

November 9, 2010

Project Number #10837

Ms. Pamela Mylotta  
Wisconsin Department of Natural Resources  
2300 North Martin Luther King Drive  
Milwaukee, WI 53212

RE: Contained-out Determination  
McKplaco – One Hour Fabricare  
4704 Burleigh Street  
Milwaukee, Wisconsin  
BRRTS #:02-41-548391

Dear Ms. Mylotta,

Sigma Environmental Services, Inc. (Sigma) on behalf of McKplaco, Inc. has prepared the attached Remediation Site Hazardous Waste Determination request for your review and hazardous waste determination of the soil and groundwater generated during the recent site investigation activities conducted at the McKplaco, Inc. One Hour Fabricare property located at 4704 Burleigh Street in Milwaukee, Wisconsin (hereinafter the "site").

#### **BACKGROUND**

Investigation activities recently conducted at site generated soil and groundwater which requires proper disposal off-site. Based on the site investigation results, select chlorinated volatile organic compounds (primarily tetrachloroethene [PCE] and trichloroethane [TCE]) were detected within the soil and groundwater collected at the site. According to chapter NR 661, PCE, TCE, and vinyl chloride are listed hazardous wastes and therefore soil containing these constituents would also be categorized as a hazardous waste unless contaminant concentrations are detected below the health based levels (WDNR Publication RR-705). In the Wisconsin Department of Natural Resource (WDNR) newsletter dated November 14, 2005 the WDNR provided contained-out values for soil containing TCE (14 parts per million [ppm]), PCE (33 ppm), and vinyl chloride (0.87 ppm). In addition, according to the WDNR Publication RR-705 contaminated groundwater containing a listed waste remains hazardous until the chapter NR 140 enforcement standard (ES) is met.

#### **HAZARDOUS WASTE DETERMINATIONS**

The following hazardous waste determinations were concluded by evaluating the soil and groundwater quality results generated to date with respect to the WDNR contained-out values.

### Soil

Based on the site investigation activities completed to date, TCE, PCE, and vinyl chloride were not detected at concentrations greater than the WDNR contained-out values within any of the soil samples collected at the site. Subsequently the soil generated from the investigation activities conducted at the site to date should not be considered hazardous waste. Soil quality results generated to date are included as *Table 1*.

### Groundwater

Contaminant concentrations detected within the groundwater collected to date indicates that PCE and/or TCE are present at concentrations greater than the NR 140 ES within the groundwater collected from select site monitoring wells (TWM-2, MW-1 and MW-3). Due to the NR 140 ES exceedances detected within the groundwater collected from select monitoring wells at the site, Sigma recommends that groundwater be segregated during groundwater sampling activities at the site. Specifically, groundwater generated from monitoring wells (TWM-2, MW-1 and MW-3) which exhibit NR 140 ES exceedances will be disposed of as a hazardous waste while groundwater generated from monitoring wells (MW-2, MW-4, and MW-5) which do not display a NR 140 ES exceedance meet the requirement of the contained-out decisions and will be disposed as a non-hazardous waste. Groundwater quality results generated to date are included as *Table 2*.

We request that the WDNR concur with our contained-out determinations for the soil and groundwater generated during the site investigation activities completed to date. If approval is granted, Sigma will utilize the hazardous waste determination guidelines presented in this letter to determine the proper disposal of soil and groundwater which may be generated as a part of future investigation activities. If you have any questions or require further information during your review of the Remediation Site Hazardous Waste Determination request, please call me at (414) 643-4200.

Sincerely,

**SIGMA ENVIRONMENTAL SERVICES, INC.**



Mary E. Trotta  
Project Scientist

Cc: Tom McKay – McKplaco, Inc.  
Michelle Williams – Reinhart Boerner Van Deuren, S.C.

Enclosure

**TABLE 1**  
**SOIL ANALYTICAL QUALITY RESULTS**  
**VOLATILE ORGANIC COMPOUNDS**  
**One Hour Fabricare - McKplaco**  
**4704 Burleigh Street**  
**Milwaukee, Wisconsin**  
**Project Reference #10837**

Soil Boring Identification:				SB-1		SB-2		SB-3		SB-4		
Sample Depth (ft):				21"	27.5"	4	11	10	14	4	14	
PID / FID				5.1	4.7	30	0.4	19.7	0	0	0	
Parameter	Unit	NR 720	NR 746		Collection Date							
		RCL	Table 1	Table 2	10/09/06	10/09/06	10/09/06	10/09/06	10/09/06	10/09/06	10/09/06	10/09/06
Benzene	µg/kg	5.5	8,500	1,100	<25	<25	<25	<25	<25	<25	<25	<25
Bromobenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Bromodichloromethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
n-Butylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
sec-Butylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
tert-Butylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Carbon tetrachloride	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Chlorobenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Chloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Chloroform	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Chloromethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
2-Chlorotoluene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
4-Chlorotoluene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Dibromochloromethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2-Dibromo-3-chloropropane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2-Dibromoethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2-Dichlorobenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,3-Dichlorobenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,4-Dichlorobenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Dichlorodifluoromethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,1-Dichloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2-Dichloroethane	µg/kg	4.9	600	540	<25	<25	<25	<25	<25	<25	<25	<25
1,1-Dichloroethene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
cis-1,2-Dichloroethene	µg/kg	NS	NS	NS	<25	<25	<25	<25	151	<25	<25	<25
trans-1,2-Dichloroethene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2-Dichloropropane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,3-Dichloropropane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Di-isopropyl ether	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Ethylbenzene	µg/kg	2,900	4,600	NS	<25	<25	<25	<25	<25	<25	<25	<25
Hexachlorobutadiene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Isopropylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
p-Isopropyltoluene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Methylene chloride	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Methyl-tert-butyl-ether	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Naphthalene	µg/kg	NS	2,700	NS	<25	<25	<25	<25	<25	<25	<25	<25
n-Propylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,1,2,2-Tetrachloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Tetrachloroethene	µg/kg	1230 <sup>1</sup>	33000 <sup>2</sup>	NS	<b>2,440</b>	<b>9,500</b>	<b>120</b>	<25	<b>10,100</b>	<25	<25	<25
Toluene	µg/kg	1,500	38,000	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2,3-Trichlorobenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2,4-Trichlorobenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,1,1-Trichloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,1,2-Trichloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Trichloroethene	µg/kg	160 <sup>1</sup>	14000 <sup>2</sup>	NS	<b>25J</b>	<b>45J</b>	<25	<25	<b>190</b>	<25	<25	<25
Trichlorofluoromethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	µg/kg	NS	83,000	NS	<25	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	µg/kg	NS	11,000	NS	<25	<25	<25	<25	<25	<25	<25	<25
Vinyl chloride	µg/kg	NS	870 <sup>2</sup>	NS	<25	<25	<25	<25	<25	<25	<25	<25
Total Xylenes	µg/kg	4,100	42,000	NS	<75	<75	<75	<75	<75	<75	<75	<75

Notes: Laboratory analyses performed by: Synergy Environmental Lab, Inc. on behalf of Terracon Consultants.

µg/kg = micrograms per kilogram (equivalent to parts per billion)  
 NA = Not Analyzed      NS = No Standard

J = Analyte detected between limit of detection and limit of quantification.

NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (industrial land use RCLs for RCRA metals).  
 NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level: Indicators of Residual Petroleum Products in Soil Pores.  
 NR 746 Table 2 = Wisconsin Administrative Code, Chapter NR 746, Table 2: Protection of Human Health from Direct Contact with Contaminated Soil.

<sup>1</sup> = Calculated Site Specific RCLs  
<sup>2</sup> = WDNR hazardous waste contained-out determination values

Exceedances: **BOLD** = detected compound      **BOX** = concentration exceeds standard

**TABLE 1**  
**SOIL ANALYTICAL QUALITY RESULTS**  
**VOLATILE ORGANIC COMPOUNDS**  
**One Hour Fabricare - McKlaco**  
**4704 Burleigh Street**  
**Milwaukee, Wisconsin**  
**Project Reference #10837**

Soil Boring Identification:		GP-1			GP-2		GP-3		GP-4				
Sample Depth (ft):		2-4	6-8		0-2	4-6	0-2	6-8	2-4	4-6			
PID / FID		1.5	1		7.9	9	0.9	171	1	1			
Parameter	Unit	NR 720			NR 746			Collection Date					
		RCL	Table 1	Table 2	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09
Benzene	µg/kg	5.5	8,500	1,100	<20	<20	<20	<20	<20	<b>1,100</b>	<20	<20	
Bromobenzene	µg/kg	NS	NS	NS	<34	<34	<34	<34	<34	<34	<34	<34	
Bromodichloromethane	µg/kg	NS	NS	NS	<16	<16	<16	<16	<16	<16	<16	<16	
n-Butylbenzene	µg/kg	NS	NS	NS	<35	<35	<35	<35	<35	<b>660</b>	<35	<35	
sec-Butylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<b>153</b>	<25	<25	
tert-Butylbenzene	µg/kg	NS	NS	NS	<23	<23	<23	<23	<23	<23	<23	<23	
Carbon tetrachloride	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21	
Chlorobenzene	µg/kg	NS	NS	NS	<16	<16	<16	<16	<16	<16	<16	<16	
Chloroethane	µg/kg	NS	NS	NS	<23	<23	<23	<23	<23	<23	<23	<23	
Chloroform	µg/kg	NS	NS	NS	<50	<50	<50	<50	<50	<50	<50	<50	
Chloromethane	µg/kg	NS	NS	NS	<43	<43	<43	<43	<43	<43	<43	<43	
2-Chlorotoluene	µg/kg	NS	NS	NS	<31	<31	<31	<31	<31	<31	<31	<31	
4-Chlorotoluene	µg/kg	NS	NS	NS	<24	<24	<24	<24	<24	<24	<24	<24	
Dibromochloromethane	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21	
1,2-Dibromo-3-chloropropane	µg/kg	NS	NS	NS	<37	<37	<37	<37	<37	<37	<37	<37	
1,2-Dibromoethane	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21	
1,2-Dichlorobenzene	µg/kg	NS	NS	NS	<32	<32	<32	<32	<32	<32	<32	<32	
1,3-Dichlorobenzene	µg/kg	NS	NS	NS	<41	<41	<41	<41	<41	<41	<41	<41	
1,4-Dichlorobenzene	µg/kg	NS	NS	NS	<42	<42	<42	<42	<42	<42	<42	<42	
Dichlorodifluoromethane	µg/kg	NS	NS	NS	<33	<33	<33	<33	<33	<33	<33	<33	
1,1-Dichloroethane	µg/kg	NS	NS	NS	<22	<22	<22	<22	<22	<22	<22	<22	
1,2-Dichloroethane	µg/kg	4.9	600	540	<24	<24	<24	<24	<24	<24	<24	<24	
1,1-Dichloroethene	µg/kg	NS	NS	NS	<27	<27	<27	<27	<27	<27	<27	<27	
cis-1,2-Dichloroethene	µg/kg	NS	NS	NS	<24	<24	<b>83</b>	<b>164</b>	<24	<24	<24	<24	
trans-1,2-Dichloroethene	µg/kg	NS	NS	NS	<29	<29	<29	<29	<29	<29	<29	<29	
1,2-Dichloropropane	µg/kg	NS	NS	NS	<19	<19	<19	<19	<19	<19	<19	<19	
1,3-Dichloropropane	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21	
Di-isopropyl ether	µg/kg	NS	NS	NS	<15	<15	<15	<15	<15	<15	<15	<15	
Ethylbenzene	µg/kg	2,900	4,600	NS	<16	<16	<16	<16	<b>23 J</b>	<b>8,800</b>	<16	<16	
Hexachlorobutadiene	µg/kg	NS	NS	NS	<50	<50	<50	<50	<50	<50	<50	<50	
Isopropylbenzene	µg/kg	NS	NS	NS	<30	<30	<30	<30	<30	<b>580</b>	<30	<30	
p-Isopropyltoluene	µg/kg	NS	NS	NS	<30	<30	<30	<30	<30	<b>41 J</b>	<30	<30	
Methylene chloride	µg/kg	NS	NS	NS	<44	<44	<44	<44	<44	<44	<44	<44	
Methyl-tert-butyl-ether	µg/kg	NS	NS	NS	<23	<23	<23	<23	<23	<23	<23	<23	
Naphthalene	µg/kg	NS	2,700	NS	<117	<117	<117	<117	<117	<b>550</b>	<117	<117	
n-Propylbenzene	µg/kg	NS	NS	NS	<29	<29	<29	<29	<29	<b>2,780</b>	<29	<29	
1,1,2,2-Tetrachloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25	
Tetrachloroethene	µg/kg	1230 <sup>1</sup>	33000 <sup>2</sup>	NS	<b>88</b>	<18	<b>710</b>	<b>2,490</b>	<18	<18	<18	<18	
Toluene	µg/kg	1,500	38,000	NS	<23	<23	<23	<23	<23	<b>62 J</b>	<b>27 J</b>	<23	
1,2,3-Trichlorobenzene	µg/kg	NS	NS	NS	<87	<87	<87	<87	<87	<87	<87	<87	
1,2,4-Trichlorobenzene	µg/kg	NS	NS	NS	<53	<53	<53	<53	<53	<53	<53	<53	
1,1,1-Trichloroethane	µg/kg	NS	NS	NS	<27	<27	<27	<27	<27	<27	<27	<27	
1,1,2-Trichloroethane	µg/kg	NS	NS	NS	<30	<30	<30	<30	<30	<30	<30	<30	
Trichloroethene	µg/kg	160 <sup>1</sup>	14000 <sup>2</sup>	NS	<b>29 J</b>	<20	<b>123</b>	<b>470</b>	<20	<20	<20	<20	
Trichlorofluoromethane	µg/kg	NS	NS	NS	<16	<16	<16	<16	<16	<16	<16	<16	
1,2,4-Trimethylbenzene	µg/kg	NS	83,000	NS	<20	<20	<20	<20	<b>86</b>	<b>2,220</b>	<20	<20	
1,3,5-Trimethylbenzene	µg/kg	NS	11,000	NS	<24	<24	<24	<24	<b>29.5 J</b>	<b>1,220</b>	<24	<24	
Vinyl chloride	µg/kg	NS	870 <sup>2</sup>	NS	<17	<17	<17	<17	<17	<17	<17	<17	
Total Xylenes	µg/kg	4,100	42,000	NS	<48	<48	<48	<48	<b>73 J</b>	<b>2,696</b>	<48	<48	

Notes: Laboratory analyses performed by: Synergy Environmental Lab, Inc.  
µg/kg = micrograms per kilogram (equivalent to parts per billion)  
NA = Not Analyzed NS = No Standard  
J = Analyte detected between limit of detection and limit of quantification.  
NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (industrial land use RCLs for RCRA metals).  
NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level: Indicators of Residual Petroleum Products in Soil Pores.  
NR 746 Table 2 = Wisconsin Administrative Code, Chapter NR 746, Table 2: Protection of Human Health from Direct Contact with Contaminated Soil.  
<sup>1</sup> = Calculated Site Specific RCLs  
<sup>2</sup> = WDNR hazardous waste contained-out determination values  
Exceedances: **BOLD** = detected compound **BOX** = concentration exceeds standard

**TABLE 1**  
**SOIL ANALYTICAL QUALITY RESULTS**  
**VOLATILE ORGANIC COMPOUNDS**  
**One Hour Fabricare - McKplaco**  
**4704 Burleigh Street**  
**Milwaukee, Wisconsin**  
**Project Reference #10837**

Soil Boring Identification:					GP-5		GP-6		GP-7		GP-8	
Sample Depth (ft):					0-2	4-6	0-2	4-6	2-4	4-6	2-4	6-8
PID / FID					12	0	1.2	1.6	0.6	1	4	6
Parameter	Unit	NR 720			NR 746			Collection Date				
		RCL	Table 1	Table 2	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09
Benzene	µg/kg	5.5	8,500	1,100	<20	<20	<20	<20	<20	<20	<20	<20
Bromobenzene	µg/kg	NS	NS	NS	<34	<34	<34	<34	<34	<34	<34	<34
Bromodichloromethane	µg/kg	NS	NS	NS	<16	<16	<16	<16	<16	<16	<16	<16
n-Butylbenzene	µg/kg	NS	NS	NS	<35	<35	<35	<35	<35	<35	<35	<35
sec-Butylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
tert-Butylbenzene	µg/kg	NS	NS	NS	<23	<23	<23	<23	<23	<23	<23	<23
Carbon tetrachloride	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21
Chlorobenzene	µg/kg	NS	NS	NS	<16	<16	<16	<16	<16	<16	<16	<16
Chloroethane	µg/kg	NS	NS	NS	<23	<23	<23	<23	<23	<23	<23	<23
Chloroform	µg/kg	NS	NS	NS	<50	<50	<50	<50	<50	<50	<50	<50
Chloromethane	µg/kg	NS	NS	NS	<43	<43	<43	<43	<43	<43	<43	<43
2-Chlorotoluene	µg/kg	NS	NS	NS	<31	<31	<31	<31	<31	<31	<31	<31
4-Chlorotoluene	µg/kg	NS	NS	NS	<24	<24	<24	<24	<24	<24	<24	<24
Dibromochloromethane	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21
1,2-Dibromo-3-chloropropane	µg/kg	NS	NS	NS	<37	<37	<37	<37	<37	<37	<37	<37
1,2-Dibromoethane	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21
1,2-Dichlorobenzene	µg/kg	NS	NS	NS	<32	<32	<32	<32	<32	<32	<32	<32
1,3-Dichlorobenzene	µg/kg	NS	NS	NS	<41	<41	<41	<41	<41	<41	<41	<41
1,4-Dichlorobenzene	µg/kg	NS	NS	NS	<42	<42	<42	<42	<42	<42	<42	<42
Dichlorodifluoromethane	µg/kg	NS	NS	NS	<33	<33	<33	<33	<33	<33	<33	<33
1,1-Dichloroethane	µg/kg	NS	NS	NS	<22	<22	<22	<22	<22	<22	<22	<22
1,2-Dichloroethane	µg/kg	4.9	600	540	<24	<24	<24	<24	<24	<24	<24	<24
1,1-Dichloroethene	µg/kg	NS	NS	NS	<27	<27	<27	<27	<27	<27	<27	<27
cis-1,2-Dichloroethene	µg/kg	NS	NS	NS	<24	<24	<24	<24	<24	<24	<24	<24
trans-1,2-Dichloroethene	µg/kg	NS	NS	NS	<29	<29	<29	<29	<29	<29	<29	<29
1,2-Dichloropropane	µg/kg	NS	NS	NS	<19	<19	<19	<19	<19	<19	<19	<19
1,3-Dichloropropane	µg/kg	NS	NS	NS	<21	<21	<21	<21	<21	<21	<21	<21
Di-isopropyl ether	µg/kg	NS	NS	NS	<15	<15	<15	<15	<15	<15	<15	<15
Ethylbenzene	µg/kg	2,900	4,600	NS	<16	<16	<16	<16	<16	<16	<16	<16
Hexachlorobutadiene	µg/kg	NS	NS	NS	<50	<50	<50	<50	<50	<50	<50	<50
Isopropylbenzene	µg/kg	NS	NS	NS	<30	<30	<30	<30	<30	<30	<30	<30
p-Isopropyltoluene	µg/kg	NS	NS	NS	<30	<30	<30	<30	<30	<30	<30	<30
Methylene chloride	µg/kg	NS	NS	NS	<44	<44	<44	<44	<44	<44	<44	<44
Methyl-tert-butyl-ether	µg/kg	NS	NS	NS	<23	<23	<23	<23	<23	<23	<23	<23
Naphthalene	µg/kg	NS	2,700	NS	<117	<117	<117	<117	<117	<117	<117	<117
n-Propylbenzene	µg/kg	NS	NS	NS	<29	<29	<29	<29	<29	<29	<29	<29
1,1,2,2-Tetrachloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<25	<25	<25	<25	<25
Tetrachloroethene	µg/kg	1230 <sup>1</sup>	33000 <sup>2</sup>	NS	<18	<18	<b>100</b>	<b>1,290</b>	<b>210</b>	<b>172</b>	<b>3,900</b>	<b>5,900</b>
Toluene	µg/kg	1,500	38,000	NS	<23	<23	<23	<23	<23	<23	<23	<b>23 J</b>
1,2,3-Trichlorobenzene	µg/kg	NS	NS	NS	<87	<87	<87	<87	<87	<87	<87	<87
1,2,4-Trichlorobenzene	µg/kg	NS	NS	NS	<53	<53	<53	<53	<53	<53	<53	<53
1,1,1-Trichloroethane	µg/kg	NS	NS	NS	<27	<27	<27	<27	<27	<27	<27	<27
1,1,2-Trichloroethane	µg/kg	NS	NS	NS	<30	<30	<30	<30	<30	<30	<30	<30
Trichloroethene	µg/kg	160 <sup>1</sup>	14000 <sup>2</sup>	NS	<20	<20	<20	<20	<20	<20	<20	<b>134</b>
Trichlorofluoromethane	µg/kg	NS	NS	NS	<16	<16	<16	<16	<16	<16	<16	<16
1,2,4-Trimethylbenzene	µg/kg	NS	83,000	NS	<20	<20	<20	<20	<20	<20	<20	<20
1,3,5-Trimethylbenzene	µg/kg	NS	11,000	NS	<24	<24	<24	<24	<24	<24	<24	<24
Vinyl chloride	µg/kg	NS	870 <sup>2</sup>	NS	<17	<17	<17	<17	<17	<17	<17	<17
Total Xylenes	µg/kg	4,100	42,000	NS	<48	<48	<48	<48	<48	<48	<48	<48

Notes: Laboratory analyses performed by: Synergy Environmental Lab, Inc.  
µg/kg = micrograms per kilogram (equivalent to parts per billion)  
NA = Not Analyzed NS = No Standard  
J = Analyte detected between limit of detection and limit of quantification.  
NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (industrial land use RCLs for RCRA metals).  
NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level: Indicators of Residual Petroleum Products in Soil Pores.  
NR 746 Table 2 = Wisconsin Administrative Code, Chapter NR 746, Table 2: Protection of Human Health from Direct Contact with Contaminated Soil.  
<sup>1</sup> = Calculated Site Specific RCLs  
<sup>2</sup> = WDNR hazardous waste contained-out determination values  
Exceedances: **BOLD** = detected compound **BOX** = concentration exceeds standard

TABLE 1  
SOIL ANALYTICAL QUALITY RESULTS  
VOLATILE ORGANIC COMPOUNDS  
One Hour Fabricare - McKplaco  
4704 Burleigh Street  
Milwaukee, Wisconsin  
Project Reference #10837

Soil Boring Identification:					HA-1		HA-2	MW-1	MW-4	MW-5
Sample Depth (ft):					3	6	6	2-4	2-4	2-4
PID / FID					8	4.5	23	0	0	0
Parameter	Unit	NR 720	NR 746		Collection Date					
		RCL	Table 1	Table 2	06/02/09	06/02/09	06/02/09	05/05/10	05/05/10	05/05/10
Benzene	µg/kg	5.5	8,500	1,100	<20	<20	<20	<35	<35	<35
Bromobenzene	µg/kg	NS	NS	NS	<34	<34	<34	<55	<55	<55
Bromodichloromethane	µg/kg	NS	NS	NS	<16	<16	<16	<31	<31	<31
n-Butylbenzene	µg/kg	NS	NS	NS	<35	<35	<35	<46	<46	<46
sec-Butylbenzene	µg/kg	NS	NS	NS	<25	<25	<25	<35	<35	<35
tert-Butylbenzene	µg/kg	NS	NS	NS	<23	<23	<23	<41	<41	<41
Carbon tetrachloride	µg/kg	NS	NS	NS	<21	<21	<21	<28	<28	<28
Chlorobenzene	µg/kg	NS	NS	NS	<16	<16	<16	<40	<40	<40
Chloroethane	µg/kg	NS	NS	NS	<23	<23	<23	<80	<80	<80
Chloroform	µg/kg	NS	NS	NS	<50	<50	<50	<39	<39	<39
Chloromethane	µg/kg	NS	NS	NS	<43	<43	<43	<43	<43	<43
2-Chlorotoluene	µg/kg	NS	NS	NS	<31	<31	<31	<46	<46	<46
4-Chlorotoluene	µg/kg	NS	NS	NS	<24	<24	<24	<36	<36	<36
Dibromochloromethane	µg/kg	NS	NS	NS	<21	<21	<21	<42	<42	<42
1,2-Dibromo-3-chloropropane	µg/kg	NS	NS	NS	<37	<37	<37	<67	<67	<67
1,2-Dibromoethane	µg/kg	NS	NS	NS	<21	<21	<21	<20	<20	<20
1,2-Dichlorobenzene	µg/kg	NS	NS	NS	<32	<32	<32	<41	<41	<41
1,3-Dichlorobenzene	µg/kg	NS	NS	NS	<41	<41	<41	<37	<37	<37
1,4-Dichlorobenzene	µg/kg	NS	NS	NS	<42	<42	<42	<20	<20	<20
Dichlorodifluoromethane	µg/kg	NS	NS	NS	<33	<33	<33	<33	<33	<33
1,1-Dichloroethane	µg/kg	NS	NS	NS	<22	<22	<22	<45	<45	<45
1,2-Dichloroethane	µg/kg	4.9	600	540	<24	<24	<24	<45	<45	<45
1,1-Dichloroethene	µg/kg	NS	NS	NS	<27	<27	<27	<44	<44	<44
cis-1,2-Dichloroethene	µg/kg	NS	NS	NS	<24	<24	<24	<44	<44	<44
trans-1,2-Dichloroethene	µg/kg	NS	NS	NS	<29	<29	<29	<43	<43	<43
1,2-Dichloropropane	µg/kg	NS	NS	NS	<19	<19	<19	<38	<38	<38
1,3-Dichloropropane	µg/kg	NS	NS	NS	<21	<21	<21	<33	<33	<33
Di-isopropyl ether	µg/kg	NS	NS	NS	<15	<15	<15	<31	<31	<31
Ethylbenzene	µg/kg	2,900	4,600	NS	<16	<16	<16	<56	<56	<56
Hexachlorobutadiene	µg/kg	NS	NS	NS	<50	<50	<50	<79	<79	<79
Isopropylbenzene	µg/kg	NS	NS	NS	<30	<30	<30	<39	<39	<39
p-Isopropyltoluene	µg/kg	NS	NS	NS	<30	<30	<30	<43	<43	<43
Methylene chloride	µg/kg	NS	NS	NS	<44	<44	<44	<52	<52	<52
Methyl-tert-butyl-ether	µg/kg	NS	NS	NS	<23	<23	<23	<27	<27	<27
Naphthalene	µg/kg	NS	2,700	NS	<117	<117	<117	<53	<53	<53
n-Propylbenzene	µg/kg	NS	NS	NS	<29	<29	<29	<44	<44	<44
1,1,1,2-Tetrachloroethane	µg/kg	NS	NS	NS	<25	<25	<25	<29	<29	<29
Tetrachloroethene	µg/kg	1230 <sup>1</sup>	33000 <sup>2</sup>	NS	<b>1,360</b>	<b>980</b>	<b>2,820</b>	<b>1,730</b>	<53	<b>141 J</b>
Toluene	µg/kg	1,500	38,000	NS	<23	<23	<23	<51	<51	<51
1,2,3-Trichlorobenzene	µg/kg	NS	NS	NS	<87	<87	<87	<58	<58	<58
1,2,4-Trichlorobenzene	µg/kg	NS	NS	NS	<53	<53	<53	<48	<48	<48
1,1,1-Trichloroethane	µg/kg	NS	NS	NS	<27	<27	<27	<28	<28	<28
1,1,2-Trichloroethane	µg/kg	NS	NS	NS	<30	<30	<30	<36	<36	<36
Trichloroethene	µg/kg	160 <sup>1</sup>	14000 <sup>2</sup>	NS	<20	<20	<b>60 J</b>	<b>169</b>	<50	<50
Trichlorofluoromethane	µg/kg	NS	NS	NS	<16	<16	<16	<35	<35	<35
1,2,4-Trimethylbenzene	µg/kg	NS	83,000	NS	<20	<20	<20	<73	<73	<73
1,3,5-Trimethylbenzene	µg/kg	NS	11,000	NS	<24	<24	<24	<57	<57	<57
Vinyl chloride	µg/kg	NS	870 <sup>2</sup>	NS	<17	<17	<17	<33	<33	<33
Total Xylenes	µg/kg	4,100	42,000	NS	<48	<48	<48	<124	<124	<124

Notes: Laboratory analyses performed by: Synergy Environmental Lab, Inc.  
µg/kg = micrograms per kilogram (equivalent to parts per billion)  
NA = Not Analyzed NS = No Standard  
J = Analyte detected between limit of detection and limit of quantification.  
NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (industrial land use RCLs for RCRA metals).  
NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level: Indicators of Residual Petroleum Products in Soil Pores.  
NR 746 Table 2 = Wisconsin Administrative Code, Chapter NR 746, Table 2: Protection of Human Health from Direct Contact with Contaminated Soil.  
<sup>1</sup> = Calculated Site Specific RCLs  
<sup>2</sup> = WDNR hazardous waste contained-out determination values  
Exceedances: **BOLD** = detected compound **BOX** = concentration exceeds standard

**TABLE 2**  
**GROUNDWATER ANALYTICAL QUALITY RESULTS**  
**VOLATILE ORGANIC COMPOUNDS**  
**One Hour Fabricare - McKplaco Property**  
**4704 West Burleigh Street**  
**Milwaukee, Wisconsin**  
**Project Reference #10837**

Monitoring Well Identification:			TMW-2	MW-1	MW-2	MW-3	MW-4	MW-5		
Parameter	Unit	NR 140		Collection Date						
		ES	PAL	10/13/06	05/11/10	05/11/10	05/11/10	05/11/10	05/11/10	05/11/10
Benzene	µg/L	5.0	0.5	<47	<0.38	<3.8	<0.38	<38	<0.38	<0.38
Bromobenzene	µg/L	NS	NS	<0.62	<1	<10	<1	<100	<1	<1
Bromodichloromethane	µg/L	0.6	0.06	<0.82	<0.64	<6.4	<0.64	<64	<0.64	<0.64
Bromoform	µg/L	4.4	0.44	<0.3	<0.39	<3.9	<0.39	<39	<0.39	<0.39
tert-Butylbenzene	µg/L	NS	NS	<0.6	<0.55	<5.5	<0.55	<55	<0.55	<0.55
sec-Butylbenzene	µg/L	NS	NS	<0.76	<0.59	<5.9	<0.59	<59	<0.59	<0.59
n-Butylbenzene	µg/L	NS	NS	<1.1	<0.94	<9.4	<0.94	<94	<0.94	<0.94
Carbon Tetrachloride	µg/L	5.0	0.5	<0.52	<0.25	<2.5	<0.25	<25	<0.25	<0.25
Chlorobenzene	µg/L	100	10	<0.56	<0.91	<9.1	<0.91	<91	<0.91	<0.91
Chloroethane	µg/L	400	80	<0.54	<0.67	<6.7	<0.67	<67	<0.67	<0.67
Chloroform	µg/L	6.0	0.6	<0.61	<0.32	<3.2	<0.32	<32	<0.32	<0.32
Chloromethane	µg/L	3.0	0.3	<1	<1.2	<12	<1.2	<120	<1.2	<1.2
2-Chlorotoluene	µg/L	NS	NS	<1.1	<0.51	<5.1	<0.51	<51	<0.51	<0.51
4-Chlorotoluene	µg/L	NS	NS	<0.62	<0.74	<7.4	<0.74	<74	<0.74	<0.74
1,2-Dibromo-3-Chloropropane	µg/L	0.2	0.02	<2.5	<1.9	<19	<1.9	<190	<1.9	<1.9
Dibromochloromethane	µg/L	60	6.0	<0.65	<1.1	<11	<1.1	<110	<1.1	<1.1
1,4-Dichlorobenzene	µg/L	75	15	<0.68	<0.95	<9.5	<0.95	<95	<0.95	<0.95
1,3-Dichlorobenzene	µg/L	1,250	125	<0.72	<0.79	<7.9	<0.79	<79	<0.79	<0.79
1,2-Dichlorobenzene	µg/L	600	60	<0.69	<0.84	<8.4	<0.84	<84	<0.84	<0.84
Dichlorodifluoromethane	µg/L	1,000	200	<0.5	<0.7	<7	<0.7	<70	<0.7	<0.7
1,2-Dichloroethane	µg/L	5.0	0.5	<0.72	<0.38	<3.8	<0.38	<38	<0.38	<0.38
1,1-Dichloroethane	µg/L	850	85	<0.56	<0.69	<6.9	<0.69	<69	<0.69	<0.69
1,1-Dichloroethene	µg/L	7.0	0.7	<0.3	<0.7	<7	<0.7	<70	<0.7	<0.7
cis-1,2-Dichloroethene	µg/L	70	7.0	1.29 J	<0.78	<b>106</b>	1.56 J	<b>150 J</b>	<0.78	<0.78
trans-1,2-Dichloroethene	µg/L	100	20	<0.95	<1.3	<b>23.1 J</b>	<1.3	<130	<1.3	<1.3
1,2-Dichloropropane	µg/L	5.0	0.5	<0.47	<0.34	<3.4	<0.34	<34	<0.34	<0.34
2,2-Dichloropropane	µg/L	NS	NS	<1.2	<0.46	<4.6	<0.46	<46	<0.46	<0.46
1,3-Dichloropropane	µg/L	NS	NS	<0.67	<0.97	<9.7	<0.97	<97	<0.97	<0.97
Di-isopropyl ether	µg/L	NS	NS	<0.71	<0.7	<7	<0.7	<70	<0.7	<0.7
EDB (1,2-Dibromoethane)	µg/L	0.05	0.01	<0.49	<0.95	<9.5	<0.95	<95	<0.95	<0.95
Ethylbenzene	µg/L	700	140	<0.38	<0.55	<5.5	<0.55	<55	<0.55	<0.55
Hexachlorobutadiene	µg/L	NS	NS	<2.1	<1.8	<18	<1.8	<180	<1.8	<1.8
Isopropylbenzene	µg/L	NS	NS	<0.99	<0.71	<7.1	<0.71	<71	<0.71	<0.71
p-Isopropyltoluene	µg/L	NS	NS	<0.81	<0.91	<9.1	<0.91	<91	<0.91	<0.91
Methylene Chloride	µg/L	5.0	0.5	<0.69	<0.47	<4.7	<0.47	<47	<0.47	<0.47
Methyl Tert Butyl Ether (MTBE)	µg/L	60	12	<0.52	<0.25	<2.5	<0.25	<25	<0.25	<0.25
Naphthalene	µg/L	100	10	<2.2	<2.4	<24	<2.4	<240	<2.4	<2.4
n-Propylbenzene	µg/L	NS	NS	<0.61	<0.67	<6.7	<0.67	<67	<0.67	<0.67
1,1,2,2-Tetrachloroethane	µg/L	0.2	0.02	<0.89	<0.5	<5	<0.5	<50	<0.5	<0.5
1,1,1,2-Tetrachloroethane	µg/L	70	7.0	<0.65	<0.7	<7	<0.7	<70	<0.7	<0.7
Tetrachloroethene	µg/L	5.0	0.5	<0.52	<b>9.1</b>	<b>510</b>	<0.43	<b>4100</b>	<0.43	<0.43
Toluene	µg/L	1,000	200	<0.59	<0.72	<7.2	<0.72	<72	<0.72	<0.72
1,2,4-Trichlorobenzene	µg/L	70	14	<1.5	<1.5	<15	<1.5	<150	<1.5	<1.5
1,2,3-Trichlorobenzene	µg/L	NS	NS	<1.4	<0.28	<28	<0.28	<280	<0.28	<0.28
1,1,1-Trichloroethane	µg/L	200	40	<0.5	<0.53	<5.3	<0.53	<53	<0.53	<0.53
1,1,2-Trichloroethane	µg/L	5.0	0.5	<0.5	<0.47	<4.7	<0.47	<47	<0.47	<0.47
Trichloroethene (TCE)	µg/L	5.0	0.5	<0.44	<b>0.55 J</b>	<b>112</b>	0.40 J	<b>267</b>	<0.39	<b>1.92</b>
Trichlorofluoromethane	µg/L	3,490	698	<0.61	<0.56	<5.6	<0.56	<56	<0.56	<0.56
1,2,4-Trimethylbenzene	µg/L	**	**	<0.39	<0.65	<6.5	<0.65	<65	<0.65	<0.65
1,3,5-Trimethylbenzene	µg/L	**	**	<1.2	<0.55	<5.5	<0.55	<55	<0.55	<0.55
Total Trimethylbenzenes	µg/L	480	96	<1.59	<1.2	<12	<1.2	<120	<1.2	<1.2
Vinyl Chloride	µg/L	0.2	0.02	<b>0.2 J</b>	<0.19	<1.9	<0.19	<19	<0.19	<0.19
Xylenes (total)	µg/L	10,000	1,000	<1.42	<1.62	<16.2	<1.62	<162	<1.62	<1.62

**Notes:**

Terracon conducted groundwater sampling on October 13, 2006  
µg/L = micrograms per liter (equivalent to parts per billion)  
J = Analyte detected between limit of detection and limit of quantification  
NA = Not Analyzed                      NS = No Standard  
NR 140 ES = Wisconsin Administrative Code, Chapter NR 140 Enforcement Standard  
NR 140 PAL = Wisconsin Administrative Code, Chapter NR 140 Preventive Action Limit  
Exceedances:     **BOLD**     = concentration exceeds Chapter NR 140 PAL                      **BOX**     = concentration exceeds Chapter NR 140 ES

**ATTACHMENT**

Remediation Site Hazardous Waste Determination Form



**Notice:** This voluntary form is intended as an aid for use by Generators and Responsible Parties in determining whether *contaminated soil or groundwater and wastes* encountered or generated during the remediation of contaminated sites in Wisconsin are or would be listed or characteristic hazardous wastes subject to regulation under ch. 291, Wis. Stats. and chs. NR 600 to 690, Wis. Adm. Code. There are no penalties for failure to provide information requested. Personally identifiable information collected will be used for program management. Wisconsin's Open Records law requires the Department to provide this information upon request [ss. 19.31 - 19.69, Wis. Stats.].

Listing determinations are often particularly difficult in the remedial context because the listings are generally identified by the sources of the hazardous wastes rather than the concentrations of various hazardous constituents. Therefore, analytical testing alone, without information on a waste's source, will not generally produce information that will conclusively indicate whether a given waste is a listed hazardous waste. Generators and Responsible Parties should use available site information such as material safety data sheets (MSDS's), manifests, vouchers, bills of lading, sales and inventory records, accident reports, spill reports, inspection reports, and other available information. It may also be necessary to conduct interviews of current or former personnel who would have knowledge of the processes and hazardous materials used including waste handling or past spills in an effort to ascertain the sources of wastes or contaminants.

Where a person makes a good faith effort to determine if a material is a listed hazardous waste but cannot make such a determination because documentation regarding a source of contamination, contaminant, or waste is unavailable or inconclusive, EPA has stated that one may assume the source, contaminant or waste is not listed hazardous waste and, therefore, provided the material in question does not exhibit a characteristic of hazardous waste, RCRA requirements do not apply.

**Generator Information**

Generator's Name <i>McKplaco, Inc. Representative: Tom McKay</i>	Preparer's Name <i>Mary Trotta</i>
Address <i>602 N 5<sup>th</sup> Street</i>	Address <i>1300 W Canal Street</i>
City, State and ZIP Code <i>Milwaukee, WI 53203</i>	City, State and ZIP Code <i>Milwaukee, WI 53233</i>
Telephone Number	Telephone Number <i>414-643-4200</i>

**Site Information**

Site Name <i>One Hour Fabricare</i>	Other name(s) site is known by
Address <i>4704 W Burlingame ST</i>	County <i>Milwaukee</i>
Located in the City, Town or Village ZIP Code <i>City of Milwaukee, 53210</i>	

**Hazardous Waste Determination Information Reviewed**

**Listed Hazardous Waste Determination**

Manifests reviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available	Vouchers reviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available
Bills of lading reviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available	Sales and inventory records reviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available
Material safety data sheets <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available	Accident reports reviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available
Spill reports reviewed <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> None Found <input type="checkbox"/> None Available	Inspection reports reviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available
DNR's case files reviewed <i>currently conducting investigation 02-41548391</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available	Interviewed current and/or former employees who are likely to know about the use and/or disposal of the chemical or waste of concern (not just managers). <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input type="checkbox"/> None Available

Remediation Site  
Hazardous Waste Determination

Form 4430-019 (R 4/03)

Page 2 of 2

Hazardous Waste Determination Information Reviewed (continued)

Other information considered (provide description)

Yes

No

None Found

None Available

The property has been operated as a dry cleaner which utilized PCE since the late 1970's.

See attached Contained - Out Determination Request letter for recent soil and groundwater quality results and how they relate to contained - out values.

Characteristic Hazardous Waste Determination

Identified location(s)

Testing results

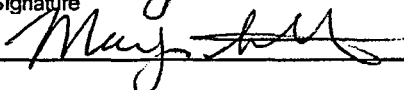
Certification

I certify that the information documented above in the "Information reviewed to make a hazardous waste determination" section was developed and used as part of a good faith effort to make a hazardous waste determination. Reasonable diligence was used in collecting the information, evaluating the information, and using the compiled information. I certify that this document is true and correct to the best of my knowledge, and that I have authority to make this certification.

Name and Title

Mary Trotta, Project Scientist

Signature



Date

10/18/10