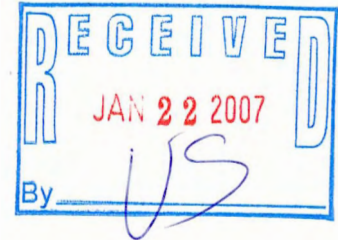


January 16, 2007
(ECI 01-2300-3057)



Mr. Mark Drews
Wisconsin Department of Natural Resources
141 Northwest Barstow Street, Room 180
Waukesha, Wisconsin 53188

RE: Site Investigation Scoping; Express Cleaners, Incorporated, 3941 North Main Street, Racine,
Wisconsin; WDNR BRRTS #02-52-547631

Dear Mr. Drews:

Northern Environmental Technologies, Incorporated (Northern Environmental) completed the site investigation scoping for Express Cleaners, Incorporated (Express Cleaners) at 3941 North Main Street, Racine, Wisconsin (the Site). Express Cleaners is an active dry cleaning business that occupies the northern portion of a building on a parcel of property with the address of 3921-3941 North Main Street, Racine, Wisconsin (the Property).

During April 2006, perchloroethylene contamination was discovered during a Phase II environmental site assessment (ESA) completed at the Site. This submittal summarizes the historic uses of the Site, provides details of previous Phase I and II ESAs, and addresses the site investigation scoping requirements of section NR 169.05(27), Wisconsin Administrative Code (s. NR 169.05[27], Wis. Adm. Code). This report was prepared to ensure that the scope and detail of subsequent field investigation is appropriate to the complexity of the Site.

BACKGROUND INFORMATION

The Site is located on an approximately 0.78-acre parcel in the northeast quarter of the northeast quarter of Section 33, Township 4 North, Range 23 East, Racine, Racine County, Wisconsin as shown in Figure 1 (USGS, 1971). The Property layout is shown in Figure 2. The Site is in a commercial and residential developed area in the city of Racine. The Property is bordered by a gasoline filling station/automobile repair business to the north, vegetable gardens to the east, commercial businesses to the south, and North Main Street followed by an apartment complex to the west.

A single-story masonry building on a concrete slab occupies the Property. The remainder of the Property is covered by asphalt. The Property building is divided into three units (Figure 2). Express Cleaners has operated a dry cleaning business in the northern unit for approximately 1 year. The former and current layout of the dry cleaning equipment is illustrated in Figure 3. Tetrachloroethene (PCE) is the solvent currently used in the dry cleaning machine at the Site. The middle unit, (3931 North Main Street), formerly used as a liquor store, is currently vacant. A tanning salon has occupied the southern unit (3921 North Main Street) for at least 16 years.

Gabriel Environmental Services (Gabriel) completed a Phase I ESA of the Site during March 2006 (Gabriel, 2006a). At the time of the Phase I ESA, Express Cleaners operated a dry cleaning business in the northern unit of the Property building. Based on information contained in the report, a Columbia Dry Cleaning Machine and other laundry equipment were observed in the southeast corner of the northern unit. The dry

cleaning machine was placed within secondary containment. Gabriel identified recognized environmental conditions (RECs) associated with the dry cleaning business operating at the Property. During Gabriel's property inspection, three 55-gallon drums of used PCE and used filters were observed along the outside east wall of the building. The drums did not have secondary containment. Disposal documentation of used PCE and filters was not available at the time of the Phase I ESA inspection. Gabriel also observed a 143-pound plastic container of sodium hydroxide and a 5-gallon container of PCE adjacent to the dry cleaning machine in the southeast corner of Express Cleaners. The containers did not have secondary containment. The condition of the storage containers or evidence of spilling was not discussed. A garbage dumpster was also observed in the northeast corner of the Property. No dry cleaning waste was observed within the dumpster.

Gabriel conducted a Phase II ESA during April 2006 (Gabriel, 2006b) to evaluate soil quality near the building. Gabriel collected soil samples from three boreholes. The soil samples were laboratory analyzed for volatile organic compounds. The borehole locations are included in Figure 3. PCE concentrations as high as 121,000 micrograms per kilogram and lesser concentrations of trichloroethene (TCE) and cis 1,2-dichloroethene (cis 1,2-DCE) were detected in the collected soil samples. Gabriel concluded that used PCE and filters stored in 55-gallon drums and PCE stored within the building had been released to soil at the Site. A copy of the Phase II ESA report is included in Attachment A.

The results of the Phase II ESA were reported to the Wisconsin Department of Natural Resources (WDNR) who subsequently assigned Bureau of Remediation and Redevelopment Tracking System number 02-52-547631 to the Site and requested a site investigation and appropriate remedial action be performed (WDNR, 2006). During December 2006, Mr. James C. Small, on behalf of the owner (Erlich Family Limited Partnership), retained Northern Environmental to complete site scoping activities at the Site. Northern Environmental understands that eligibility for the Dry Cleaning Environmental Fund has been established for the Site.

METHODS OF INVESTIGATION

Northern Environmental inspected the Property, interviewed the following individuals, and reviewed data from the following sources to determine current historical land use, physical setting, existing soil conditions, and to address the Site Investigation Scoping requirements of s. NR 169.05(27), Wis. Adm. Code.

- ▲ Aerial photographs (SEWRPC, 1963, 1967, 1970, 1975, 1980, 1985, 1990, 1995, 2000)
- ▲ Local physiography (USGS, 1971)
- ▲ Local geology and hydrology (Mickelson, et al., 1984) (Trotta and Cotter, 1973)
- ▲ Historical fire insurance map search (EDR, 2006a)
- ▲ Mr. Jun Ahn (Hatfield, 2006a)
- ▲ Ms. Gretchen Killips (Hatfield, 2006b)
- ▲ City of Racine building inspection department (CRBI, 2006)
- ▲ City of Racine Geographic Information System (COR, 2006)
- ▲ Wisconsin Department of Commerce Tank Database (COMM, 2006)
- ▲ Phase I ESA (Gabriel, 2006a)
- ▲ Phase II ESA (Gabriel, 2006b)
- ▲ Wisconsin Department of Natural Resources (WDNR) LUST File Review, Pugh Oil Property (Hatfield, 2006c)
- ▲ WDNR BRRTS Database (WDNR, 2006)

Northern Environmental also contracted Environmental Data Resources, Incorporated (EDR) to perform a records search of standard federal and state databases to identify documented potential environmental conditions on or near the Property (EDR, 2006b). Relevant sections of the EDR report and a listing of the searched databases are included in Attachment B. The results of our investigation are documented in the following sections.

OVERVIEW OF LOCAL PHYSIOGRAPHY, GEOLOGY, AND HYDROGEOLOGY

The ground surface at the Site is generally flat. Surface-water runoff west of the Site building flows into storm sewer catch basins in north Main Street. Surface-water runoff east of the Site building flows east and onto the adjacent unpaved property. The parking lot and service drive are paved with asphalt.

Native sediments in the area consist of till deposits of the Oak Creek Formation (Mickelson, et al., 1984). The Oak Creek Formation generally consists of silty clay till deposited by ice of the Lake Michigan and Green Bay Lobes and associated fluvial and lacustrine deposits. This formation typically overlies older glacial sediments or Ordovician-age dolomite bedrock (Mickelson, et al., 1984). Based on soil descriptions logged by Gabriel during a Phase II ESA, soil at the Site consists of discontinuous units of sand, clay, and sandy clay. Depth to bedrock ranges from 50 to 100 feet below grade (fbg) (Trotta and Cotter, 1973).

The shallow water table is often a subdued expression of surface topography. Shallow groundwater generally flows from areas of groundwater recharge, such as hills and broad uplands, to areas of groundwater discharge, such as wetlands, rivers, and lakes. Based on the local surface topography, shallow groundwater is expected to flow generally north towards an unnamed intermittent stream that flows east into Lake Michigan. Based on groundwater elevation measurements collected as part of a leaking underground storage tank (LUST) investigation at the neighboring Pugh Oil property, groundwater was encountered at approximately 4 to 16 fbg and flowed northwest (Hatfield, 2006c). A groundwater elevation contour map is included in Attachment C. Buried utility lines and sewers within North Main Street may be altering shallow groundwater flow direction.

SCOPING RESULTS

Site investigation scoping was conducted in accordance with s NR 169.05(27), Wis. Adm. Code. The specific scoping requirements are listed in italics and followed by the appropriate response.

- 1 History of the facility, including the location of dry cleaning equipment and chemical and filter storage.*

Northern Environmental contracted EDR to conduct a search of historical fire insurance maps of the Property and surrounding area (EDR, 2006b). Historical fire insurance maps were not available for the Property or surrounding area.

Aerial photographs (SWRPC, 1963, 1967, 1970, 1975, 1980, 1985, 1990, 1995, 2000) were reviewed for historical changes that have occurred at the Property since 1963. The Property appeared to be a vacant grassy field between at least 1963 and 1970. The current Property building is first visible in the 1975 aerial photograph. No significant changes to the Property were observed in the aerial photographs after 1975. The two gasoline filling stations north of the Property were observed in all the aerial photographs.

No permits or records of environmental concern were noted in the building inspection records (CRBI, 2006). Information regarding how long the Site had been used as by a dry cleaning business was not available. The EDR report identified the Site as a RCRA small quantity generator, FINDS site, and MANIFEST site. According to EDR records, these are the result of the disposal of used dry cleaning solvents. No violations were reported. No underground storage tanks (USTs) or aboveground storage tanks were registered on Wisconsin Department of Commerce tank database for the Property (COMM, 2006)

The current owner of Express Cleaners, Mr. Jun Ahn, was interviewed to evaluate the current dry cleaning operation and to provide information regarding the Site history (Hatfield, 2006a). Mr. Ahn has operated Express Cleaners at the Site since 2005. Valet Cleaners, also a dry cleaning business, occupied the Site before 2005. Before moving his dry cleaning business to the Site, Mr. Ahn observed a dry cleaning machine that used PCE being removed from the building. According to Mr. Ahn, the dry cleaning machine was "very old" and did not have secondary containment. The former dry cleaning machine location is shown in Figure

3. Mr. Ahn did not observe any other dry cleaning machines at the Site. Mr. Ahn installed the in-use Columbia Dry Cleaning Machine before opening Express Cleaners. The Columbia Dry Cleaning Machine uses PCE and is placed within secondary containment. PCE is stored within the machine. Mr. Ahn stated that the only solvent he uses is PCE. Used PCE, dry cleaning machine filters, and separator water are stored in 5- to 55-gallon sealed containers within the Site building.

During a site inspection conducted by Mr. Christopher Hatfield (Northern Environmental) on December 8, 2006, the observed Property uses were consistent with those reported in the Gabriel Phase I ESA. However, the drums of used PCE and filters were stored within the Site building. In addition, no floor drains were observed within the Site building. Two sealed sanitary sewer pipes were observed protruding from the concrete floor at the locations shown in Figure 3.

Ms. Gretchen Killips, an employee of Valet Cleaners between 1991 and 2005 and employee of Express Cleaners between 2005 and the present, was also interviewed to determine historic dry cleaning operations at the Site (Hatfield, 2006b). She confirmed the location of the former dry cleaning machine (Figure 3) and stated that the dry cleaning machine previously used was a Marvel brand machine and at least 30 years old when it was removed during 2005. The machine was typically filled by a tanker truck that parked along the east side of the Site building and pumped PCE through a hose directly into the dry cleaning machine. She also reported the storage of used PCE and filters (without secondary containment) in 55-gallon drums occurred east of the building. She did not recall who performed the disposal of used PCE or filters and did not recall any spillage on surfaces east of the building associated with the used PCE and filter storage, or PCE deliveries. She did recall "minor" spillage of PCE on a few occasions at the dry cleaning machine during filling. She did not observe any spilled PCE spreading further than a few feet from the dry cleaning machine and did not believe any other solvents (Stoddard solvents, naphthalene, trichloroethene, etc.) were used in the dry cleaning process. She also stated that the garbage dumpster has always been located at the northeast corner of the Site.

Northern Environmental attempted to contact a former manager of Valet Cleaners (Mr. Steve Rawlinko) to obtain additional dry cleaning operation history. Mr. Rawlinko did not respond to our requests (Hatfield, 2006d).

2) *Knowledge of the type and amount of contamination.*

The type of contamination (PCE and its breakdown products) was identified during the Gabriel Phase II ESA. The amount of contamination is unknown. Boreholes completed during the Gabriel Phase II ESA are shown on Figure 3. The soil sampling results are summarized below.

Borehole ID	Sample #	Depth (feet)	Detected Volatile Organic Compounds (micrograms per liter)			
			PCE	TCE	Cis-1,2-DCE	Acetone
B1	S2	4	121,000	618	461	ND
B1	S6	12	ND	ND	ND	ND
B2	S1	2	9900	ND	ND	ND
B2	S6	12	465	ND	26	ND
B3	S2	4	21,100	346	6	475

Note:

ND = not detected

3) *Environmental media-affected or potentially effected by the contamination.*

The Gabriel Phase II ESA detected released PCE and associated breakdown products in soil at the Site. The released PCE has also likely contaminated groundwater at the Site and has potentially migrated off site.

4) *Location of the Site or facility and its proximity to other sources of contamination.*

Two LUST sites (Pugh Oil Company [Pugh Oil] and Murphy Oil USA [Murphy Oil]) are located near the Site (EDR, 2006b). The Pugh Oil site is adjacent to the northern Site boundary. Northern Environmental personnel reviewed the WDNR records regarding Pugh Oil (Hatfield, 2006c). Petroleum contamination was discovered during the removal of six USTs from the site during 1991. The extent of petroleum-contaminated soil and groundwater resulting from the release was determined during subsequent site investigation activities. During 1991, approximately 1040 tons of petroleum-contaminated soil was excavated from the site. Additional groundwater monitoring was conducted between 1992 and 1999. Dry cleaning solvents were not detected during the investigation. However, very few soil or groundwater samples were analyzed using methods that would detect non-petroleum-based solvents. The recorded groundwater flow direction was to the northwest. During 2000, the WDNR required no further investigation of the petroleum release and conditionally closed the site (Kalvelage, 2000). Based on the results of the site investigation, petroleum-contaminated soil does not appear to extend onto the Site. However, the current USTs at this site are within approximately 20 feet of the northern Site boundary. Therefore, a future release could affect soil or groundwater quality at the Site. Additional details regarding Pugh Oil investigation are present in Attachment D.

The Murphy Oil LUST site is located approximately 300 feet northwest of the Site on the northwest corner of 3 Mile Road and North Main Street. A gasoline filling station has operated at the Murphy Oil site since at least 1973. During April 1991, gasoline was detected in collected soil samples. The gasoline release was reported to the WDNR during April 1991 (Lewis, 2006). Between 1991 and 2006, a site investigation was completed that defined the extent of released petroleum in soil and groundwater at the Murphy Oil site. Gasoline-contaminated soil and groundwater extended into 3 Mile Road, North Main Street, and an adjacent property but did not appear to extend south of 3 Mile Road. In addition, PCE was detected in groundwater from a monitoring well located in the North Main Street right-of-way approximately 180 feet north of 3 Mile Road. PCE was not detected in any other monitoring well. The source of the PCE was not determined. Northern Environmental completed a letter summarizing the site investigation and groundwater monitoring conducted at the site and requested the WDNR review the site for closure during 2006 (Lewis, 2006). During 2006, the WDNR approved the request for no further action and closed the site. Gasoline-contaminated soil or groundwater originating from the site is not likely to impact soil or groundwater quality at the Property.

5) *Assessment of potential or known impacts to receptors. Receptors are defined by the Wisconsin Administrative Code as "environmental resources, including but not limited to, plant and animal species and humans, sensitive environments and habitats, water supply wells, and buildings or locations that have the potential to be, or have actually been exposed to contamination."*

There are no known threatened or endangered species, habitats, or ecosystems sensitive to the contamination; outstanding resource waters; sites; or facilities of historical or archeological significance (CRBI, 2006) (COR, 2006). The property immediately east of the subject site, approximately 25 feet from the rear door of the dry cleaning operation, is used as a public vegetable garden. This area may have the potential for human contact with the dry cleaning solvent contamination.

6) *Assessment of potential or known impacts to sensitive areas including wetlands, outstanding resource waters and exceptional resource waters, and sites or facilities of historical or archaeological significance.*

The Property is serviced by city of Racine public water and sewer utilities. Potable water is obtained from Lake Michigan. No other known private wells are located within 1200 feet of the Site (Lewis, 2006). There are no known impacts to sensitive areas.

- 7) *A map showing the site boundaries, location of the source areas, including utility corridors, sewer lines, adjacent streets, receptor locations, sample locations and the results of sampling.*

Figures 2 and 3 illustrate the layout of the Site and surrounding area. The Gabriel Phase II ESA borehole locations are also shown in Figure 3. Water and sewer utilities likely enter beneath the southern end of the Site building and extend to the eastern side of the Site buildings (COR, 2006). Natural gas-burning furnaces are used to heat the building. Natural-gas service is provided by a buried utility pipe extending along the northern Property boundary and entering the northeast corner of the building.

CONCLUSIONS

The Site has been used by two dry cleaning businesses since at least 1991. PCE is reportedly the only dry cleaning solvent used in dry cleaning machines at the Site. Historically, used PCE and filters were stored in 55-gallon drums placed east of the Site building. PCE spillage may have occurred at the former dry cleaner machine location.

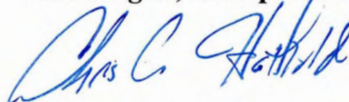
Soil sampling conducted by Gabriel during April 2006 determined that a PCE release to soil has occurred. The highest concentrations of PCE in soil were detected near the used PCE solvent storage area. PCE was also detected beneath the concrete floor adjacent to the active dry cleaning machine. Soil samples were not collected in the former dry cleaning machine location.

RECOMMENDATIONS

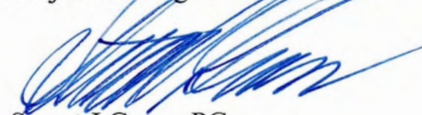
Additional investigation is needed to determine the magnitude and extent of contaminated soil and groundwater. This site investigation scoping report should be used to develop a workplan for completing the site investigation. The goal of the investigative work is to further evaluate contaminant concentrations and determine the vertical and horizontal extent of released dry cleaning solvent. To assist with obtaining cost proposals for the site investigation, we are submitting our suggested workplan for the site investigation in a separate letter.

We trust this information meets your needs. Please contact us if you have any questions or comments.

Sincerely,
**Northern Environmental
Technologies, Incorporated**



Christopher C. Hatfield
Project Geologist



Stuart I. Gross, PG
Associate Geologist

CCH/lmh
Attachments

c: James C. Small POA, Ehrlich Family Limited Partnership

REFERENCES

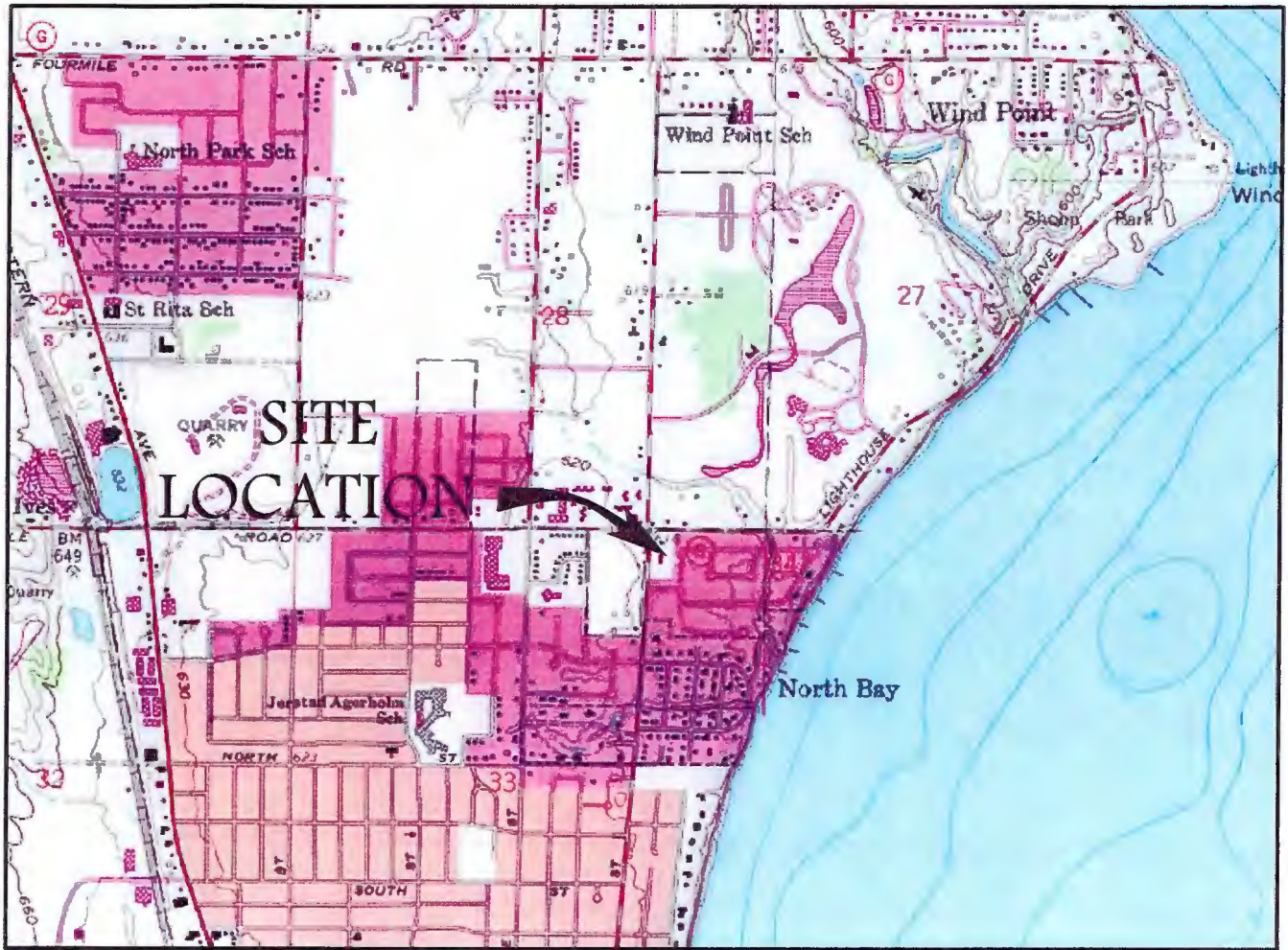
- City of Racine (COR) Geographic Information System, December 7, 2006. <http://gisweb.cityofracine.org>
- City of Racine Building Inspection Department (CRBI) records review by Christopher C. Hatfield (Northern Environmental, Technologies, Incorporated (Northern Environmental)), December 8, 2006.
- Environmental Data Resources, Incorporated, *Sanborn Fire Insurance Map Search, Express Cleaners, Inc, 3941 North Main Street, Racine, Wisconsin*, December 6, 2006(a).
- Environmental Data Resources, Incorporated, *The EDR Radius Map Report, Express Cleaners, Inc, 3941 North Main Street, Racine, Wisconsin*, December 6, 2006(b).
- Gabriel Environmental Services (Gabriel), "*Phase I Environmental Site Assessment, 3921-3941 North Main Street, Racine, Wisconsin*", March 6, 2006(a).
- Gabriel Environmental Services (Gabriel), "*Limited Focused Phase II Environmental Site Assessment, 3921-3941 North Main Street, Racine, Wisconsin*", March 6, 2006(b).
- Hatfield, Christopher C. (Northern Environmental Technologies, Incorporated) conversation with Jun Ahn (Express Cleaners, Incorporated), December 8, 2006(a).
- Hatfield, Christopher C. (Northern Environmental Technologies, Incorporated) conversation with Gretchen Killips (Express Cleaners, Incorporated), December 11, 2006(b).
- Hatfield, Christopher C. (Northern Environmental Technologies, Incorporated) review of WDNR LUST file Pugh Oil Company, 3953 North Main Street, Racine, Wisconsin, December 11, 2006(c).
- Hatfield, Christopher C. (Northern Environmental Technologies, Incorporated), telephone call to Steve Rawlinko (former Manager, Valet Cleaners), December 11 and 12, 2006(d).
- Kalvelage, Brian H. (Wisconsin Department of Natural Resources), letter to William Pugh (Pugh Oil), January 31, 2000.
- Lewis, Jonathan C. (Northern Environmental Technologies, Incorporated) letter to C.L. Russell (Murphy Oil USA), June 5, 2006.
- Mickelson, D. M., Lee Clayton, Robert W. Baker, William D. Mode, and Allen F. Schneider, *Miscellaneous Paper 84-1: Pleistocene Stratigraphic Units of Wisconsin*, Wisconsin Geological and Natural History Survey, July 1984.
- Southeast Wisconsin Regional Planning Commission (SEWRPC), *Aerial Photographs, Township 4 North, Range 23 East Section 33*, 1963, 1967, 1970, 1975, 1980, 1985, 1990, 1995, 2000.
- Trotta, L.C. and R.D. Cotter, *Depth to Bedrock Map of Wisconsin*, United States Geological Survey, 1973.
- U.S. Geological Survey (USGS), *Racine North, Wisconsin, 7.5 Minute Quadrangle Topographic Map*, 1951, revised 1971.
- Wisconsin Department of Commerce (COMM), Tank Database Search, December 8, 2006.

Wisconsin Department of Natural Resources, "Hazardous Substance Discharge Notification and Source Confirmation Requirements, *Wisconsin Administrative Code*, Chapter 706, March 2001.

Wisconsin Department of Natural Resources, "Site Investigation," *Wisconsin Administrative Code*, Chapter 716, October 2001.

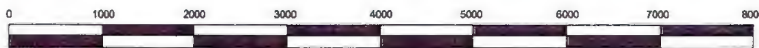
Wisconsin Department of Natural Resources, "Dry Cleaner Environmental Response Program," *Wisconsin Administrative Code*, Chapter NR 169, July 2005.

Wisconsin Department of Natural Resources, BRRTS Internet Database,
<http://botw.dnr.state.wi.us/botw/GetActivityDetail.do?detailSeqNo=547631&siteId=754300&crumb=1&s=B>,
December 18, 2006.



SCALE IN FEET

1" = 2000'



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



QUADRANGLE LOCATION

BASE MAP SOURCE: USGS 7.5 MINUTE QUADRANGLE, WHITING, WISCONSIN, 1976 (NATIONAL GEOGRAPHIC HOLDINGS, INC.)

Northern Environmental SM
Hydrologists • Engineers • Surveyors • Scientists

12075 North Corporate Parkway, Suite 210, Mequon, Wisconsin 53092
Phone: 800-776-7140 Fax: 262-241-8222

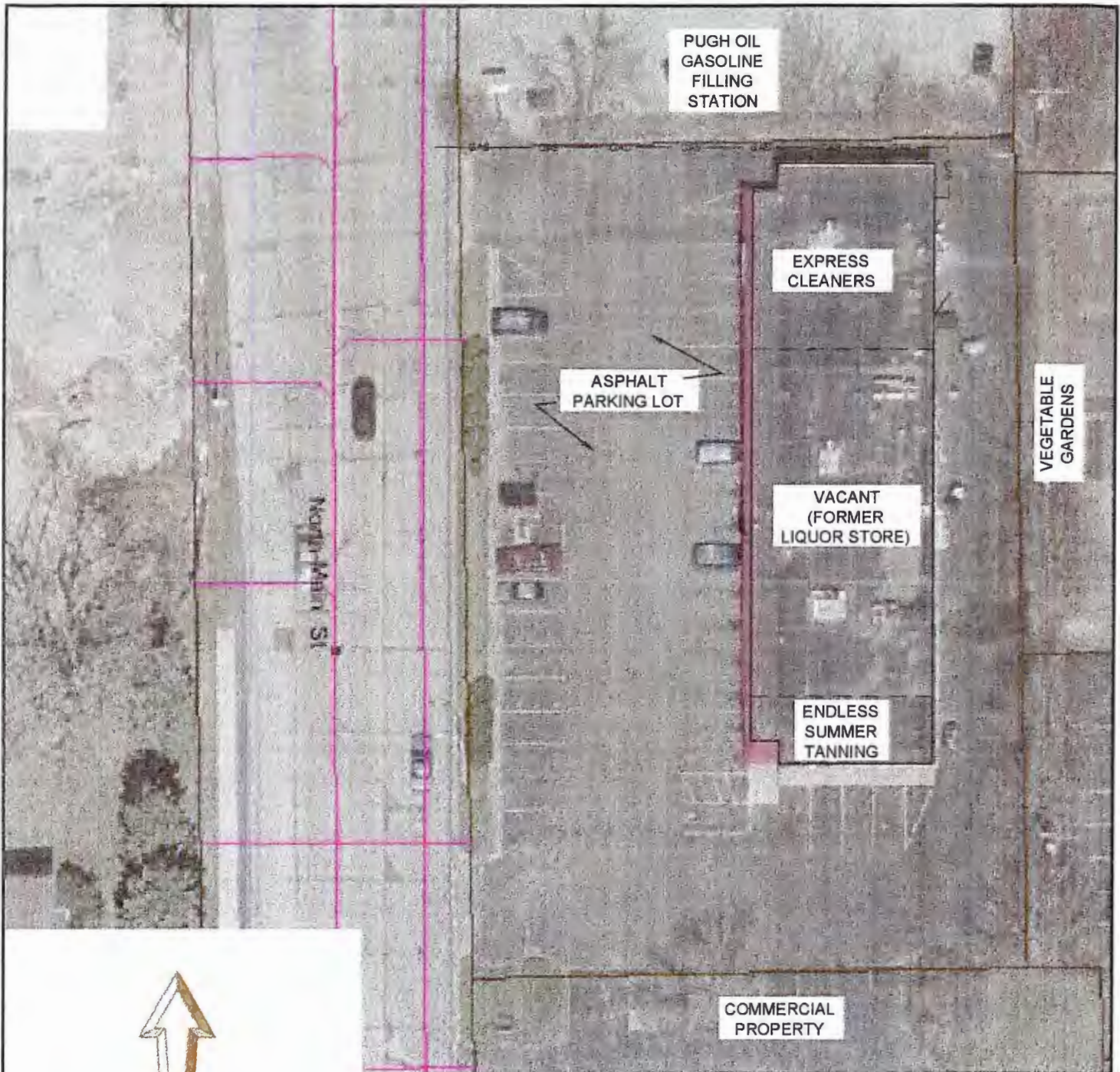
WISCONSIN ▲ MICHIGAN ▲ ILLINOIS ▲ IOWA

**SITE LOCATION
& LOCAL TOPOGRAPHY**

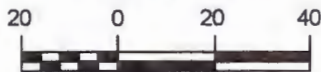
EXPRESS CLEANERS, INCORPORATED
3941 N. MAIN STREET
RACINE, WISCONSIN

DATE: 12/12/06	DRAWN BY: BMP	TASK NUMBER:	PROJECT NUMBER: ECI 01-2300-3057	FIGURE 1
----------------	---------------	--------------	----------------------------------	----------

This drawing and all information contained thereon is the property of Northern Environmental. Northern Environmental will not be held liable for improper or incorrect usage. Professional seals and signatures do not apply to electronic drawing files. The user assumes all responsibility and risk for the accuracy and verification of all information contained in electronic files.



SCALE IN FEET



LEGEND

- GAS —— NATURAL GAS LINE
- BLUE= WATER UTILITY
- PURPLE= SANITARY SEWER UTILITY
- BROWN= PROPERTY LINE



Hydrologists • Engineers • Surveyors • Scientists

12075 North Corporate Parkway, Suite 210, Mequon, Wisconsin 53092
 Phone: 800-776-7140 Fax: 262-241-8222

WISCONSIN ▲ MICHIGAN ▲ ILLINOIS ▲ IOWA

SITE LAYOUT

EXPRESS CLEANERS, INCORPORATED
3921 N. MAIN STREET
RACINE, WISCONSIN

DATE: 12/12/06	DRAWN BY: BMP	TASK NUMBER: 1	PROJECT NUMBER: ECI 01-2300-3057	FIGURE 2
----------------	---------------	----------------	----------------------------------	----------

ATTACHMENT A

**GABRIEL ENVIRONMENTAL SERVICES
PHASE II ENVIRONMENTAL SITE ASSESSMENT**

GABRIEL

Environmental Services

LIMITED FOCUSED PHASE II ENVIRONMENTAL SITE ASSESSMENT

Performed For

**EHRlich FAMILY LIMITED PARTNERSHIP
4101 WASHINGTON AVENUE
RACINE, WISCONSIN 53408**

On A Site Located At

**3921-3941 NORTH MAIN STREET
RACINE, WISCONSIN 53402**

By

**Gabriel Environmental Services
1500 S. Sylvania Avenue #112
Sturtevant, Wisconsin 53177-1232**

©2005

Submitted on April 25, 2005^{6 MAY} by:

**Deidrah Simcik
Field Specialist**

Project Number: P06-04014

COPY

Chicago

1421 N. Elston Avenue
Chicago, Illinois 60622
Phone (773) 486-2123
Fax (773) 486-0004

Rockford

7123 Chenyvale Blvd. North
Suite 200B
Rockford, IL 61112
Phone (815) 332-8378
Fax (815) 332-8377



NW Indiana

8522 Kennedy Avenue
Highland, IN 46322
Phone (219) 972-1110
Fax (219) 972-1211

SE Wisconsin

1500 S. Sylvania Avenue
Suite 112
Sturtevant, WI 53177
Phone (262) 886-9505
Fax (262) 886-9510

LIMITED PHASE II ENVIRONMENTAL INVESTIGATION
 EHRLICH FAMILY LIMITED PARTNERSHIP
 4101 WASHINGTON AVENUE
 RACINE, WISCONSIN 53408

TABLE OF CONTENTS

Section	Page
1. Executive Summary.....	1
2. Site Background.....	2
3. Methodology.....	2
3.1 Subsurface Soil Borings	
3.2 Sample Collection	
3.3 Field Screening Method	
3.4 Sample Selection and Laboratory Analysis	
4. Data Review.....	3
4.1 Volatile Organic Compounds Results	
5. Statement of Limitations.....	5
6. Appendices.....	6
A. Analytical Results	
B. Soil Boring Location Diagram	

1. Executive Summary

Ehrlich Family Limited Partnership retained Gabriel Environmental Services (Gabriel) to conduct a Limited Phase II Environmental Investigation at the property located at 3921-3941 North Main Street, Racine, Wisconsin 53402. This investigation action was performed to address the subsurface soils on the north/east end of the building, where according to the Phase I Environmental Site Assessment, soil contaminants may have been leaking from 55-gallon storage drums containing hazardous wastes and from solvents stored inside the building without secondary containment.

A total of (3) soil borings were advanced into the subsurface soils at the subject site on April 12, 2006. See Soil Boring Location Map in Appendix B for boring locations. Field screening of samples collected from the borings, including the use of a Photoionization Detector (PID) meter, revealed no levels of petroleum contamination in the soil borings.

EPA Method 8260 Volatile Organic Compound (VOC) analysis was performed on (5) soil samples, B-1 (4.0'), (12.0'), B-2 (2.0'), (12.0'), and B-3 (4.0'). Laboratory analysis revealed VOC levels in all but one, B-1 (12.0'), of the soil samples collected. Complete Laboratory Results are located in Appendix A.

Based on laboratory analysis, it appears that the 55-gallon storage drums outside and the solvent stored inside the building have negatively impacted the subsurface conditions of the subject site.

2. Site Background

The subject property is located at 3921-3941 North Main Street, Racine, Wisconsin. The subject property consists of a rectangular shaped, approximately 0.78 acre, parcel of land, located east of North Main Street between 3 Mile Road and Saxony Drive, three miles north of downtown Racine, in the State of Wisconsin. The site is currently developed with one building that is utilized as a commercial space containing a tanning salon, a dry cleaner and a vacant commercial space.

3. Methodology

During the course of the Limited Phase II Environmental Investigation performed at 3921-3941 North Main Street, Racine, Wisconsin, soil samples were procured to evaluate the environmental conditions on the property. A total of three (3) soil borings, labeled B-1, B-2 and B-3 were performed on Wednesday, April 12, 2006.

3.1 Subsurface Soil Borings

Prior to any sampling, utility locations were marked by the appropriate authorities utilizing the Diggers Hotline, a service provided by the State of Wisconsin. Diggers Hotline was informed to notify utilities of digging and allow for marking of the utilities underground lines. The Diggers Hotline number associated with this project is 20061509153.

Three (3) soil borings were advanced into the subsurface soils at the subject property on April 12, 2006. See soil Boring Location Map in Appendix B for boring locations. Boring B-1 was advanced to a depth of twelve (12) feet Below Surface Grade (BSG). Boring B-2 was advanced to a total depth of twelve (12) feet BSG. Boring B-3 was advanced to a total depth of four (4) feet BSG. The boring depths were determined based on the suspect depth of contamination.

3.2 Sample Collection

Representative soil samples for soil borings B-1 and B-2 were collected at intervals from a 2.125' diameter Geoprobe Macro Bore sampling tube. The sampling tube was pushed through the subsurface sediments with a Geoprobe 5400 drilling unit as a continuous soil sample was procured to the desired depth. Samples for boring B-3 were collected from a one and a half inch diameter. The sampling tube was pushed through the subsurface sediments with a Bosch hand held drilling unit. Soil samples were collected directly from the Acetate insert liner of the sampling tube.

All sampling equipment was then washed with alkaline detergent and rinsed with deionized water between the collection of each sample. Separate Nitride gloves were used to remove the soil samples from each liner.

Samples submitted for laboratory analysis were transferred from the soil liner to disposable plastic syringes and individual plastic containers for VOC and Total Solids analysis. Samples were then immediately placed in a cooler packed with ice to preserve the samples during transport to our laboratory, where all laboratory procedures identified in UPSEPA Method 8260B were followed.

3.3 Field Screening Methods

Soil samples collected in the field were screened with a MiniRae® Micro Tip Photoionization Detector (PID) with a 106 eV lamp. Soil types were described, and visual and olfactory indications were noted. A portion of each sample was placed into a clean plastic Ziploc® bag. The bag was sealed and placed in the cab of the truck then allowed to warm to the ambient air temperature (approximately 70° F). The probe of the PID was inserted through the seal of the plastic bag to measure the concentration of airborne photoionizable gases present in the area over the soil sample "head space". The PID readings were used to provide relative levels of contamination in the soil samples. The PID was calibrated in the field prior to field screening.

3.4 Sample Selection and Laboratory Analysis

Five (5) soil samples, B-1 (4.0'), (12.0'), B-2 (2.0'), (12.0') and B-3 (4.0'), were submitted to the laboratory for UPSEPA Method 8260B Volatile Organic Compound (VOC) analysis. The five (5) samples were chosen for lab analysis due to field location and likelihood of contamination.

4. Data Review

4.1 Volatile Organic Compound Results

USEPA Method 8260B Volatile Organic Compound (VOC) analysis utilized Gas Chromatography and Mass Spectrometry to analyze 69 target volatile compounds including many petroleum and chlorinated compounds. This analysis generates a graphic representation called a chromatogram. The chromatogram shows the target compounds listed in the analytical report and may also indicate the presence of other compounds detected outside of the target parameters. The chromatogram does not quantify concentrations or identify the non-target compounds, but does graphically represent their presence.

Five (5) soil samples, B-1 (4.0'), (12.0'), B-2 (2.0'), (12.0') and B-3 (4.0'), were submitted to the laboratory for UPSEPA Method 8260B Volatile Organic Compound (VOC) analysis. Complete laboratory results, including chromatograms, are contained in Appendix A.

Laboratory analysis of four (4) samples revealed detectable VOC levels.

5. Statement of Limitations

The environmental assessment detailed in this report has been performed in accordance with generally accepted methods and practices of the environmental laboratory engineering profession. The scope and depth of this study were as directed, and as agreed to, by the client.

Gabriel uses experienced and trained professionals in attempting to locate and identify hazardous materials or conditions. We do not warrant that all such materials have been identified. It is possible that some materials containing a hazardous substance were not visible or accessible to the surveyor, or, for various other reasons, were not sampled.

All findings are based on documentary review, conversations, and analytical data proved by the laboratory as noted in this report. These findings are not to be considered scientific certainties. The intent of this study was to identify environmental concerns, which would be obvious to skilled, knowledgeable professional applying accepted standards. This report is not intended to represent an exhaustive research of all potential hazards that may exist at this site.

This report also does not purport to be representative of future conditions or events. Activities, which transpire subsequent to this report, which result in adverse environmental impacts, are not to be construed as relevant to this study.

This report has been performed for the exclusive use of the client. Our report and its findings shall not, in whole or part, be disseminated to any other party, nor be used by any other party without prior written consent by Gabriel Environmental Services.

STONE PALMERIAN HILLER

011

APPENDICES

- A. Analytical Results
- B. Soil Boring Location Diagram

APPENDIX A

GABRIEL

Environmental Services

Client: Gabriel Wisconsin

Sample Description: B1 S2
 Sample Date: 4/12/06
 Date Analyzed: 4/13/06
 Collected By: Gabriel

Method: SW-846-8260B

Sample No.: 2006040053-1
 Date Received: 4/12/2006
 Matrix: Solids
 Analyst: AS
 Units: ug/Kg (Dry wt.)

PARAMETER	RESULT	RL	PARAMETER	RESULT	RL
Acetone	BRL	100	1,3-Dichloropropane	ND	5
Benzene	ND	5	2,2-Dichloropropane	ND	5
Bromobenzene	ND	5	1,1-Dichloropropane	ND	5
Bromochloromethane	ND	5	cis-1,3-Dichloropropene	ND	5
Bromodichloromethane	ND	5	trans-1,3-Dichloropropene	ND	5
Bromoforn	ND	10	Ethylbenzene	ND	5
Bromomethane	ND	5	Hexachlorobutadiene	ND	5
n-Butylbenzene	ND	5	2-Hexanone	ND	5
2-Butanone (MEK)	BRL*	2000	Iodomethane	ND	100
sec-Butylbenzene	ND	5	Isopropylbenzene	ND	5
tert-Butylbenzene	ND	5	4-Isopropyl toluene	ND	5
Carbon disulfide	ND	100	Methylene chloride	ND	10
Carbon tetrachloride	ND	5	4-Methyl-2-pentanone	ND	5
Chlorobenzene	ND	5	Methyl tert-butyl ether	ND	5
Chloroethane	ND	10	Naphthalene	ND	5
Chloroform	ND	5	n-Propylbenzene	ND	5
Chloromethane	ND	10	Styrene	ND	5
2-Chlorotoluene	ND	5	1,1,1,2-Tetrachloroethane	ND	5
4-Chlorotoluene	ND	5	1,1,2,2-Tetrachloroethane	ND	5
Dibromochloromethane	ND	5	Tetrachloroethene	121000**	5000
1,2-Dibromo-3-chloropropane	ND	5	Toluene	ND	5
1,2-Dibromomethane	ND	5	1,2,3-Trichlorobenzene	ND	5
Dibromomethane	ND	5	1,2,4-Trichlorobenzene	ND	5
1,2-Dichlorobenzene	ND	5	1,1,1-Trichloroethane	ND	5
1,3-Dichlorobenzene	ND	5	1,1,2-Trichloroethane	ND	5
1,4-Dichlorobenzene	ND	5	Trichloroethane	618*	250
Dichlorodifluoromethane	ND	5	Trichlorofluoromethane	ND	5
1,1-Dichloroethane	ND	5	1,2,3-Trichloropropane	ND	5
1,2-Dichloroethane	ND	5	1,2,4-Trimethylbenzene	ND	5
1,1-Dichloroethene	ND	5	1,3,5-Trimethylbenzene	ND	5
cis-1,2-Dichloroethene	461*	250	Vinyl chloride	ND	10
trans-1,2-Dichloroethene	BRL	5	Vinyl acetate	ND	100
1,2-Dichloropropane	ND	5	Xylenes (total)	ND	10

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	104	79-123
Toluene-d8	102	88-119
4-Bromofluorobenzene	92	79-117

Abbreviations: ND= Compound not detected J= Concentration < RL, based on detection limit E= Result exceeds calibration curve
 BRL= Below reportable limits Q= Recovery outside limits MI= Matrix interference RL= Reporting limit

Comments:

- * Dilution factor of 50, analyzed 4/19/06. Surrogate recoveries were within control limits.
- ** Dilution factor of 1000, analyzed 4/20/06. Surrogate recoveries were within control limits.

Data Release Authorized by:

D. Panek / KS
 Danuta Panek, Organics Laboratory Manager

Date:

4-21-06

GABRIEL

Environmental Services

Client: Gabriel Wisconsin

Sample Description: B1 S6
 Sample Date: 4/12/06
 Date Analyzed: 4/13/06
 Collected By: Gabriel
 Method: SW-846-8260B

Sample No.: 2006040053-4
 Date Received: 4/12/06
 Matrix: Solids
 Analyst: AS
 Units: ug/Kg (Dry wt.)

PARAMETER	RESULT	RL	PARAMETER	RESULT	RL
Acetone	BRL*	200	1,3-Dichloropropane	ND	5
Benzene	ND	5	2,2-Dichloropropane	ND	5
Bromobenzene	ND	5	1,1-Dichloropropene	ND	5
Bromochloromethane	ND	5	cis-1,3-Dichloropropene	ND	5
Bromodichloromethane	ND	5	trans-1,3-Dichloropropene	ND	5
Bromoform	ND	10	Ethylbenzene	ND	5
Bromomethane	ND	5	Hexachlorobutadiene	ND	5
n-Butylbenzene	ND	5	2-Hexanone	ND	5
2-Butanone (MEK)	BRL*	100	Iodomethane	ND	100
sec-Butylbenzene	ND	5	Isopropylbenzene	ND	5
tert-Butylbenzene	ND	5	4-Isopropyl toluene	ND	5
Carbon disulfide	ND	100	Methylene chloride	ND	10
Carbon tetrachloride	ND	5	4-Methyl-2-pentanone	ND	5
Chlorobenzene	ND	5	Methyl tert-butyl ether	ND	5
Chloroethane	ND	10	Naphthalene	ND	5
Chloroform	ND	5	n-Propylbenzene	ND	5
Chloromethane	ND	10	Styrene	ND	5
2-Chlorotoluene	ND	5	1,1,1,2-Tetrachloroethane	ND	5
4-Chlorotoluene	ND	5	1,1,2,2-Tetrachloroethane	ND	5
Dibromochloromethane	ND	5	Tetrachloroethene	BRL*	25
1,2-Dibromo-3-chloropropane	ND	5	Toluene	BRL*	25
1,2-Dibromoethane	ND	5	1,2,3-Trichlorobenzene	ND	5
Dibromomethane	ND	5	1,2,4-Trichlorobenzene	ND	5
1,2-Dichlorobenzene	ND	5	1,1,1-Trichloroethane	ND	5
1,3-Dichlorobenzene	ND	5	1,1,2-Trichloroethane	ND	5
1,4-Dichlorobenzene	ND	5	Trichloroethene	ND	5
Dichlorodifluoromethane	ND	5	Trichlorofluoromethane	ND	5
1,1-Dichloroethane	ND	5	1,2,3-Trichloropropane	ND	5
1,2-Dichloroethane	ND	5	1,2,4-Trimethylbenzene	ND	5
1,1-Dichloroethene	ND	5	1,3,5-Trimethylbenzene	ND	5
cis-1,2-Dichloroethene	ND	5	Vinyl chloride	ND	10
trans-1,2-Dichloroethene	ND	5	Vinyl acetate	ND	100
1,2-Dichloropropane	ND	5	Xylenes (total)	ND	10

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	107	79-123
Toluene-d8	96	88-119
4-Bromofluorobenzene	96	79-117

Abbreviations: ND= Compound not detected J= Concentration < RL, based on detection limit E= Result exceeds calibration curve
 BRL= Below reportable limits Q= Recovery outside limits MI= Matrix interference RL= Reporting limit

Comments:

* Dilution factor of 5, analyzed 4/18/06. Surrogate recoveries were within control limits.

Data Release Authorized by:

D. Panek / KS
 Danuta Panek, Organics Laboratory Manager

Date:

4-21-06

GABRIEL

*Environmental Services*Client: **Gabriel Wisconsin**

Sample Description: B2 S1
 Sample Date: 4/12/06
 Date Analyzed: 4/13/06
 Collected By: Gabriel
 Method: SW-846-8260B

Sample No.: 2006040053-5
 Date Received: 4/12/06
 Matrix: Solids
 Analyst: AS
 Units: ug/Kg (Dry wt.)

PARAMETER	RESULT	RL	PARAMETER	RESULT	RL
Acetone	BRL*	200	1,3-Dichloropropane	ND	5
Benzene	BRL	5	2,2-Dichloropropane	ND	5
Bromobenzene	ND	5	1,1-Dichloropropene	ND	5
Bromochloromethane	ND	5	cis-1,3-Dichloropropene	ND	5
Bromodichloromethane	ND	5	trans-1,3-Dichloropropene	ND	5
Bromoform	ND	10	Ethylbenzene	ND	5
Bromomethane	ND	5	Hexachlorobutadiene	ND	5
n-Butylbenzene	ND	5	2-Hexanone	ND	5
2-Butanone (MEK)	ND	100	Iodomethane	BRL**	1000
sec-Butylbenzene	ND	5	Isopropylbenzene	ND	5
tert-Butylbenzene	ND	5	4-Isopropyl toluene	ND	5
Carbon disulfide	ND	100	Methylene chloride	ND	10
Carbon tetrachloride	ND	5	4-Methyl-2-pentanone	ND	5
Chlorobenzene	ND	5	Methyl tert-butyl ether	ND	5
Chloroethane	ND	10	Naphthalene	BRL**	250
Chloroform	ND	5	n-Propylbenzene	ND	5
Chloromethane	ND	10	Styrene	ND	5
2-Chlorotoluene	ND	5	1,1,1,2-Tetrachloroethane	ND	5
4-Chlorotoluene	ND	5	1,1,2,2-Tetrachloroethane	ND	5
Dibromochloromethane	ND	5	Tetrachloroethene	9900**	250
1,2-Dibromo-3-chloropropane	ND	5	Toluene	BRL**	250
1,2-Dibromoethane	ND	5	1,2,3-Trichlorobenzene	ND	5
Dibromomethane	ND	5	1,2,4-Trichlorobenzene	ND	5
1,2-Dichlorobenzene	ND	5	1,1,1-Trichloroethane	ND	5
1,3-Dichlorobenzene	ND	5	1,1,2-Trichloroethane	ND	5
1,4-Dichlorobenzene	ND	5	Trichloroethene	BRL**	250
Dichlorodifluoromethane	ND	5	Trichlorofluoromethane	ND	5
1,1-Dichloroethane	ND	5	1,2,3-Trichloropropane	ND	5
1,2-Dichloroethane	ND	5	1,2,4-Trimethylbenzene	ND	5
1,1-Dichloroethene	ND	5	1,3,5-Trimethylbenzene	ND	5
cis-1,2-Dichloroethene	BRL	5	Vinyl chloride	ND	10
trans-1,2-Dichloroethene	ND	5	Vinyl acetate	ND	100
1,2-Dichloropropane	ND	5	Xylenes (total)	BRL**	250

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	109	79-123
Toluene-d8	94	88-119
4-Bromofluorobenzene	82	79-117

Abbreviations: ND= Compound not detected J= Concentration < RL, based on detection limit E= Result exceeds calibration curve
 BRL= Below reportable limits Q= Recovery outside limits MI= Matrix interference RL= Reporting limit

Comments:

* Dilution factor of 5, analyzed 4/18/06. Surrogate recoveries were within control limits.

** Dilution factor of 50, analyzed 4/19/06. Surrogate recoveries were within control limits.

Data Release Authorized by:

D. Panek / KS
 Danuta Panek, Organics Laboratory Manager

Date: *4-21-06*

GABRIEL

Environmental Services

Client: Gabriel Wisconsin

Sample Description: B3 S2
 Sample Date: 4/12/06
 Date Analyzed: 4/13/06
 Collected By: Gabriel

Sample No.: 2006040053-9
 Date Received: 4/12/2006
 Matrix: Solids
 Analyst: AS
 Units: ug/Kg (Dry wt.)

Method: SW-846-8260B

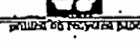
PARAMETER	RESULT	RL	PARAMETER	RESULT	RL
Acetone	475*	200	1,3-Dichloropropane	ND	5
Benzene	ND	5	2,2-Dichloropropane	ND	5
Bromobenzene	ND	5	1,1-Dichloropropene	ND	5
Bromochloromethane	ND	5	cis-1,3-Dichloropropene	ND	5
Bromodichloromethane	ND	5	trans-1,3-Dichloropropene	ND	5
Bromoform	ND	10	Ethylbenzene	ND	5
Bromomethane	ND	5	Hexachlorobutadiene	ND	5
n-Butylbenzene	ND	5	2-Hexanone	ND	5
2-Butanone (MEK)	ND	100	Iodomethane	ND	100
sec-Butylbenzene	ND	5	Isopropylbenzene	ND	5
tert-Butylbenzene	ND	5	4-Isopropyl toluene	ND	5
Carbon disulfide	ND	100	Methylene chloride	ND	10
Carbon tetrachloride	ND	5	4-Methyl-2-pentanone	ND	5
Chlorobenzene	ND	5	Methyl tert-butyl ether	ND	5
Chloroethane	ND	10	Naphthalene	ND	5
Chloroform	ND	5	n-Propylbenzene	ND	5
Chloromethane	ND	10	Styrene	ND	5
2-Chlorotoluene	ND	5	1,1,1,2-Tetrachloroethane	ND	5
4-Chlorotoluene	ND	5	1,1,2,2-Tetrachloroethane	ND	5
Dibromochloromethane	ND	5	Tetrachloroethene	21100***	2500
1,2-Dibromo-3-chloropropane	ND	5	Toluene	ND	5
1,2-Dibromoethane	ND	5	1,2,3-Trichlorobenzene	ND	5
Dibromomethane	ND	5	1,2,4-Trichlorobenzene	ND	5
1,2-Dichlorobenzene	ND	5	1,1,1-Trichloroethane	ND	5
1,3-Dichlorobenzene	ND	5	1,1,2-Trichloroethane	ND	5
1,4-Dichlorobenzene	ND	5	Trichloroethene	346**	250
Dichlorodifluoromethane	ND	5	Trichlorofluoromethane	ND	5
1,1-Dichloroethane	ND	5	1,2,3-Trichloropropane	ND	5
1,2-Dichloroethane	ND	5	1,2,4-Trimethylbenzene	ND	5
1,1-Dichloroethene	ND	5	1,3,5-Trimethylbenzene	ND	5
cis-1,2-Dichloroethene	6	5	Vinyl chloride	ND	10
trans-1,2-Dichloroethene	ND	5	Vinyl acetate	ND	100
1,2-Dichloropropane	ND	5	Xylenes (total)	ND	10

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	103	79-123
Toluene-d8	96	88-119
4-Bromofluorobenzene	95	79-117

Abbreviations: ND= Compound not detected J= Concentration < RL, based on detection limit E= Result exceeds calibration curve
 BRL= Below reportable limits Q= Recovery outside limits MI= Matrix interference RI= Reporting limit

Comments:
 * Dilution factor of 5, analyzed 4/18/06. Surrogate recoveries were within control limits.
 ** Dilution factor of 50, analyzed 4/19/06. Surrogate recoveries were within control limits.
 *** Dilution factor of 500, analyzed 4/20/06. Surrogate recoveries were within control limits.

Data Release Authorized by: D. Panek / KS Date: 4-21-06
 Danuta Panek, Organics Laboratory Manager



GABRIEL

Environmental Services

Client: Gabriel Wisconsin

Sample Description: B2 S6
 Sample Date: 4/12/06
 Date Analyzed: 4/13/06
 Collected By: Gabriel
 Method: SW-846-8260B

Sample No.: 2006040053-7
 Date Received: 4/12/06
 Matrix: Solids
 Analyst: AS
 Units: ug/Kg (Dry wt)

PARAMETER	RESULT	RL	PARAMETER	RESULT	RL
Acetone	BRL*	200	1,3-Dichloropropane	ND	5
Benzene	ND	5	2,2-Dichloropropane	ND	5
Bromobenzene	ND	5	1,1-Dichloropropene	ND	5
Bromochloromethane	ND	5	cis-1,3-Dichloropropene	ND	5
Bromodichloromethane	ND	5	trans-1,3-Dichloropropene	ND	5
Bromoform	ND	10	Ethylbenzene	ND	5
Bromomethane	ND	5	Hexachlorobutadiene	ND	5
n-Butylbenzene	ND	5	2-Hexanone	ND	5
2-Butanone (MEK)	ND	100	Iodomethane	ND	100
sec-Butylbenzene	ND	5	Isopropylbenzene	ND	5
tert-Butylbenzene	ND	5	4-Isopropyl toluene	ND	5
Carbon disulfide	ND	100	Methylene chloride	ND	10
Carbon tetrachloride	ND	5	4-Methyl-2-pentanone	ND	5
Chlorobenzene	ND	5	Methyl tert-butyl ether	ND	5
Chloroethane	ND	10	Naphthalene	ND	5
Chloroform	ND	5	n-Propylbenzene	ND	5
Chloromethane	ND	10	Styrene	ND	5
2-Chlorotoluene	ND	5	1,1,1,2-Tetrachloroethane	ND	5
4-Chlorotoluene	ND	5	1,1,2,2-Tetrachloroethane	ND	5
Dibromochloromethane	ND	5	Tetrachloroethene	465*	25
1,2-Dibromo-3-chloropropane	ND	5	Toluene	BRL*	25
1,2-Dibromoethane	ND	5	1,2,3-Trichlorobenzene	ND	5
Dibromomethane	ND	5	1,2,4-Trichlorobenzene	ND	5
1,2-Dichlorobenzene	ND	5	1,1,1-Trichloroethane	ND	5
1,3-Dichlorobenzene	ND	5	1,1,2-Trichloroethane	ND	5
1,4-Dichlorobenzene	ND	5	Trichloroethene	BRL	5
Dichlorodifluoromethane	ND	5	Trichlorofluoromethane	ND	5
1,1-Dichloroethane	ND	5	1,2,3-Trichloropropane	ND	5
1,2-Dichloroethane	ND	5	1,2,4-Trimethylbenzene	ND	5
1,1-Dichloroethene	ND	5	1,3,5-Trimethylbenzene	ND	5
cis-1,2-Dichloroethene	26*	25	Vinyl chloride	ND	10
trans-1,2-Dichloroethene	ND	5	Vinyl acetate	ND	100
1,2-Dichloropropane	ND	5	Xylenes (total)	ND	10

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	105	79-123
Toluene-d8	91	88-119
4-Bromofluorobenzene	84	79-117

Abbreviations: ND= Compound not detected J= Concentration < RL, based on detection limit E= Result exceeds calibration curve
 BRL= Below reportable limits Q= Recovery outside limits MI= Matrix interference RL= Reporting limit

Comments:
 * Dilution factor of 5, analyzed 4/18/06. Surrogate recoveries were within control limits.

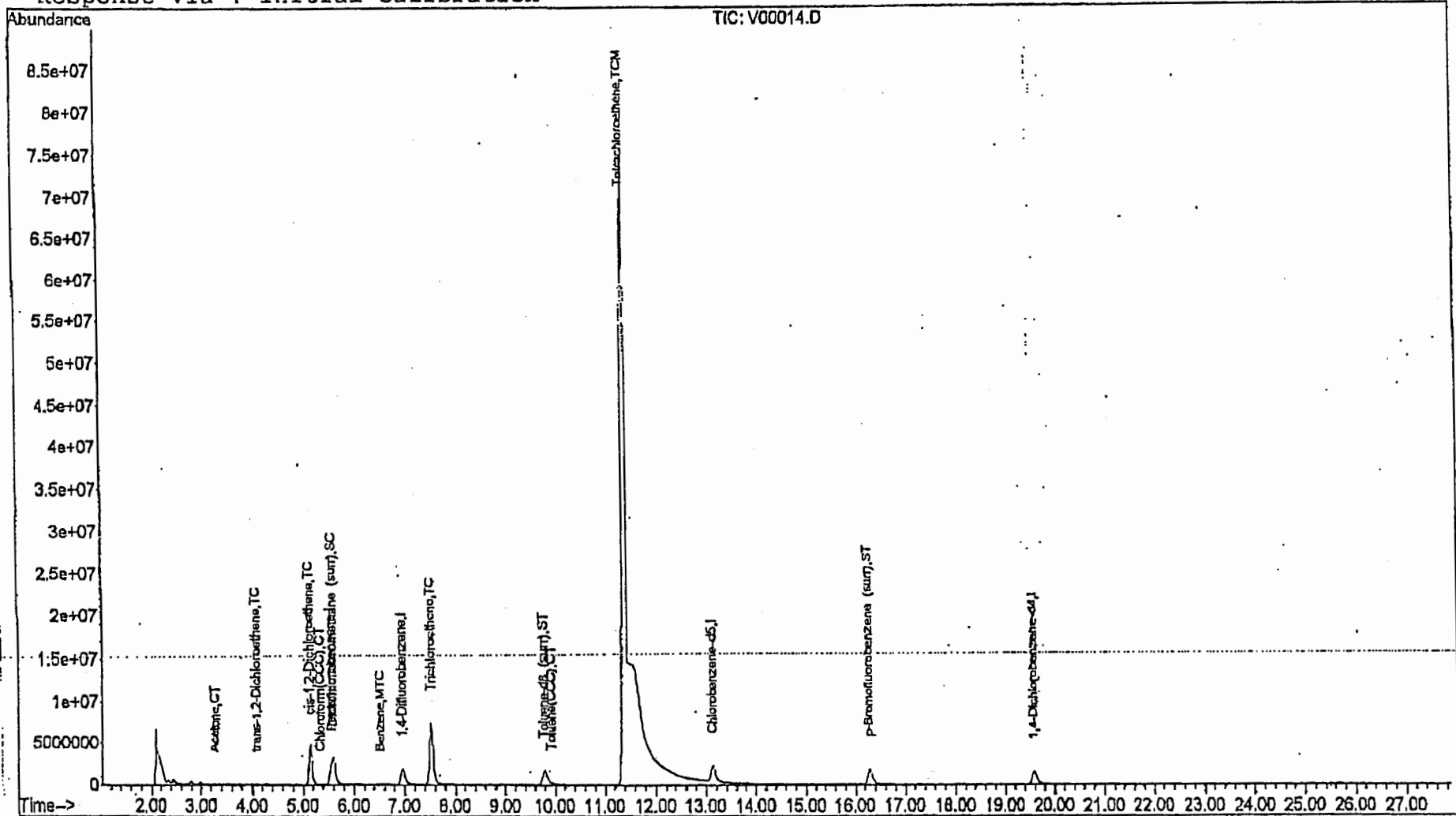
Data Release Authorized by: D. Panek / KS Date: 4-21-06
 Danuta Panek, Organics Laboratory Manager

Data File : C:\HPCHEM\1\DATA\APR1306\V00014.D
Acq On : 13 Apr 2006 7:43 pm
Sample : 06040053-1 5GM/5ML
Misc : SOIL
MS Integration Params: RTEINT.P
Quant Time: Apr 14 11:01 2006

Vial: 13
Operator: ATUL
Inst : VOA 5971
Multiplr: 1.00

Quant Results File: APR106SL.RES

Method : C:\HPCHEM\1\DATA\APR1006\APR106SL.M (RTE Integrator)
Title : SOIL
Last Update : Wed Apr 12 09:48:28 2006
Response via : Initial Calibration



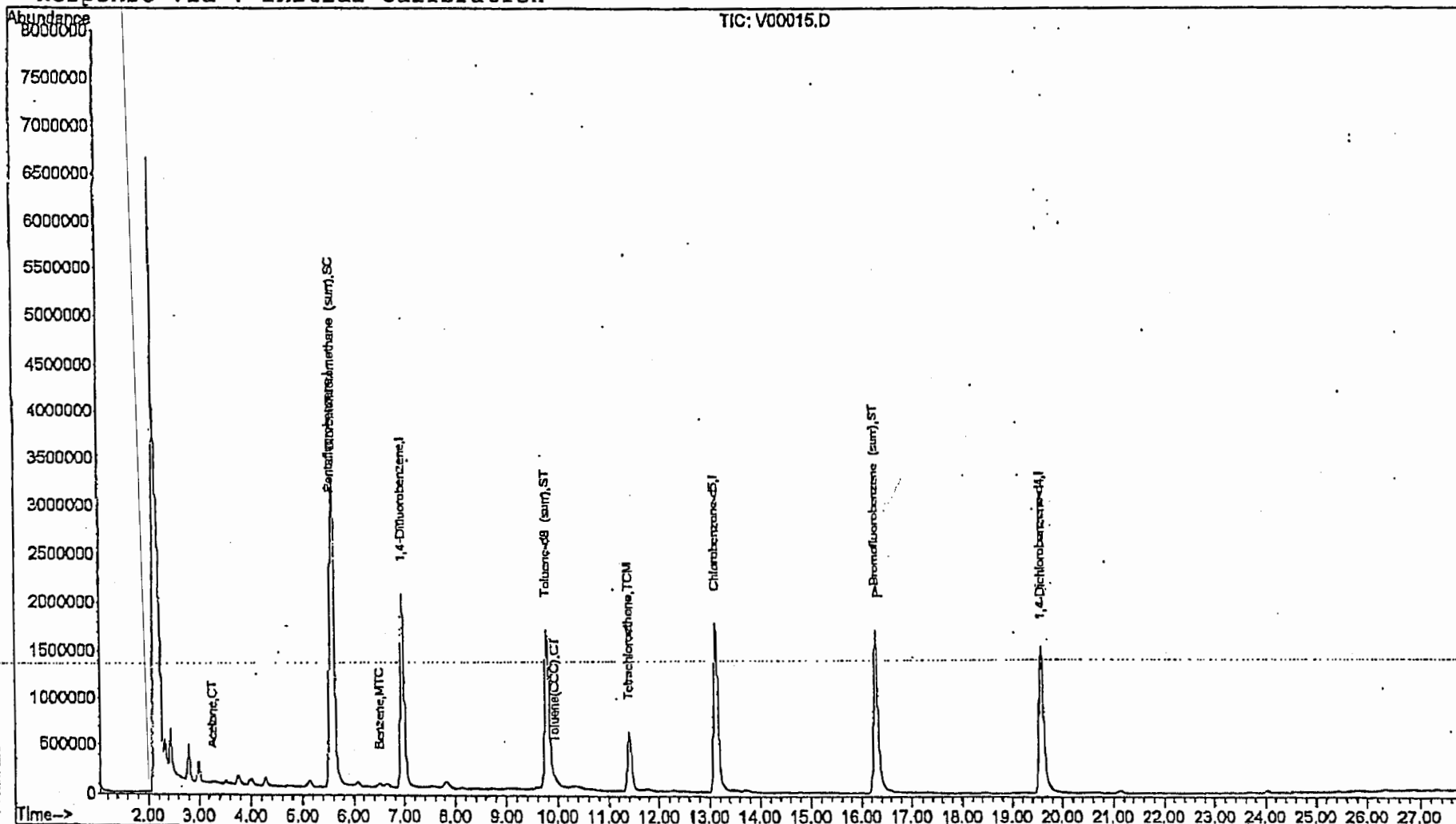
Quantitation Report

Data File : C:\HPCHEM\1\DATA\APR1306\V00015.D
Acq On : 13 Apr 2006 8:19 pm
Sample : 06040053-4 5GM/5ML
Misc : SOLID
MS Integration Params: RTEINT.P
Quant Time: Apr 14 11:35 2006

Vial: 14
Operator: ATUL
Inst : VOA 5971
Multiplr: 1.00

Quant Results File: APR106SL.RES

Method : C:\HPCHEM\1\DATA\APR1006\APR106SL.M (RTE Integrator)
Title : SOIL
Last Update : Wed Apr 12 09:48:28 2006
Response via : Initial Calibration

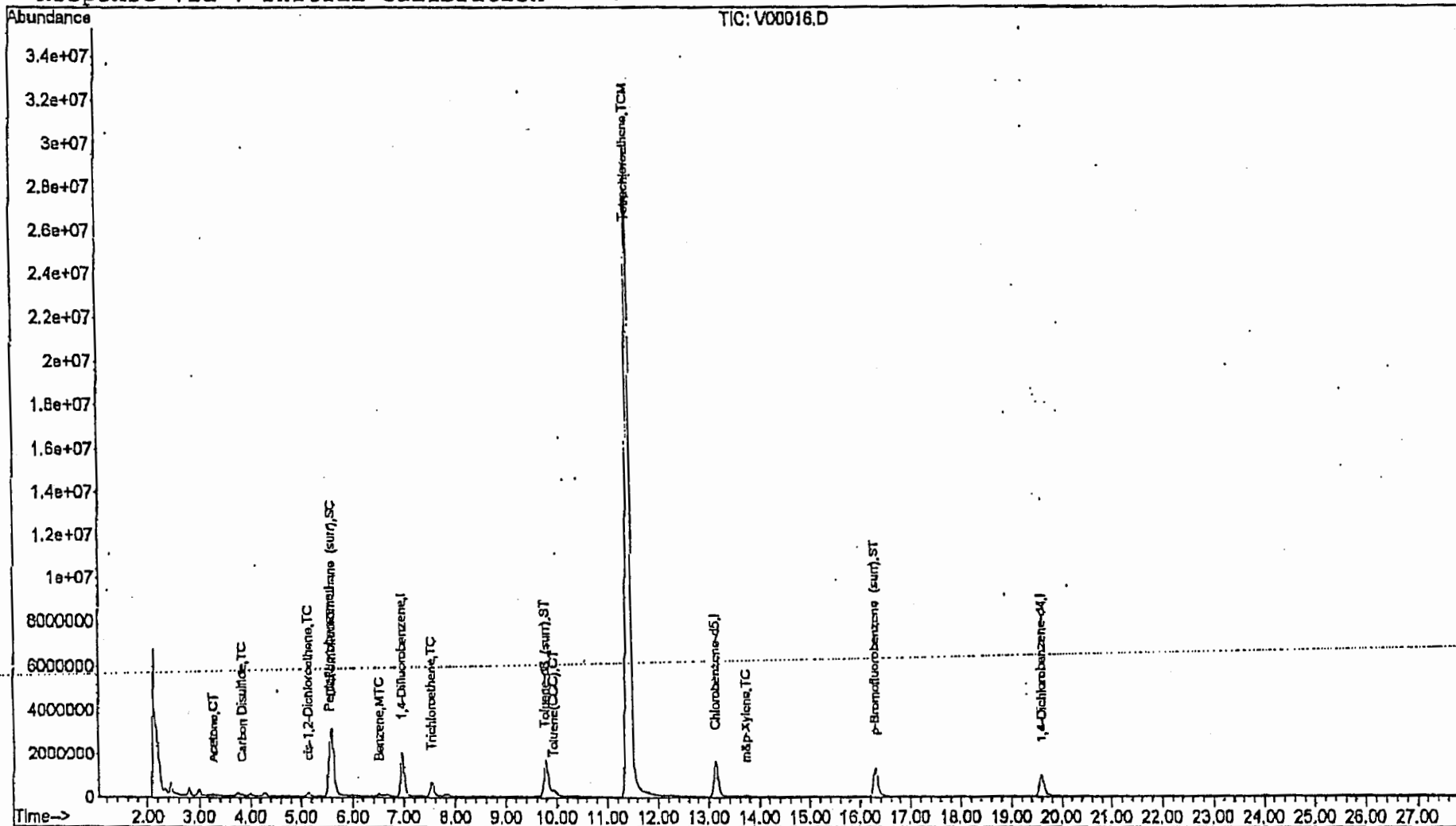


Data File : C:\HPCHEM\1\DATA\APR1306\V00016.D
Acq On : 13 Apr 2006 8:55 pm
Sample : 06040053-5 5GM/SML
Misc : SOLID
MS Integration Params: RTEINT.P
Quant Time: Apr 14 11:38 2006

Vial: 15
Operator: ATUL
Inst : VOA 5971
Multiplr: 1.00

Quant Results File: APR106SL.RES

Method : C:\HPCHEM\1\DATA\APR1006\APR106SL.M (RTE Integrator)
Title : SOIL
Last Update : Wed Apr 12 09:48:28 2006
Response via : Initial Calibration



quantitation Report

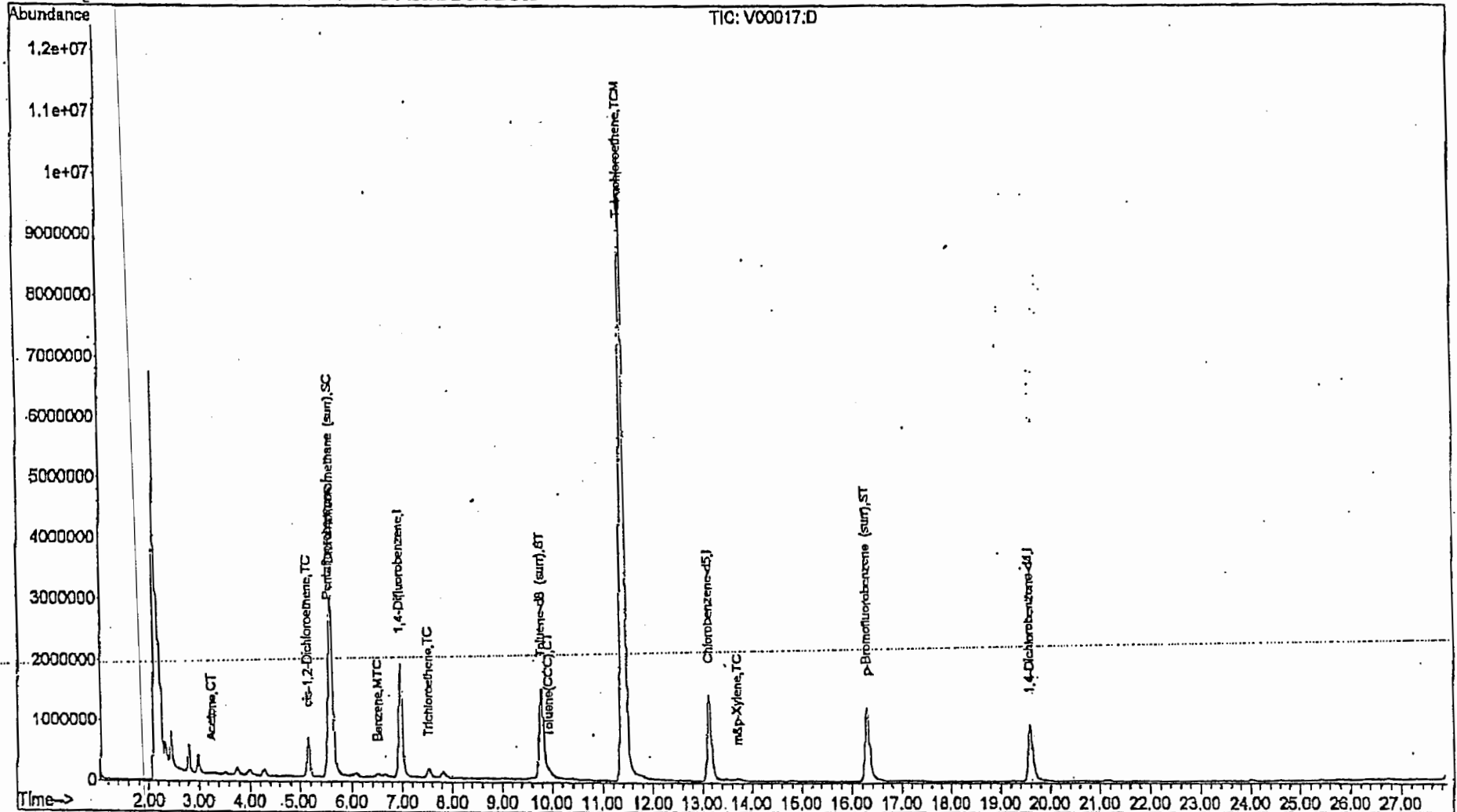
Data File : C:\HPCHEM\1\DATA\APR1306\V00017.D
Acq On : 13 Apr 2006 9:31 pm
Sample : 06040053-7 5GM/5ML
Misc : SOLID

Vial: 16
Operator: ATUL
Inst : VOA 5971
Multiplr: 1.00

MS Integration Params: RTEINT.P
Quant Time: Apr 14 11:45 2006

Quant Results File: APR106SL.RES

Method : C:\HPCHEM\1\DATA\APR1006\APR106SL.M (RTE Integrator)
Title : SOIL
Last Update : Wed Apr 12 09:48:28 2006
Response via : Initial Calibration

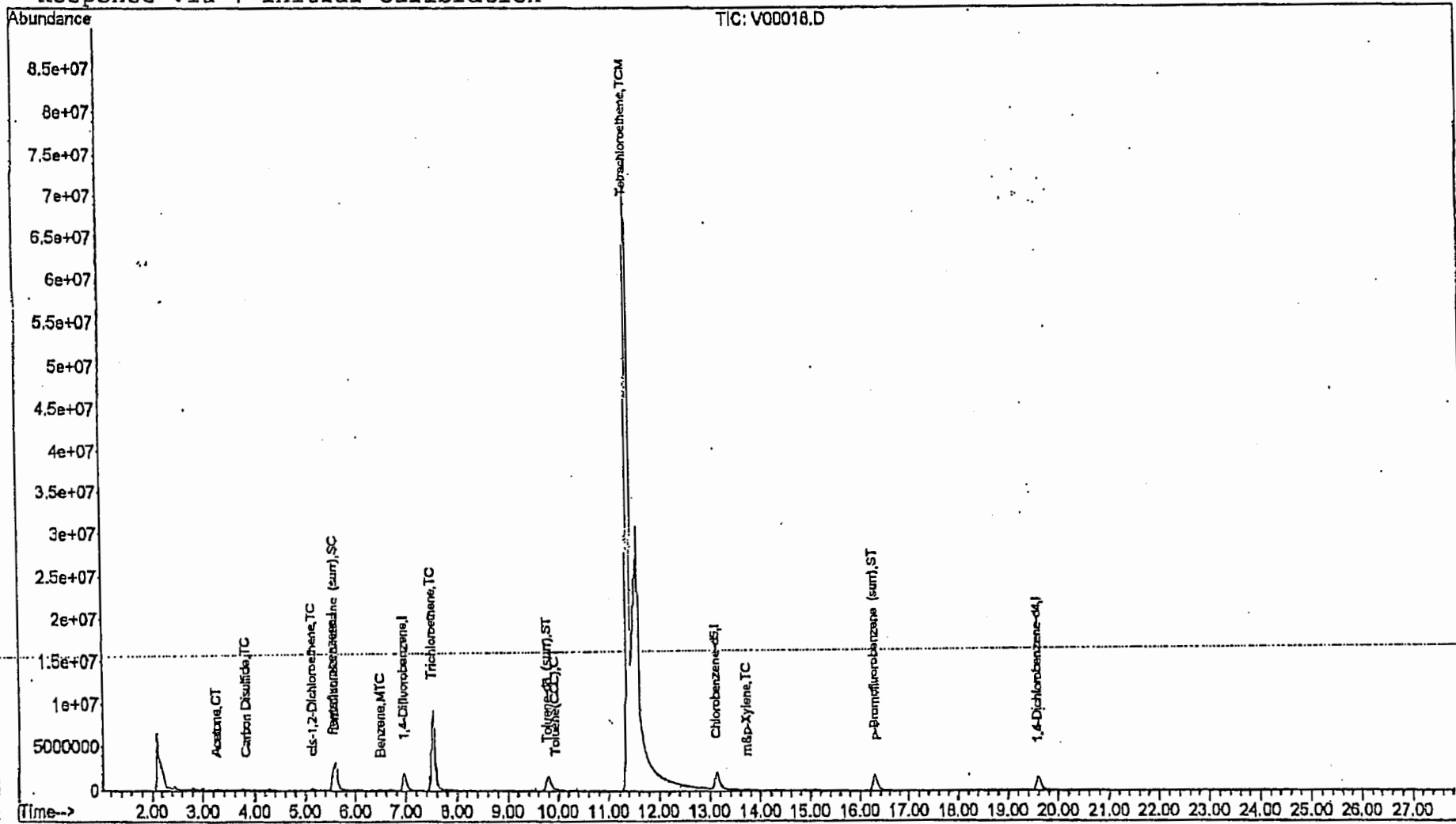


Data File : C:\HPCHEM\1\DATA\APR1306\V00018.D
 Acq On : 13 Apr 2006 10:07 pm
 Sample : 06040053-9 5GM/5ML
 Misc : SOLID
 MS Integration Params: RTEINT.P
 Quant Time: Apr 14 11:49 2006

Vial: 17
 Operator: ATUL
 Inst : VOA 5971
 Multiplr: 1.00

Quant Results File: APR106SL.RES

Method : C:\HPCHEM\1\DATA\APR1006\APR106SL.M (RTE Integrator)
 Title : SOIL
 Last Update : Wed Apr 12 09:48:28 2006
 Response via : Initial Calibration



gabriel environmental services, ltd.

chain of custody record

GABRIEL WISCONSIN
 1500 S. Sylvania Ave #112
 Sturtevant, WI 53177
 Phone (262) 886-9505
 Fax (262) 886-9510

PROJECT NO.		PROJECT NAME/LOCATION					PARAMETERS				PROJECT MANAGER	
		Bob Storm, Calgemant & Miller Sc. - 3941 N. Main St.									SUPPORT PERSONNEL	
CLIENT Bob Storm		CONTACT Bob Storm					NO. OF CONTAINERS PRESERVED VOC Total Solids				2006040053 • COMMENTS • TRANSFER RECORD	
ADDRESS 2433 N. Mayfair Rd Suite 207 Milwaukee, WI 53226		PHONE 414-453-8500 FAX 414-453-0604										
FIELD SAMPLE IDENTIFICATION	SAMPLE INFORMATION				SAMPLED BY	SAMPLE LOCATION	PARAMETERS				REMARKS	
	DATE	TIME	MATRIX	TYPE			NO. OF CONTAINERS	PRESERVED	VOC	Total Solids	COMMENTS	TRANSFER RECORD
	4/12	10:50	S	Grab	DTS	B1 S2	2	X	X			-1.2
	"	11:10	S	Grab	DTS	B1 S3	1		X			-3
	"	11:15	S	Grab	DTS	B1 S6	1	X	X			-4.1
	4/12	11:30	S	Grab	DTS	B2 S1	2	X	X			-5.6
	"	11:45	S	Grab	DTS	B2 S6	2	X	X			-7.8
	"	12:10	S	Grab	DTS	B3 S7	2	X	X			-9.10
Relinquished by: (Signature)		Date / Time		Received by: (Signature)			Remarks					
<i>Daniel Amick</i>		4/12/06 12:15 PM										
Relinquished by: (Signature)		Date / Time		Received for Laboratory by: (Signature)								
<i>[Signature]</i>		4/12/06 3pm		Eng. Ompeng 4-12-06								

APPENDIX B

3 Mile Road

Pugh
Gas.
Station

3941 N. Main Street

B-1



B-3



B-2



3931 N. Main Street

3921 N. Main Street

North Main Street

Soil Boring Location Map

Site Location: 3921-3941 North Main Street

Racine, WI 53402

Project # P06-04014

drawn by DS

⊗ Soil Boring
Location



Gabriel Environmental Services

1500 S Sylvania Ave. #112
Sturtevant, WI 53177

Phone (262) 886-9505

Fax (262) 886-9510

Route Use: Wastewater Waste Management
Remediation/Development Other

Page 1 of 1

Facility/Project Name 3921-3941 North Main Street		Location/Parish/Assessing District	Boring Number B-1
Boring Drilled By: Name of crew chief (Print, last) and First Initial John Gienzik		Date Drilling Started 04.12.2006	Date Drilling Completed 04.12.2006
For: Gabriel Environmental		Drilling Method	
Well Unique Well No.	DNR Well ID No.	Well Name	
		Final Static Water Level Feet MSL	Surface Elevation Feet MSL
			Barometric Pressure 22 inches
Local Grid Origin: <input type="checkbox"/> Easting <input type="checkbox"/> or Boring Location <input type="checkbox"/> East Point		Local Grid Location	
1/4 of <u>N</u> 1/4 of Section <u>1</u> T <u>1</u> N R <u>1</u>		Lat <u>43</u> ° <u>0</u> ' <u>0</u> "	Local Grid Location Feet <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W
Facility ID	County Racine	County Code 52	City/Town/Village Racine

Sample Number and Type	Length (ft) Recovered (ft)	Flow Control	Depth in Feet (from ground surface)	Soil/Rock Description And Geologic Origin For Each Major Unit	USEC	Graphic Log	Well Diameter	RFD/ED	Soil Properties						
									Compressive Strength	Mollier Content	Liquid Limit	Plasticity Index	P 100	ACQ/Comments	
			1	Cement, Gravel	SP										
			2	Damp sand	SP					damp					
			3	Gray Clay	CL										
2			4	Damp brown clay	CL			0.0		damp					
			5	Moist sand	SP					moist					
			6	Wet sand	SP			0.0		wet					
			7	Wet sandy clay	CL					wet					
			8	Wet brown/gray clay	CL			0.0		wet					
			9	Damp stony sand	SP					damp					
			10	Damp gray clay	CL			0.0		damp					
			11	Wet gray clay	CL					wet					
			12	Wet gray clay	CL			0.0		wet					

I hereby certify that the information on this form is true and correct to the best of my knowledge.
Signature: _____ Date: _____

This form is authorized by Chapters 261, 263, 289, 294, 297, 298, 299, and 299, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Reasonably identifiable information on this form is not intended to be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

State of Wisconsin
Department of Natural Resources

SOIL BORING LOG AND GENERAL DATA
Form 4400-028 Rev. 7-98

Route For: Water/Wastewater Waste Management
 Remediation/Development Other

Page 1 of 1

Project Name 3921-3941 North Main Street			Licensed Permit/Monitoring Number	Project Number B-3
Boring Drilled By: Name of crew chief (last, first) and firm John Giemzik			Date Drilling Started 04.12.2006	Date Drilling Completed 04.12.2006
By: Gabriel Environmental			Drilling Method	
WI Drilling Well No.	DCR Well ID No.	Well Name	Final Static Water Level Feet MSL	Surface Elevation Feet MSL
Local Grid Coordinates (Easting/Northing) or Boring Location Note			Local Grid Location	
1/4 of Section T N E			Feet E S Feet N W	
Project ID	County Racine	County Code 5 2	City/Town/Village Racine	

Sample Number and Type	Length (ft) or Interval (ft)	Blow Counts	Depth in Feet (to top of each section)	Soil/Rock Description and Geologic Origin For Each Major Unit	UCR	Grain Log	Water	pH	Soil Properties					Notes
									Compressive Strength	Mobility Content	Liquid Limit	Plasticity Index	P 200	
S-2			1	Cement	GP									
			2	Dry sand	SP			0.0						
			3	Dry sand	SP									
			4	Damp dark brown sandy clay	SP			0.0			Damp			

I hereby certify that the information on this form is true and correct to the best of my knowledge.
Signature _____ Date _____

This form is authorized by Chapters 281, 282, 283, 291, 292, 293, 295, and 299, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

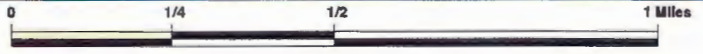
<u>Site Name</u>	<u>Database(s)</u>
PUCELY, EMIL PROPERTY	LUST
GAS LIGHT POINT OFFICE BLDG	LUST
DELI-FOOD EXPRESS	LUST, WI Spills
33 E FOUR MILE RD	UST
6422 N HWY 31	UST
15 4 MILE RD	UST
550 THREE MILE RD	UST
1212 FOUR MILE RD	AST
6422 N HWY 31	AST
MOTOR TECHNOLOGIES	RCRA-SQG, FINDS
SC JOHNSON ENTOMOLOGY RESEARCH CEN	RCRA-SQG, FINDS
NORTH PARK SAN DIST	RCRA-SQG, FINDS, BRRTS
SC JOHNSON & SON COUNCIL HOUSE	RCRA-SQG, FINDS
VILLAGE OF WINDPOINT CLNSWP	FINDS, RCRA-LQG
MID STATE EXPRESS	WI Spills
AZARIAN LF (FS)-HOUSING	WI ERP
LONI LANE-REGENCY W DR, NW CNR	WI ERP, AUL
RACINE GAS LIGHT FORMER	WI ERP
RACINE COMMERICAL AIRPORT	WI WDS
WISCONSIN SCREEN PROCESS INC	WI MANIFEST

OVERVIEW MAP - 01811652.1r



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites

- Indian Reservations BIA
- ▲ Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone



SITE NAME: Express Cleaners, Inc
ADDRESS: 3941 North Main Street
 Racine WI 53402
LAT/LONG: 42.7690 / 87.7819

CLIENT: Northern Environmental
CONTACT: Chris Hatfield
INQUIRY #: 01811652.1r
DATE: December 06, 2006 4:41 pm

DETAIL MAP - 01811652.1r



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- ▲ Sensitive Receptors
- 🚰 National Priority List Sites
- 🗑️ Landfill Sites
- 🏢 Dept. Defense Sites

- 🏠 Indian Reservations BIA
- 🛢️ Oil & Gas pipelines
- 🌊 100-year flood zone
- 🌊 500-year flood zone

SITE NAME: Express Cleaners, Inc
ADDRESS: 3941 North Main Street
Racine WI 53402
LAT/LONG: 42.7690 / 87.7819

CLIENT: Northern Environmental
CONTACT: Chris Hatfield
INQUIRY #: 01811652.1r
DATE: December 06, 2006 4:42 pm

Copyright © 2006 EDR, Inc. © 2006 Tele Atlas Rel. 07/2005.

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<u>FEDERAL RECORDS</u>								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
NPL RECOVERY		TP	NR	NR	NR	NR	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		0.500	0	0	0	NR	NR	0
CORRACTS		1.000	0	0	0	0	NR	0
RCRA TSD		0.500	0	0	0	NR	NR	0
RCRA Lg. Quan. Gen.		0.250	0	0	NR	NR	NR	0
RCRA Sm. Quan. Gen.	X	0.250	0	0	NR	NR	NR	0
ERNS		TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
US ENG CONTROLS		0.500	0	0	0	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
FUDS		1.000	0	0	0	0	NR	0
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
ODI		0.500	0	0	0	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
ICIS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
FINDS	X	TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
<u>STATE AND LOCAL RECORDS</u>								
State Haz. Waste		1.000	0	0	0	0	NR	0
BRRTS		TP	NR	NR	NR	NR	NR	0
WI ERP		0.500	0	0	0	NR	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
WI WDS		0.500	0	0	0	NR	NR	0
LUST		0.500	2	0	3	NR	NR	5
UST		0.250	2	3	NR	NR	NR	5
LAST		0.500	0	0	0	NR	NR	0
AST		0.250	0	0	NR	NR	NR	0
MANIFEST	X	0.250	0	0	NR	NR	NR	0
WI Spills		TP	NR	NR	NR	NR	NR	0
AGSPILLS		TP	NR	NR	NR	NR	NR	0
CRS		TP	NR	NR	NR	NR	NR	0
AUL		0.500	2	0	1	NR	NR	3

State Use: Wastewater/Wastewater Waste Management
 Remediation/Development Other

Project Name 3921-3941 North Main Street		Location/Parcel/Mapping Number	Boring Number B-2
Boring Drilled By: Name of crew chief (last, first) and Firm John Giemzik Gabriel Environmental		Date Drilling Started 04, 12, 2006	Date Drilling Completed 04, 12, 2006
Well Group No.	DNCR Well ID No.	Well Name	Drilling Method
Local Grid Origin <input type="checkbox"/> Testimony <input type="checkbox"/> or Boring Location <input type="checkbox"/> State Plane <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/>		Final Static Water Level Feet MSL	Surface Elevation Feet MSL
US of <input type="checkbox"/> 1/4 of Section <input type="checkbox"/> T <input type="checkbox"/> N, R <input type="checkbox"/>		Local Grid Location E <input type="checkbox"/> W <input type="checkbox"/> N <input type="checkbox"/> S <input type="checkbox"/> Feet <input type="checkbox"/> S <input type="checkbox"/> Feet <input type="checkbox"/> W	
County Racine	County Code 5 2	Local Township or Village Racine	

Sample Number and Type	Length in Feet Recovered (ft)	Blow Counts	Depth in Feet (top or bottom)	Soil Rock Description and Qualitative Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PI/PILO	Soil Properties						
									Compressive Strength	Moisture Content	Liquidity Limit	Plasticity Index	P 200	AQW Classification	
S-1			1	Blacktop, Gravel	GP										
			2	Wet sand	SP			0.0	wet						
			3	Wet gray Clay	CL				wet						
			4	Damp sand	SP			0.0	damp						
			5	Wet sand	SP				wet						
			6	Damp sand	SP			0.0	damp						
			7	Wet sand	SP				wet						
			8	Wet gray clay	CL			0.0	wet						
			9	Wet sand	SP				wet						
			10	Wet sand	SP			0.0	wet						
			11	Wet clay	CL				wet						
S-6			12	Wet clay	CL			0.0	wet						

I hereby certify that the information on this form is true and correct to the best of my knowledge.
 Signature: _____ Title: _____

This form is authorized by Chapters 281, 283, 289, 291, 293, 295, and 296, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Reasonably foreseeable information on this form is not intended to be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

ATTACHMENT B

**PERTINENT PORTIONS OF EDR RADIUS MAP REPORT
AND SANBORN FIRE INSURANCE MAP SEARCH**



EDR® Environmental
Data Resources Inc

The EDR Radius Map™ Report

**Express Cleaners, Inc
3941 North Main Street
Racine, WI 53402**

Inquiry Number: 01811652.1r

December 06, 2006

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
Executive Summary.....	ES1
Overview Map.....	2
Detail Map.....	3
Map Findings Summary.....	4
Map Findings.....	6
Orphan Summary.....	38
Government Records Searched/Data Currency Tracking.....	GR-1
 <u>GEOCHECK ADDENDUM</u>	
GeoCheck - Not Requested	
Orphan Details.....	OD-1

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

Disclaimer - Copyright and Trademark Notice

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. **NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT.** Purchaser accepts this Report "AS IS". Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

Copyright 2006 by Environmental Data Resources, Inc. All rights reserved. Reproduction in any media or format, in whole or in part, of any report or map of Environmental Data Resources, Inc., or its affiliates, is prohibited without prior written permission.

EDR and its logos (including Sanborn and Sanborn Map) are trademarks of Environmental Data Resources, Inc. or its affiliates. All other trademarks used herein are the property of their respective owners.

EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-05) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

3941 NORTH MAIN STREET
RACINE, WI 53402

COORDINATES

Latitude (North): 42.769000 - 42° 46' 8.4"
Longitude (West): 87.781900 - 87° 46' 54.8"
Universal Transverse Mercator: Zone 16
UTM X (Meters): 436028.4
UTM Y (Meters): 4735245.0
Elevation: 618 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 42087-G7 RACINE NORTH, WI
Most Recent Revision: 1971

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 6 of the attached EDR Radius Map report:

<u>Site</u>	<u>Database(s)</u>	<u>EPA ID</u>
PARIS ROYAL CLEANERS 3941 N MAIN ST RACINE, WI 53402	RCRA-SQG FINDS WI MANIFEST	WID023515885

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

FEDERAL RECORDS

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
Delisted NPL..... National Priority List Deletions

EXECUTIVE SUMMARY

NPL RECOVERY	Federal Superfund Liens
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP	CERCLIS No Further Remedial Action Planned
CORRACTS	Corrective Action Report
RCRA-TSDF	Resource Conservation and Recovery Act Information
RCRA-LQG	Resource Conservation and Recovery Act Information
ERNS	Emergency Response Notification System
HMIRS	Hazardous Materials Information Reporting System
US ENG CONTROLS	Engineering Controls Sites List
US INST CONTROL	Sites with Institutional Controls
DOD	Department of Defense Sites
FUDS	Formerly Used Defense Sites
US BROWNFIELDS	A Listing of Brownfields Sites
CONSENT	Superfund (CERCLA) Consent Decrees
ROD	Records Of Decision
UMTRA	Uranium Mill Tailings Sites
ODI	Open Dump Inventory
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
SSTS	Section 7 Tracking Systems
ICIS	Integrated Compliance Information System
PADS	PCB Activity Database System
MLTS	Material Licensing Tracking System
MINES	Mines Master Index File
RAATS	RCRA Administrative Action Tracking System

STATE AND LOCAL RECORDS

SHWS	Hazard Ranking List
BRRTS	Bureau of Remediation & Redevelopment Tracking System
WI ERP	Environmental Repair Program Database
SWF/LF	List of Licensed Landfills
WI WDS	Registry of Waste Disposal Sites
LAST	Leaking Aboveground Storage Tank Listing
AST	Tanks Database
WI Spills	Spills Database
AGSPILLS	Agricultural Spill Cases
CRS	Closed Remediation Sites
VCP	Voluntary Party Liability Exemption Sites
DRYCLEANERS	Five Star Recognition Program Sites
WI WRRSER	Wisconsin Remedial Response Site Evaluation Report
BEAP	Brownfields Environmental Assessment Program
BROWNFIELDS	Brownfields Site Locations Listing
AIRS	Air Permit Program Listing
TIER 2	Tier 2 Facility Listing
LEAD	Lead Inspection Data

TRIBAL RECORDS

INDIAN RESERV	Indian Reservations
INDIAN LUST	Leaking Underground Storage Tanks on Indian Land
INDIAN UST	Underground Storage Tanks on Indian Land

EXECUTIVE SUMMARY

EDR PROPRIETARY RECORDS

Manufactured Gas Plants... EDR Proprietary Manufactured Gas Plants

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property. Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in *bold italics* are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

STATE AND LOCAL RECORDS

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Natural Resource's LUST Database.

A review of the LUST list, as provided by EDR, and dated 06/21/2006 has revealed that there are 5 LUST sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
<i>PUGH OIL CO/WISHAU'S SERVICE</i> Facility Status: CONDITIONALLY CLOSED	<i>3953 N MAIN ST</i>	<i>0 - 1/8 N</i>	<i>A2</i>	<i>8</i>
<i>SHELL, FORMER</i> Facility Status: CLOSED	<i>3945 ERIE ST</i>	<i>1/4 - 1/2W</i>	<i>9</i>	<i>27</i>
<i>7-ELEVEN #30512</i> Facility Status: CLOSED	<i>600 THREE MILE RD</i>	<i>1/4 - 1/2WNW 10</i>		<i>29</i>
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
<i>MURPHY OIL/SPUR #2433</i> Facility Status: OPEN	<i>414 3 MILE RD</i>	<i>0 - 1/8 NNW 4</i>		<i>18</i>
<i>PRAIRIE SCHOOL</i> Facility Status: CLOSED	<i>4050 LIGHTHOUSE DR</i>	<i>1/4 - 1/2ENE 11</i>		<i>35</i>

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Commerces' List: All Underground Storage Tanks Except for Fuel Oil.

A review of the UST list, as provided by EDR, and dated 10/06/2006 has revealed that there are 5 UST

EXECUTIVE SUMMARY

sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
Not reported	3953 N MAIN ST	0 - 1/8 N	A3	14
Not reported	414 THREE MILE RD	0 - 1/8 NW	5	23
Not reported	3720 N MAIN ST	1/8 - 1/4 S	6	24
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
Not reported	222 3 MILE RD	1/8 - 1/4 ENE	7	25
Not reported	312 N VINECENNES CIR	1/8 - 1/4 S	8	26

AUL: Date a deed restriction is recorded at the Register of Deeds office for a property. Extent of soil contamination is known but impracticable to remove now or an engineering control is required to be maintained or NR720 industrial stds are applied. Restricts property use or requires future actions.

A review of the AUL list, as provided by EDR, and dated 06/21/2006 has revealed that there are 3 AUL sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
PUGH OIL CO/WISHAU'S SERVICE 7-ELEVEN #30512	3953 N MAIN ST 600 THREE MILE RD	0 - 1/8 N 1/4 - 1/2 WNW	A2 10	8 29
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
MURPHY OIL/SPUR #2433	414 3 MILE RD	0 - 1/8 NNW	4	18

MAP FINDINGS SUMMARY

<u>Database</u>	<u>Target Property</u>	<u>Search Distance (Miles)</u>	<u>< 1/8</u>	<u>1/8 - 1/4</u>	<u>1/4 - 1/2</u>	<u>1/2 - 1</u>	<u>> 1</u>	<u>Total Plotted</u>
VCP		0.500	0	0	0	NR	NR	0
DRYCLEANERS		0.250	0	0	NR	NR	NR	0
WI WRRSER	TP		NR	NR	NR	NR	NR	0
BEAP		0.500	0	0	0	NR	NR	0
BROWNFIELDS		0.500	0	0	0	NR	NR	0
AIRS	TP		NR	NR	NR	NR	NR	0
TIER 2	TP		NR	NR	NR	NR	NR	0
LEAD	TP		NR	NR	NR	NR	NR	0

TRIBAL RECORDS

INDIAN RESERV		1.000	0	0	0	0	NR	0
INDIAN LUST		0.500	0	0	0	NR	NR	0
INDIAN UST		0.250	0	0	NR	NR	NR	0

EDR PROPRIETARY RECORDS

Manufactured Gas Plants		1.000	0	0	0	0	NR	0
-------------------------	--	-------	---	---	---	---	----	---

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database



EDR® Environmental
Data Resources Inc

"Linking Technology with Tradition"®

Sanborn® Map Report

Ship To: Chris Hatfield
Northern Environmental
12075 N. Corporate
Mequon, WI 53092

Order Date: 12/6/2006 **Completion Date:** 12/6/2006
Inquiry #: 1811652.2
P.O. #: ECI-01-2300-3300
Site Name: Express Cleaners, Inc

Address: 3941 North Main Street

City/State: Racine, WI 53402

Customer Project: NA

024233CAR 262-241-3133

Cross Streets:

This document reports that the largest and most complete collection of Sanborn fire insurance maps has been reviewed based on client supplied information, and fire insurance maps depicting the target property at the specified address were not identified.

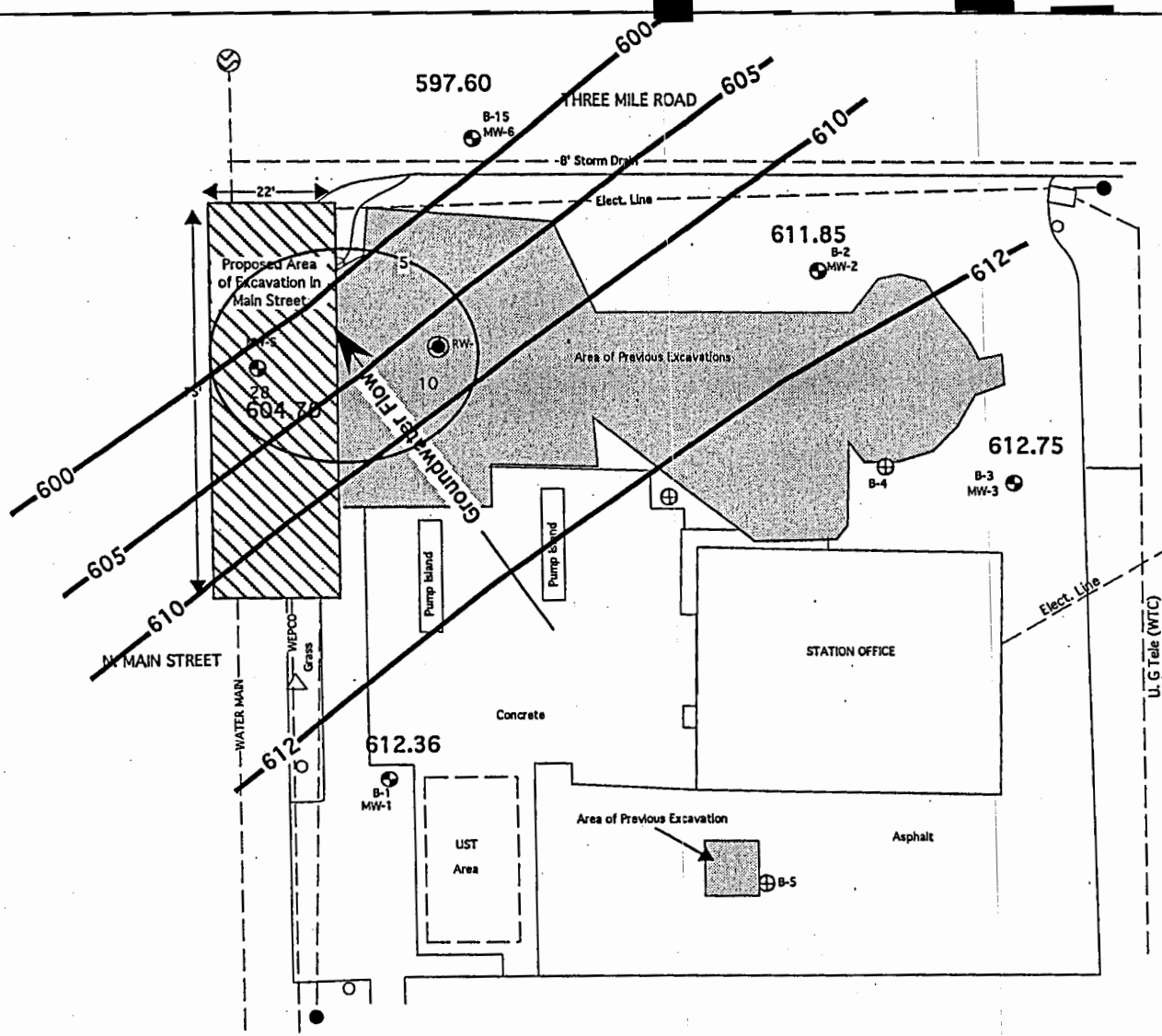
NO COVERAGE

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT. Purchaser accepts this Report AS IS. Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

Copyright 2006 by Environmental Data Resources, Inc. All rights reserved. Reproduction in any media or format, in whole or in part, of any report or map of Environmental Data Resources, Inc., or its affiliates, is prohibited without prior written permission. EDR and its logos (including Sanborn and Sanborn Map) are trademarks of Environmental Data Resources, Inc. or its affiliates. All other trademarks used herein are the property of their respective owners.

ATTACHMENT C

GROUNDWATER ELEVATION CONTOUR MAP



Note:
Groundwater Elevation contours are based on
April 16, 1999 observations.

LEGEND			
⊕	Soil Boring		
⊕	Monitoring Well		
⊙	Recovery Well		

OWNER
PUGH OIL COMPANY

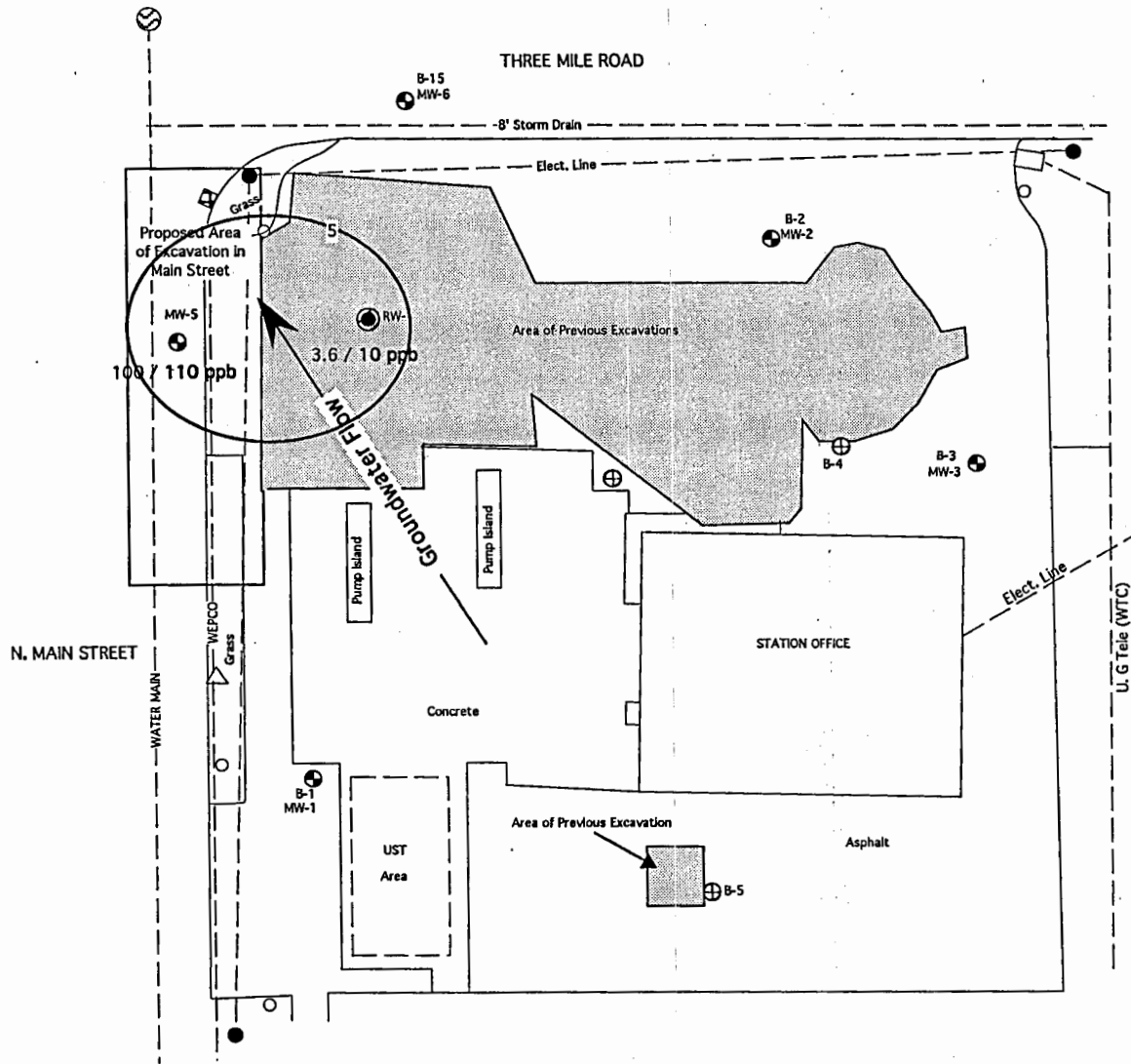
Wishau's Service
3953 N. Main Street Racine, WI 53402

Engineer
K. SINGH & ASSOCIATES, INC.
Engineers & Environmental Management Consultants
1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171

Figure 2. Groundwater Elevation Contours				
Date August 25, 1992	Drawn by V. L. S.	Revisions by	Date	Project no.
SCALE 0' 15' 30'	Checked by P.N.S.	C.S.S.	8-3-95	2049
				Sheet no. One

ATTACHMENT D

PUGH OIL LUST INVESTIGATION INFORMATION



Note:
Benzene concentrations are based on
6/3/98 / 4/16/99 observations

LEGEND	
⊕	Soil Boring
⊙	Monitoring Well
●	Recovery Well

OWNER	
PUGH OIL COMPANY	
Wishau's Service	
3953 N. Main Street	Racine, WI 53402

Engineer	
K. SINGH & ASSOCIATES, INC.	
Engineers & Environmental Management Consultants	
1135 Legion Drive, Elm Grove, Wisconsin 53122, (414) 821-1171	

Figure 1. Layout Map				
Date	Drawn by	Revisions by	Date	Project no.
August 25, 1992	V. L. S.		8-3-95	2049
SCALE		Checked by	C.S.S.	Sheet no.
0' 15' 30'		P.N.S.		One

Table 1
Groundwater Quality Test Results for Wells Located at
Wishau's Service, Racine, Wisconsin

Parameters	Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	RW-1
Benzene (ppb)	1/31/92	<1	8.0	<1	2,900	NS	NS	NI
	2/25/92	<2	<2	<2	4.0	<1	<1	NI
ES (ppb) 5	11/14/92	<0.04	9.5	<0.04	DW	<0.04	<0.04	NS
PAL (ppb) 0.5	7/26/93	NS	NS	NS	DW	NS	NS	220
	7/28/93	5.7	7.0	<0.7	DW	32.0	<0.7	220
	3/2/94	<0.7	0.8	NT	DW	NT	NT	<0.7
	12/28/94	<0.7	<0.7	<0.7	DW	<0.7	<0.7	0.1
	4/7/95	<1.0	<1.0	<1.0	DW	6.2	<1.0	25
	6/21/96	<0.5	2.9	<0.5	DW	150	<0.5	3.6
	9/10/96	<0.5	2.1	<0.5	DW	51	<0.5	12
	1/31/97	<0.13	0.76	<0.13	DW	300	<0.13	4.3
	4/7/97	NS	0.84	<0.13	DW	48	NS	22
	7/21/97	NS	NS	NS	DW	95	NS	21
	10/7/97	NS	NS	NS	DW	59	NS	18
	1/21/98	NS	NS	NS	DW	28	NS	10
	6/3/98	NS	NS	NS	DW	100	NS	3.6
	4/16/99	NS	NS	NS	DW	110	NS	10
Ethylbenzene (ppb)	1/31/92	<1	10.0	<1	52.0	NS	NS	NI
	2/25/92	<2	25.0	<2	39.0	<1	<1	NI
ES (ppb) 700	11/14/92	<0.2	3.0	<0.2	DW	<0.2	<0.2	NS
PAL (ppb) 140	7/26/93	NS	NS	NS	DW	NS	NS	47
	7/28/93	3.8	4.3	<0.9	DW	2.2	<0.9	67
	3/2/94	<0.9	<0.9	NT	DW	NT	NT	<0.9
	12/28/94	<0.9	<0.9	<0.9	DW	<0.9	<0.9	<0.9
	4/7/95	<1.0	<1.0	<1.0	DW	2.4	<1.0	22
	6/21/96	<0.5	<0.5	<0.5	DW	6.6	<0.5	2.8
	9/10/96	<0.5	0.7	<0.5	DW	1.1	<0.5	13
	1/31/97	<0.22	<0.22	<0.22	DW	4.3	<0.22	2.4
	4/7/97	NS	0.25	<0.22	DW	1.4	NS	27
	7/21/97	NS	NS	NS	DW	2.7	NS	31
	10/7/97	NS	NS	NS	DW	1.3	NS	32
	1/21/98	NS	NS	NS	DW	<0.22	NS	8.2
	6/3/98	NS	NS	NS	DW	3.5	NS	1.8
	4/16/99	NS	NS	NS	DW	5.5	NS	3.3

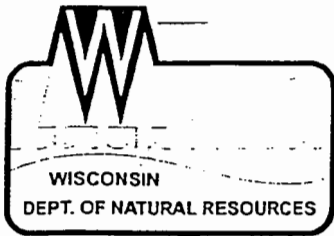
Table 1
Groundwater Quality Test Results for Wells Located at
Wishau's Service, Racine, Wisconsin

Parameters	Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	RW-1
Toluene (ppb)	1/31/92	<1	2.0	3.0	370.0	NS	NS	NI
	2/25/92	<2	<2	<2	6.0	<1	<1	NI
ES (ppb) 343	11/14/92	<0.2	<0.2	<0.2	DW	<0.2	<0.2	NS
PAL (ppb) 68.6	7/26/93	NS	NS	NS	DW	NS	NS	440.0
	7/28/93	5.8	3.8	<1	DW	2.2	<1	500.0
	3/2/94	<1	<1	NT	DW	NT	NT	<1
	12/28/94	<1.0	<1.0	<1.0	DW	<1.0	<1.0	0.2
	4/7/95	<1.0	<1.0	<1.0	DW	<1.0	<1.0	20.0
	6/21/96	<0.5	0.8	<0.5	DW	<1.3	<0.5	7.2
	9/10/96	<0.5	0.6	<0.5	DW	1.1	<0.5	6.2
	1/31/97	<0.2	<0.2	<0.2	DW	0.9	<0.2	2.5
	4/7/97	NS	<0.2	<0.2	DW	0.92	NS	17
	7/21/97	NS	NS	NS	DW	0.96	NS	8.5
	10/7/97	NS	NS	NS	DW	0.66	NS	4.0
	1/21/98	NS	NS	NS	DW	<0.20	NS	3.0
	6/3/98	NS	NS	NS	DW	0.83	NS	0.7
	4/16/99	NS	NS	NS	DW	1.6	NS	4.1
Total Xylenes (ppb)	1/31/92	<1	75.0	4.0	122.0	NS	NS	NI
	2/25/92	<2	2.0	<2	87.0	<1	<1	NI
ES (ppb) 620	11/14/92	<0.2	14.8	<0.2	DW	<0.2	<0.2	NS
PAL (ppb) 124	7/26/93	NS	NS	NS	DW	NS	NS	104.0
	7/28/93	18.0	30.0	<2.4	DW	<2.4	<2.4	420.0
	3/2/94	<2.4	<2.4	NT	DW	NT	NT	<2.4
	12/28/94	<3.9	<3.9	<3.9	DW	<3.9	<3.9	0.6
	4/7/95	<3.0	<3.0	<3.0	DW	5.2	<3.0	33.0
	6/21/96	<0.5	3.1	5.1	DW	4.9	<0.5	2.6
	9/10/96	<0.5	4.1	<0.5	DW	0.9	<0.5	5.5
	1/31/97	<0.23	0.3	<0.23	DW	<0.23	<0.23	0.2
	4/7/97	NS	1.6	<0.23	DW	1.3	NS	24
	7/21/97	NS	NS	NS	DW	1.5	NS	24
	10/7/97	NS	NS	NS	DW	1.6	NS	4.8
	1/21/98	NS	NS	NS	DW	<0.23	NS	4.1
	6/3/98	NS	NS	NS	DW	6.8	NS	2.3
	4/16/99	NS	NS	NS	DW	16	NS	8.6
BETX (ppb)	1/31/92	<4	95.0	<9	3,444	NS	NS	NI
	2/25/92	<8	<31	<8	136	<4	<4	NI
	11/14/92	<0.64	<14.7	<0.64	DW	<0.84	<0.84	NS
	7/26/93	NS	NS	NS	DW	NS	NS	811
	7/28/93	33.3	45.1	<5	DW	<38.8	<5	1,207
	3/2/94	<5	<5.1	NT	DW	NT	NT	<5
	12/28/94	<6.5	<6.5	<6.5	DW	<6.5	<6.5	<1.8
	4/7/95	<6.0	<6.0	<6.0	DW	<14.8	<6.0	100.0

Table 1
Groundwater Quality Test Results for Wells Located at
Wishau's Service, Racine, Wisconsin

Parameters	Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	RW-1
BETX (ppb)	6/21/96	<2.0	<7.3	<6.6	DW	<162.8	<2.0	16.2
	9/10/96	<2.0	7.5	<2.0	DW	54.1	<2.0	1.3
	1/31/97	<0.78	<1.47	<0.78	DW	<305.5	<0.78	10.5
	4/7/97	NS	<2.89	<0.78	DW	51.62	NS	90.0
	7/21/97	NS	NS	NS	DW	100.16	NS	84.5
	10/7/97	NS	NS	NS	DW	62.56	NS	58.8
	1/21/98	NS	NS	NS	DW	<28.65	NS	25.3
	6/3/98	NS	NS	NS	DW	111.13	NS	8.35
	4/16/99	NS	NS	NS	DW	133.1	NS	26.0
				..				
MTBE (ppb)	7/26/93	NS	NS	NS	DW	NS	NS	63
	7/28/93	5.9	18	<4.6	DW	<4.6	<4.6	84
ES (ppb) 60	3/2/94	16.3	9.6	NT	DW	NT	NT	<4.6
PAL (ppb) 12	12/28/94	18.4	14.7	<4.6	DW	<4.6	<4.6	3
	4/7/95	25.0	11	<1.0	DW	2.2	<1.0	5.9
	6/21/96	30.0	42	<5	DW	<13	<5	11
	9/10/96	23.0	16	<5	DW	<5.0	<5	26
	1/31/97	9.8	<0.16	<0.16	DW	0.23	<1.0	5.7
	4/7/97	NS	6.1	0.84	DW	4.3	NS	3.3
	7/21/97	NS	NS	NS	DW	<0.16	NS	<0.16
	10/7/97	NS	NS	NS	DW	<0.16	NS	<0.16
	1/21/98	NS	NS	NS	DW	<0.16	NS	<0.16
	6/3/98	NS	NS	NS	DW	<1.0	NS	<2.0
4/16/99	NS	NS	NS	DW	0.86	NS	3.8	
GRO (ppm)	12/28/94	<0.1	<0.1	<0.1	DW	<0.1	<0.1	0.2
	4/7/95	<0.05	<0.05	<0.05	DW	0.28	<0.05	0.28
	6/21/96	<0.05	<0.05	0.48	DW	1.1	<0.05	<0.05
	9/10/96	<0.05	<0.05	<0.05	DW	0.17	<0.05	0.14
	1/31/97	<0.05	<0.05	<0.05	DW	0.61	<0.05	<0.05
	4/7/97	NS	<0.05	<0.05	DW	0.16	NS	0.24
	7/21/97	NS	NS	NS	DW	0.27	NS	0.33
	10/7/97	NS	NS	NS	DW	0.15	NS	0.2
	1/21/98	NS	NS	NS	DW	0.09	NS	0.2
	6/3/98	NS	NS	NS	DW	0.17	NS	<0.05
4/16/99	NS	NS	NS	DW	NS	NS	NS	

Note: NT -- Not Tested due to cover of snow and ice NI -- Not Installed
 DW -- Damaged during excavation NS -- Not Sampled



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region
Sturtevant Service Center
9531 Rayne Road
Sturtevant, Wisconsin 53177
Telephone 414-884-2300
FAX 414-884-2307
TDD 414-884-2304

January 31, 2000

William Pugh
Wishaus Service Station/Pugh Oil
3953 North Main Street
Racine, WI 53402

RECEIVED

JUN 30 2000
PECFA SITE REVIEW
MILWAUKEE OFFICE

Subject: Proactive closure for Wishaus Service Station, Racine, WI. 53402
(FID#252056090, BRRTS# 03-52-001511)

252058730

Dear Mr. Pugh:

I have reviewed your case file based on the documents submitted by K. Singh and Associates. The Department has determined (prior to November 31, 1999) that it will not require additional site investigation or remediation for this site at this time. However, the case will not be officially entered as closed on the Department's tracking system until a groundwater use restriction is recorded for all properties where there are groundwater enforcement standard exceedances (or until the closure criteria of s. NR 726.05 Wis. Admin. Code has been amended).

Case closure under s. NR 726.05 Wis. Adm. Code requires the recording of a groundwater use restriction for all properties where groundwater contamination exceeds ch. NR 140 enforcement standards (ES), including street and highway right-of-ways. NR 140 ESs are exceeded at RW-1 and MW-5 for Benzene. Because MW-5 is located in the right-of-way (ROW) of North Main Street, it appears evident that the groundwater ES exceedances extend under the ROW. The latest round of groundwater samples indicated Benzene concentrations of 10 and 110 ppb in RW-1 and MW-5 respectively.

However, you should know that the Department is in the process of proposing changes to s. NR 726.05, Wis. Adm. Code, to allow case closure when contamination is present within a public street or highway right-of-way as long as the investigation has confirmed that the groundwater contaminant plume is stable or receding, that natural attenuation will restore the groundwater to NR 140 standards within a reasonable period of time, and that the contamination has not migrated across the right-of-way to another property. The Code change, which is anticipated sometime in 2000, will probably require written notification to the municipality or the state agency that owns or maintains the street or highway that contamination exists, but will not require the recording of a groundwater use restriction for groundwater contamination beneath public streets or highways.

If you choose not to wait for the proposed changes to s. NR 726.05, Wis. Adm. Code, to become effective, then case closure cannot occur until the current closure requirements are met. Existing closure requirements include the following:

1. A groundwater use restriction (GWUR) must be recorded for the property or properties that have ch. NR 140 enforcement standard exceedances as a result of migration of contamination from the responsible party property, per s. NR 726.05(2)(b)4 Wis. Admin. Code, and a copy of the recorded restriction must be sent to this office. A GWUR will be necessary for the Wishaus Service Station property and the adjacent ROW of North Main Street. A draft deed document is enclosed to assist