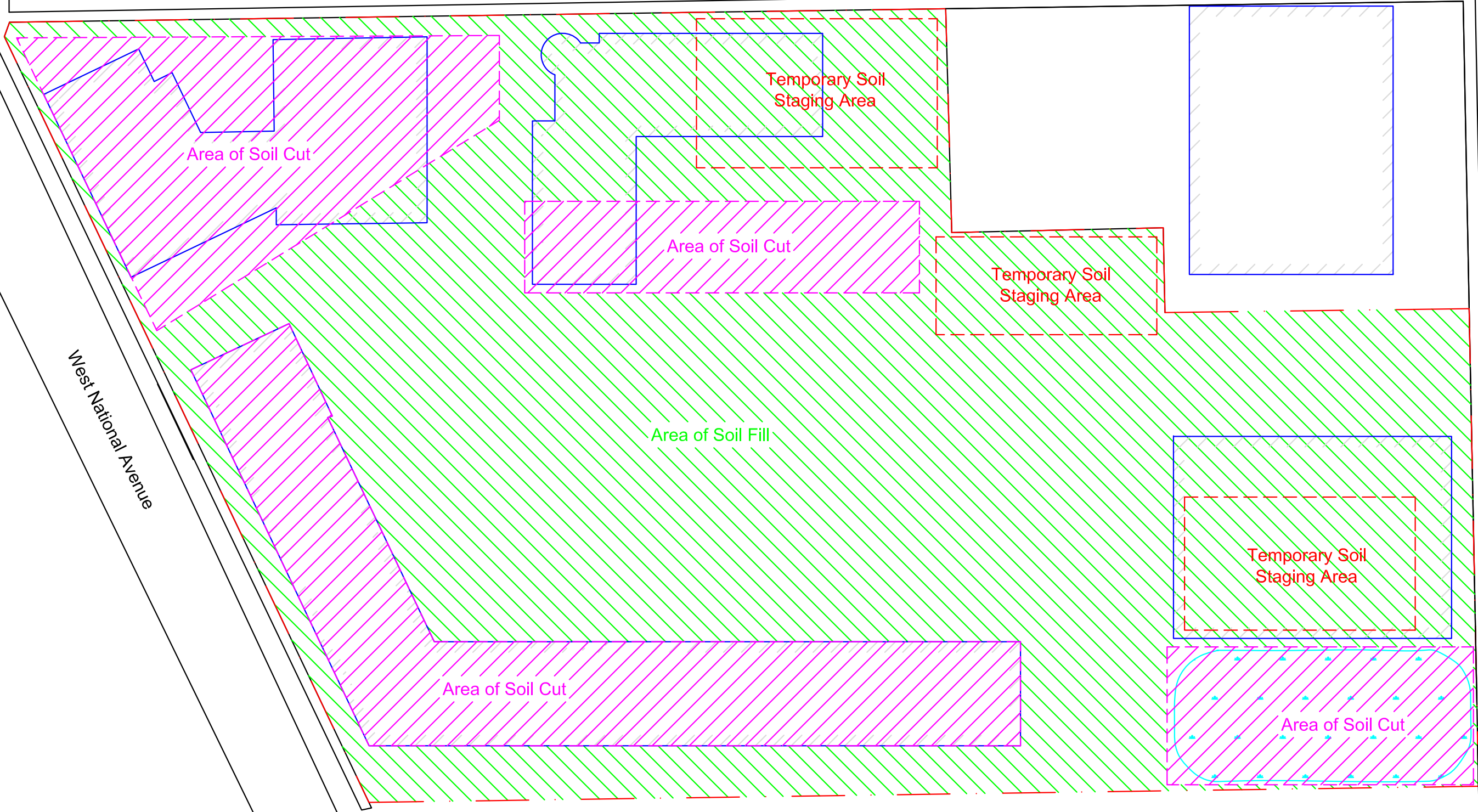
Figure

11

South 66th Street

West National Avenue

West Mitchell Street



File No.: 210807
 DWG Date: 10-24-21
 Rev Date:
 Drawn By: TJO
 Checked By (PM): TJO

Development and Soil Staging Diagram
 Parcel 705 - SoNa Property
 6633 - 39 W. National Avenue
 West Allis, Wisconsin

Scale
 0 60
 1 inch = 60 feet
 All dimensions on this diagram are approximate

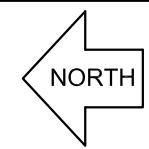


Figure
 12

APPENDIX B TABLES

- 1.) Table 1 – VOC Analytical Results – Soil Samples
- 2.) Table 2 – PAH Analytical Results – Soil Samples
- 3.) Table 3 – Metals Analytical Results – Soil Samples
- 4.) Table 4 – VOC Analytical Results – Groundwater Samples
- 5.) Table 5 – PAH Analytical Results – Groundwater Samples
- 6.) Table 6 – Metals Analytical Results – Groundwater Samples

Table 1- Soil VOC Analytical Results (Page 1 of 2)
Parcel 705 - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin

Sample Location	Sampling Date	Benzene (ppb)	Ethyl-benzene (ppb)	Methyl tert-butyl ether (ppb)	Naphthalene (ppb)	Tetra-chloro-ethene (ppb)	Toluene (ppb)	1,1,1-Trichloro-ethane (ppb)	Trichloro-ethene (ppb)	Combined Trimethyl-benzenes (ppb)	Total Xylenes (ppb)
SB-1: 4-8 FT	06/19/02	<u>6,100</u>	<u>22,000</u>	<25.0	<u>20,000</u>	<25.0	<u>1,400</u>	<25.0	<25.0	<u>48,000</u>	<u>53,000</u>
SB-2: 4-8 FT	06/19/02	<u>30.0</u>	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-3: 8-12 FT	06/19/02	[<u>13,000</u>]	[<u>41,000</u>]	<25.0	<u>19,000</u>	<25.0	<u>75,000</u>	<25.0	<25.0	<u>72,000</u>	<u>164,000</u>
SB-4: 8-12 FT	06/19/02	<u>1,000</u>	<u>2,200</u>	<25.0	<u>2,300</u>	<25.0	780	<25.0	<25.0	<u>3,300</u>	<u>5,000</u>
SB-5: 4-8 FT	06/19/02	<u>1,200</u>	<u>2,900</u>	<25.0	<u>1,700</u>	<25.0	400	<25.0	<25.0	<u>7,100</u>	<u>10,300</u>
SB-6: 8-12 FT	06/19/02	<u>280</u>	940	<25.0	<u>1000</u>	<25.0	100	<25.0	<25.0	700	800
SB-7: 0-4 FT	06/19/02	<25.0	<34.0	<25.0	190	<25.0	34.0	<25.0	<25.0	79.0	1,080
SB-8: 4-8 FT	06/19/02	<u>5,700</u>	[<u>44,000</u>]	<25.0	<u>27,000</u>	<25.0	<u>32,000</u>	<25.0	<25.0	<u>82,000</u>	<u>148,000</u>
SB-9: 4-8 FT	06/19/02	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-10: 4-8 FT	06/19/02	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-11: 8-12 FT	06/19/02	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-12: 0-4 FT	06/19/02	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-13: 4-8 FT	06/20/02	<u>180</u>	390	<25.0	350	<25.0	<25.0	<25.0	<25.0	480	420
SB-14: 4-8 FT	06/20/02	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-15: 4-8 FT	06/20/02	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-19: 1-2 FT	06/20/02	<25.0	<25.0	<25.0	48.0	<25.0	<25.0	<25.0	<u>31.0</u>	37.0	<50.0
E-1: 6-7.5 FT	07/16/02	<u>42.0</u>	34.0	NR	<25.0	NR	59.0	NR	<25.0	50.0 J	<50.0
E-2: 6-7 FT	07/16/02	<25.0	<25.0	NR	<25.0	NR	<25.0	NR	<25.0	<50.0	<50.0
E-3: 7-9 FT	07/16/02	<u>540</u>	100	NR	53.0	NR	31.0	NR	<25.0	58.0 J	96.0
E-4: 6-7 FT	07/16/02	<25.0	<25.0	NR	<25.0	NR	<25.0	NR	<25.0	<50.0	<50.0
E-5: 5-6 FT	07/16/02	<25.0	<25.0	NR	<25.0	NR	<25.0	NR	<25.0	<50.0	<50.0
SB-20: 3.5-4 FT	10/19/04	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-21: 2.5-4 FT	10/19/04	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-22: 1-4 FT	10/23/04	<25.0	<25.0	<25.0	<25.0	<u>41.0</u>	<25.0	<25.0	<25.0	<50.0	<50.0
SB-22:4-8 FT	10/23/04	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-22:9-10 FT	10/23/04	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-23:0.5-1.5 FT	01/05/05	<25.0	<25.0	<25.0	31.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-23:7-8 FT	01/05/05	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-24:2.5-4 FT	01/05/05	<25.0	61.0	<25.0	99.0	<25.0	<25.0	<25.0	<25.0	<u>8,710</u>	130
SB-24:7-8 FT	01/05/05	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
Excav Bottom 1 - 11 FT	04/22/05	<u>1,500</u>	<u>3,400</u>	<25.0	NA	NA	250	NA	NA	<u>3,170</u>	3,500
Excav Bottom 2 - 11 FT	04/22/05	<25.0	<25.0	<25.0	NA	NA	<25.0	NA	NA	<50.0	<75.0
Off-Site	04/22/05	<25.0	<25.0	<25.0	100	NA	65.0	NA	NA	56.0	113
Excav Mid - 11 FT	06/16/05	<25.0	<25.0	<25.0	NA	NA	<25.0	NA	NA	<50.0	<75.0
Excav N. End - 11 FT	06/16/05	<25.0	<25.0	<25.0	NA	NA	<25.0	NA	NA	<50.0	<75.0
Excav NE - 11 FT	06/16/05	<25.0	<25.0	<25.0	NA	NA	<25.0	NA	NA	<50.0	<75.0
Excav Mid S. - 11 FT	06/16/05	<25.0	<25.0	<25.0	NA	NA	<25.0	NA	NA	<50.0	<75.0
SB-46:2-4 FT	04/04/06	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
SB-47:1.5-2.5 FT	04/04/06	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<50.0
NR 720 Groundwater RCL		5.1	1,570	27	658	4.5	1,107	140	3.6	1,379	3,960
NR 720 Residential DC RCL		1,600	8,020	63,800	5,520	33,000	818,000	640,000	1,300	219K/182K	260,000
NR 720 Industrial DC RCL		7,070	35,400	282,000	24,100	145,000	818,000	640,000	8,410	219K/182K	260,000

Note: Only the detected compounds are presented.

Note: NR 720 values are calculated utilizing the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890 (updated December 2017).

Note: Concentrations that exceed their respective RCLs for the protection of groundwater are in *blue italics*.

Note: Concentrations that exceed their respective non-industrial RCLs for direct contact are underlined.

Note: Concentrations that exceed their respective industrial RCLs for direct contact are in [brackets].

Note "J" indicates estimated concentration above the level of detection but less than the level of quantification.

Table 1- Soil VOC Analytical Results (Page 2 of 2)
Parcel 705 - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin

Sample Location	Sampling Date	Benzene (ppb)	Ethylbenzene (ppb)	Methyl tert-butyl ether (ppb)	Naphthalene (ppb)	Tetrachloroethene (ppb)	Toluene (ppb)	1,1,1-Trichloroethane (ppb)	Trichloroethene (ppb)	Combined Trimethylbenzenes (ppb)	Total Xylenes (ppb)
EX-1: 8 FT	05/08/06	<u>37.0</u>	95.0	<25.0	138	NR	<25.0	NR	<25.0	128	<25.0
EX-2: 8 FT	05/08/06	<25.0	<25.0	<25.0	26.4	NR	<25.0	NR	<25.0	<50.0	<25.0
EX-3: 8 FT	05/08/06	<u>71.0</u>	<25.0	<25.0	<25.0	NR	<25.0	NR	<25.0	<50.0	<25.0
EX-4: 8 FT	05/08/06	<25.0	<25.0	<25.0	36.0	NR	<25.0	NR	<25.0	71.0	<25.0
EX-5: 8 FT	05/09/06	<25.0	<25.0	<25.0	<25.0	NR	<25.0	NR	<25.0	<50.0	<25.0
EX-6: 8 FT	05/09/06	<25.0	<25.0	<25.0	<25.0	NR	<25.0	NR	<25.0	<50.0	<25.0
EX-7: 8 FT	05/09/06	<25.0	<25.0	<25.0	<25.0	NR	<25.0	NR	<25.0	<50.0	<25.0
EX-8: 8 FT	05/09/06	<u>299</u>	<25.0	<25.0	29.3	NR	<25.0	NR	<25.0	<50.0	<25.0
EX-9: 8 FT	05/09/06	<25.0	<25.0	<25.0	<25.0	NR	<25.0	NR	<25.0	<50.0	<25.0
TW-1: 9 FT	04/05/12	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	NA	<50.0	<50.0
TW-2: 6.5 FT	04/05/12	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	NA	<50.0	<50.0
TW-3: 6-7 FT	04/05/12	<u>400</u>	249	NA	141	NA	111	NA	NA	223	486
TW-4: 6 FT	04/05/12	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	NA	<50.0	<50.0
Ductile GP-25: 2-3 FT	11/02/12	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	82.7	<25.0	<50.0	<75.0
Ductile GP-25: 7-8 FT	11/02/12	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<u>398</u>	<25.0	<50.0	<75.0
Ductile GP-26: 3-4 FT	11/02/12	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-26: 8-9 FT	11/02/12	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-27: 3-4 FT	11/02/12	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-27: 7-8 FT	11/02/12	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile MW-6: 7-8 FT	08/27/13	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<u>329</u>	<25.0	<50.0	<75.0
Ductile GP-52: 1-2 FT	04/01/15	<25.0	<25.0	<25.0	<40.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-52: 5-6 FT	04/01/15	<25.0	<25.0	<25.0	<40.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-53: 2-3 FT	04/01/15	<25.0	<25.0	<25.0	<40.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-53: 5-6 FT	04/01/15	<25.0	<25.0	<25.0	<40.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-54: 2-3 FT	04/01/15	<25.0	<25.0	<25.0	572	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
Ductile GP-54: 7-8 FT	04/01/15	<25.0	<25.0	<25.0	<40.0	<25.0	<25.0	<25.0	<25.0	<50.0	<75.0
NR 720 Groundwater RCL		5.1	1,570	27	658	4.5	1,107	140	3.6	1,379	3,960
NR 720 Residential DC RCL		1,600	8,020	63,800	5,520	33,000	818,000	640,000	1,300	219K/182K	260,000
NR 720 Industrial DC RCL		7,070	35,400	282,000	24,100	145,000	818,000	640,000	8,410	219K/182K	260,000

Note: Only the detected compounds are presented.

Note: NR 720 values are calculated utilizing the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890 (updated December 2017).

Note: Concentrations that exceed their respective RCLs for the protection of groundwater are in *blue italics*.

Note: Concentrations that exceed their respective non-industrial RCLs for direct contact are underlined.

Note: Concentrations that exceed their respective industrial RCLs for direct contact are in [brackets].

Note "J" indicates estimated concentration above the level of detection but less than the level of quantification.

Table 2 - Soil PAH Results (Page 1 of 2)
Parcel 705 - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin

Sample Location	Sampling Date	Acena-phthene (ppb)	Acena-phthylene (ppb)	Anthracene (ppb)	Benzo (a) anthra-cene (ppb)	Benzo (a) pyrene (ppb)	Benzo (b) fluor-anthene (ppb)	Benzo (g,h,i) perylene (ppb)	Benzo (k) fluor-anthene (ppb)	Chrysene (ppb)	Dibenzo (a,h) anthra-cene (ppb)	Fluor-anthene (ppb)	Fluorene (ppb)	Indeno (1,2,3-cd) pyrene (ppb)	1-Methyl Naph-thalene (ppb)	2-Methyl Naph-thalene (ppb)	Naph-thalene (ppb)	Phen-anthrene (ppb)	Pyrene (ppb)
SB-1 4-8 FT	6/19/2002	<210	<210	<170	<270	<300	<210	<410	<400	<190	<380	<210	<210	<350	2,400	5,300	<u>14,000</u>	130	<290
SB-19 1-2 FT	6/20/2002	<41.0	<42.0	38.0	93.0	110	120	100	100	<u>160</u>	<76.0	220	<41.0	<69.0	84.0	100	57.0	230	170
E-1: 6-7.5 FT	7/16/2002	<41.0	<42.0	37.0 J	<54.0	<59.0	<42.0	<82.0	<79.0	43.0 J	<76.0	89.0 J	<41.0	<69.0	73.0 J	85.0 J	68.0 J	160	84.0 J
SB-20 5-6 FT	10/19/2004	<41.0	<42.0	<34.0	<54.0	<59.0	<41.0	<82.0	<79.0	<38.0	<76.0	<42.0	<41.0	<69.0	<37.0	<72.0	<40.0	<20.0	<58.0
SB-22 1-4 FT	10/23/2004	<41.0	<42.0	<34.0	<54.0	<59.0	<41.0	<82.0	<79.0	<38.0	<76.0	<42.0	<41.0	<69.0	<37.0	<72.0	<40.0	<20.0	<58.0
SB-23 0.5-1.5 FT	1/5/2005	<41.0	<42.0	<34.0	71.0	64.0	96.0	<82.0	<79.0	102	<76.0	134	<41.0	<69.0	<37.0	<72.0	<40.0	128	143
SB-24 0.5-1.5 FT	1/5/2005	<41.0	<42.0	96.0	<u>1,520</u>	<u>1,500</u>	<u>1,860</u>	378	1,250	<u>1,800</u>	194	1,111	74.0	413	<37.0	<72.0	47.0	509	1,580
Off-Site	4/22/2005	<82.0	354	699	<u>1,550</u>	<u>1,420</u>	<u>2,140</u>	507	799	<u>1,610</u>	<u>194</u>	2,620	260	591	<74.0	<144	<80.0	<u>1,870</u>	2,420
SB-25 2-3 FT	3/13/2006	43.0	57.0	201	601	<u>539</u>	<u>913</u>	302	321	<u>549</u>	79.0	<u>1,400,000</u>	74.0	258	43.0	36.0	35.0	686	1,020
SB-25 6-7 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-26 4-5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-26 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	96.0	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-27 3.5-5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-27 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-28 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-29 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-30 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-31 4-5 FT	3/13/2006	<17.0	<19.0	16.0	95.0	71.0	264	81.0	64.0	<u>157</u>	21.0	172	<9.50	61.0	22.0	17.0	<17.0	111	141
SB-31 6-7 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-32 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-33 4-5 FT	3/13/2006	<17.0	48.0	51.0	395	<u>446</u>	<u>1,070</u>	332	272	<u>484</u>	104	806	32.0	239	97.0	87.0	81.0	525	553
SB-33 7-8 FT	3/13/2006	<17.0	<19.0	<11.0	15.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	11.0	29.0
SB-34 4-5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-34 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-35 0.5-1.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-35 4-5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-36 1-2 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-36 5-6 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
NR 720 Groundwater RCL		<i>*38,000</i>	<i>*700</i>	<i>196,949</i>	<i>*17,000</i>	<i>470</i>	<i>478</i>	<i>*6,800,000</i>	<i>*870,000</i>	<i>144</i>	<i>*38,000</i>	<i>88,878</i>	<i>14,830</i>	<i>*680,000</i>	<i>*23,000</i>	<i>*20,000</i>	<i>658</i>	<i>*1,800</i>	<i>54,546</i>
NR 720 Non-industrial DC RCL		<i>3,590,000</i>	<i>NS</i>	<i>17,900,000</i>	<i>1,140</i>	<i>115</i>	<i>1,150</i>	<i>NS</i>	<i>11,500</i>	<i>115,000</i>	<i>115</i>	<i>2,390,000</i>	<i>2,390,000</i>	<i>1,150</i>	<i>17,600</i>	<i>239,000</i>	<i>5,520</i>	<i>NS</i>	<i>1,790,000</i>
NR 720 Industrial DC RCL		<i>45,200,000</i>	<i>NS</i>	<i>100,000,000</i>	<i>20,800</i>	<i>2,110</i>	<i>21,100</i>	<i>NS</i>	<i>211,000</i>	<i>2,110,000</i>	<i>2,110</i>	<i>30,100,000</i>	<i>30,100,000</i>	<i>21,100</i>	<i>72,700</i>	<i>3,010,000</i>	<i>24,100</i>	<i>NS</i>	<i>22,600,000</i>

* indicates a suggested value.

Note: NR 720 values are calculated utilizing the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890 (updated December 2017).

Note: Concentrations that exceed their respective RCLs for the protection of groundwater are in *blue italics*.

Note: Concentrations that exceed their respective non-industrial RCLs for direct contact are underlined.

Note: Concentrations that exceed their respective industrial RCLs for direct contact are in [brackets].

Note "J" indicates slight detection above the level of detection but less than the level of quantification.

Table 2 - Soil PAH Results (Page 2 of 2)
Parcel 705 - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin

Sample Location	Sampling Date	Acena-phthene (ppb)	Acena-phthylene (ppb)	Anthracene (ppb)	Benzo (a) anthra-cene (ppb)	Benzo (a) pyrene (ppb)	Benzo (b) fluor-anthene (ppb)	Benzo (g,h,i) perylene (ppb)	Benzo (k) fluor-anthene (ppb)	Chrysene (ppb)	Dibenzo (a,h) anthra-cene (ppb)	Fluor-anthene (ppb)	Fluorene (ppb)	Indeno (1,2,3-cd) pyrene (ppb)	1-Methyl Naph-thalene (ppb)	2-Methyl Naph-thalene (ppb)	Naph-thalene (ppb)	Phen-anthrene (ppb)	Pyrene (ppb)
SB-37 2-3 FT	3/13/2006	<17.0	<19.0	24.0	105	81.0	181	104	51.0	200	30.0	253	20.0	73.0	91.0	115	72.0	340	223
SB-37 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.5	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-38 1.5-2.5 FT	3/13/2006	120	89.0	512	859	<u>842</u>	<u>1,230</u>	458	332	791	88.0	2,350	225	383	39.0	29.0	56.0	1,460	1,750
SB-38 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-39 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-40 2.5-3.5 FT	3/13/2006	<17.0	21.0	71.0	393	421	852	251	252	549	61.0	813	21.0	213	44.0	39.0	99.0	266	770
SB-40 7-8 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-41 3-4 FT	3/13/2006	27.0	<19.0	43.0	195	308	517	224	148	295	33.0	450	17.0	192	25.0	22.0	36.0	211	370
SB-41 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-42 3-4 FT	3/13/2006	<17.0	30.0	22.0	83.0	81.0	253	95.0	67.0	157	19.0	324	14.0	76.0	67.0	30.0	28.0	202	229
SB-42 5.5-6.5 FT	3/13/2006	<17.0	<19.0	<11.0	13.0	11.0	<7.50	<8.50	<14.0	<20.0	<11.0	15.0	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-43 2-3 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-43 5.5-6.5 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-44 3-4 FT	3/15/2006	55.0	23.0	164	446	408	772	294	273	609	39.0	1,510	54.0	259	17.0	13.0	23.0	869	1,390
SB-44 5.5-6.5 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-45 2-3 FT	3/15/2006	23.0	<19.0	53.0	175	139	418	150	149	332	25.0	674	18.0	121	<11.0	<12.0	<17.0	320	546
SB-45 5.5-6.5 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-46 2-4 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-46 5-7 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-47 1.5-2.5 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	<8.90	<11.0
SB-47 5.5-6.5 FT	3/15/2006	<17.0	<19.0	<11.0	<12.0	<8.10	<7.50	<8.50	<14.0	<20.0	<11.0	<7.40	<9.50	<9.50	<11.0	<12.0	<17.0	19.0	<11.0
Ductile GP-25: 2-3 FT	11/2/2012	<10.1	<10.1	<2.10	<10.1	<10.1	<2.90	<10.1	<10.1	<2.30	<10.1	<10.1	<10.1	<10.1	<9.20	3.70 J	<3.80	5.80 J	<10.1
Ductile GP-26: 3-4 FT	11/2/2012	<10.1	12.9 J	24.0	102	112	118	71.1	90.1	117	27.1	189	<10.1	59.6	16.1 J	19.9 J	23.4	81.0	157
Ductile GP-27: 3-4 FT	11/2/2012	<10.8	<10.8	5.90 J	<10.8	<10.8	8.60 J	<10.8	<10.8	10.0 J	<10.8	22.2	<10.8	<10.8	10.5 J	13.1 J	11.8 J	31.1	16.1 J
Ductile GP-52: 1-2 FT	4/1/2015	146 J	225	688	<u>1,910</u>	<u>1,860</u>	<u>1,680</u>	1,170	1,700	<u>2,200</u>	<u>436</u>	3,350	152 J	1,110	194 J	235	265	<u>2,040</u>	2,800
Ductile GP-53: 2-3 FT	4/1/2015	<10.2	<9.10	<10.6	<7.10	<7.30	<10.2	<7.80	<11.3	<9.40	<7.50	<10.2	<10.2	<7.80	<10.2	<10.2	<10.2	<10.2	<10.2
Ductile GP-54: 2-3 FT	4/1/2015	675	<91.6	843	310	<u>252</u>	198 J	123 J	218	<u>327</u>	<75.1	1,020	1,140	121 J	283	321	542	<u>2,480</u>	765
NR 720 Groundwater RCL		*38,000	*700	196,949	*17,000	470	478	*6,800,000	*870,000	144	*38,000	88,878	14,830	*680,000	*23,000	*20,000	658	*1,800	54,546
NR 720 Non-industrial DC RCL		3,590,000	NS	17,900,000	1,140	115	1,150	NS	11,500	115,000	115	2,390,000	2,390,000	1,150	17,600	239,000	5,520	NS	1,790,000
NR 720 Industrial DC RCL		45,200,000	NS	100,000,000	20,800	2,110	21,100	NS	211,000	2,110,000	2,110	30,100,000	30,100,000	21,100	72,700	3,010,000	24,100	NS	22,600,000

* indicates a suggested value.

Note: NR 720 values are calculated utilizing the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890 (updated December 2017).

Note: Concentrations that exceed their respective RCLs for the protection of groundwater are in *blue italics*.

Note: Concentrations that exceed their respective non-industrial RCLs for direct contact are underlined.

Note: Concentrations that exceed their respective industrial RCLs for direct contact are in [brackets].

Note "J" indicates slight detection above the level of detection but less than the level of quantification.

**Table 3 - Soil Metals Results
Parcel 705 - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin**

Sample Location	Sampling Date	Arsenic (ppm)	Barium (ppm)	Cadmium (ppm)	Chromium (ppm)	Lead (ppm)	Mercury (ppm)	Selenium (ppm)	Silver (ppm)
SB-3 (704): 1-2 FT	9/12/2001	<u>[3.40]</u>	589	<1.20	13.0	484	0.092	3.60	<3.00
SB-19: 1-2 FT	6/20/2002	<0.60	88.0	<0.70	21.0	31.0	0.037	<2.50	5.60
MW-7: 2.5-4.5 FT	3/20/2003	<u>2.30</u>	150	0.24	32.0	14.0	0.071	0.67	<0.024
MW-9: 2.5-4.5 FT	3/20/2003	<u>[6.60]</u>	81.0	0.38	13.0	52.0	0.052	1.00	0.10
SB-20: 5-6 FT	10/19/2004	<u>1.90</u>	120	1.20	32.0	14.0	0.039	<0.72	0.36
SB-22: 1-4 FT	10/23/2004	<0.60	120	1.00	41.0	2.00	<0.024	6.00	<0.30
Off-Site	4/22/2005	<u>[22.0]</u>	98.0	4.70	42.0	88.0	0.059	0.039	0.46
SB-26: 4-5 FT	3/13/2006	<0.015	NA	NA	NA	NA	NA	NA	NA
SB-26: 5.5-6.5 FT	3/13/2006	<0.015	NA	NA	NA	NA	NA	NA	NA
SB-27: 5.5-6.5 FT	3/13/2006	<u>[4.90]</u>	NA	NA	NA	8.40	NA	NA	NA
SB-33: 7-8 FT	3/13/2006	<u>1.60</u>	NA	NA	NA	19.0	NA	NA	NA
SB-34: 4-5 FT	3/13/2006	<u>1.20</u>	NA	NA	NA	17.0	NA	NA	NA
SB-37: 5.5-6.5 FT	3/13/2006	<u>[3.10]</u>	NA	NA	NA	7.60	NA	NA	NA
SB-40: 7-8 FT	3/13/2006	<u>2.30</u>	NA	NA	NA	13.0	NA	NA	NA
SB-42: 3-4 FT	3/13/2006	<u>[5.90]</u>	NA	NA	NA	29.0	NA	NA	NA
SB-46: 2-4 FT	4/4/2006	<u>[4.70]</u>	NA	NA	NA	17.0	NA	NA	NA
SB-47: 1.5-2.5 FT	4/4/2006	<u>[5.10]</u>	NA	NA	NA	17.0	NA	NA	NA
SB-48: 0-4 FT	5/24/2006	<2.50	NA	NA	NA	<5.00	NA	NA	NA
SB-48: 4-8 FT	5/24/2006	<u>[5.30]</u>	NA	NA	NA	80.0	NA	NA	NA
SB-49: 0-4 FT	5/24/2006	<u>[3.30]</u>	NA	NA	NA	<5.00	NA	NA	NA
SB-49: 4-8 FT	5/24/2006	<2.50	NA	NA	NA	<5.00	NA	NA	NA
SB-50: 0-4 FT	5/24/2006	<2.50	NA	NA	NA	<5.00	NA	NA	NA
SB-50: 4-8 FT	5/24/2006	<u>[4.70]</u>	NA	NA	NA	<5.00	NA	NA	NA
SB-51: 0-4 FT	5/24/2006	<2.50	NA	NA	NA	7.00	NA	NA	NA
SB-51: 4-8 FT	5/24/2006	<2.50	NA	NA	NA	8.80	NA	NA	NA
SB-52: 0-4 FT	5/24/2006	<u>[3.10]</u>	NA	NA	NA	31.0	NA	NA	NA
SB-52: 4-8 FT	5/24/2006	<u>[4.20]</u>	NA	NA	NA	23.0	NA	NA	NA
Ductile GP-25: 2-3 FT	11/2/2012	<u>[4.60]</u>	63.3	<0.032	32.2	13.5	0.034	<0.49	<0.22
Ductile GP-26: 3-4 FT	11/2/2012	<u>[6.20]</u>	69.2	<0.034	29.7	66.0	0.080	<0.52	<0.24
Ductile GP-27: 3-4 FT	11/2/2012	<u>[7.00]</u>	79.9	<0.034	27.8	34.9	0.025	<0.52	<0.24
NR 720 Groundwater RCL		0.584	164.8	0.752	360,000	27	0.208	0.52	0.849
NR 720 Non-industrial DC RCL		0.677	15,300	71.1	0.3/100K	400	3.13	391	391
NR 720 Industrial DC RCL		3	100,000	985	6.36/100K	800	3.13	5,840	5,840
USGS Background Values		8.3	364	1.07	43.5	51.6	NS	NS	NS

Note: NR 720 values are calculated utilizing the EPA's Regional Screening Level Web-Calculator per DNR document RR-890 (updated December 2018).

Note: Concentrations that exceed their respective RCLs for the protection of groundwater are in blue italics.

Note: Concentrations that exceed their respective non-industrial RCLs for direct contact are underlined.

Note: Concentrations that exceed their respective industrial RCLs for direct contact are in [brackets].

Note "J" indicates slight detection above the level of detection but less than the level of quantification.

Table 4 - GW VOC Results
Parcel 705 - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin

Sample Location	Sampling Date	Benzene (ppb)	1,1-Dichloroethane (ppb)	1,1-Dichloroethene (ppb)	Ethylbenzene (ppb)	Isopropylbenzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	n-Propylbenzene (ppb)	Toluene (ppb)	1,1,1-TCA (ppb)	Combined TMBs (ppb)	Total Xylenes (ppb)
MW-1	5/14/2003 6/8/2004	<0.41 <0.29	<0.57 NA	NR NA	<0.54 <0.56	<0.59 NA	<0.61 <0.20	<0.74 <0.60	<0.81 NA	<0.67 <0.57	<0.90 NA	<1.80 <1.17	<2.63 <1.74
MW-2	5/14/2003 6/8/2004	<0.41 <0.29	4.00 NA	NR NA	<0.54 <0.56	<0.59 NA	<0.61 <0.20	<0.74 <0.60	<0.81 NA	<0.67 <0.57	1.80 J NA	<1.80 <1.17	<2.63 <1.74
MW-3	5/14/2003 6/8/2004	110 51.0	<1.50 NA	NR NA	<i>190</i> 10.0	7.90 NA	<1.20 <0.20	<i>42.0</i> 2.90	16.0 NA	60.0 7.20	<1.80 NA	82.0 5.43 J	353 18.1
MW-4	5/14/2003 6/8/2004	<0.41 <0.29	<0.57 NA	NR NA	<0.54 <0.56	<0.59 NA	<0.61 <0.20	<0.74 <0.60	<0.81 NA	<0.67 <0.57	<0.90 NA	<1.80 <1.17	<2.63 <1.74
MW-5	5/14/2003 6/8/2004	170 280	<1.90 NA	NR NA	4.40 J 5.00	<1.50 NA	<1.50 <0.20	<1.80 1.20 J	<2.00 NA	3.50 J 6.60	<2.20 NA	<4.50 1.78 J	<6.60 8.34 J
MW-6	5/14/2003 6/8/2004	2,900 2,110	<15.0 NA	NR NA	<i>250</i> <i>561</i>	16.0 J NA	<12.0 <10.0	<i>59.0</i> <i>48.5 J</i>	31.0 J NA	<i>530</i> 53.0 J	<18.0 NA	<i>137 J</i> 90.0 J	810 53.0 J
MW-7	5/14/2003 6/8/2004	620 340	<19.0 NA	NR NA	72.0 57.0	<15.0 NA	<15.0 <0.20	<18.0 2.80	<20.0 NA	38.0 4.10	<22.0 NA	12.0 J 9.70	70.0 14.9
MW-8	5/14/2003 6/8/2004	3,000 370	<19.0 NA	NR NA	<i>190</i> 10.0	<15.0 NA	<15.0 <0.20	<18.0 <0.60	<20.0 NA	67.0 8.20	<22.0 NA	<45.0 <1.17	49.0 J 3.16 J
MW-9	5/14/2003 6/8/2004	3,600 3,180	<38.0 NA	NR NA	1,100 823	69.0 J NA	<30.0 <10.0	270 224	200 NA	220 146	<45.0 NA	<i>166 J</i> <58.5	670 J 244 J
TW-1	4/5/2012	<0.50	NA	NA	<0.78	NA	<0.80	<2.10	NA	<0.53	NA	<1.58	<1.10
TW-2	4/5/2012	<0.50	NA	NA	<0.78	NA	<0.80	<2.10	NA	<0.53	NA	1.89 J	<1.10
TW-3	4/5/2012	10.1	NA	NA	5.90	NA	<0.80	<2.10	NA	0.80 J	NA	<1.58	4.10
TW-4	4/5/2012	<0.50	NA	NA	<0.78	NA	<0.80	<2.10	NA	<0.53	NA	<1.58	<1.10
Ductile GP-25	11/6/2012	<0.41	3.50	7.60	<0.54	<0.59	<0.61	<0.89	<0.81	<0.67	<i>139</i>	<1.80	<2.63
Ductile GP-26	11/6/2012	<0.41	<0.75	<0.57	<0.54	<0.59	<0.61	<0.89	<0.81	<0.67	<0.90	<1.80	<2.63
Ductile GP-27	11/6/2012	<0.41	<0.75	<0.57	<0.54	<0.59	<0.61	<0.89	<0.81	<0.67	<0.90	<1.80	<2.63
Ductile GP-52	4/24/2015	<0.50	<0.24	<0.41	<0.50	<0.14	<0.17	<2.50	<0.50	<0.50	<0.50	<1.00	<1.50
Ductile GP-53	4/3/2015	<0.50	<0.24	<0.41	<0.50	<0.14	<0.17	<2.50	<0.50	<0.50	<0.50	<1.00	<1.50
Ductile GP-54	4/3/2015	<0.50	<0.24	<0.41	<0.50	<0.14	<0.17	<2.50	<0.50	<0.50	<0.50	<1.00	<1.50
Ductile MW-6	9/12/2013 4/24/2015	<0.50 <0.50	<0.28 2.10	<0.43 7.10	<0.50 <0.50	<0.34 <0.14	<0.49 <0.17	<2.50 <2.50	<0.50 <0.50	<0.44 <0.50	2.50 <i>121</i>	<1.00 <1.00	<1.32 <1.50
ES (ppb)	-	5	850	7	700	NS	60	100	NS	1,000	200	480	10,000
PAL (ppb)	-	0.5	85	0.7	140	NS	12	10	NS	200	40	96	1,000

Notes:

1. Only the detected compounds are presented.
2. Concentrations in *blue italics* exceed their respective NR 140 preventive action limits (PALs).
3. Concentrations in **red bold** exceed their respective NR 140 enforcement standards (ESs).

**Table 5 - GW PAH Results
705 Parcel - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin**

Sample Location	Sampling Date	Acena-phthene (ppb)	Acena-phthylene (ppb)	Anthra-cene (ppb)	Benzo (a) anthra-cene (ppb)	Benzo (a) pyrene (ppb)	Benzo (b) fluor-anthene (ppb)	Benzo (g,h,i) perylene (ppb)	Benzo (k) fluor-anthene (ppb)	Chrysene (ppb)	Dibenzo (a,h) anthra-cene (ppb)	Fluor-anthrene (ppb)	Flourene (ppb)	Indeno (1,2,3-cd) pyrene (ppb)	1-Methyl Naph-thalene (ppb)	2-Methyl Naph-thalene (ppb)	Naph-thalene (ppb)	Phen-anthrene (ppb)	Pyrene (ppb)
MW-1	5/14/2003	<0.018	<0.019	<0.020	<0.012	<0.014	<0.013	<0.016	<0.019	<0.014	<0.016	<0.013	<0.013	<0.021	<0.018	<0.017	0.035 J	<0.016	<0.017
MW-4	5/14/2003	<0.018	0.033 J	0.088	0.13	<i>0.11</i>	<i>0.12</i>	0.082	0.10	<i>0.18</i>	0.027 J	0.20	0.029 J	0.071	0.032 J	0.059	0.057 J	0.19	0.28
MW-5	5/14/2003	<0.018	<0.019	<0.020	0.044	<i>0.042 J</i>	<i>0.057</i>	0.038 J	0.036 J	<i>0.054</i>	<0.016	0.072	<0.017	0.031 J	0.022 J	0.032 J	0.40	0.041 J	0.069
MW-6	5/14/2003	<0.36	<0.38	<0.40	<0.24	<0.28	<0.26	<0.32	<0.38	<0.28	<0.32	<0.26	<0.34	<0.42	1.10	1.20	18.0	<0.32	<0.34
TW-3	4/5/2012	<0.025	<0.019	0.03 J	0.118	<i>0.134</i>	0.214	0.131	0.073	<i>0.148</i>	0.028 J	0.207	<0.02	0.098	0.048 J	0.054 J	0.179	0.153	0.192
NR 140 ES		NS	NS	3,000	NS	0.2	0.2	NS	NS	0.2	NS	400	400	NS	NS	NS	100	NS	250
NR 140 PAL		NS	NS	600	NS	0.02	0.02	NS	NS	0.02	NS	80	80	NS	NS	NS	10	NS	50

Notes:

1. Only the detected compounds are presented.
2. Concentrations in *blue italics* exceed their respective NR 140 preventive action limits (PALs).
3. Concentrations in **red bold** exceed their respective NR 140 enforcement standards (ESs).

**Table 6 - GW Metals Results
Parcel 705 - SoNa
6633-6639 West National Avenue
West Allis, Wisconsin**

Sample Location	Sampling Date	Arsenic (ppb)	Barium (ppb)	Cadmium (ppb)	Chromium (ppb)	Lead (ppb)	Mercury (ppb)	Selenium (ppb)	Silver (ppb)
MW-1	5/14/2003	0.75	<i>730</i>	0.29	3.80	0.46	<0.03	3.90	<0.07
MW-4	5/14/2003	<i>1.10</i>	250	<0.14	0.58 J	1.40	<0.03	2.20	<0.05
MW-5	5/14/2003	<i>4.00</i>	220	<i>1.70</i>	3.00	<i>2.20</i>	<0.03	2.40	<0.05
MW-6	5/14/2003	<i>2.00</i>	310	0.13 J	1.20	0.84	<0.03	3.50	<0.07
Ductile MW-6	9/12/2013	<4.20	NA	NA	NA	<2.70	NA	NA	NA
<i>NR 140 PAL</i>	-	<i>1.0</i>	<i>400</i>	<i>0.5</i>	<i>10</i>	<i>1.5</i>	<i>0.2</i>	<i>10</i>	<i>10</i>
<i>NR 140 ES</i>	-	<i>10</i>	<i>2,000</i>	<i>5.0</i>	<i>100</i>	<i>15</i>	<i>2.0</i>	<i>50</i>	<i>50</i>

Note: Concentrations in *blue italics* exceed their respective NR 140 preventive action limits (PALs).

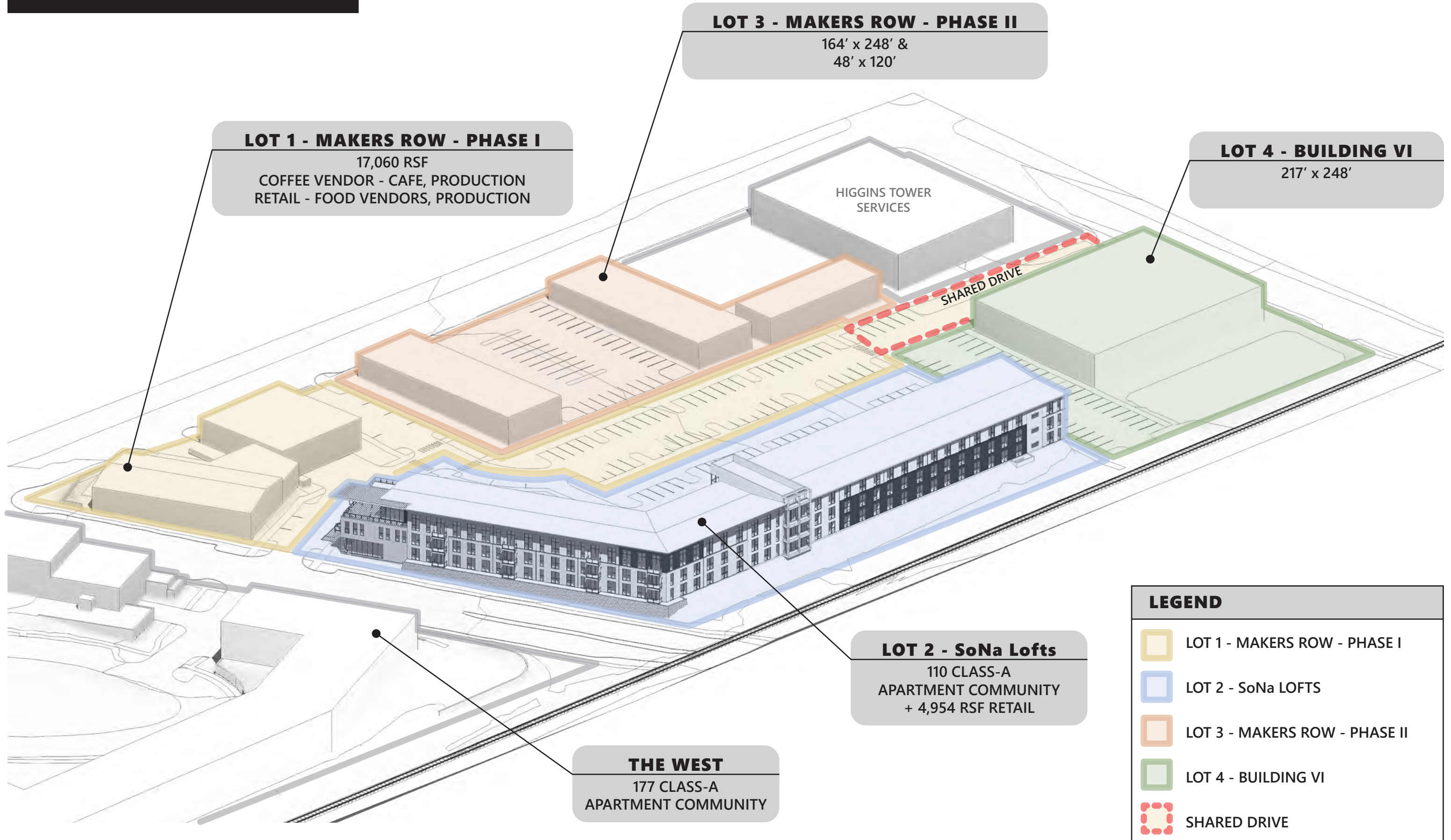
Note: Concentrations in *red bold* exceed their respective NR 140 enforcement standards (ESs).

APPENDIX C
CUMULATIVE cPAH CALCULATIONS

**APPENDIX D
DEVELOPMENT
PLANS**

SoNa PARCEL PLAN - AERIAL VIEW

11.06.2020



LOT 1 - MAKERS ROW - PHASE I
17,060 RSF
COFFEE VENDOR - CAFE, PRODUCTION
RETAIL - FOOD VENDORS, PRODUCTION

LOT 3 - MAKERS ROW - PHASE II
164' x 248' &
48' x 120'

LOT 4 - BUILDING VI
217' x 248'

LOT 2 - SoNa Lofts
110 CLASS-A
APARTMENT COMMUNITY
+ 4,954 RSF RETAIL

THE WEST
177 CLASS-A
APARTMENT COMMUNITY

LEGEND	
	LOT 1 - MAKERS ROW - PHASE I
	LOT 2 - SoNa LOFTS
	LOT 3 - MAKERS ROW - PHASE II
	LOT 4 - BUILDING VI
	SHARED DRIVE

November 6, 2020

SoNa Development Submission
PROJECT OVERVIEW | DESIGN STRATEGY

Mandel Group conceived of a highly interactive mixed-use project called “The Market at Six Points”. Since our original submission and selection by the City of West Allis, Mandel Group has completed investment of over \$50 million on lands north of National Avenue and west of 66th Street. We are now focusing on the area south of National Avenue, referred to as “SoNa” for “south of National” and are submitting for approval plans for a highly detailed mixed-use commercial and residential project. An additional \$25-35 million of new development is envisioned once all parcels of SoNa are developed.

BACKGROUND

The concept of mixed-use land development is important to understand in the context of the SoNa project. Several years ago we were offered for purchase Six Points Apartments due east of The West. As part of our underwriting we interviewed the property manager. The takeaway was that people were interested in trying West Allis and this location as a place to live but that after living there for some time their interest faded. The objection most heard by property management was “There’s just not anything happening around us.”

Fast forward to 2015-16 when the initial plans for The Market at Six Points developed. We knew from market information like above, and from our 30 years of developing urban housing, that developing a multi-functional neighborhood was as important as the quality of the apartments themselves. Our housing would not enjoy long-term sustainability unless we added goods, services and diversions to the setting in which it was developed for a diverse mixed-use urban neighborhood.

Our initial concept for SoNa was a food-centric cluster of uses incorporating two or more restaurants and an international market grocery. Other related food industry tenants were also contacted and showed interest. The erosion of economics in the grocery industry scuttled multiple attempts to attract a food store, and restaurants showed substantial interest but little financial capacity to contribute to the capitalization of a new-build location. With the presence of so many vacant buildings in West Allis that present adaptive reuse potential, restaurant prospects have routinely opted for this more cost-effective alternative.

SoNa DESIGN CONCEPT

We investigated alternative approaches to achieving the above-stated goals and objectives. We are presenting a plan for SoNa that has two major components: unique commercial buildings detailed to recall the character of repurposed industrial buildings, together with a residential building that reflects on the character of its neighboring commercial structures.



The photo above is of a repurposed industrial service building in Nashville, TN. The conversion now houses Diskin Cider’s production operations, tasting room and events space. The interior reflects the industrial character of the original steel-framed building while the exterior has been reskinned with a sharp-looking, tasteful palette of materials together with carefully selected glazing, signage and lighting. This project was visited by Mandel Group in April 2019 as part of our conceptualization for Makers Row, the food-centric commercial component of the SoNa development.

Makers Row Phase I is an 18,000 square foot collection of buildings designed to appear as individual buildings constructed over a period of time. An anchor tenant of 12,000 square feet is joined by a 6,000 square foot southern building that will be subdivided for smaller users. This southern building is set up in particular to appeal to ghost kitchen/food truck operators who may also want to stage periodic retail operations, such as during events at the Farmers Market.

Makers Row Phase II is 17,500 square feet of additional space that is attracting attention from similar food + beverage producers/retail operations as occur in Phase I. The intent is that the same approach will be used to detail these buildings.

The SoNa Lofts apartment building takes its inspiration from historic loft structures and borrows certain exterior palette materials from Makers Row. The masonry base of the building is complemented with ribbed metal skin and pops of color to make the finished product a contemporary, memorable design statement. The overall form of the building is unique and will present a high-quality design statement along National Avenue.



The architectural drawing above is a study of materials and window fenestration. A masonry brick base supports a rooftop terrace amenity space. The upper floor is sheathed in a combination of vertical ribbed metal panel and horizontally laid deep-profile metal panel with a burnt orange accent color.

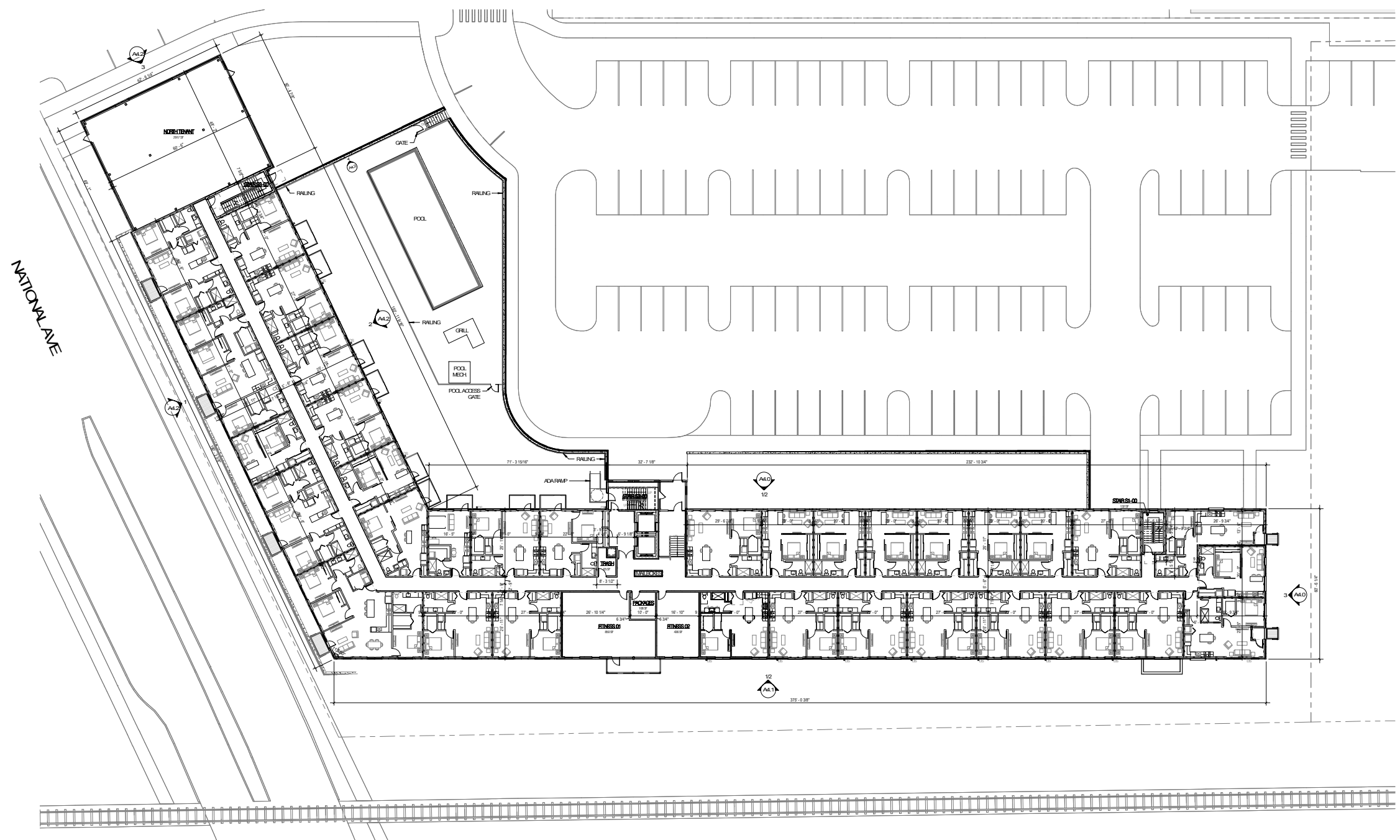
OTHER SoNa OPPORTUNITIES

The site design for SoNa creates a final parcel at the south end of the property fronting on Mitchell Street. This adjoins an access drive and a retention pond. A wide variety of uses could be accommodated here, from a larger scale food producing employment generator (which we have been in contact with in the past) or even additional residential units. Once the infrastructure to support this is in place it is intended that Makers Row Phase II and this remaining southerly parcel will be pursued for an immediate subsequent phase of development.

LANDSCAPE

Estimated cost of landscaping & screening:

SoNa Lofts: \$130,330
 Makers Row: \$30,000



Zimmerman
 ARCHITECTURAL STUDIOS, INC.
 2121 W. North Vernon Avenue | Milwaukee, WI 53233 | zstudio.com
 TELEPHONE: (414) 476-9500
 FACSIMILE: (414) 476-8852

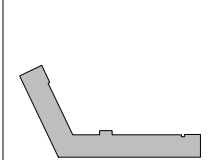
Developer/Owner:
MANDEL GROUP

Consultant:

Project:
 SoNa Apartments

NOT FOR CONSTRUCTION

Location:
 6700 W National Avenue
 West Allis, WI 53214



Sheet:
FIRST FLOOR PLAN - OVERALL

Phase:
 Planning Commission
 Submittal

Scale:
 1/16" = 1'-0"

Revisions:

No.	Date	Description

Date:
 11.06.20

Project No:
 200064.00

Sheet No:
A2.1



Zimmerman
 ARCHITECTURAL STUDIOS, INC.
 2122 W North Vernon Avenue | Milwaukee, WI 53233 | zstudies.com
 TELEPHONE (414) 476-9500
 FACSIMILE (414) 476-8582

Developer/Owner:



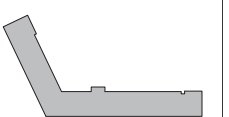
Consultant:

Project:
 SoNa Apartments

**NOT FOR
 CONSTRUCTION**

Location:
 6700 W National Avenue
 West Allis, WI 53214

Key Plan:



Sheet:
 PERSPECTIVE VIEWS

Phase:
 Planning Commission
 Submittal

Scale:

Revisions:		
No.	Date	Description

Date:
 11.06.20

Project No:
 200054.00

Sheet No:

R1.1





Developer/Owner:



Consultant:

Project:
 SoNa Apartments

**NOT FOR
 CONSTRUCTION**

Location:
 6700 W National Avenue
 West Allis, WI 53214

Key Plan:



Sheet:
 PERSPECTIVE VIEWS

Phase:
 Planning Commission
 Submittal

Scale:

Revisions:

No.	Date	Description

Date:
 11.06.20

Project No:
 200054.00

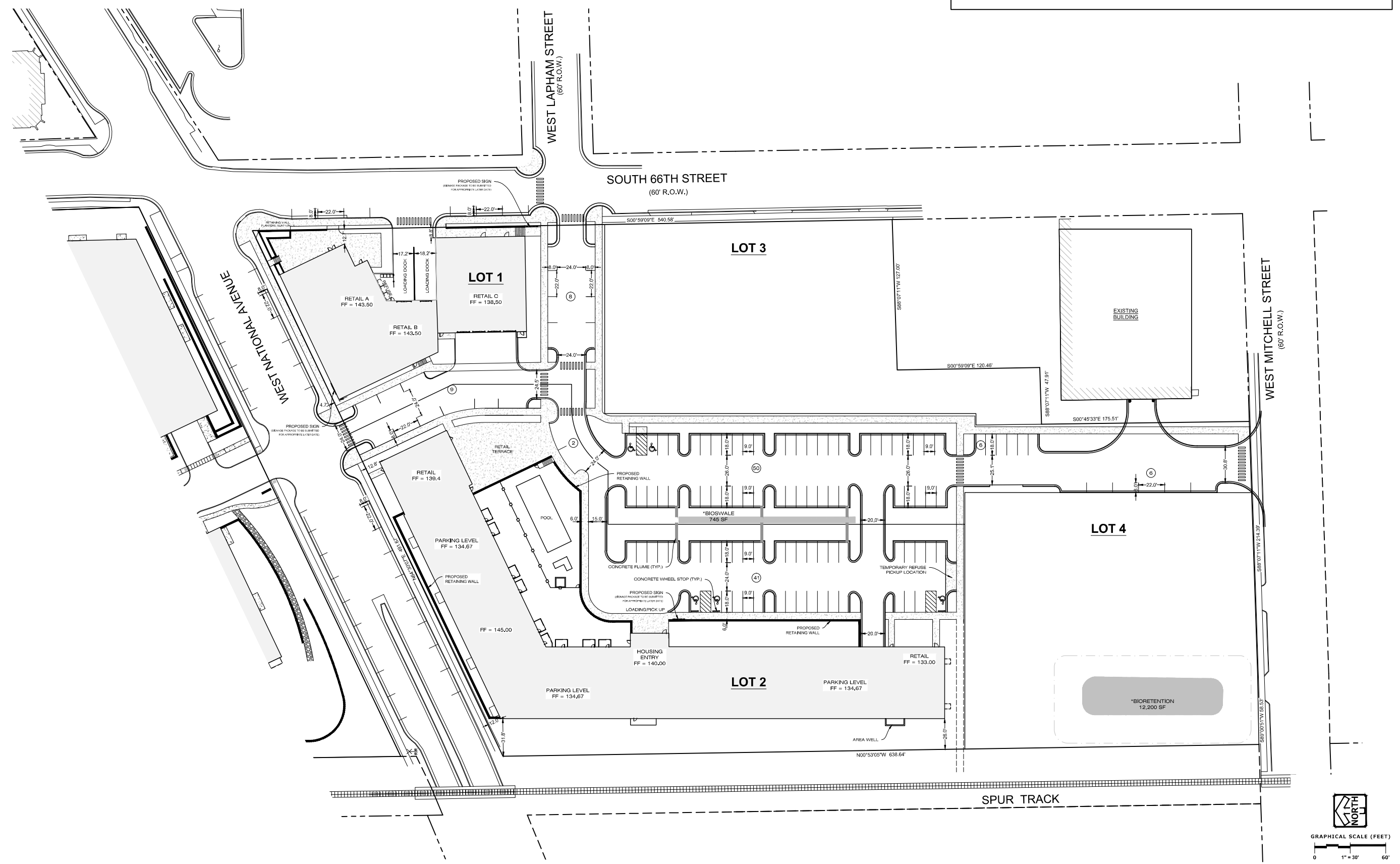
Sheet No:

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 DESIGNED BY: [NAME]
 CHECKED BY: [NAME]
 DATE: [DATE]

LEGEND	
	CONCRETE SIDEWALK 4" CLASPS AGGREGATE BASE COURSE (1 1/2" DENSE GRADED LIMESTONE) 3" PCC (50# FILLER) WIRE FABRIC PER AISC 312-92
	PAVING COUNT (FOR INFORMATION ONLY, NOT TO BE PAINTED)

PARKING DATA	
ON-SITE PARKING: 120 STALLS	
ADA REQUIREMENTS:	
-REQUIRED: 5 ADA STALLS, 1 VAN ACCESSIBLE	
-PROVIDED: 5 ADA STALLS, 2 VAN ACCESSIBLE	

SITE DATA				
LOT 1	LOT 2	LOT 3	LOT 4	SITE TOTAL
TOTAL AREA: 1.88 AC	TOTAL AREA: 2.42 AC	TOTAL AREA: 1.03 AC	TOTAL AREA: 1.21 AC	TOTAL AREA: 6.54 AC
BUILDING: 0.36 AC / 19.1%	BUILDING: 0.81 AC / 33.5%	BUILDING: 0.00 AC / 0.0%	BUILDING: 0.00 AC / 0.0%	BUILDING: 1.17 AC / 17.9%
IMPERVIOUS: 1.49 AC / 79.3%	IMPERVIOUS: 1.65 AC / 68.2%	IMPERVIOUS: 0.00 AC / 0.0%	IMPERVIOUS: 0.00 AC / 0.0%	IMPERVIOUS: 3.14 AC / 48.0%
GREEN SPACE: 0.39 AC / 20.7%	GREEN SPACE: 0.77 AC / 31.8%	GREEN SPACE: 1.03 AC / 100.0%	GREEN SPACE: 1.21 AC / 100.0%	GREEN SPACE: 3.40 AC / 52.0%



PINNACLE ENGINEERING GROUP
 ENGINEERING | NATURAL RESOURCES | SURVEYING
 CHICAGO | MILWAUKEE | NATIONWIDE
 WISCONSIN OFFICE:
 2025 WATERTOWN ROAD, SUITE 200
 BROOKFIELD, WI 53005
 (262) 754-8888

SONA LOFTS
W. NATIONAL AVENUE
WEST ALLIS, WI

SITE PLAN

REVISIONS	
PLANNING COMMISSION SUBMITTAL	11/06/20

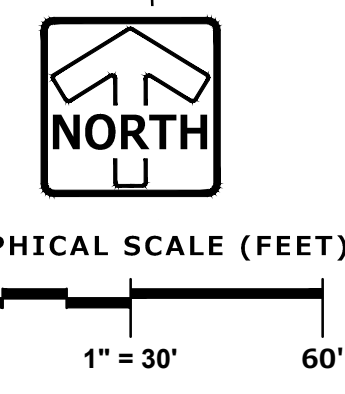
PROJECT NO. 0500000001	DATE 11/06/20	SCALE 1" = 30'
DESIGNED BY [NAME]	CHECKED BY [NAME]	DATE [DATE]

SHEET
C1.0
 &
C3.0
SITE PLAN

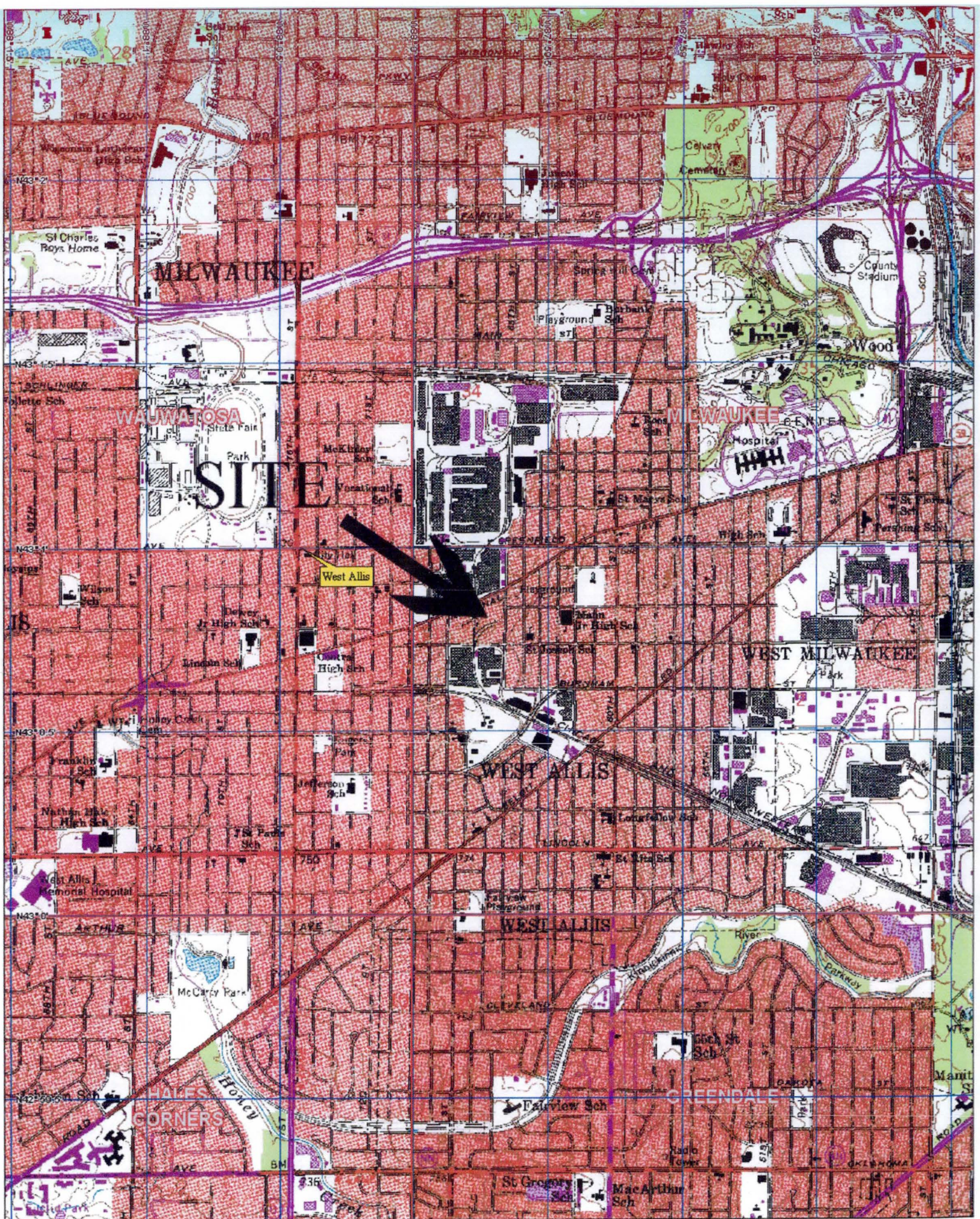


Elevations Table			
Number	Color	Minimum	Maximum
1	Dark Red	-16.00	-12.00
2	Red	-12.00	-8.00
3	Light Red	-8.00	-4.00
4	Red-Orange	-4.00	0.00
5	Light Green	0.00	4.00
6	Green	4.00	8.00
7	Dark Green	8.00	12.00
8	Very Dark Green	12.00	16.00

ESTIMATE OF EARTHWORK QUANTITIES FOR SONA			
RAW CUT/FILL (EXISTING CONTOURS VS. FINAL CONTOURS) 6,177 CY CUT 21,203 CY FILL 5% SHRINKAGE FACTOR ON FILL 22,263 ADJUSTED FILL 16,086 CY RAW IMPORT		TOTAL SITE AREA 6.4 ACRES	
SURFACE ADJUSTMENTS			
TOPSOIL STRIPING	0 IN OVER	6.4 AC =	- CY LESS STRUCTURAL
<i>Topsoil depth is based on actual borings or field data</i>			
PAVEMENT SUBCUT	12 IN OVER	122,484 SF =	4,536 CY ADDED STRUCTURAL
18" IMPORTED CAP	18 IN OVER	91,600 SF =	5,089 CY ADDED STRUCTURAL
UTILITY TRENCH SPOILS			
		TRENCH SIZE - WIDTH BY DEPTH	
SANITARY	200 LF	4 FT BY 12 FT =	356 CY ADDED STRUCTURAL
WATER	820 LF	3 FT BY 7 FT =	638 CY ADDED STRUCTURAL
STORM	1800 LF	4 FT BY 5 FT =	1,333 CY ADDED STRUCTURAL
BUILDING ADJUSTMENTS			
SLAB ON GRADE (OR BASEMENT FLOOR SLAB)	12 IN OVER	64,700 SF =	2,396 CY ADDED STRUCTURAL
		TRENCH SIZE - WIDTH BY DEPTH	
FOOTINGS	3600 LF	4 FT BY 5 FT =	2,667 CY ADDED STRUCTURAL
SONA LOFTS FOOTINGS & PIER UNDERCUT		2,430 CY ADDED STRUCTURAL	
ESTIMATE OF NET STRUCTURAL EXPORT		3,359 CY	
TOPSOIL REMAINING		(5,089) CY	
TOPSOIL STOCKPILES ONSITE		6,000 CY	
MATERIAL NEEDED TO BE IMPORTED FOR CAP (AFTER TOPSOIL USED UP)		911 CY	



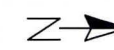
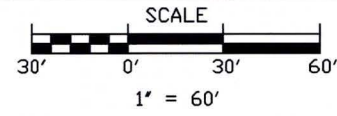
APPENDIX E
2012 RAP DIAGRAMS



LEGEND

PROPERTY LINES

SPUR TRACK



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC

DATE: 04/28/12 DRAWN BY: TJM

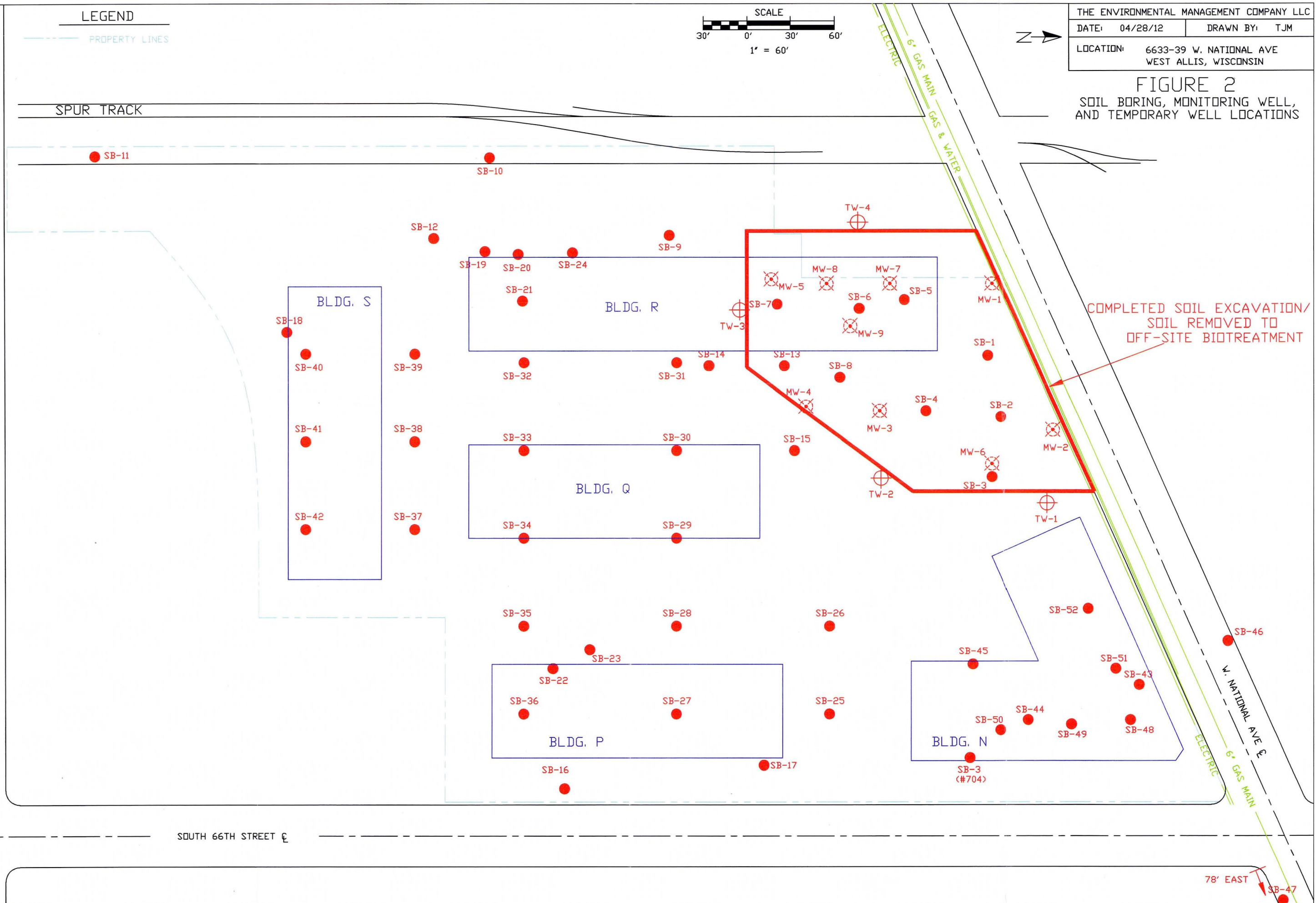
LOCATION: 6633-39 W. NATIONAL AVE
WEST ALLIS, WISCONSIN

FIGURE 2
SOIL BORING, MONITORING WELL,
AND TEMPORARY WELL LOCATIONS

W. MITCHELL STREET

SOUTH 66TH STREET

78' EAST

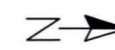
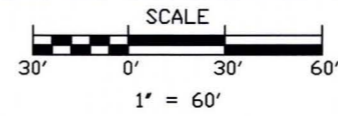


COMPLETED SOIL EXCAVATION/
SOIL REMOVED TO
OFF-SITE BIOTREATMENT

LEGEND

PROPERTY LINES

SPUR TRACK



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
 DATE: 04/28/12 DRAWN BY: TJM
 LOCATION: 6633-39 W. NATIONAL AVE
 WEST ALLIS, WISCONSIN

FIGURE 3.1
 SOIL CONTAMINANT DISTRIBUTION
 VOC & DRD

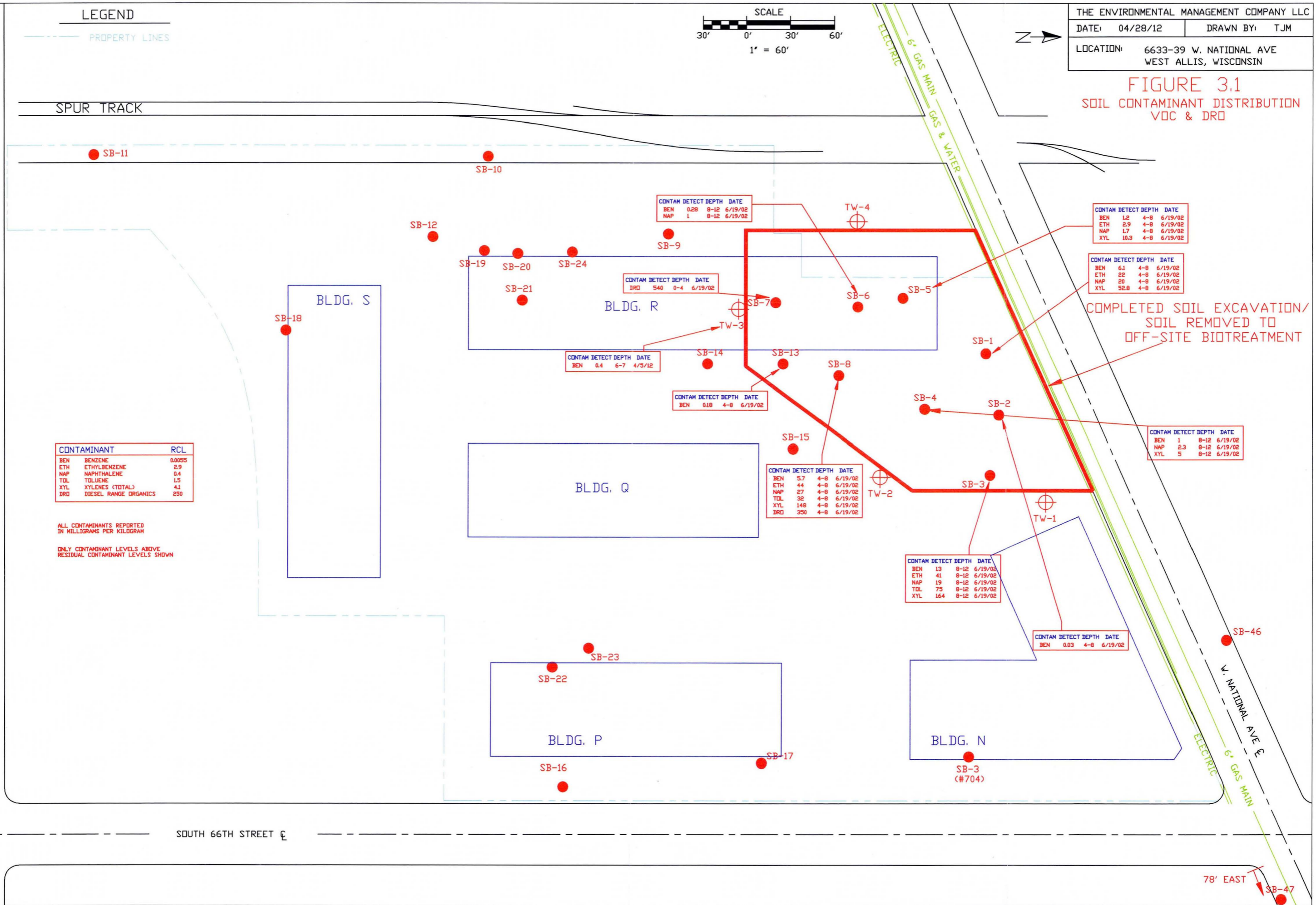
CONTAMINANT	RCL
BEN BENZENE	0.0055
ETH ETHYLBENZENE	2.9
NAP NAPHTHALENE	0.4
TOL TOLUENE	1.5
XYL XYLENES (TOTAL)	4.1
DRD DIESEL RANGE ORGANICS	250

ALL CONTAMINANTS REPORTED
 IN MILLIGRAMS PER KILOGRAM
 ONLY CONTAMINANT LEVELS ABOVE
 RESIDUAL CONTAMINANT LEVELS SHOWN

W. MITCHELL STREET

SOUTH 66TH STREET

78' EAST



CONTAM DETECT DEPTH DATE

BEN	0.28	8-12	6/19/02
NAP	1	8-12	6/19/02

CONTAM DETECT DEPTH DATE

BEN	1.2	4-8	6/19/02
ETH	2.9	4-8	6/19/02
NAP	1.7	4-8	6/19/02
XYL	10.3	4-8	6/19/02

CONTAM DETECT DEPTH DATE

BEN	6.1	4-8	6/19/02
ETH	22	4-8	6/19/02
NAP	20	4-8	6/19/02
XYL	52.8	4-8	6/19/02

CONTAM DETECT DEPTH DATE

DRD	540	0-4	6/19/02
-----	-----	-----	---------

CONTAM DETECT DEPTH DATE

BEN	0.4	6-7	4/5/12
-----	-----	-----	--------

CONTAM DETECT DEPTH DATE

BEN	0.18	4-8	6/19/02
-----	------	-----	---------

CONTAM DETECT DEPTH DATE

BEN	5.7	4-8	6/19/02
ETH	44	4-8	6/19/02
NAP	27	4-8	6/19/02
TOL	32	4-8	6/19/02
XYL	148	4-8	6/19/02
DRD	350	4-8	6/19/02

CONTAM DETECT DEPTH DATE

BEN	1	8-12	6/19/02
NAP	2.3	8-12	6/19/02
XYL	5	8-12	6/19/02

CONTAM DETECT DEPTH DATE

BEN	13	8-12	6/19/02
ETH	41	8-12	6/19/02
NAP	19	8-12	6/19/02
TOL	75	8-12	6/19/02
XYL	164	8-12	6/19/02

CONTAM DETECT DEPTH DATE

BEN	0.03	4-8	6/19/02
-----	------	-----	---------

COMPLETED SOIL EXCAVATION/
 SOIL REMOVED TO
 OFF-SITE BIOTREATMENT

SB-3
 (#704)

SB-46

SB-47

W. NATIONAL AVE E

ELECTRIC
 6" GAS MAIN
 GAS & WATER

BLDG. S

BLDG. R

BLDG. Q

BLDG. P

BLDG. N

SB-11

SB-10

SB-12

SB-9

SB-19

SB-20

SB-24

SB-21

SB-18

SB-7

SB-6

SB-5

TW-3

SB-14

SB-13

SB-8

SB-4

SB-2

SB-15

SB-3

TW-2

TW-1

TW-4

SB-23

SB-22

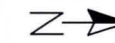
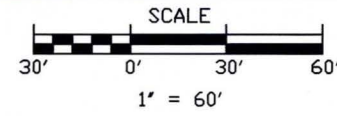
SB-17

SB-16

LEGEND

PROPERTY LINES

SPUR TRACK



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC	
DATE: 04/28/12	DRAWN BY: TJM
LOCATION: 6633-39 W. NATIONAL AVE WEST ALLIS, WISCONSIN	

FIGURE 3.2
SOIL CONTAMINANT DISTRIBUTION
PAH

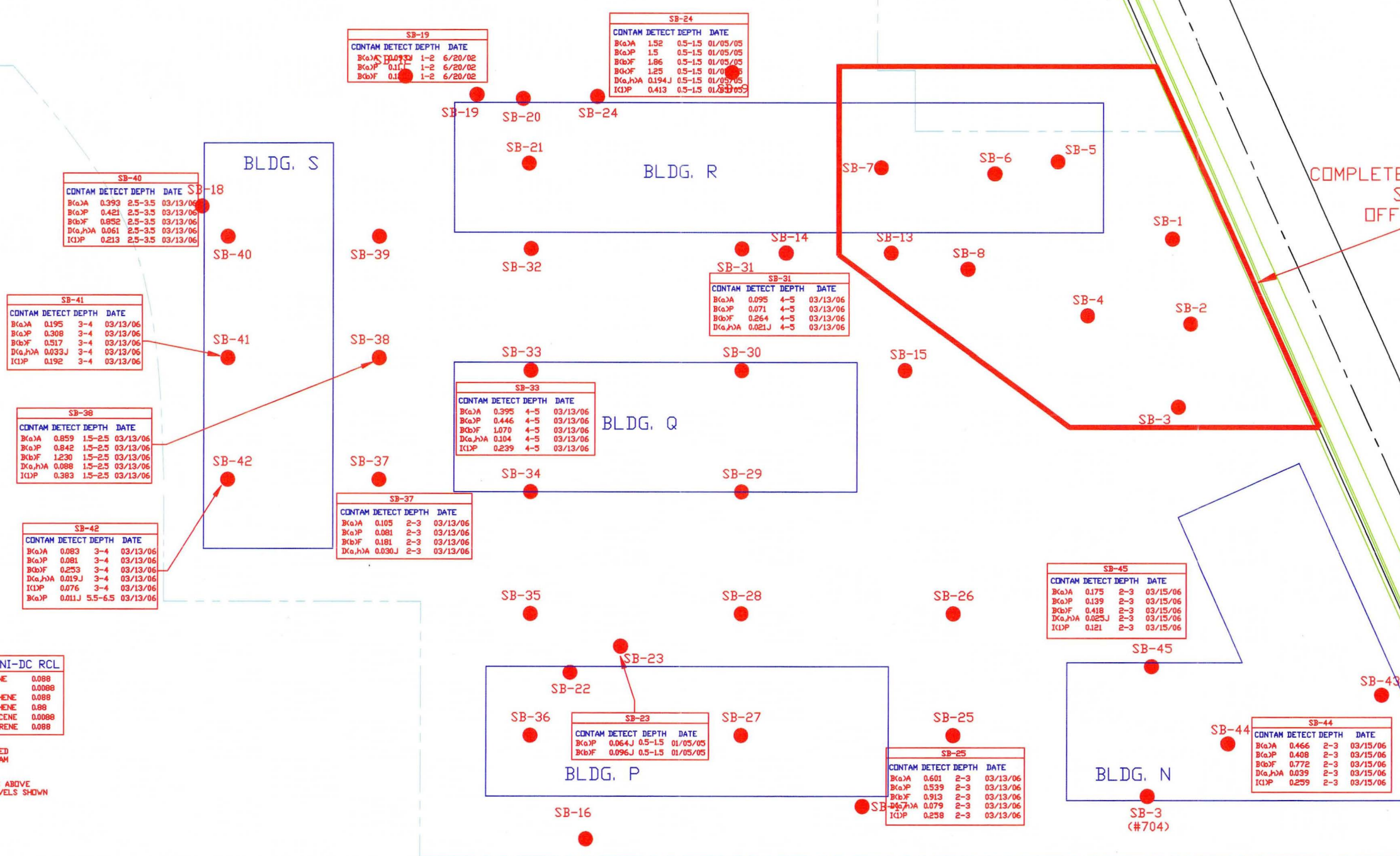
W. MITCHELL STREET

PAH CONTAMINANT- NI-DC RCL

B(a)A	BENZO (a) ANTHRACENE	0.088
B(a)P	BENZ (a) PYRENE	0.0088
B(b)F	BENZO (b) FLUORANTHENE	0.088
B(b)F	BENZO (k) FLUORANTHENE	0.88
D(a,h)A	DIBENZ (a,h) ANTHRACENE	0.0088
I(1)P	INDENO (1,2,3-cd) PYRENE	0.088

ALL CONTAMINANTS REPORTED
IN MILLIGRAMS PER KILOGRAM

ONLY CONTAMINANT LEVELS ABOVE
RESIDUAL CONTAMINANT LEVELS SHOWN



COMPLETED SOIL EXCAVATION/
SOIL REMOVED TO
OFF-SITE BIOTREATMENT

SOUTH 66TH STREET

78' EAST

W. NATIONAL AVE

BLDG. N
SB-3 (#704)

BLDG. P

BLDG. Q

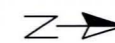
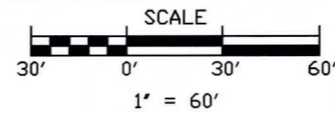
BLDG. R

BLDG. S

LEGEND

PROPERTY LINES

SPUR TRACK



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
 DATE: 04/28/12 DRAWN BY: TJM
 LOCATION: 6633-39 W. NATIONAL AVE
 WEST ALLIS, WISCONSIN

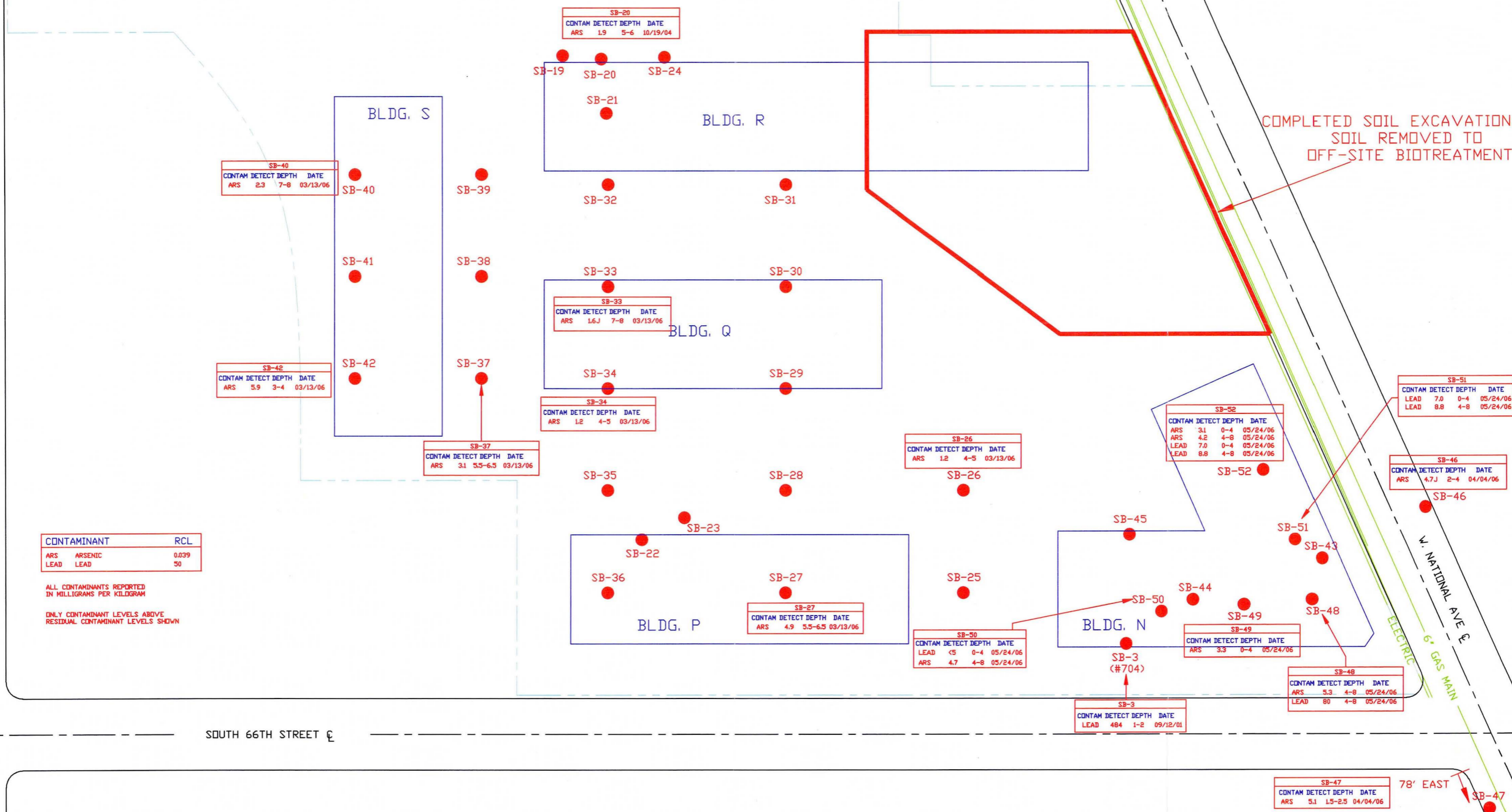
FIGURE 3.3
 SOIL CONTAMINANT DISTRIBUTION
 METALS

W. MITCHELL STREET

W. NATIONAL AVE E

SOUTH 66TH STREET

78' EAST



CONTAMINANT	RCL
ARS ARSENIC	0.039
LEAD LEAD	50

ALL CONTAMINANTS REPORTED
 IN MILLIGRAMS PER KILOGRAM
 ONLY CONTAMINANT LEVELS ABOVE
 RESIDUAL CONTAMINANT LEVELS SHOWN

SB-20

CONTAM	DETECT	DEPTH	DATE
ARS	1.9	5-6	10/19/04

SB-40

CONTAM	DETECT	DEPTH	DATE
ARS	2.3	7-8	03/13/06

SB-33

CONTAM	DETECT	DEPTH	DATE
ARS	1.6J	7-8	03/13/06

SB-42

CONTAM	DETECT	DEPTH	DATE
ARS	5.9	3-4	03/13/06

SB-37

CONTAM	DETECT	DEPTH	DATE
ARS	3.1	5.5-6.5	03/13/06

SB-34

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-26

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-52

CONTAM	DETECT	DEPTH	DATE
ARS	3.1	0-4	05/24/06
ARS	4.2	4-8	05/24/06
LEAD	7.0	0-4	05/24/06
LEAD	8.8	4-8	05/24/06

SB-51

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

SB-46

CONTAM	DETECT	DEPTH	DATE
ARS	4.7J	2-4	04/04/06

SB-34

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-35

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-26

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-52

CONTAM	DETECT	DEPTH	DATE
ARS	3.1	0-4	05/24/06
ARS	4.2	4-8	05/24/06
LEAD	7.0	0-4	05/24/06
LEAD	8.8	4-8	05/24/06

SB-51

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

SB-46

CONTAM	DETECT	DEPTH	DATE
ARS	4.7J	2-4	04/04/06

SB-37

CONTAM	DETECT	DEPTH	DATE
ARS	3.1	5.5-6.5	03/13/06

SB-34

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-26

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-52

CONTAM	DETECT	DEPTH	DATE
ARS	3.1	0-4	05/24/06
ARS	4.2	4-8	05/24/06
LEAD	7.0	0-4	05/24/06
LEAD	8.8	4-8	05/24/06

SB-51

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

SB-46

CONTAM	DETECT	DEPTH	DATE
ARS	4.7J	2-4	04/04/06

SB-34

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-35

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-26

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-52

CONTAM	DETECT	DEPTH	DATE
ARS	3.1	0-4	05/24/06
ARS	4.2	4-8	05/24/06
LEAD	7.0	0-4	05/24/06
LEAD	8.8	4-8	05/24/06

SB-51

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

SB-46

CONTAM	DETECT	DEPTH	DATE
ARS	4.7J	2-4	04/04/06

SB-37

CONTAM	DETECT	DEPTH	DATE
ARS	3.1	5.5-6.5	03/13/06

SB-34

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-26

CONTAM	DETECT	DEPTH	DATE
ARS	1.2	4-5	03/13/06

SB-52

CONTAM	DETECT	DEPTH	DATE
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LEAD	7.0	0-4	05/24/06
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SB-46

CONTAM	DETECT	DEPTH	DATE
ARS	4.7J	2-4	04/04/06

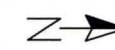
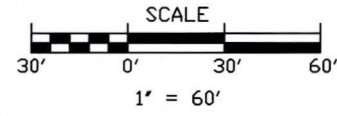
SB-37

CONTAM	DETECT	DEPTH	DATE
ARS			

LEGEND

PROPERTY LINES

SPUR TRACK



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
 DATE: 04/29/12 DRAWN BY: TJM
 LOCATION: 6633-39 W. NATIONAL AVE
 WEST ALLIS, WISCONSIN

FIGURE 4
 GROUNDWATER CONTAMINANT
 DISTRIBUTION

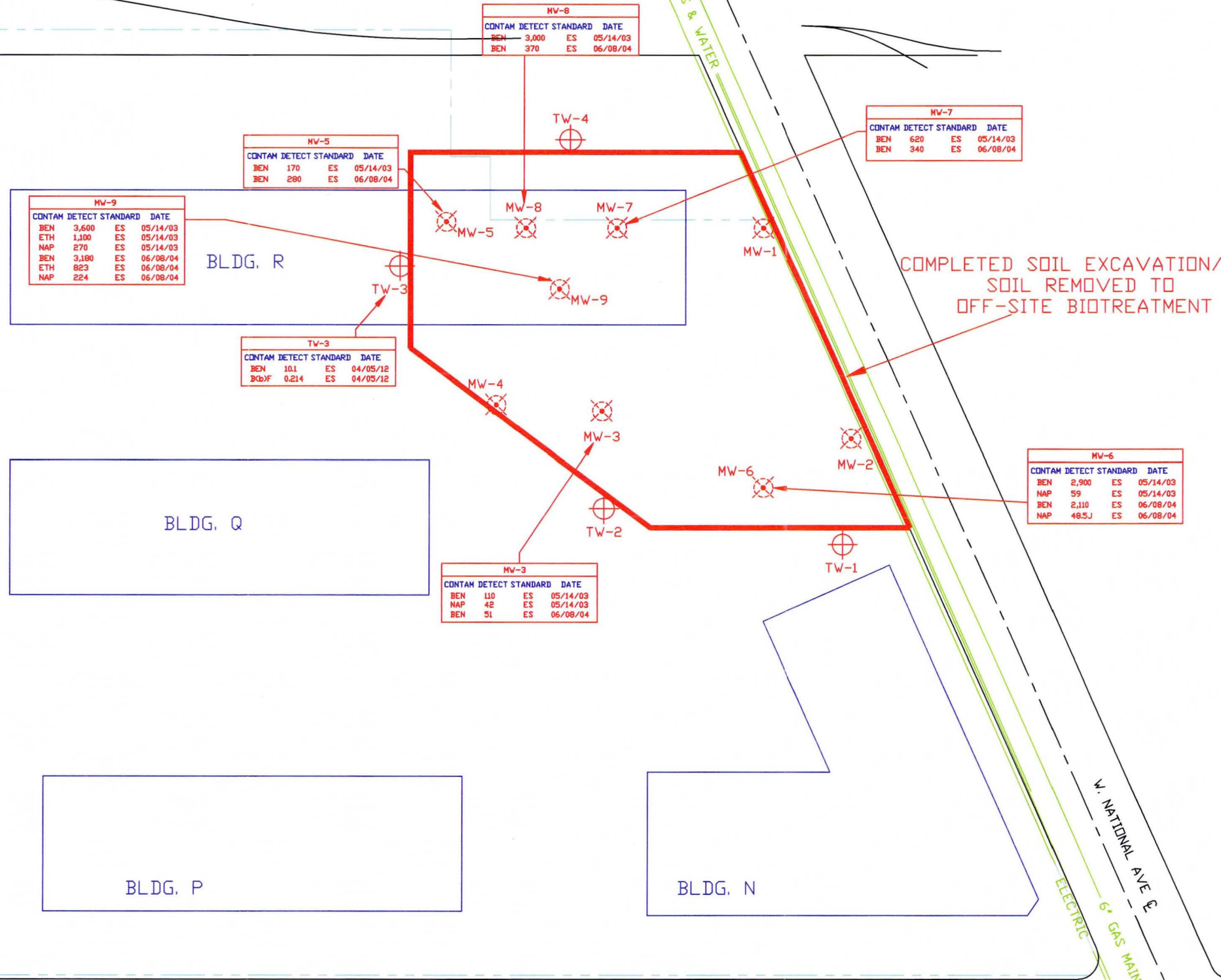
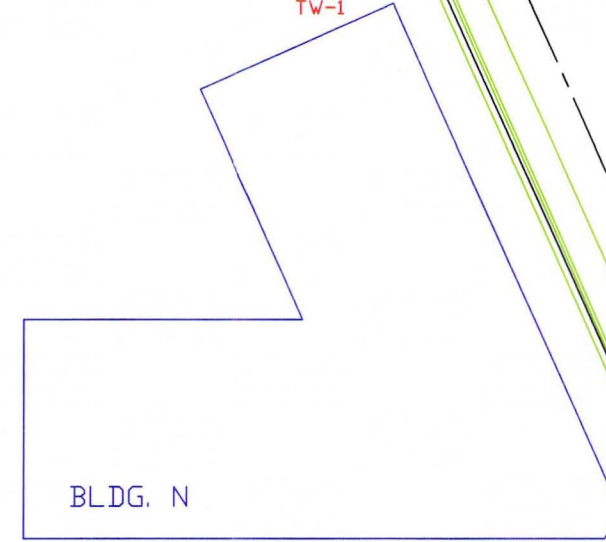
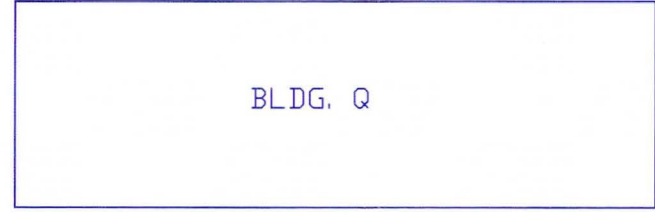
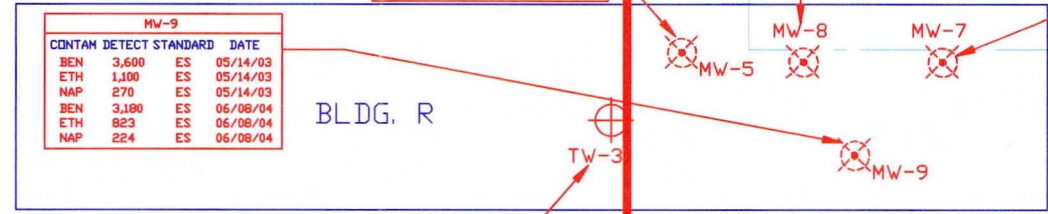
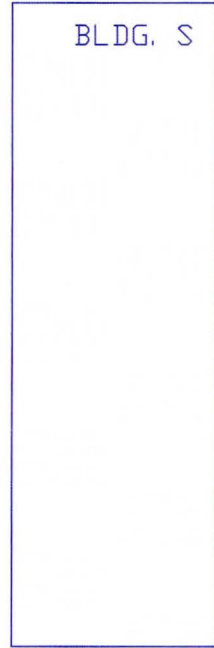
W. MITCHELL STREET

VOC CONTAMINANT	ES	
BEN	BENZENE	5
EBEN	ETHYL BENZENE	700
TBUT	tert-BUTYL BENZENE	-
NBUT	n-BUTYL BENZENE	-
SBUT	sec-BUTYL BENZENE	-
NBUT	n-BUTYL BENZENE	-
CHLM	CHLOROMETHANE	-
CHLE	CHLOROETHANE	400
PISO	p-ISOPROPYL TOLUENE	-
11DCA	1,1-DICHLOROETHANE	7
11DCE	1,1-DICHLOROETHENE	70
C12	cis-1,2-DICHLOROETHENE	70
ISOP	ISOPROPYL BENZENE	-
T12	trans-1,2-DICHLOROETHENE	100
NPRO	n-PROPYL BENZENE	-
TOL	TOLUENE	1000
TCE	TRICHLOROETHENE	5
TMB	TRIMETHYL BENZENES	480
VC	VINYL CHLORIDE	0.2
NAP	NAPHTHALENE	40
XYL	XYLENES	10000

ALL CONTAMINANTS SHOWN IN ug/L
 MICROGRAMS PER LITER

ES ENFORCEMENT STANDARD

ONLY ES EXCEEDANCES SHOWN



COMPLETED SOIL EXCAVATION/
 SOIL REMOVED TO
 OFF-SITE BIOTREATMENT

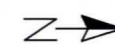
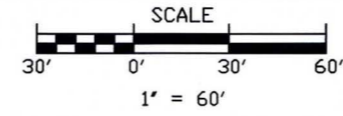
SOUTH 66TH STREET

W. NATIONAL AVE E

LEGEND

PROPERTY LINES

SPUR TRACK



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC
 DATE: 04/29/12 DRAWN BY: TJM
 LOCATION: 6633-39 W. NATIONAL AVE
 WEST ALLIS, WISCONSIN

FIGURE 5
 DIRECTION OF
 GROUNDWATER FLOW

↑
 DIRECTION OF
 GROUNDWATER FLOW

93.16 MAY 15, 2003
 93.72 JUNE 8, 2004

W. MITCHELL STREET

SOUTH 66TH STREET

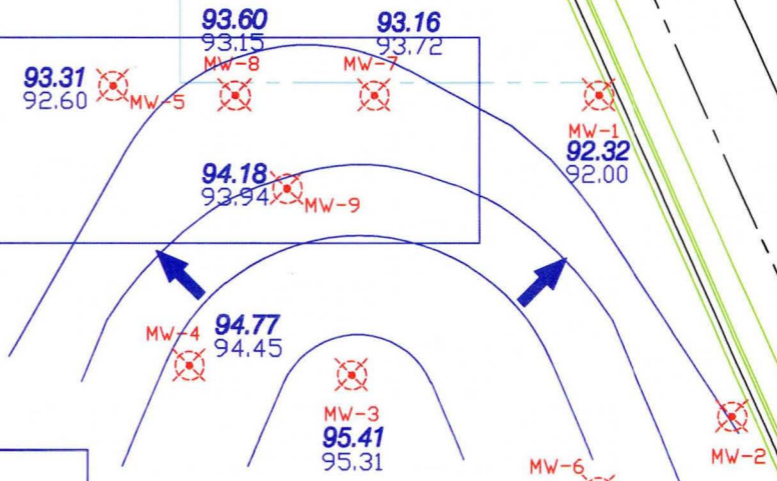
BLDG. S

BLDG. R

BLDG. Q

BLDG. P

BLDG. N



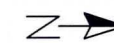
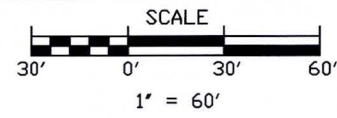
ELECTRIC
 6" GAS MAIN
 GAS & WATER

W. NATIONAL AVE E
 6" GAS MAIN
 ELECTRIC

LEGEND

PROPERTY LINES

EXCAVATION SOIL SAMPLES



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC

DATE: 04/29/12

DRAWN BY: TJM

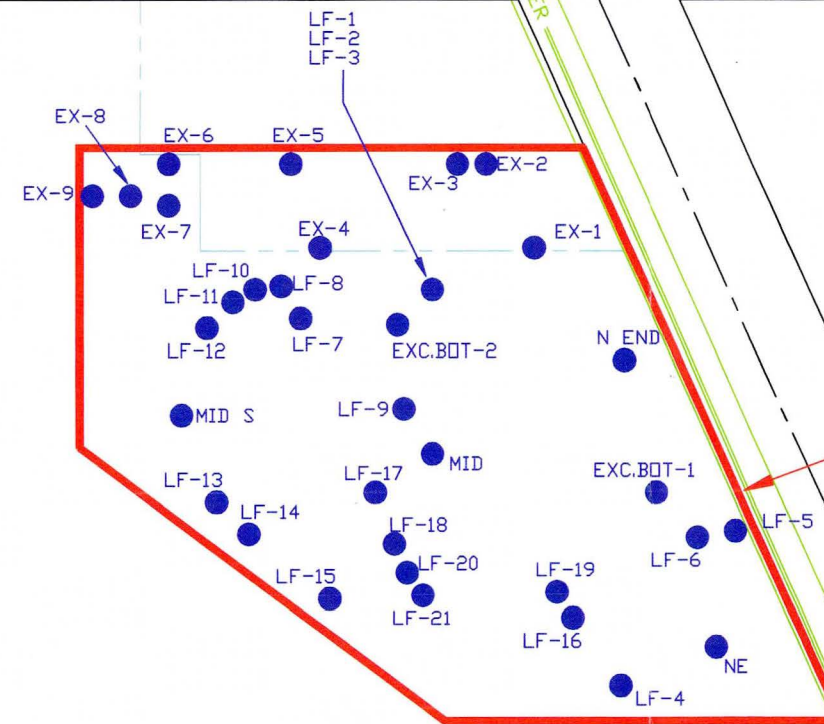
LOCATION: 6633-39 W. NATIONAL AVE
WEST ALLIS, WISCONSIN

FIGURE 6
EXCAVATION SOIL
SAMPLE LOCATIONS

W. MITCHELL STREET

SPUR TRACK

SOUTH 66TH STREET



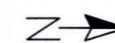
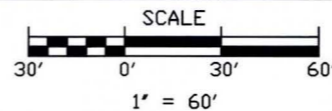
COMPLETED SOIL EXCAVATION/
SOIL REMOVED TO
OFF-SITE BIOTREATMENT

W. NATIONAL AVE
ELECTRIC
6" GAS MAIN

LEGEND

PROPERTY LINES

SPUR TRACK



THE ENVIRONMENTAL MANAGEMENT COMPANY LLC

DATE: 04/29/12 DRAWN BY: TJM

LOCATION: 6633-39 W. NATIONAL AVE WEST ALLIS, WISCONSIN

FIGURE 7 AREAS AND DEPTH INTERVALS OF SOIL CONTAMINATION ABOVE RCL'S

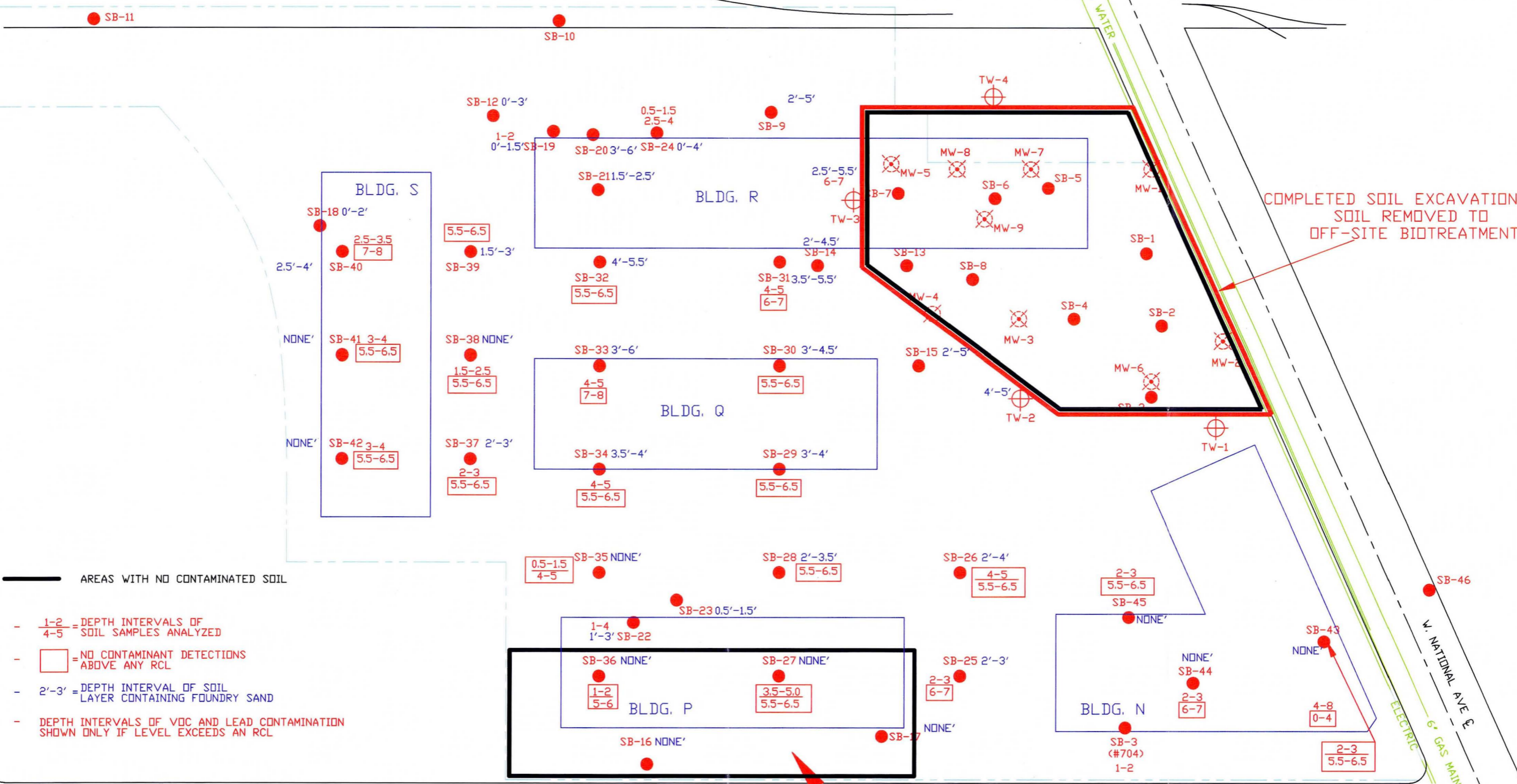
COMPLETED SOIL EXCAVATION/ SOIL REMOVED TO OFF-SITE BIOTREATMENT

W. MITCHELL STREET

W. NATIONAL AVE E

SOUTH 66TH STREET

78' EAST



AREAS WITH NO CONTAMINATED SOIL

- 1-2 / 4-5 = DEPTH INTERVALS OF SOIL SAMPLES ANALYZED
- [] = NO CONTAMINANT DETECTIONS ABOVE ANY RCL
- 2'-3' = DEPTH INTERVAL OF SOIL LAYER CONTAINING FOUNDRY SAND
- DEPTH INTERVALS OF VOC AND LEAD CONTAMINATION SHOWN ONLY IF LEVEL EXCEEDS AN RCL

AREA WITH NO SOIL CONTAMINATION ABOVE ANY RCL

SB-47