

Amadi, Eric A - DNR

From: Patrick Patterson <patrick.patterson@psiusa.com>
Sent: Wednesday, August 23, 2017 3:08 PM
To: Amadi, Eric A - DNR
Cc: George Marek; Norman, Michele R - DNR
Subject: RE: Former Midwest Tanning Corp; South Milwaukee, WI. FID #: 241043330; BRRTS Activity 02-41-556117
Attachments: Retraction Letter - City of South Milwaukee.pdf; Retraction Letter - Union Pacific.pdf

Hi Eric,

We are taking you up on your offer to review of the retraction letters before they go out. I have attached the completed letters for your review.

Thanks,
Pat

Patrick J. Patterson, P.E., P.G., C.S.T.
Senior Engineer
PROFESSIONAL SERVICE INDUSTRIES, INC. (PSI)



Building **Better Together.**

821 Corporate Court | Waukesha, WI 53189
Office: 262.521.2125 Fax: 262.521.2471
patrick.patterson@psiusa.com | www.psiusa.com | Intertek.com/building

From: Amadi, Eric A - DNR [mailto:Eric.Amadi@wisconsin.gov]
Sent: Thursday, August 10, 2017 5:03 PM
To: Patrick Patterson <patrick.patterson@psiusa.com>
Cc: George Marek <george.marek@quarles.com>; Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>
Subject: FW: Former Midwest Tanning Corp; South Milwaukee, WI. FID #: 241043330; BRRTS Activity 02-41-556117

Hi Pat:

We suggest you draft the letters explaining why the concentrations are no longer cause for a continuing obligation or considered residual contamination. We also offer to review the letters before you send them. Let me know if you have questions. Thanks.

Eric

We are committed to service excellence.
Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Eric Amadi
Phone: (414) 263-8639
Eric.Amadi@wisconsin.gov

From: Patrick Patterson [<mailto:patrick.patterson@psiusa.com>]
Sent: Thursday, July 27, 2017 2:40 PM
To: Norman, Michele R - DNR; Amadi, Eric A - DNR
Cc: George Marek
Subject: FW: Former Midwest Tanning Corp; South Milwaukee, WI. FID #: 241043330; BRRTS Activity 02-41-556117

Hi Michele and Eric,

PSI is compiling the requested data/information for the Midwest Tanning parcel as indicated in the April 17, 2017 email from Eric. With the revisions to the NR720 DC RCLs and the implementation of the Hygienetics Chromium test results indicating that all of the detected Chromium was attributable to Trivalent Chromium, PSI has determined that there is no offsite contamination attributable to the Midwest Tanning Parcel. As a result, PSI and our client would like to retract the notifications of contamination on: (1) the adjoining railroad right of way (ROW), which was related to only Chromium within soils and (2) on the City of South Milwaukee Davis Avenue ROW, which was generally related to Chromium and PAHs in soils. An Arsenic level of 8.1 mg/kg was detected in one of the six sidewall samples collected from along the Davis Avenue ROW, but we believe this level does not justify notification, since the background threshold value (BTV) for Arsenic is 8 mg/kg. We would like to have guidance regarding the retraction process. I have attached the notifications that were sent to the railroad and the City for your review, along with two diagrams showing the City of South Milwaukee-Owned Davis Avenue ROW.

Thank you,
Pat

Patrick J. Patterson, P.E., P.G., C.S.T.
Senior Engineer
PROFESSIONAL SERVICE INDUSTRIES, INC. (PSI)



Building **Better Together.**

821 Corporate Court | Waukesha, WI 53189
Office: 262.521.2125 Fax: 262.521.2471
patrick.patterson@psiusa.com | www.psiusa.com | Intertek.com/building

From: Amadi, Eric A - DNR [<mailto:Eric.Amadi@wisconsin.gov>]
Sent: Monday, April 17, 2017 6:17 PM
To: Patrick Patterson <patrick.patterson@psiusa.com>
Cc: Larry Raether <larry.raether@psiusa.com>; Marek, George J. <George.Marek@quarles.com>; Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>
Subject: RE: Former Midwest Tanning Corp; South Milwaukee, WI. FID #: 241043330; BRRTS Activity 02-41-556117

Hi Pat,

During our April 10, 2017, conference call, we promised to follow up with email. Below are our comments regarding the subject site closure submittal:

General Comments and in accordance with Form 4400-202 (R/16):

1. Revise Soil Tables to include chromium species (i.e. chromium valence specific - see attached sample table); For results of chromium species/valence-specific data previously collected at the site, you may review the report, *Notification of Phase II Sampling Results and Request for Case Closure*, dated September 30, 2010,

prepared by Sigma Group. Attached also is a response from the Department (dated April 2011), to a staff from your firm regarding species of chromium that need to be analyzed and thus would be acceptable;

2. Soil maps need to show pre-remediation extent of contamination; limits of excavation; post-excavation soil sample locations and contaminants detected;
3. Identify groundwater (GW) and direct contact (DC) RCL exceedances and **extrapolate limits of residuals contamination greater than GW RCLs & DC RCLs (little ellipses may not provide clarity)**;
4. Transfer the extent of contamination iso-contours to a large or site-wide map with site barriers/features shown;
5. Some figures (soil maps; x-sections; etc.) may be revised due to the modifications outlined above;
6. Use distinguishing colors, lines; etc. to minimize confusion when displaying features (i.e. gas utility location; Approx. property line; etc);
7. Need to provide vapor intrusion (VI) assessment, after you put together the residual soil and groundwater contamination maps. Justify sampling/not sampling (in accordance with the Department's vapor assessment guidance, *Addressing vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin, PUB-RR-800*). Explain how the VI pathway is protected and what long term care is needed to maintain this protection. Also state how the property use change might affect the VI pathway.

Specific:

Attached is sample GIS registry form (page 1 of 16) showing revised site address and parcel ID No. for use in site tables, maps, etc.

Midwest Tanning Corp; Former; 1200 Davis Avenue (Current Address: 222 N. Chicago Avenue, South Milwaukee, WI 53172).

When you have incorporated the suggested comments/revisions into the GIS registry packet, please send a hard copy of revised version for our comment and/or concurrence. We will let you know when to place the final document onto the CD. Let me know if you have any questions. Thanks.

Eric

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Eric Amadi

Phone: (414) 263-8639

Eric.Amadi@wisconsin.gov

PSI - www.psiusa.com - Offices Nationwide
Environmental Consulting * Geotechnical Engineering
Construction Materials Testing & Engineering * Industrial Hygiene
NDE * Facilities & Roof Consulting * Specialty Engineering & Testing

This e-mail and any attachments are for the sole use of the intended recipient(s) and may contain confidential and/or privileged material. If you have received this e-mail in error, please contact the sender and delete the material from any computer. You are hereby notified that any unauthorized disclosure, copying, distribution, or use of this transmitted information is strictly prohibited.

August 23, 2017

City of South Milwaukee
2424 15th Avenue
South Milwaukee, WI 53172

Attn: Tamara Mayzik

RE: Retraction Letter for the October 2016 Notification of Continuing Obligations and Residual Contamination (Form 4400-286) Former Midwest Tanning Corporation Parcel 222 North Chicago Avenue (Formerly 1200 Davis Avenue) South Milwaukee, Wisconsin WDNR BRRTS Activity # 02-41-556117

Dear Ms. Mayzik:

Professional Service Industries, Inc. (PSI) originally notified the City of South Milwaukee of potential residual soil contamination that may be present within the right of way (ROW) of Davis Avenue along the western half of the southern property line of an existing Walmart store. As described below, based upon further evaluation of the soil results and changes to Wisconsin's environmental regulatory standards for soil, there is no soil contamination in the ROW that migrated from our client's adjacent property. Accordingly, we now retract that prior notification.

The potential contamination was anticipated to have originated from former site activities that occurred at the former Midwest Tanning Corporation facility that was located on this property. As stated in the Wisconsin Department of Natural Resources (WDNR) Notification of Residual Contamination form, the potential contaminants of concern were Chromium at residual Total Chromium levels of 60.7 milligrams per kilogram (mg/kg) and 88 mg/kg; Benzo (a) pyrene levels of 29.2 micrograms per kilogram (ug/kg) and 562 ug/kg; and an Arsenic level of 8.1 ug/kg. The Chromium levels are above its NR720 Background Threshold Value (BTV) of 44 mg/kg. The Benzo (a) pyrene levels were above its NR720 non-industrial Direct Contact (DC) Residual Contaminant Level (RCL) of 15 ug/kg at that time. The Arsenic level is slightly above its NR720 BTV of 8 ug/kg. As such, PSI sent the notification to the City of South Milwaukee. A copy of the previously submitted form 4400-286 is included with this letter.

Chromium compounds are utilized in the tanning process of leather. These compounds can be either Trivalent or Hexavalent Chromium. Hexavalent Chromium is a known carcinogen when inhaled. Trivalent Chromium is not a known carcinogen and is an essential mineral for human health. In the original analysis performed by PSI, the type of Chromium within the Total Chromium values was not known. However, following a discussion with the WDNR, we reviewed previous analytical testing performed at the property by another consultant (Hygienetics Environmental Services, Inc.). They had tested numerous selected soil samples for the presence of Total Chromium and several of these test results were well above the NR720 BTV for Chromium. However, they also tested these samples for the presence of both Trivalent and Hexavalent Chromium. The test results indicated that the detected Total Chromium was

composed entirely of Trivalent Chromium and no Hexavalent Chromium was present within these selected soil samples. A table of the Hygienetics test results is included with this letter.

As such, PSI further evaluated the analytical test results of the selected soil samples which we had collected. This evaluation indicated that when the PSI Total Chromium data is compared with the Hygienetics Chromium data, no Hexavalent Chromium is anticipated to be potentially present within the soils along the western property line of the existing Walmart property. Therefore, no migration of Chromium compounds that could be potentially hazardous to the environment and/or human health has occurred.

Due to updated exposure assumptions used to calculate residual contamination levels by the US EPA, in March 2017 the WDNR revised the RCL spreadsheet used to assess soil contamination. These revisions increased the NR720 non-industrial DC RCL for Benzo (a) pyrene from 15 ug/kg to 115 ug/kg. Due to the revisions, oil contaminated with Benzo (a) pyrene above its NR720 DC RCL is not present within the west half of the northern portion of existing ROW of Davis Avenue.

Finally, an Arsenic level of 8.1 mg/kg was detected in one of the six sidewall samples collected from along the Davis Avenue ROW. PSI believes this level does not justify notification, since the background threshold value (BTV) for Arsenic is 8 mg/kg and the detected level may be attributable to natural Arsenic levels that are typically associated with soils in Southeast Wisconsin.

In conclusion, the purpose of this letter is to retract the previous notification that contamination above current WDNR NR720 RCLs and/or BTVs may have migrated onto the existing right of way of Davis Avenue. PSI's revised table of the test results is included with this letter.

If you have any questions, please feel free to contact the undersigned at 262-521-2125.

Respectfully submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.



Patrick J. Patterson, P.E., P.G.
Senior Engineer



Larry Raether, P.E.
Department Manager

Enclosures

cc (w/encl.): Ms. Angela Vick – Wal-Mart Stores, Inc.
Atty. George Marek – Quarles & Brady, LLP.

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (5/15)

Section B: ROW Notification: Residual Contamination and/or Continuing Obligations - Non-DOT ROWs

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

2424 15th Avenue
South Milwaukee, WI, 53172

Dear Ms. Mayzik:

I am providing this notification to inform you of the location and extent of contamination remaining in a right-of-way for which you are responsible, and of certain long-term responsibilities (continuing obligations) for which city of South Milwaukee may become responsible. I investigated a release of: unknown petroleum and RCRA metals on 1200 Davis Avenue (Former), South Milwaukee, WI, 53172 that has shown that contamination has migrated into the right-of-way for which city of South Milwaukee is responsible. I have responded to the release, and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

You have 30 days to comment on the proposed closure request:

The DNR will not review my closure request for at least 30 days after the date of this letter. As an affected right-of-way holder, you have a right to contact the DNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the DNR that is relevant to this closure request, you should mail that information to the DNR contact: 2300 N. Dr. Martin Luther King Jr. Drive, Milwaukee, WI, 53212, or at eric.amadi@wisconsin.gov.

Residual Contamination:

Soil Contamination:

Soil contamination remains at:

along the north side of Davis Avenue from the western end to about 120 feet to the east

The remaining contaminants include:

Benzo(a)pyrene at concentrations of 29.2 and 56.2 ug/kg; Arsenic at a concentration of 8.1 mg/kg; and Chromium at concentrations of 60.7 and 88 mg/kg

at levels which exceed the soil standards found in ch. NR 720, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining soil contamination.

The large portion of the known impacted soil fill material in the above-referenced area has been removed from the former Midwest Tanning Corp. property and has been covered with pavement and 2 feet of clean fill soils.

If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If you or any other person plan to conduct utility or building construction for which dewatering will be necessary, you or that person must contact the DNR's Water Quality Program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>.

Continuing Obligations on the Right-of-Way (ROW): As part of the response actions, I am proposing that the following continuing obligations be used at the affected ROW. If my closure request is approved, you will be responsible for the following continuing obligations:

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (5/15)

Page 2 of 4

Residual Soil Contamination:

If soil is excavated from the areas with residual contamination, the right-of-way holder at the time of excavation will be responsible for the following:

- determine if contamination is present,
- determine whether the material would be considered solid or hazardous waste,
- ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. Contaminated soil may be managed in-place, in accordance with s. NR 718, Wis. Adm. Code, with prior Department approval.

The right-of-way holder needs to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans from ingestion, inhalation or dermal contact.

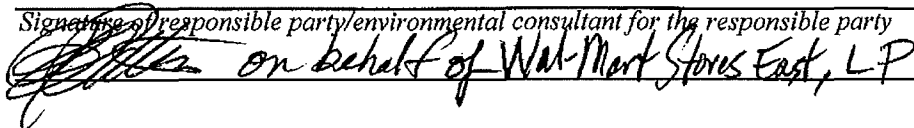
Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

GIS Registry and Well Construction Requirements:

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at <http://dnr.wi.gov/topic/Brownfields/clean.html>. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

If you have any questions regarding this notification, I can be reached at: (262) 521-2125
patrick.patterson@psiusa.com

Signature of responsible party/environmental consultant for the responsible party	Date Signed
 on behalf of Wal-Mart Stores East, LP	10/28/16

Attachments

Contact Information

Legal Description for each Parcel:

Notification of Continuing Obligations and Residual Contamination

Form 4400-286 (5/15)

C. I. Page

The affected property is:

- the source property (the source of the hazardous substance discharge), but the property is not owned by the person who conducted the cleanup (a deeded property)
- a deeded property affected by contamination from the source property
- a right-of-way (ROW)
- a Department of Transportation (DOT) ROW

Included in this completed page as an attachment with all notification provided in these sections A and B.

Contact Information

Responsible Party: The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:

Responsible Party Name Wal-Mart Stores East, LP

Contact Person Last Name Vick	First Angela	MI P	Phone Number (include area code) (479) 204-2042
Address 2001 SE 10th Street	City Bentonville	State AR	ZIP Code 72716
E-mail Angie.Vick@wal-mart.com			

Name of Party Receiving Notification:

Business Name, if applicable: City of South Milwaukee

Title Ms.	Last Name Mayzik	First Tamara	MI	Phone Number (include area code) (414) 768-8051
Address 2424 15th Avenue		City South Milwaukee	State WI	ZIP Code 53172

Site Name and Source Property Information:

Site (Activity) Name Midwest Tanning Corp. (Former)

Address 1200 Davis Avenue (Former)	City South Milwaukee	State WI	ZIP Code 53172
DNR ID # (BRRTS#) 02-41-556117	(DATCP) ID #		

Contacts for Questions:

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

Environmental Consultant: Professional Service Industries, Inc.

Contact Person Last Name Patterson	First Patrick	MI J	Phone Number (include area code) (262) 521-2125
Address 821 Corporate Court	City Waukesha	State WI	ZIP Code 53189
E-mail patrick.patterson@psiusa.com			

Department Contact:

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

Address 2300 N. Dr. Martin Luther King Jr. Drive	City Milwaukee	State WI	ZIP Code 53212
Contact Person Last Name Amadi	First Eric	MI	Phone Number (include area code) (414) 263-8639
E-mail (Firstname.Lastname@wisconsin.gov) eric.amadi@wisconsin.gov			

CONTAMINATION LOCATION MAP


BRRTS No. 02-41-556117
(City of South Milwaukee ROW)



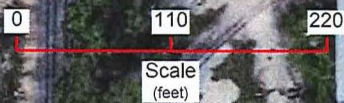
Property Boundary and
Approximate Extent of
Engineered Cap/Barrier

Approximate Area of
Residual Soil Contamination
ROW of Davis Avenue

Legend:

 Approximate Extent of Soil-Impacted Above NR720 DC RCLs

Adapted from 2015 Google Earth Aerial Photograph



Midwest Tanning Corp (Former)
1200 Davis Avenue
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

©2015 Google

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS
 (page 1 of 4)

DETECTS ONLY
 1200 Davis Avenue
 South Milwaukee, Wisconsin
 Project Reference #12101

Soil Boring Identification:			SB-1	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-9	SB-10	SB-11	SB-12	SB-13	SB-14	SB-15	SB-17	SB-18	SB-19	SB-20	SB-21	SB-22	SB-23	SB-24	SB-25	SB-26	SB-27				
Sample Depth (ft):			2-4	1-2	4-6	5-8	3.5-4.5	6-9	14-14.5	5-7	10-12	6-8	7-8	6-7	5-6	7-8	5-6	6-8	5-6	9-10	11-12	9-10	6-7	7-8	10-11	10-12	7-9	7-10				
METALS	Units	SSL (GW)	NR 720 RCL Table 2																													
			(1) Non-Industrial	(2) Industrial	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01		
Arsenic	mg/kg	NC	0.039	1.6	(1,2) 5.5	NA	(1,2) 4.3	NA	NA	NA	(1,2) 3.3	NA	NA	(1,2) 6.5	NA	<1.7	NA	(1,2) 5.2	(1,2) 4.3	NA	NA	NA	NA	NA	NA	(1,2) 3.3	NA	(1,2) 5.6	NA	NA	(1,2) 5.7**	
Barium	mg/kg	NC	NS	NS	94	NA	50	NA	NA	NA	48	NA	NA	96	NA	4.9	NA	46	19	NA	NA	NA	NA	NA	NA	83	NA	33	NA	NA	67	
Cadmium	mg/kg	NC	8.0	510	0.74	NA	<0.64	NA	NA	NA	<0.81	NA	NA	<0.6	NA	<0.57	NA	<0.58	<0.58	NA	NA	NA	NA	NA	NA	<0.59	NA	<0.59	NA	NA	0.54	
Chromium, ICP	mg/kg	NC	NS	NS	417	NA	24	NA	NA	NA	17	NA	NA	30	NA	4.9	NA	17	1100	NA	NA	NA	NA	NA	NA	21	NA	14	17	17	22	
Chromium, Trivalent	mg/kg	359,854	16,000	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Chromium, Hexavalent	mg/kg	NC	14	200	NA	<5.7	NA	<6.5	<5.9	<5.9	NA	<6.1	<5.7	NA	<5.7	NA	<5.7	NA	NA	<5.8	<6.4	<5.9	<5.8	<5.6	NA	<5.8	NA	<5.8	<5.6	NA		
Lead	mg/kg	NC	50	500	26	NA	9.1	NA	NA	NA	7.4	NA	NA	12	NA	<4.6	NA	8.4	6.7	NA	NA	NA	NA	NA	NA	9.4	NA	8.5	NA	NA	11	
Mercury	mg/kg	NC	NS	NS	0.061	NA	<0.051	NA	NA	NA	<0.049	NA	NA	<0.048	NA	<0.046**	NA	<0.046	0.068	NA	NA	NA	NA	NA	NA	<0.047	NA	<0.047	NA	NA	<0.046	
Selenium	mg/kg	NC	NS	NS	<1.8	NA	<1.9	NA	NA	NA	<1.8	NA	NA	<1.8	NA	<1.7	NA	<1.7	<1.7	NA	NA	NA	NA	NA	NA	<1.8	NA	<1.8	NA	NA	<1.7**	
Silver	mg/kg	NC	NS	NS	<2.5	NA	<2.6	NA	NA	NA	<2.5	NA	NA	<2.4	NA	<2.3	NA	<2.3	<2.3	NA	NA	NA	NA	NA	NA	<2.4	NA	<2.3	NA	NA	2.3	
INORGANICS			SSL (GW)	SSL (D.C.-R)																												
pH, Non-Aqueous	units	NS	NS	NA	8.77	NA	7.96	8.92	9.79	NA	9.14	8.67	NA	8.54	NA	9.28	NA	NA	NA	8.48	8.53	8.45	8.38	8.82	NA	8.51	NA	8.02	8.09	NA		
Sulfide, total	mg/kg	NS	NS	NA	<11 ^S	NA	<13 ^S	<12 ^S	<12 ^S	NA	<12 ^S	<11 ^S	NA	<11 ^S	NA	<11 ^S	NA	<12 ^S	<13 ^S	<12 ^S	<12 ^S	<11 ^S	NA	<12 ^S	NA	<12 ^S	NA	<23.1 ^S	<22.4 ^S	NA		
N-Ammonia	mg/kg	NS	10,900,000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
POLYNUCLEAR AROMATIC HYDROCARBONS			Suggested Generic RCLs for PAHs in Soil (for PAHs) DR SSLs (either SVOCs)																													
			(3) GW Pathway	(1) Non-Industrial	(2) Industrial																											
Fluorene	µg/kg	100,000	600,000	40,000,000	NA	NA	<320	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<290	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<285	
N-Nitrosodiphenylamine	µg/kg	87.7	13,000	NC	NA	NA	<320	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<290	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<265	
Phenanthrene	µg/kg	1,800	18,000	390,000	NA	NA	<320	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<290	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<285	

Notes

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-862.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only; most appropriate values for several parameters were not determined.

mg/kg = milligrams per kilogram (equivalent to parts per million)

NA = Not Analyzed

NS = No Standard Established (for SSLs this indicates analyte not available in EPA web site).

NC = Not Calculated (for SSLs)

NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (Industrial land use RCLs for RCRA metals).

Suggested Generic RCL = More stringent generic Residual Contaminant Level for protection of groundwater (gw) or direct contact (dc) pathway for non-industrial land use from WDNR Publication RR-519-97 "Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance" (April 1997)

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds Non-Industrial Direct Contact RCLs

(2) = concentration exceeds Industrial Direct Contact RCLs

(3) = concentration exceeds suggested generic Groundwater Pathway RCLs (PAHs) or groundwater pathway SSLs (other analytes)

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS
 (page 2 of 4)

DETECTS ONLY
 1200 Davis Avenue
 South Milwaukee, Wisconsin
 Project Reference #12101

Soil Boring Identification:		NR 720 RCL Table 2		SB-28	SB-29	SB-30	SB-31	SB-32	SB-33	SB-34	SB-35	SB-37	SB-38	SB-39	SB-40	SB-41	SB-42	SB-43	SB-44	SB-45	SB-46	SB-47	SB-48	SB-49	SB-50	SB-51	SB-52	SB-53				
Sample Depth (ft)		NR 720 RCL Table 2		4-7	7-8	8.5-10	8.5-7	4-5	4-7	4-8	0-6	4-5	4-7	7-9	5-6	2-4	4-6	5-6.5	4-7	9-10	4-5	2-3	5-7	3-4	4-6	1-2	2-3	4-5	3-4			
METALS	Units	SSL (GW)	NR 720 RCL Table 2		07/17/01																											
			(1) Non-Industrial	(2) Industrial	07/17/01	07/17/01	7/17/2001	07/17/01	07/17/01	07/17/01	07/17/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01		
Arsenic	mg/kg	NC	0.039	1.6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Barium	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	87	NA	175	60	NA	NA	NA	NA	NA	NA	NA	NA		
Cadmium	mg/kg	NC	8.0	510	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.6	NA	0.85	<0.57	NA	NA	NA	NA	NA	NA	NA			
Chromium, ICP	mg/kg	NC	NS	NS	16	24	24	18	672	19	60	38	25	25	34	21	26	24	57	54	20	38	31	31	33	34	38	25	27	30		
Chromium, Trivalent	mg/kg	359,854	18,000	NS	16	24	24	18	672	19	60	36	25	25	34	21	26	NA	57	NA	NA	38	31	31	33	34	38	25	27	30		
Chromium, Hexavalent	mg/kg	NC	14	200	<5.7	<5.9	<6.3	<6.0	<6.0	<5.7	<5.8	<6.0	<5.7	<6.0	<6.2	<5.9	<6.2	NA	<5.8	NA	<5.6	<5.8	<5.8	<6.1	<5.7	<6.0	<5.7	<5.7	<6.2			
Lead	mg/kg	NC	50	500	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	11	NA	19	9.8	NA	NA	NA	NA	NA	NA	NA			
Mercury	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.048	NA	<0.054	<0.045	NA	NA	NA	NA	NA	NA	NA			
Selenium	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<1.8	NA	<2.0	<1.7	NA	NA	NA	NA	NA	NA	NA			
Silver	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<2.4	NA	<2.7	<2.3	NA	NA	NA	NA	NA	NA	NA			
INORGANICS	SSL (GW)	SSL (D.C.-R)																														
pH, Non-Aqueous	units	NS	NS		9.5	10.88	9.63	8.75	9.4	8.71	9.33	9.61	9.53	8.2	8.69	8.87	9.24	NA	8.58	NA	NA	8.19	8.42	8.43	7.33	8.42	7.59	8.58	8.91	8.55		
Sulfide, total	mg/kg	NS	NS		<23 ⁵	<23.5 ⁵	50.8 ⁸	<23.9 ⁵	<24 ⁸	<22.8 ⁸	<23.2 ⁵	134 ⁸	<22.8 ⁵	<23.8 ⁵	<24.5 ⁵	<23.5 ⁵	<24.8 ⁵	NA	<23.2 ⁵	NA	NA	<22.3 ⁵	<23.5 ⁵	<23 ⁵	<24.4 ⁵	<22.8 ⁵	<24 ⁵	<22.7 ⁵	<22.9 ⁵	<24.8 ⁵		
N-Ammonia	mg/kg	NS	10,900,000		NA	NA	NA	NA	NA	NA	NA	506	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
SEMIVOLATILE ORGANIC COMPOUNDS		Suggested Generic RCLs for PAHs in Soil (for PAHs) OR SSLs (other SVOCs)																														
		(3) GW Pathway	(1) Non-Industrial	(2) Industrial																												
Fluorene	µg/kg	100,000	600,000	40,000,000	NA	NA	NA	NA	NA	<287 ¹⁵	NA	NA	NA	NA	NA	NA	NA	<298	NA	632	<284	NA	NA	NA	NA	NA	NA	NA	NA			
N-Nitrosodiphenylamine	µg/kg	87.7	13,000	NC	NA	NA	NA	NA	NA	<287	NA	NA	NA	NA	NA	NA	NA	<298	NA	(3) 753	<284	NA	NA	NA	NA	NA	NA	NA	NA			
Phenanthrene	µg/kg	1,800	18,000	390,000	NA	NA	NA	NA	NA	<287	NA	NA	NA	NA	NA	NA	NA	<298	NA	1340	<284	NA	NA	NA	NA	NA	NA	NA	NA			

Notes

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-682.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only, most appropriate values for several parameters were not determined.

mg/kg = milligrams per kilogram (equivalent to parts per million)

NA = Not Analyzed

NS = No Standard Established (for SSLs this indicates analyte not available in EPA web site).

NC = Not Calculated (for SSLs)

NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (industrial land use RCLs for RCRA metals).

Suggested Generic Interim RCL = More stringent generic Residual Contaminant Level for protection of groundwater (gw) or direct contact (dc) pathway for non-industrial land use from WDNR Publication RR-519-97 "Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance" (April 1997)

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds Non-Industrial Direct Contact RCLs

(2) = concentration exceeds Industrial Direct Contact RCLs

(3) = concentration exceeds suggested generic Groundwater Pathway RCLs (PAHs) or groundwater pathway SSLs (other analytes)

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS
(page 3 of 4)

DETECTS ONLY
1200 Davis Avenue
South Milwaukee, Wisconsin
Project Reference #12101

Soil Boring Identification:					SB-1	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-9	SB-10	SB-11	SB-12	SB-13	SB-14	SB-15	SB-17	SB-18	SB-19	SB-20	SB-21	SB-22	SB-23	SB-24	SB-25	SB-26	SB-27
Sample Depth (ft):					2-4	1-2	4-6	5-8	3.5-4.5	8-9	14-14.5	5-7	10-12	6-8	7-8	6-7	5-6	7-8	5-6	6-8	5-6	9-10	11-12	9-10	6-7	7-8	10-11	10-12	7-9	7-10
VOLATILE ORGANIC COMPOUNDS	Unit	SSL (3) GW	SSL (1) D.C.-R	NR 746 (2) Table 1	08/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/13/01	06/13/01	06/13/01	06/13/01	06/13/01	06/13/01	06/13/01	07/17/01	07/17/01	07/17/01	
					n-Butylbenzene	µg/g	NC	NC	NS	NA	NA	19	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9
sec-Butylbenzene	µg/g	NC	NC	NS	NA	NA	10	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7
Isopropylbenzene	µg/g	NC	NC	NS	NA	NA	<6.4	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7
p-Isopropyltoluene	µg/g	NC	NC	NS	NA	NA	13	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7
Methylene chloride	µg/g	NC	NC	NS	NA	NA	<19	NA	NA	NA	<18	NA	NA	<18	NA	<17	NA	<17	NA	NA	NA	NA	NA	NA	<18	NA	<18	NA	NA	<17
n-Propylbenzene	µg/g	NC	NC	NS	NA	NA	<6.4	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7
1,2,4-Trimethylbenzene	µg/g	7,449	33,700	83,000	NA	NA	43	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7

Notes:

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-682.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only; most appropriate values for several parameters were not determined.

µg/kg = micrograms per kilogram (equivalent to parts per billion)

NA = Not Analyzed NS = No Standard

NC = Not Calculated (for SSLs)

NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level; Indicators of Residual Petroleum Products in Soil Pores.

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds residential direct contact pathway SSL

(2) = concentration exceeds NR 746 Table 1 value

(3) = concentration exceeds groundwater pathway SSL

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS
 (page 4 of 4)

DETECTS ONLY
 1200 Davis Avenue
 South Milwaukee, Wisconsin
 Project Reference #12101

Soil Boring Identification:					SB-28	SB-29	SB-30	SB-31	SB-32	SB-33	SB-34	SB-35	SB-37	SB-38	SB-39	SB-40	SB-41	SB-42	SB-43	SB-44	SB-45	SB-46	SB-47	SB-48	SB-49	SB-50	SB-51	SB-52	SB-53			
Sample Depth (ft):					4-7	7-8	8.5-10	6.5-7	4-5	4-7	4-8	0-6	4-5	4-7	7-9	5-6	2-4	4-8	5-6.5	4-7	9-10	4-5	2-3	5-7	3-4	4-6	1-2	2-3	4-5	3-4		
VOLATILE ORGANIC COMPOUNDS	Unit	SSL	SSL	NR 746																												
		(3) GW	(1) D.C.-R	(2) Table 1	07/17/01	07/17/01	7/17/2001	07/17/01	07/17/01	07/17/01	07/17/01	07/17/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01		
n-Butylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	1610	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	1750	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	188	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	728	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene chloride	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	NA	<17	<17	NA	NA	NA	NA	NA	NA	NA	<18	NA	148	<17	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	444	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	µg/kg	7,449	33,700	83,000	NA	NA	NA	NA	NA	NA	<5.7	6.8	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	2420	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-682.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only; most appropriate values for several parameters were not determined.

µg/kg = micrograms per kilogram (equivalent to parts per billion)

NA = Not Analyzed NS = No Standard

NC = Not Calculated (for SSLs)

NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level: Indicators of Residual Petroleum Products in Soil Pores.

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds residential direct contact pathway SSL

(2) = concentration exceeds NR 726 Table 1 value

(3) = concentration exceeds groundwater pathway SSL

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 1 of 12)

Midwest Tanning Corp. (Former)
 222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
 South Milwaukee, Wisconsin
 BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-26	SP-27	SP-28	SP-29	SP-30	NR 720			NR 720
		1' - 2' 3/15/11	1' - 2' 3/15/11	1' - 2' 3/15/11	1' - 4' 3/14/11	1' - 4' 3/14/11	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	<0.53	14.1	3.5	24.6	38.9	---	---	---	---
GRO	mg/kg	<2.9	<1.3	<1.4	71.8	<2.8	---	---	---	---
Detected VOCs										
sec-Butylbenzene	ug/kg	<25.0	<9.5	<9.7	189	<25.0	145,000	145,000	---	---
Isopropylbenzene	ug/kg	<25.0	<6.5	<6.6	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<23.7	<24.0	175	<25.0	162,000	162,000	---	---
Methylene Chloride	ug/kg	53.2J	65.6	49.1J	65.7J	38.4J	1,150,000	61,800	2.6	---
Naphthalene	ug/kg	<25.0	1,830	<18.1	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<11.9	<12.1	35.1J	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<22.6	<22.9	394	<25.0	219,000	219,000	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<10.9	<11.1	165	<25.0	182,000	182,000	1,382.1	---
PAHs										
Acenaphthene	ug/kg	<2.7	568	<2.8	<2.8	365J	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<31.6	<3.2	<3.2	<121	---	---	---	---
Anthracene	ug/kg	<4.4	1,160	<4.7	<4.6	1,080	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	1,190	2.9J	<2.8	2,540	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	1,120	<3.3	<3.3	2,790	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	931	<3.5	<3.4	2,710	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	400	<2.7	<2.6	1,980	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	1,050	<3.7	<3.7	2,940	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	1,200	4.3J	<3.6	2,840	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	175J	<5.5	<5.4	577J	2110	115	---	---
Fluoranthene	ug/kg	<9.5	2,930	<10.1	<9.9	7,110	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	619	<5.0	<4.9	456J	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	402	<2.9	<2.8	1,630	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	199	7.5J	<3.0	<116	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	287	8.2J	<3.0	<116	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	587	6.4J	<3.5	<133	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	3,290	7.1J	<4.4	4,370	---	---	---	---
Pyrene	ug/kg	<3.5	2,650	4.6J	<3.6	6,080	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	6.8	(8.5)	3.9	5.0	7.8	3	0.677	0.584	(8)
Barium	mg/kg	42.9	83.6	44.1	38	276	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.35J	0.25J	0.18J	0.25J	0.24J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	19.1	(76.9)	20.3	(87)	(575)	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	19.1	76.9	20.3	87	575	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	9.3	32	15.1	9.8	(144)	800	400	27	(52)
Mercury	mg/kg	0.018	0.032	0.030	0.014	0.10	3.13	3.13	0.208	---
Selenium	mg/kg	0.43J	0.50J	0.50J	0.32J	0.67J	5,840	391	0.52	---
Silver	mg/kg	0.15J	0.088J	0.10J	0.12J	0.089J	5,840	391	0.8491	---
Cumulative Hazard Index		0.0011	0.2642	0.0018	0.0054	0.0126	---	---	---	---
Cumulative Cancer Risk		0	1.1E-04	0	0	2.4E-04	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Italicized concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 2 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-31	SP-32	SP-33	SP-34	SP-35	SP-36	NR 720 RCL			NR 720
		0' - 4' 3/14/11	0' - 4' 3/14/11	0' - 4' 3/14/11	0' - 4' 3/14/11	0' - 4' 3/15/11	0' - 4' 3/15/11	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	0	---	---	---	---
DRO	mg/kg	6.3	4.4	4.0	2.5	1.3	11.7	---	---	---	---
GRO	mg/kg	<3.2	<3.0	<3.0	<2.9	<1.4	1.5J	---	---	---	---
Detected VOCs											
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<9.7	<9.7	145,000	145,000	---	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<6.6	<6.6	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<24.1	<24.1	162,000	162,000	---	---
Methylene Chloride	ug/kg	43.7J	41.1J	47.9J	58.7J	44.3J	65.7	1,150,000	61,800	2.6	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<18.2	<18.2	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<12.1	<12.2	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<23.0	<23.1	219,000	219,000	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<11.2	<11.2	182,000	182,000	1,382.1	---
PAHs											
Acenaphthene	ug/kg	<3.0	<2.8	6.5J	<2.7	40.8J	12.8J	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.4	<3.2	12.9J	<3.1	41.5J	203	---	---	---	---
Anthracene	ug/kg	<5.0	<4.7	39.5	<4.5	197	136	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<3.1	9.0J	163	<2.8	846	481	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.5	8.7J	180	<3.2	862	685	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.7	8.8J	171	<3.4	967	833	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.9	6.1J	136	<2.6	375	381	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<4.0	9.5J	175	<3.6	870	547	211,000	11,500	---	---
Chrysene	ug/kg	<3.9	11.4J	182	3.6J	1,040	549	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.9	<5.4	43.6	<5.3	169	122	2110	115	---	---
Fluoranthene	ug/kg	<10.8	16.3J	295	<9.8	1,630	816	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<5.4	<5.0	9.1J	<4.9	54.2J	22J	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<3.1	4.9J	106	<2.8	377	334	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<3.3	<3.1	<3.1	<3.0	140	35.6J	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<3.3	<3.1	3.7J	<3.0	193	71.0	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.8	<3.5	9.9J	<3.4	161	167	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.8	7.9J	117	5.7J	838	339	---	---	---	---
Pyrene	ug/kg	4.3J	14.3J	260	3.8J	1,430	846	22,600,000	1,790,000	54,545.2	---
RCRA Metals											
Arsenic	mg/kg	(11.1)	(11.9)	6.0	4.4	(8.5)	(9)	3	0.677	0.584	(8)
Barium	mg/kg	108	60.8	44.1	34.4	63.8	42.7	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.16J	0.17J	0.26J	0.15J	0.26J	0.25J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	36.3	40.5	(64.1)	23.7	(54.6)	27.1	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	36.3	40.5	64.1	23.7	54.6	27.1	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	14.6	18	13	8.4	27.6	18.3	800	400	27	(52)
Mercury	mg/kg	0.079	0.087	0.037	0.053	0.065	0.037	3.13	3.13	0.208	---
Selenium	mg/kg	0.42J	0.42J	0.37J	0.41J	0.84J	0.41J	5,840	391	0.52	---
Silver	mg/kg	0.14J	0.15J	0.14J	0.14J	0.19J	0.23J	5,840	391	0.8491	---
Cumulative Hazard Index		0.3283	0.3521	0.0025	0.053	0.2541	0.2668	---	---	---	---
Cumulative Cancer Risk		1.8E-05	1.9E-05	1.8E-05	0	9.9E-05	8.1E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Italicized concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 3 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-37	SP-38	SP-39	SP-40	SP-41	SP-42	NR 720			NR 720
		3' - 5' 3/14/11	7.5' - 10' 3/14/11	3' - 5' 3/14/11	3' - 5' 3/15/11	3' - 5' 3/15/11	3' - 5' 3/15/11	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	u	---	---	---	---
PID	i.u.	0	38.2	0	0	0	0	---	---	---	---
DRO	mg/kg	61.4	0.91J	0.74J	41.3	6.2	3.1	---	---	---	---
GRO	mg/kg	<2.8	127	<2.8	37.0	<1.3	<1.2	---	---	---	---
Detected VOCs											
sec-Butylbenzene	ug/kg	<25.0	153	<25.0	165	<9.3	<8.8	145,000	145,000	---	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	9.9J	<6.4	<6.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	128	<25.0	136	<23.2	<21.8	162,000	162,000	---	---
Methylene Chloride	ug/kg	48.4J	50.7J	59.4J	49.3J	44.3J	39.9J	1,150,000	61,800	2.6	---
Naphthalene	ug/kg	<25.0	274	<25.0	224J	<17.5	<16.5	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	25.7J	<11.7	<11.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	180	<25.0	294	<22.1	<20.9	219,000	219,000	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	191	<10.7	<10.1	182,000	182,000	1,382.1	---
PAHs											
Acenaphthene	ug/kg	<2.7	9.6J	<2.6	<2.9	<2.7	<2.6	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<10.1	<3.0	<3.3	<3.1	<2.9	---	---	---	---
Anthracene	ug/kg	<4.4	<14.8	<4.4	<4.8	<4.5	<4.3	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	3.5J	<9.0	<2.7	3.2J	<2.8	5.3J	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	3.3J	<10.4	<3.1	<3.4	<3.2	5.3J	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	3.7J	<11.0	<3.2	<3.6	<3.4	4.2J	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	2.5J	<8.4	<2.5	<2.7	<2.6	4.2J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<11.8	<3.5	<3.8	<3.6	6.5J	211,000	11,500	---	---
Chrysene	ug/kg	6.7J	<11.5	<3.4	7.8J	<3.5	6.7J	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.1	<17.3	<5.1	<5.6	<5.3	<5.0	2110	115	---	---
Fluoranthene	ug/kg	<9.4	<31.7	<9.4	<10.3	<9.7	10.8J	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<15.8	<4.7	<5.1	<4.8	<4.6	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<9.0	<2.7	<2.9	<2.8	3.1J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	489	<2.9	33.3	5.1J	<2.8	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	3.9J	716	<2.9	34.2	6.6J	<2.8	3,010,000	239,000	---	---
Naphthalene	ug/kg	3.6J	290	<3.3	15.0J	<3.4	<3.2	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.1	<14.0	<4.1	10.1J	<4.3	6.7J	---	---	---	---
Pyrene	ug/kg	4.5J	<11.6	<3.4	5.3J	<3.6	10.4J	22,600,000	1,790,000	54,545.2	---
RCRA Metals											
Arsenic	mg/kg	5.8	4.6	5.4	(8.5)	5.1	0.42J	3	0.677	0.584	(8)
Barium	mg/kg	37.4	29.2	36.1	84.5	65.3	14.2	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.23J	0.22J	0.29J	0.26J	0.37J	0.083J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	17.8	15.5	15.2	31.9	26.7	8.3	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	17.8	15.5	15.2	31.9	26.7	8.3	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	8.7	7.4	8.1	15.9	9.0	9.9	800	400	27	(52)
Mercury	mg/kg	0.014	0.015	0.013	0.037	0.012	<0.0011	3.13	3.13	0.208	---
Selenium	mg/kg	0.26J	0.39J	0.19J	0.29J	0.52J	0.19J	5,840	391	0.52	---
Silver	mg/kg	0.12J	<0.048	0.069J	0.17J	0.20J	0.055J	5,840	391	0.8491	---
Cumulative Hazard Index		0.0008	0.0076	0.0008	0.2535	0.0008	0	---	---	---	---
Cumulative Cancer Risk		0	0	0	1.4E-05	0	0	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value
--- Not analyzed/Not Established
J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
i.u. - instrument units
mg/kg - milligrams per kilogram, parts per million
ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOCs - volatile organic compounds
RCRA - resource conservation and recovery act
BTV - background threshold value
DC-I - direct contact industrial
DC-NI - direct contact non-industrial
GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
c: BTV applies to Total Chromium
d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 4 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-1	SP-2	SP-3	SP-4	SP-5	NR 720 RCL			NR 720
		0' - 4' 3/19/12	0' - 4' 3/19/12	0' - 4' 3/19/12	0' - 4' 3/19/12	0' - 4' 3/19/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	2.6	6.8	66.7	1.2J	<0.96	---	---	---	---
GRO	mg/kg	<3.0	<3.0	5.2	<3.1	<2.9	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	<40.4	<40.4	<40.4	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	376,000	376,000	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	36.2J	<25.0	<25.0	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	36.2J	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	30.3J	<50.0	<50.0	260,000	260,000	3,960	---
Tetrachloroethene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	33,000	4.5	---
1,1,1-Trichloroethane	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	640,000	640,000	140.2	---
PAHs										
Acenaphthene	ug/kg	<2.8	<2.9	6.1J	<2.9	<5.3	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.2	<3.2	7.3J	<3.3	<6.1	---	---	---	---
Anthracene	ug/kg	<4.7	<4.7	16.5J	<4.8	<8.9	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.9	4.0J	31.6	<2.9	<5.4	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.3	4.2J	32.3	<3.4	<6.2	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.5	6.5J	48.8	<3.6	<6.6	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.7	4.3J	32.8	<2.7	<5.0	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.8	4.4J	23.4	<3.8	<7.1	211,000	11,500	---	---
Chrysene	ug/kg	<3.7	6.8J	56.8	<3.8	<6.9	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.5	<5.5	9.0J	<5.6	<10.4	2110	115	---	---
Fluoranthene	ug/kg	<10.1	12.8J	72.7	<10.4	<19	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<5.0	<5.0	7.0J	<5.2	<9.5	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.9	<2.9	20.6	<2.9	<5.4	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<3.1	3.7J	93.9	<3.2	<5.8	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<3.1	3.8J	113	<3.2	9.7J	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.5	8.6J	78.8	<3.6	16.5J	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.4	10.6J	105	<4.6	<8.4	---	---	---	---
Pyrene	ug/kg	<3.7	8.4J	62.9	<3.8	<7	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	7.5	7.1	5.6	4.6	(9.7)	3	0.677	0.584	(8)
Barium	mg/kg	68.8	40.3	84	51.6	63.1	100,000	15,300	164.8	(364)
Cadmium	mg/kg	<0.034	0.22J	0.23J	0.29J	0.18J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	38.3	20.8	(1,030)	23.7	27.4	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	38.3	20.8	1,030	23.7	27.4	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	13.5	7.8	41.4	7.8	13	800	400	27	(52)
Mercury	mg/kg	0.049	0.020	0.025	0.015	0.017	3.13	3.13	0.208	---
Selenium	mg/kg	4.3	<0.52	1.1J	<0.55	<0.48	5,840	391	0.52	---
Silver	mg/kg	<0.24	<0.24	<0.24	<0.25	<0.22	5,840	391	0.8491	---
Cumulative Hazard Index		0.0029	0.0012	0.0025	0.0009	0.2838	---	---	---	---
Cumulative Cancer Risk		0	0	2.9E-06	0	1.6E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 5 of 12)

Midwest Tanning Corp. (Former)
 222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
 South Milwaukee, Wisconsin
 BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-6	SP-7	SP-8	SP-9	SP-10	NR 720			NR 720
		0' - 4' 3/19/12	0' - 4' 3/23/12	0' - 5' 3/19/12	0' - 4' 3/22/12	2' - 4' 3/22/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	1.6J	1.5J	2.0J	1,400	25.7	---	---	---	---
GRO	mg/kg	<2.9	<3.0	<3.0	<3.0	<3.1	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	<40.4	<40.4	<40.4	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	376,000	376,000	<i>1,168</i>	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	24,100	5,520	<i>658.2</i>	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	219,000	219,000	<i>1,382.1</i>	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	<50.0	<50.0	<50.0	260,000	260,000	<i>3,960</i>	---
Tetrachloroethene	ug/kg	<25.0	<i>1,080</i>	<25.0	<25.0	<25.0	145,000	33,000	<i>4.5</i>	---
1,1,1-Trichloroethane	ug/kg	<25.0	<i>73.6</i>	<25.0	<25.0	<25.0	640,000	640,000	<i>140.2</i>	---
PAHs										
Acenaphthene	ug/kg	255	<2.9	<2.8	<2.8	<2.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	64.3	<3.2	<3.2	<3.2	<3.3	---	---	---	---
Anthracene	ug/kg	96.3	<4.7	<4.7	<4.7	<4.8	100,000,000	17,900,000	<i>196,949.2</i>	---
Benzo(a)anthracene	ug/kg	<2.7	<i>4.7J</i>	<2.9	<2.9	<3	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.2	<3.3	<3.3	<3.3	<3.4	2,110	115	<i>470</i>	---
Benzo(b)fluoranthene	ug/kg	<3.3	<i>5.5J</i>	<3.5	<3.5	<3.6	21,100	1,150	<i>479.3</i>	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<i>2.9J</i>	<2.7	<2.7	<2.7	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.6	<3.8	<3.7	<3.7	<3.9	211,000	11,500	---	---
Chrysene	ug/kg	<i>4.5J</i>	<i>5.5J</i>	<3.7	<3.6	<3.8	2,110,000	115,000	<i>144.6</i>	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.5	<5.5	<5.5	<5.7	2110	115	---	---
Fluoranthene	ug/kg	27.8	<10.1	<10.1	<10.1	<10.4	30,100,000	2,390,000	<i>88,877.8</i>	---
Fluorene	ug/kg	325	<5.0	<5	<5	<5.2	30,100,000	2,390,000	<i>14,829.9</i>	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.9	<2.9	<2.9	<3	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	546	<i>4.2J</i>	<i>4.3J</i>	<3.1	<3.2	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<i>7.5J</i>	<i>3.8J</i>	<i>4.5J</i>	<3.1	2.39	3,010,000	239,000	---	---
Naphthalene	ug/kg	54.7	<i>5.3J</i>	<i>4.5J</i>	<3.5	<3.6	24,100	5,520	<i>658.2</i>	---
Phenanthrene	ug/kg	243	<i>9.4J</i>	<4.4	<4.4	<4.6	---	---	---	---
Pyrene	ug/kg	81.7	<i>7.1J</i>	<3.7	<3.7	<i>6.7J</i>	22,600,000	1,790,000	<i>54,545.2</i>	---
RCRA Metals										
Arsenic	mg/kg	5.1	6.1	7.9	7.6	(8.4)	3	0.677	<i>0.584</i>	(8)
Barium	mg/kg	48.7	52.7	75.3	69	67.7	100,000	15,300	<i>164.8</i>	(364)
Cadmium	mg/kg	0.24J	0.28J	0.23J	0.12J	0.34J	985	71.1	<i>0.752</i>	(1)
Chromium (a)	mg/kg	21.9	18.1	29.2	25.2	(503)	---	---	<i>360,000 (b)</i>	(44) (c)
Chromium, Trivalent	mg/kg	21.9	18.1	29.2	25.2	503	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	7.9	17.4	17.6	15.1	16.1	800	400	<i>27</i>	(52)
Mercury	mg/kg	0.013	0.028	0.033	0.024	0.039	3.13	3.13	<i>0.208</i>	---
Selenium	mg/kg	<0.50	<0.55	<0.52	<0.58	<0.55	5,840	391	<i>0.52</i>	---
Silver	mg/kg	<0.23	<0.25	<0.24	<0.27	<0.25	5,840	391	<i>0.8491</i>	---
Cumulative Hazard Index		0.0019	0.0111	0.002	0.0014	0.2472	---	---	---	---
Cumulative Cancer Risk		4.6E-08	3.5E-08	0	0	1.4E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 6 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-11	SP-12	SP-13	SP-14	SP-15	NR 720 RCL			NR 720
		0' - 4' 3/23/12	0' - 2' 3/23/12	4' - 6' 3/22/12	0' - 4' 3/22/12	2' - 4' 3/22/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	60	0	7.5	---	---	---	---
DRO	mg/kg	19.6	44.7	1,850	13.2	6.4	---	---	---	---
GRO	mg/kg	<3.3	<3.2	456	<3.0	<2.8	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	<40.4	<40.4	601	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	1,060	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	36.7J	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	82.5	<44.4	<44.4	376,000	376,000	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	168	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	1,410	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	1,330	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	440	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	1,790	<25.0	<25.0	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	97.7	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	214	<50.0	<50.0	260,000	260,000	3,960	---
Tetrachloroethene	ug/kg	77.6J	<25.0	<25.0	<25.0	<25.0	145,000	33,000	4.5	---
PAHs										
Acenaphthene	ug/kg	<3.1	<3	27.9	<2.8	<2.7	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.5	<3.4	18.5J	<3.2	<3	---	---	---	---
Anthracene	ug/kg	7J	5.9J	<4.7	<4.7	6.9J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	19.9J	6.9J	13.1J	<2.9	14.1J	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	21.2J	6.8J	3.4J	<3.3	13.1J	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	30	11.5J	7.4J	<3.5	18.1J	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	18.8J	7.9J	3J	6.6J	10.4J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	16.5J	7.1J	<3.8	<3.7	9.4J	211,000	11,500	---	---
Chrysene	ug/kg	28.4	18.9J	81.3	<3.6	18.6J	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<6	<5.8	<5.5	<5.5	<5.2	2110	115	---	---
Fluoranthene	ug/kg	38.3	17J	11.7J	<10	35.9	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<5.5	<5.3	38.3	<5.0	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	14.9J	4.4J	<2.9	<2.9	7.1J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	20.8J	24.2	82.2	6J	8J	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	24.2	33.1	42.6	6.8J	7.9J	3,010,000	239,000	---	---
Naphthalene	ug/kg	24	34.7	126	4.7J	6.4J	24,100	5,520	658.2	---
Phenanthrene	ug/kg	43.6	24	26.5	6.6J	25.2	---	---	---	---
Pyrene	ug/kg	37.2	14.4J	7.9J	<3.7	30.9	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	7.4	7.9	(8.4)	5.4	4.2	3	0.677	0.584	(8)
Barium	mg/kg	129	247	44.6	47.5	22.5	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.12J	0.29J	0.19J	0.10J	0.22J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	(5,150)	(361)	34.6	22.8	17.9	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	5,150	361	34.6	22.8	17.9	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	28.3	(58.2)	9.6	11.3	7.1	800	400	27	(52)
Mercury	mg/kg	0.069	0.3	0.18	0.051	0.012	3.13	3.13	0.208	---
Selenium	mg/kg	<0.58	<0.59	<0.58	<0.57	<0.55	5,840	391	0.52	---
Silver	mg/kg	<0.26	<0.27	<0.26	<0.26	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0044	0.0181	0.2835	0.003	0.0007	---	---	---	---
Cumulative Cancer Risk		2.1E-07	8.3E-09	1.4E-05	0	0	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg -milligrams per kilogram, parts per million
 ug/kg -micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 7 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-16	SP-17	SP-18	SP-19	SP-20	NR 720			NR 720
		4' - 6' 3/19/12	6' - 8' 3/19/12	0' - 4' 3/22/12	0' - 4' 3/22/12	0' - 2' 3/23/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	82.7	613	1.8J	2.8	25.6	---	---	---	---
GRO	mg/kg	12.8	141	<2.9	<3.1	<3.4	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	74.4	226	<40.4	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	225	251	<25.0	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	376,000	376,000	1,168	---
Isopropylbenzene (Cumene)	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	55.4J	<25.0	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	<50.0	<50.0	<50.0	260,000	260,000	3,960	---
Tetrachloroethene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	33,000	4.5	---
PAHs										
Acenaphthene	ug/kg	29.7	254	<2.8	<2.9	65.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	5J	56.5	<3.1	5J	32.2	---	---	---	---
Anthracene	ug/kg	11.9J	83.4	<4.6	9.1J	188	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.9	<2.8	11J	144	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.2	<3.3	<3.2	16J	114	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.5	<3.4	18.8J	121	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.7	<2.6	15.6J	54.4	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.6	<3.8	<3.6	10.7J	59.7	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	3.9J	<3.6	16J	153	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.6	<5.3	<5.6	20.5J	2110	115	---	---
Fluoranthene	ug/kg	<9.6	29.0	<9.8	23.9	416	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	19.5	334	<4.9	<5.1	108	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.9	<2.8	10.4J	49.4	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	18.3J	367	<3	9.1J	86.3	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	23.4	<3	7.9J	103	3,010,000	239,000	---	---
Naphthalene	ug/kg	8.5J	36.7	<3.4	8.5J	2.39	24,100	5,520	658.2	---
Phenanthrene	ug/kg	17.6J	191	<4.3	17.5J	542	---	---	---	---
Pyrene	ug/kg	13.3J	69.8	<3.6	22.1	313	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	3.0	7.5	5.6	6.4	(9.2)	3	0.677	0.584	(8)
Barium	mg/kg	60.5	35.9	68.6	72.4	123	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.13J	0.23J	0.15J	0.22J	0.29J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	19.2	18.0	18.8	20.3	(128)	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	19.2	18.0	18.8	20.3	128	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	5.6	11.0	11.4	21.1	22.6	800	400	27	(52)
Mercury	mg/kg	0.017	0.014	0.028	0.032	0.074	3.13	3.13	0.208	---
Selenium	mg/kg	<0.52	<0.54	<0.50	<0.57	<0.62	5,840	391	0.52	---
Silver	mg/kg	<0.24	<0.25	<0.23	0.27J	0.39J	5,840	391	0.8491	---
Cumulative Hazard Index		0.0007	0.0016	0.0017	0.002	0.2733	---	---	---	---
Cumulative Cancer Risk		0	3.1E-08	0	0	1.7E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value
--- - Not analyzed/Not Established
J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
i.u. - instrument units
mg/kg -milligrams per kilogram, parts per million
ug/kg -micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOCs - volatile organic compounds
RCRA - resource conservation and recovery act
BTV - background threshold value
DC-I - direct contact industrial
DC-NI - direct contact non-industrial
GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
c: BTV applies to Total Chromium
d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 8 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	NSW-1	NSW-2	NSW-3	NSW-4	ESW	NR 720			NR 720
		2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	8.7	234	3.3	66.1	2.7	---	---	---	---
Detected VOCs										
sec-Butylbenzene	ug/kg	<25	<25	<25	30.4J	<25	145,000	145,000	---	---
Naphthalene	ug/kg	<25	<25	<25	37.2J	<25	24,100	5,520	658.2	---
1,2,4-Trimethylbenzene	ug/kg	<25	<25	<25	41.2J	<25	219,000	219,000	1,382.1	---
PAHs										
Acenaphthene	ug/kg	<2.8	<2.7	<2.7	19.5J	ND	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<2.9	<3.0	<3.0	<3.1	ND	---	---	---	---
Anthracene	ug/kg	9.4J	<4.4	<4.4	8.1J	14.3J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	11.5J	<2.7	<2.7	<2.8	35.6	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	10.3J	<3.1	<3.1	<3.2	29.2	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	11.5J	<3.3	<3.3	7.2J	24.3	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.9	<2.5	<2.5	<2.6	15.8J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	11.8J	<2.6	<2.7	<2.8	31.2	211,000	11,500	---	---
Chrysene	ug/kg	14.0J	12.6J	3.2J	9.2J	40.1	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<2.9	<5.2	<5.2	<5.3	<5.4	2110	115	---	---
Fluoranthene	ug/kg	26.7	<9.5	<9.5	16.5J	70.1	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<2.9	<4.7	<4.7	21.5	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.1	<2.7	<2.7	<2.8	14.6J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	19.7J	<2.9	<2.9	50.1	27.3	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	21.2	<2.9	2.1J	29.7	30.7	3,010,000	239,000	---	---
Naphthalene	ug/kg	73.1	<3.3	<3.4	7.7J	26.8	24,100	5,520	658.2	---
Phenanthrene	ug/kg	43.3	<4.2	5.7J	68.0	59.9	---	---	---	---
Pyrene	ug/kg	19.2J	<3.5	<3.6	21.1	46.1	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	5.1	4.2	6.0	5.5	7.9	3	0.677	0.584	(8)
Barium	mg/kg	71.7	46.2	42.7	52.1	143	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.10J	0.069J	0.082J	<0.2	0.25J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	31.3	20.6	20.7	24.1	20.1	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	31.3	20.6	20.7	24.1	20.1	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	15.9	7.5	7.9	10.8	18.4	800	400	27	(52)
Mercury	mg/kg	0.51	0.012	0.018	0.032	0.042	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	0.63J	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0307	0.0007	0.0011	0.0021	0.0028	---	---	---	---
Cumulative Cancer Risk		1.4E-08	0	0	3.2E-09	2.4E-06	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg -milligrams per kilogram, parts per million
 ug/kg -micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 9 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SSW-1	SSW-2	SSW-3	SSW-4	WSW	NR 720			NR 720
		2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	DC-I	RCL DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	1.7J	1.6J	4.6	<3.0	<3.0	---	---	---	---
No VOCs detected in these samples										
PAHs										
Acenaphthene	ug/kg	<2.7	<2.7	<2.7	<2.7	10.7J	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<3.0	<3.0	<3.0	<3.1	---	---	---	---
Anthracene	ug/kg	<4.4	<4.4	10.4J	<4.4	3.1J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	44.2	<2.7	<2.7	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	56.2	<3.1	<3.1	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	44.4	<3.3	<3.3	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.5	38.7	<2.5	<2.5	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<3.5	48.3	<3.5	<3.5	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	<3.5	51.8	2.4J	<3.5	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.3	<5.2	<5.2	2110	115	---	---
Fluoranthene	ug/kg	<9.5	<9.5	78.8	<9.5	<9.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.8	<4.7	16.6J	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	31.6	<2.7	<2.8	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.2	<2.9	113	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	<2.9	4.7J	4.0J	191	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	<3.3	5.3J	4.8J	43.0	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	<4.2	27.6	4.3J	33.0	---	---	---	---
Pyrene	ug/kg	<3.5	<3.5	65.7	<3.5	<3.6	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	5.2	4.6	4.4	(8.1)	7.5	3	0.677	0.584	(8)
Barium	mg/kg	44.3	46.3	43.9	85.3	96.2	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.050J	0.12J	0.070J	0.089J	0.096J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	18.7	18.5	(60.7)	33.1	(88)	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	18.7	18.5	60.7	33.1	88	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	6.4	7.0	6.9	14.4	13.4	800	400	27	(52)
Mercury	mg/kg	0.013	0.0096	0.019	0.055	0.076	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.26	<0.25	<0.26	5,840	391	0.8491	---
Cumulative Hazard Index		0.0008	0.0006	0.0012	0.0033	0.0056	---	---	---	---
Cumulative Cancer Risk		0	0	4.6E-06	0	1.6E-08	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 10 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRS No. 02-41-556117

Analytical Parameter	Depth Date Units	BASE-1	BASE-2	BASE-3	BASE-4	BASE-5	NR 720 RCL			NR 720
		4' 7/18/12	4' 7/18/12	4' 7/18/12	4' 7/18/12	4' 7/18/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	81.5	2.0	15.7	3.7	1.5J	---	---	---	---
No VOCs detected in these samples										
PAHs										
Acenaphthene	ug/kg	<2.7	<2.7	<2.8	<2.7	<2.7	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<3.0	<3.1	<3.0	<3.0	---	---	---	---
Anthracene	ug/kg	<4.4	<4.4	<4.5	<4.4	<4.4	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	<2.8	<2.7	<2.7	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	<3.1	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	<3.3	<3.3	<3.3	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.5	<2.6	<2.5	<2.5	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<3.5	<3.6	<3.5	<3.5	211,000	11,500	---	---
Chrysene	ug/kg	2.7J	<3.5	3.3J	<3.5	<3.5	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.3	<5.2	<5.2	2110	115	---	---
Fluoranthene	ug/kg	<9.5	<9.5	<9.6	<9.5	<9.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.8	<4.7	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	<2.7	<2.7	<2.7	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	60.0	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	84.8	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	<3.3	<3.4	<3.3	16.8J	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	<4.2	<4.3	<4.2	<4.3	---	---	---	---
Pyrene	ug/kg	<3.5	<3.5	<3.6	<3.5	<3.6	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	5.2	4.3	5.5	5.7	3.5	3	0.677	0.584	(8)
Barium	mg/kg	38.3	88.2	36.6	33.6	46.9	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.20J	0.12J	0.10J	0.13J	0.035J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	17.2	29.3	17.7	17.6	19.7	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	17.2	29.3	17.7	17.6	19.7	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	6.7	7.0	6.9	8.6	4.9	800	400	27	(52)
Mercury	mg/kg	0.0046J	0.013	0.0086	0.012	0.012	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	0.25J	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0	0.0008	0.0051	0.0007	0.0011	---	---	---	---
Cumulative Cancer Risk		0	0	0	0	3.8E-09	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs

Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs

Underlined concentrations exceed NR 720 groundwater pathway RCL

Concentrations in () exceed NR 720 background threshold value

--- - Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation

i.u. - instrument units

mg/kg - milligrams per kilogram, parts per million

ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons

GRO - gasoline range organics

DRO - diesel range organics

PID - photoionization detector

RCL - residual contaminant level

VOCs - volatile organic compounds

RCRA - resource conservation and recovery act

BTV - background threshold value

DC-I - direct contact industrial

DC-NI - direct contact non-industrial

GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 11 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	VSWW	VSWN	VSWE	VSWs	VBASE	NR 720			NR 720
		10' - 12' 7/18/12	10' - 12' 7/18/12	10' - 12' 7/18/12	10' - 12' 7/18/12	15' 7/18/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	3.5	5.8	5.7	1.7	4.6	---	---	---	---
Detected VOCs										
Benzene	ug/kg	<25	<25	<u>28.8J</u>	<25	<25	7,070	1,600	5.1	---
PAHs										
Acenaphthene	ug/kg	<2.7	<2.7	<2.7	<2.8	<2.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<3.0	<3.0	<3.1	<3.2	---	---	---	---
Anthracene	ug/kg	<4.4	<4.4	<4.4	<4.5	9.1J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	<2.7	<2.8	29.4	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	29.1	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	<3.3	<3.3	20.6	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.5	<2.5	<2.6	17.1J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<3.5	<3.5	<3.6	27.6	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	<3.5	<3.5	2.3J	33.1	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.2	<5.2	<5.3	2110	115	---	---
Fluoranthene	ug/kg	<9.5	<9.5	<9.5	<9.5	62.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.7	<4.7	<4.8	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	<2.7	<2.7	14.7J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	<2.10	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	3.5J	<2.9	<2.9	2.0J	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	4.4J	<3.3	<3.3	<3.4	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	<4.3	<4.2	<4.2	31.7	---	---	---	---
Pyrene	ug/kg	<3.5	<3.6	<3.5	<3.5	48.7	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	3.7	4.5	4.6	3.9	4.6	3	0.677	0.584	(8)
Barium	mg/kg	38.3	41.0	33.3	29.2	32.9	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.12J	0.073J	0.064J	0.074J	0.050J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	18.8	22.2	18.6	18.6	24.7	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	18.8	22.2	18.6	18.6	24.7	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	7.1	6.3	6.8	6.2	6.3	800	400	27	(52)
Mercury	mg/kg	0.012	0.010	0.0089	0.010	0.0083	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0007	0.0006	0.0005	0.0006	0.0005	---	---	---	---
Cumulative Cancer Risk		0	0	0	0	2.3E-06	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value
--- - Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
i.u. - instrument units
mg/kg - milligrams per kilogram, parts per million
ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOCs - volatile organic compounds
RCRA - resource conservation and recovery act
BTV - background threshold value
DC-I - direct contact industrial
DC-NI - direct contact non-industrial
GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
b - use 360,000 mg/kg for GW RCL, if no CR-VI is present
c - BTV applies to Total Chromium
d - In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 12 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	NSP-17	ESP-17	WSP-17	SSP-17	BSP-17	NR 720			NR 720
		6' - 7' 7/23/12	6' - 7' 7/23/12	6' - 7' 7/23/12	6' - 7' 7/23/12	10' 7/23/12	DC-I	RCL DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	1.1J	83.4	2.1	14.2	2.5	---	---	---	---
GRO	mg/kg	<3.0	69.2	<3.0	<3.1	<3.2	---	---	---	---
No VOCs detected in these samples										
PAHs										
Acenaphthene	ug/kg	<2.8	11.1J	<2.7	<2.8	<2.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<2.9	21.0J	<3.0	<3.1	<3.2	---	---	---	---
Anthracene	ug/kg	3.9J	<4.5	<4.4	<4.5	2.3J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	16.6J	<2.8	<2.7	<2.8	<2.9	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	<3.2	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	12.0J	4.2J	<3.3	<3.3	4.1J	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.6	<2.5	<2.6	<2.7	---	---	---	---
Benzo(k)fluoranthene	ug/kg	15.6J	<3.6	<3.5	<3.6	<3.7	211,000	11,500	---	---
Chrysene	ug/kg	23.4	5.6J	3.2J	3.7J	6.5J	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.3	<5.2	<5.2	<5.2	2110	115	---	---
Fluoranthene	ug/kg	29.7	<9.5	<9.5	<9.5	<9.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	35.0	<4.7	<4.7	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.8	<2.7	<2.7	<2.7	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.8	13.5J	<2.9	<2.9	<2.9	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	4.7J	10.3J	<2.9	<2.9	2.9J	3,010,000	239,000	---	---
Naphthalene	ug/kg	8.3J	24.4	<3.3	<3.3	<3.4	24,100	5,520	658.2	---
Phenanthrene	ug/kg	10.2J	16.3J	4.3J	<3.4	8.0J	---	---	---	---
Pyrene	ug/kg	23.8	<3.6	<3.6	<3.7	<3.8	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	7.2	7.5	6.5	6.3	6.8	3	0.677	0.584	(8)
Barium	mg/kg	75.0	60.6	32.5	29.9	43.8	100,000	15,300	164.8	(364)
Cadmium	mg/kg	<0.1	<0.1	0.12J	<0.1	0.066J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	(82.5)	(117)	14.9	29.3	35.3	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	82.5	117	14.9	29.3	35.3	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	10.5	11.3	10.0	6.0	11.2	800	400	27	(52)
Mercury	mg/kg	0.022	0.024	0.012	0.0069	0.036	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0014	0.0015	0.0007	0.0004	0.0021	---	---	---	---
Cumulative Cancer Risk		1.6E-09	4.7E-09	0	0	0	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

August 23, 2017

Union Pacific Railroad
1400 Douglas Street
Omaha, NE 68179

Attn: Austin Fearnow

**RE: Retraction Letter for the October 2016 Notification of Continuing Obligations and Residual Contamination (Form 4400-286)
Former Midwest Tanning Corporation Parcel
222 North Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
WDNR BRRTS Activity # 02-41-556117**

Dear Mr. Fearnow:

Professional Service Industries, Inc. (PSI) originally notified Union Pacific Railroad of potential residual soil contamination that may be present within the railroad right of way (ROW) along the western property line of an existing Walmart store. As set forth below, we are now retracting that notification. Based on further evaluation of the soil analytical results, there is no soil contamination in the railroad ROW that is attributable to the adjacent Walmart property.

The potential contamination was anticipated to have originated from historic site activities that occurred at the former Midwest Tanning Corporation facility that was located on this property. As stated in the WDNR Notification of Residual Contamination form, the potential contaminant of concern was Chromium at residual Total Chromium levels of 87 milligrams per kilogram (mg/kg) and 88 mg/kg. These levels are above the WDNR's NR720 Background Threshold Value (BTV) for Chromium of 44 mg/kg. As such, PSI sent the notification to Union Pacific. A copy of the previously submitted form 4400-286 is included with this letter.

Chromium compounds are utilized in the tanning process of leather. These compounds can be either Trivalent or Hexavalent Chromium. Hexavalent Chromium is a known carcinogen when inhaled. Trivalent Chromium is not a known carcinogen and is an essential mineral for human health. In the original analysis performed by PSI, the type of Chromium within the Total Chromium values was not known. However, following a discussion with the WDNR, PSI reviewed previous analytical testing performed at the property by another consultant (Hygienetics Environmental Services, Inc.). They had tested numerous selected soil samples for the presence of Total Chromium and several of these test results were well above the NR720 BTV for Chromium. However, they also tested these samples for the presence of both Trivalent and Hexavalent Chromium. The test results indicated that the detected Total Chromium was composed entirely of Trivalent Chromium and no Hexavalent Chromium was present within these selected soil samples. A table of the Hygienetics test results is included with this letter.

As such, PSI further evaluated the analytical test results of the selected soil samples which we had collected. This evaluation indicated that when the PSI Total Chromium data is compared with the Hygienetics Chromium data, no Hexavalent Chromium is anticipated to be potentially present within the soils along the western property line of the existing Walmart property. Therefore, no migration of Chromium compounds that could be potentially hazardous to the environment and/or human health has occurred.

In conclusion, the purpose of this letter is to retract the previous notification that contamination above current WDNR NR720 RCLs and/or BTVs may have migrated onto the existing right of way of the Union Pacific Railroad property. PSI's revised table of the test results is included with this letter.

If you have any questions, please feel free to contact the undersigned at 262-521-2125.

Respectfully submitted,
PROFESSIONAL SERVICE INDUSTRIES, INC.



Patrick J. Patterson, P.E., P.G.
Senior Engineer



Larry Raether, P.E.
Department Manager

Enclosures

cc (w/encl.): Ms. Angela Vick – Wal-Mart Stores, Inc.
Atty. George Marek – Quarles & Brady, LLP.

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (5/15)

Section B: ROW Notification: Residual Contamination and/or Continuing Obligations - Non-DOT ROWs

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

1400 Douglas Street
Omaha, NE, 68179

Dear Mr. Fearnow:

I am providing this notification to inform you of the location and extent of contamination remaining in a right-of-way for which you are responsible, and of certain long-term responsibilities (continuing obligations) for which railroad of Union Pacific may become responsible. I investigated a release of:

unknown petroleum and RCRA metals

on 1200 Davis Avenue (Former), South Milwaukee, WI, 53172 that has shown that contamination has migrated into the right-of-way for which Union Pacific is responsible.

I have responded to the release, and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

You have 30 days to comment on the proposed closure request:

The DNR will not review my closure request for at least 30 days after the date of this letter. As an affected right-of-way holder, you have a right to contact the DNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the DNR that is relevant to this closure request, you should mail that information to the DNR contact: 2300 N. Dr. Martin Luther King Jr. Drive, Milwaukee, WI, 53212, or at eric.amadi@wisconsin.gov.

Residual Contamination:

Soil Contamination:

Soil contamination remains at:

along the central portion of the western property line and near the southwest corner of the Former Midwest Tanning Corp parcel, which has been developed with a large retail facility.

The remaining contaminants include :

Chromium at concentrations of 87 and 88 mg/kg

at levels which exceed the soil standards found in ch. NR 720, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining soil contamination.

The large portion of the known impacted soil fill material in the southwestern area of the large retail property has been removed from the former Midwest Tanning Corp. property and has been covered with pavement and 2 feet of clean fill soils.

If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If you or any other person plan to conduct utility or building construction for which dewatering will be necessary, you or that person must contact the DNR's Water Quality Program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>.

Continuing Obligations on the Right-of-Way (ROW) : As part of the response actions, I am proposing that the following continuing obligations be used at the affected ROW. If my closure request is approved, you will be responsible for the following continuing obligations:

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (5/15)

Page 2 of 4

Residual Soil Contamination:

If soil is excavated from the areas with residual contamination, the right-of-way holder at the time of excavation will be responsible for the following:

- determine if contamination is present,
 - determine whether the material would be considered solid or hazardous waste,
 - ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.
- Contaminated soil may be managed in-place, in accordance with s. NR 718, Wis. Adm. Code, with prior Department approval.

The right-of-way holder needs to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans from ingestion, inhalation or dermal contact.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

GIS Registry and Well Construction Requirements:

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at <http://dnr.wi.gov/topic/Brownfields/clean.html>. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

If you have any questions regarding this notification, I can be reached at: (262) 521-2125
patrick.patterson@psiusa.com

<i>Signature of responsible party/environmental consultant for the responsible party</i>	Date Signed
<i>Patrick Patterson on behalf of Wal-Mart Stores East, LP</i>	10-28-16

Attachments

Contact Information

Legal Description for each Parcel:

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (5/15)

C. I. Page

The affected property is:

- the source property (the source of the hazardous substance discharge), but the property is not owned by the person who conducted the cleanup (a deeded property)
- a deeded property affected by contamination from the source property
- a right-of-way (ROW)
- a Department of Transportation (DOT) ROW

~~This site is completed and is a completed site with all notification provided pursuant to 40 CFR 300.410.~~

Contact Information

Responsible Party: The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:

Responsible Party Name Wal-Mart Stores East, LP

Contact Person Last Name Vick	First Angela	MI P	Phone Number (include area code) (479) 204-2042
Address 2001 SE 10th Street	City Bentonville	State AR	ZIP Code 72716
E-mail Angie.Vick@wal-mart.com			

Name of Party Receiving Notification:

Business Name, if applicable: C&NW Transportation/Union Pacific Railroad

Title Mr.	Last Name Fearnow	First Austin	MI	Phone Number (include area code) (402) 544-8593
Address 1400 Douglas Street		City Omaha	State NE	ZIP Code 68179

Site Name and Source Property Information:

Site (Activity) Name Midwest Tanning Corp. (Former)

Address 1200 Davis Avenue (Former)	City South Milwaukee	State WI	ZIP Code 53172
DNR ID # (BRRTS#) 02-41-556117	(DATCP) ID #		

Contacts for Questions:

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

Environmental Consultant: Professional Service Industries, Inc.

Contact Person Last Name Patterson	First Patrick	MI J	Phone Number (include area code) (262) 521-2125
Address 821 Corporate Court	City Waukesha	State WI	ZIP Code 53189
E-mail patrick.patterson@psiusa.com			

Department Contact:

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

Address 2300 N. Dr. Martin Luther King Jr. Drive	City Milwaukee	State WI	ZIP Code 53212
Contact Person Last Name Amadi	First Eric	MI	Phone Number (include area code) (414) 263-8639
E-mail (Firstname.Lastname@wisconsin.gov) eric.amadi@wisconsin.gov			

CONTAMINATION LOCATION MAP


BRRTS No. 02-41-556117
(C & NW ROW)



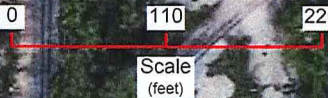
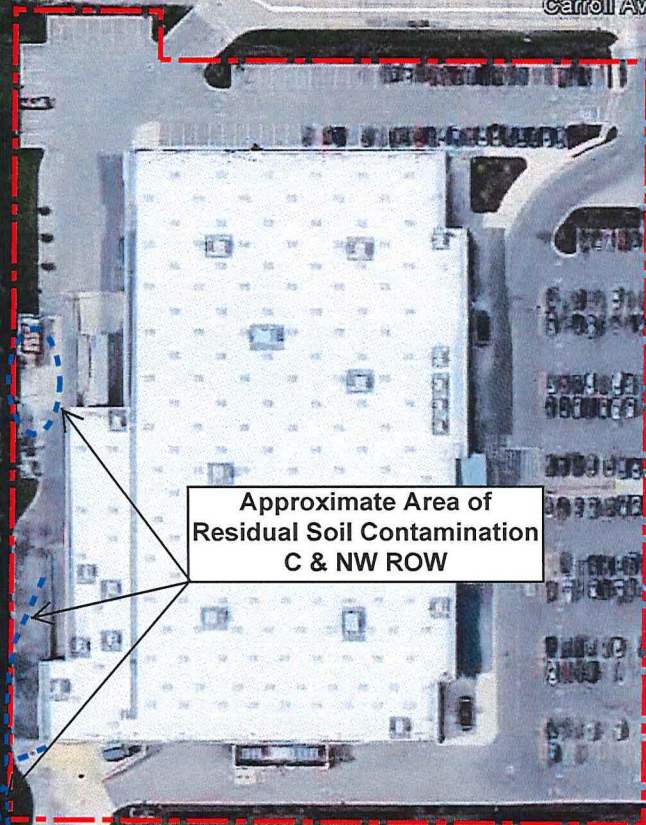
Property Boundary and
Approximate Extent of
Engineered Cap/Barrier

Approximate Area of
Residual Soil Contamination
C & NW ROW

Legend:

 : Approximate Extent of Soil-Impacted Above NR720 BTVs

Adapted from 2015 Google Earth Aerial Photograph



Midwest Tanning Corp (Former)
1200 Davis Avenue
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

© 2015 Google

N Chicago Ave

Google

A.2. SOIL ANALYTICAL RESULTS TABLE

SIGMA - HYGIENETICS

(page 1 of 4)

DETECTS ONLY

1200 Davis Avenue

South Milwaukee, Wisconsin

Project Reference #12101

Soil Boring Identification:			SB-1	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-9	SB-10	SB-11	SB-12	SB-13	SB-14	SB-15	SB-17	SB-18	SB-19	SB-20	SB-21	SB-22	SB-23	SB-24	SB-25	SB-26	SB-27								
Sample Depth (ft):			2-4	1-2	4-6	5-6	3.5-4.5	8-9	14-14.5	5-7	10-12	6-8	7-8	6-7	5-6	7-8	5-6	6-8	5-6	9-10	11-12	9-10	6-7	7-8	10-11	10-12	7-9	7-10								
METALS	Units	SSL (GW)	NR 720 RCL Table 2																																	
			(1) Non-Industrial	(2) Industrial	06/11/01	06/11/01	08/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	08/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/12/01				
Arsenic	mg/kg	NC	0.039	1.6	(1,2) 5.5	NA	(1,2) 4.3	NA	NA	NA	(1,2) 3.3	NA	NA	NA	(1,2) 6.5	NA	<1.7	NA	(1,2) 5.2	(1,2) 4.3	NA	NA	NA	NA	NA	NA	(1,2) 3.3	NA	(1,2) 5.6	NA	NA	(1,2) 5.7 ^{NA}				
Barium	mg/kg	NC	NS	NS	94	NA	50	NA	NA	NA	48	NA	NA	96	NA	4.9	NA	46	19	NA	NA	NA	NA	NA	NA	83	NA	33	NA	NA	67					
Cadmium	mg/kg	NC	8.0	510	0.74	NA	<0.64	NA	NA	NA	<0.61	NA	NA	<0.6	NA	<0.57	NA	<0.58	<0.58	NA	NA	NA	NA	NA	NA	<0.59	NA	<0.59	NA	NA	0.54					
Chromium, ICP	mg/kg	NC	NS	NS	417	NA	24	NA	NA	NA	17	NA	NA	30	NA	4.9	NA	17	1100	NA	NA	NA	NA	NA	NA	21	NA	14	17	17	22					
Chromium, Trivalent	mg/kg	359,654	16,000	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	17	17	NA				
Chromium, Hexavalent	mg/kg	NC	14	200	NA	<5.7	NA	<6.5	<5.9	<5.9	NA	<6.1	<5.7	NA	<5.7	NA	<5.7	NA	<5.8	<6.4	<5.9	<5.8	<5.6	NA	<5.8	NA	<5.8	<5.8	<5.8	<5.8	NA					
Lead	mg/kg	NC	50	500	26	NA	9.1	NA	NA	NA	7.4	NA	NA	12	NA	<4.8	NA	8.4	6.7	NA	NA	NA	NA	NA	9.4	NA	8.5	NA	NA	11						
Mercury	mg/kg	NC	NS	NS	0.061	NA	<0.051	NA	NA	NA	<0.048	NA	NA	<0.048	NA	<0.046 ^{NS}	NA	<0.046	0.068	NA	NA	NA	NA	NA	NA	<0.047	NA	<0.047	NA	NA	<0.046					
Selenium	mg/kg	NC	NS	NS	<1.8	NA	<1.9	NA	NA	NA	<1.8	NA	NA	<1.8	NA	<1.7	NA	<1.7	<1.7	NA	NA	NA	NA	NA	NA	<1.8	NA	<1.8	NA	NA	<1.7 ^{NA}					
Silver	mg/kg	NC	NS	NS	<2.5	NA	<2.6	NA	NA	NA	<2.5	NA	NA	<2.4	NA	<2.3	NA	<2.3	<2.3	NA	NA	NA	NA	NA	NA	<2.4	NA	<2.3	NA	NA	2.3					
INORGANICS			SSL (GW)	SSL (D.C.-R)																																
pH, Non-Aqueous	units	NS	NS	NA	8.77	NA	7.96	8.92	9.79	NA	9.14	8.67	NA	8.54	NA	9.28	NA	NA	8.48	8.53	8.45	8.38	8.82	NA	8.51	NA	8.02	8.09	NA							
Sulfide, total	mg/kg	NS	NS	NA	<11 ^B	NA	<13 ^B	<12 ^B	<12 ^B	NA	<12 ^B	<11 ^B	NA	<11 ^B	NA	<11 ^B	NA	NA	<12 ^B	<13 ^B	<12 ^B	<11 ^B	NA	<12 ^B	NA	<23.1 ^B	<22.4 ^B	NA								
N-Ammonia	mg/kg	NS	10,900,000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA						
POLYNUCLEAR AROMATIC HYDROCARBONS			Suggested Generic RCLs for PAHs in Soil (for PAHs) OR SSLs (other SVOCs)																																	
			(3) GW Pathway	(1) Non-Industrial	(2) Industrial																															
Fluorene	µg/kg	100,000	600,000	40,000,000	NA	NA	<320	NA	NA	NA	NA	NA	NA	NA	<300	NA	NA	NA	<290	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<290	NA	<290	NA	NA	<285	
N-Nitrosodiphenylamine	µg/kg	87.7	13,000	NC	NA	NA	<320	NA	NA	NA	NA	NA	NA	NA	<300	NA	NA	NA	<290	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<290	NA	<290	NA	NA	<285
Phenanthrene	µg/kg	1,800	18,000	300,000	NA	NA	<320	NA	NA	NA	NA	NA	NA	NA	<300	NA	NA	NA	<290	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<290	NA	<290	NA	NA	<285

Notes

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-682.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only, most appropriate values for several parameters were not determined.

mg/kg = milligrams per kilogram (equivalent to parts per million)

NA = Not Analyzed

NS = No Standard Established (for SSLs this indicates analyte not available in EPA web site).

NC = Not Calculated (for SSLs)

NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (industrial land use RCLs for RCRA metals).

Suggested Generic RCL = More stringent generic Residual Contaminant Level for protection of groundwater (gw) or direct contact (dc) pathway for non-industrial land use from WDNR Publication RR-519-97 "Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance" (April 1997)

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds Non-Industrial Direct Contact RCLs

(2) = concentration exceeds Industrial Direct Contact RCLs

(3) = concentration exceeds suggested generic Groundwater Pathway RCLs (PAHs) or groundwater pathway SSLs (other analytes)

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS
 (page 2 of 4)

DETECTS ONLY
 1200 Davis Avenue
 South Milwaukee, Wisconsin
 Project Reference #12101

Soil Boring Identification:				SB-28	SB-29	SB-30	SB-31	SB-32	SB-33	SB-34	SB-35	SB-37	SB-38	SB-39	SB-40	SB-41	SB-42	SB-43	SB-44	SB-45	SB-46	SB-47	SB-48	SB-49	SB-50	SB-51	SB-52	SB-53				
Sample Depth (ft):				4-7	7-8	8.5-10	8.5-7	4-5	4-7	4-8	0-6	4-5	4-7	7-9	5-6	2-4	4-6	5-6.5	4-7	9-10	4-5	2-3	5-7	3-4	4-6	1-2	2-3	4-5	3-4			
METALS	Units	SSL (GW)	NR 720 RCL Table 2		07/17/01																											
			(1) Non-Industrial	(2) Industrial	07/17/01	07/17/01	7/17/2001	07/17/01	07/17/01	07/17/01	07/17/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01		
Arsenic	mg/kg	NC	0.039	1.6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Barium	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Cadmium	mg/kg	NC	8.0	510	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Chromium, ICP	mg/kg	NC	NS	NS	16	24	24	18	672	19	60	36	25	25	34	21	26	24	57	54	20	38	31	31	33	34	38	25	27	30		
Chromium, Trivalent	mg/kg	359,854	15,000	NS	16	24	24	18	672	19	60	36	25	25	34	21	26	NA	57	NA	NA	38	31	31	33	34	38	25	27	30		
Chromium, Hexavalent	mg/kg	NC	14	200	<5.7	<5.9	<6.3	<6.0	<6.0	<5.7	<5.8	<6.0	<5.7	<6.0	<6.2	<5.9	<6.2	NA	<5.8	NA	NA	<5.6	<5.8	<5.8	<6.1	<5.7	<6.0	<5.7	<6.2			
Lead	mg/kg	NC	50	500	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Mercury	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.048	NA	<0.045	NA	NA	NA	NA	NA	NA			
Selenium	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<1.8	NA	<2.0	<1.7	NA	NA	NA	NA	NA			
Silver	mg/kg	NC	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<2.4	NA	<2.7	<2.3	NA	NA	NA	NA	NA			
INORGANICS				SSL (GW)	SSL (D.C.-R)																											
pH, Non-Aqueous	units	NS	NS		9.5	10.88	9.63	8.75	9.4	8.71	9.33	9.61	9.53	8.2	8.69	8.87	9.24	NA	8.58	NA	NA	8.19	8.42	8.43	7.33	8.42	7.59	8.58	8.91	8.55		
Sulfide, total	mg/kg	NS	NS		<23 ⁵	<23.5 ⁵	50.6 ⁸	<23.9 ⁵	<24 ⁵	<22.9 ⁵	<23.2 ⁵	134 ⁸	<22.9 ⁵	<23.9 ⁵	<24.9 ⁵	<23.5 ⁵	<24.8 ⁵	NA	<23.2 ⁵	NA	NA	<22.3 ⁵	<23.3 ⁵	<23 ⁵	<24.4 ⁵	<22.8 ⁵	<24 ⁵	<22.7 ⁵	<22.9 ⁵	<24.9 ⁵		
N-Ammonia	mg/kg	NS	10,900,000		NA	NA	NA	NA	NA	NA	506	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
SEMI-VOLATILE ORGANIC COMPOUNDS				Suggested Generic RCLs for PAHs in Soil (for PAHs)																												
				OR SSLs (other SVOCs)																												
				(3) GW Pathway (1) Non-Industrial	(2) Industrial																											
Fluorene	µg/kg	100,000	600,000	40,000,000	NA	NA	NA	NA	NA	<287 ¹⁵	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<298	NA	632	<284	NA	NA	NA	NA	NA			
N-Nitrosodiphenylamine	µg/kg	87.7	13,000	NC	NA	NA	NA	NA	NA	<287	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<298	NA	<287	<284	NA	NA	NA	NA	NA			
Phenanthrene	µg/kg	1,800	18,000	390,000	NA	NA	NA	NA	NA	<287	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<298	NA	1340	<284	NA	NA	NA	NA	NA			

Notes

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-682.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only; most appropriate values for several parameters were not determined.

mg/kg = milligrams per kilogram (equivalent to parts per million)

NA = Not Analyzed

NS = No Standard Established (for SSLs this indicates analyte not available in EPA web site)

NC = Not Calculated (for SSLs)

NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (industrial land use RCLs for RCRA metals).

Suggested Generic Interim RCL = More stringent generic Residual Contaminant Level for protection of groundwater (gw) or direct contact (dc) pathway for non-industrial land use from WDNR Publication RR-519-87 "Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance" (April 1997)

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds Non-Industrial Direct Contact RCLs

(2) = concentration exceeds Industrial Direct Contact RCLs

(3) = concentration exceeds suggested generic Groundwater Pathway RCLs (PAHs) or groundwater pathway SSLs (other analytoss)

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS
(page 3 of 4)

DETECTS ONLY
1200 Davis Avenue
South Milwaukee, Wisconsin
Project Reference #12101

Soil Boring Identification:					SB-1	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-9	SB-10	SB-11	SB-12	SB-13	SB-14	SB-15	SB-17	SB-18	SB-19	SB-20	SB-21	SB-22	SB-23	SB-24	SB-25	SB-26	SB-27	
Sample Depth (ft):					2-4	1-2	4-6	5-8	3.5-4.5	8-9	14-14.5	5-7	10-12	6-8	7-8	6-7	5-6	7-8	5-6	6-8	5-6	9-10	11-12	9-10	6-7	7-8	10-11	10-12	7-9	7-10	
VOLATILE ORGANIC COMPOUNDS	Unit	SSL	SSL	NR 746																											
		(3) GW	(1) D.C.-R	(2) Table 1	08/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	06/11/01	05/12/01	08/12/01	06/12/01	06/12/01	08/12/01	06/12/01	06/12/01	06/12/01	06/12/01	06/13/01	06/13/01	06/13/01	06/13/01	06/13/01	06/13/01	07/17/01	07/17/01	07/17/01	
n-Butylbenzene	µg/g	NC	NC	NS	NA	NA	19	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7	
sec-Butylbenzene	µg/g	NC	NC	NS	NA	NA	10	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7	
Isopropylbenzene	µg/g	NC	NC	NS	NA	NA	<6.4	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7	
p-Isopropyltoluene	µg/g	NC	NC	NS	NA	NA	13	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7	
Methylene chloride	µg/g	NC	NC	NS	NA	NA	<19	NA	NA	NA	<18	NA	NA	<18	NA	<17	NA	<17	NA	NA	NA	NA	NA	NA	<18	NA	<18	NA	NA	<17	
n-Propylbenzene	µg/g	NC	NC	NS	NA	NA	<6.4	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7	
1,2,4-Trimethylbenzene	µg/g	7,449	33,700	83,000	NA	NA	43	NA	NA	NA	<6.1	NA	NA	<6.0	NA	<5.7	NA	<5.8	NA	NA	NA	NA	NA	NA	<5.9	NA	<5.9	NA	NA	<5.7	

Notes:

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-682.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only; most appropriate values for several parameters were not determined.

µg/kg = micrograms per kilogram (equivalent to parts per billion)

NA = Not Analyzed NS = No Standard

NC = Not Calculated (for SSLs)

NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level Indicators of Residual Petroleum Products in Soil Pores.

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds residential direct contact pathway SSL

(2) = concentration exceeds NR 726 Table 1 value

(3) = concentration exceeds groundwater pathway SSL.

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS
 (page 4 of 4)

DETECTS ONLY
 1200 Davis Avenue
 South Milwaukee, Wisconsin
 Project Reference #12101

Soil Boring Identification:					SB-28	SB-29	SB-30	SB-31	SB-32	SB-33	SB-34	SB-35	SB-37	SB-38	SB-39	SB-40	SB-41	SB-42	SB-43	SB-44		SB-45	SB-46	SB-47	SB-48	SB-49	SB-50	SB-51	SB-52	SB-53	
Sample Depth (ft):					4-7	7-8	8.5-10	6.5-7	4-5	4-7	4-8	0-6	4-5	4-7	7-9	5-6	2-4	4-8	5-6.5	4-7	9-10	4-5	2-3	5-7	3-4	4-6	1-2	2-3	4-5	3-4	
VOLATILE ORGANIC																															
COMPOUNDS	Unit	SSL (3) GW	SSL (1) D.C.-R	NR 746 (2) Table 1	07/17/01	07/17/01	7/17/2001	07/17/01	07/17/01	07/17/01	07/17/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	07/18/01	
					n-Butylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	1610	<5.7	NA	NA	NA
sec-Butylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	1750	<5.7	NA	NA	NA	NA	NA	NA	NA	
isopropylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	188	<5.7	NA	NA	NA	NA	NA	NA	NA	
p-Isopropyltoluene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	728	<5.7	NA	NA	NA	NA	NA	NA	NA	
Methylene chloride	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	<17	<17	NA	NA	NA	NA	NA	NA	NA	NA	<18	NA	148	<17	NA	NA	NA	NA	NA	NA	NA	
n-Propylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	<5.7	<5.8	NA	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	444	<5.7	NA	NA	NA	NA	NA	NA	NA	
1,2,4-Trimethylbenzene	µg/kg	7,449	33,700	83,000	NA	NA	NA	NA	NA	<5.7	6.8	NA	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	2420	<5.7	NA	NA	NA	NA	NA	NA	NA	

Notes:

SSL (GW) = Soil Screening Level for the groundwater pathway calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and methodology in Appendix D of WDNR publication RR-682.

SSL (D.C.-R) = Soil Screening Level for the direct contact pathway (residential) calculated using EPA Soil Screening Level Web site using Wisconsin Default Parameters and a site area of 5 acres. For reference only; most appropriate values for several parameters were not determined.

µg/kg = micrograms per kilogram (equivalent to parts per billion)

NA = Not Analyzed NS = No Standard

NC = Not Calculated (for SSLs)

NR 746 Table 1 = Wisconsin Administrative Code, Chapter NR 746, Table 1 soil screening level: Indicators of Residual Petroleum Products in Soil Pores.

Exceedances: **BOLD** = detected compound

(1) = concentration exceeds residential direct contact pathway SSL

(2) = concentration exceeds NR 726 Table 1 value

(3) = concentration exceeds groundwater pathway SSL

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 1 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-26	SP-27	SP-28	SP-29	SP-30	NR 720			NR 720
		1' - 2' 3/15/11	1' - 2' 3/15/11	1' - 2' 3/15/11	1' - 4' 3/14/11	1' - 4' 3/14/11	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	<0.53	14.1	3.5	24.6	38.9	---	---	---	---
GRO	mg/kg	<2.9	<1.3	<1.4	71.8	<2.8	---	---	---	---
Detected VOCs										
sec-Butylbenzene	ug/kg	<25.0	<9.5	<9.7	189	<25.0	145,000	145,000	---	---
Isopropylbenzene	ug/kg	<25.0	<8.5	<6.6	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<23.7	<24.0	175	<25.0	162,000	162,000	---	---
Methylene Chloride	ug/kg	53.2J	65.6	49.1J	65.7J	38.4J	1,150,000	61,800	2.6	---
Naphthalene	ug/kg	<25.0	1,830	<18.1	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<11.9	<12.1	35.1J	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<22.6	<22.9	394	<25.0	219,000	219,000	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<10.9	<11.1	165	<25.0	182,000	182,000	1,382.1	---
PAHs										
Acenaphthene	ug/kg	<2.7	568	<2.8	<2.8	365J	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<31.6	<3.2	<3.2	<121	---	---	---	---
Anthracene	ug/kg	<4.4	1,160	<4.7	<4.6	1,080	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	1,190	2.9J	<2.8	2,540	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	1,120	<3.3	<3.3	2,790	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	931	<3.5	<3.4	2,710	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	400	<2.7	<2.6	1,980	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	1,050	<3.7	<3.7	2,940	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	1,200	4.3J	<3.6	2,840	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	175J	<5.5	<5.4	577J	2110	115	---	---
Fluoranthene	ug/kg	<9.5	2,930	<10.1	<9.9	7,110	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	619	<5.0	<4.9	456J	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	402	<2.9	<2.8	1,630	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	199	7.5J	<3.0	<116	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	287	8.2J	<3.0	<116	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	587	6.4J	<3.5	<133	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	3,290	7.1J	<4.4	4,370	---	---	---	---
Pyrene	ug/kg	<3.5	2,650	4.6J	<3.6	6,080	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	6.8	(8.5)	3.9	5.0	7.8	3	0.677	0.584	(8)
Barium	mg/kg	42.9	83.6	44.1	38	276	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.35J	0.25J	0.18J	0.25J	0.24J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	19.1	(76.9)	20.3	(87)	(575)	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	19.1	76.9	20.3	87	575	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	9.3	32	15.1	9.8	(144)	800	400	27	(52)
Mercury	mg/kg	0.018	0.032	0.030	0.014	0.10	3.13	3.13	0.208	---
Selenium	mg/kg	0.43J	0.50J	0.50J	0.32J	0.67J	5,840	391	0.52	---
Silver	mg/kg	0.15J	0.088J	0.10J	0.12J	0.089J	5,840	391	0.8491	---
Cumulative Hazard Index		0.0011	0.2642	0.0018	0.0054	0.0126	---	---	---	---
Cumulative Cancer Risk		0	1.1E-04	0	0	2.4E-04	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value

--- Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation

i.u. - instrument units

mg/kg - milligrams per kilogram, parts per million

ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons

GRO - gasoline range organics

DRO - diesel range organics

PID - photoionization detector

RCL - residual contaminant level

VOCs - volatile organic compounds

RCRA - resource conservation and recovery act

BTV - background threshold value

DC-I - direct contact industrial

DC-NI - direct contact non-industrial

GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no Cr-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 2 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-31	SP-32	SP-33	SP-34	SP-35	SP-36	NR 720 RCL			NR 720
		0' - 4' 3/14/11	0' - 4' 3/14/11	0' - 4' 3/14/11	0' - 4' 3/14/11	0' - 4' 3/15/11	0' - 4' 3/15/11	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	0	---	---	---	---
DRO	mg/kg	6.3	4.4	4.0	2.5	1.3	11.7	---	---	---	---
GRO	mg/kg	<3.2	<3.0	<3.0	<2.9	<1.4	1.5J	---	---	---	---
Detected VOCs											
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<9.7	<9.7	145,000	145,000	---	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<6.6	<6.6	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<24.1	<24.1	162,000	162,000	---	---
Methylene Chloride	ug/kg	43.7J	41.1J	47.9J	58.7J	44.3J	65.7	1,150,000	61,800	2.6	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<18.2	<18.2	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<12.1	<12.2	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<23.0	<23.1	219,000	219,000	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<11.2	<11.2	182,000	182,000	1,382.1	---
PAHs											
Acenaphthene	ug/kg	<3.0	<2.8	6.5J	<2.7	40.8J	12.8J	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.4	<3.2	12.9J	<3.1	41.5J	203	---	---	---	---
Anthracene	ug/kg	<5.0	<4.7	39.5	<4.5	197	136	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<3.1	9.0J	163	<2.8	846	481	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.5	8.7J	180	<3.2	862	685	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.7	8.8J	171	<3.4	967	833	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.9	6.1J	136	<2.6	375	381	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<4.0	9.5J	175	<3.6	870	547	211,000	11,500	---	---
Chrysene	ug/kg	<3.9	11.4J	182	3.6J	1,040	549	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.9	<5.4	43.6	<5.3	169	122	2110	115	---	---
Fluoranthene	ug/kg	<10.8	16.3J	295	<9.8	1,630	816	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<5.4	<5.0	9.1J	<4.9	54.2J	22J	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<3.1	4.9J	106	<2.8	377	334	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<3.3	<3.1	<3.1	<3.0	140	35.6J	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<3.3	<3.1	3.7J	<3.0	193	71.0	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.8	<3.5	9.9J	<3.4	161	167	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.8	7.9J	117	5.7J	838	339	---	---	---	---
Pyrene	ug/kg	4.3J	14.3J	260	3.8J	1,430	846	22,600,000	1,790,000	54,545.2	---
RCRA Metals											
Arsenic	mg/kg	(11.1)	(11.9)	6.0	4.4	(8.5)	(9)	3	0.677	0.584	(8)
Barium	mg/kg	108	60.8	44.1	34.4	63.8	42.7	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.16J	0.17J	0.26J	0.15J	0.26J	0.25J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	36.3	40.5	(64.1)	23.7	(54.6)	27.1	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	36.3	40.5	64.1	23.7	54.6	27.1	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	14.6	18	13	8.4	27.6	18.3	800	400	27	(52)
Mercury	mg/kg	0.079	0.087	0.037	0.053	0.065	0.037	3.13	3.13	0.208	---
Selenium	mg/kg	0.42J	0.42J	0.37J	0.41J	0.84J	0.41J	5,840	391	0.52	---
Silver	mg/kg	0.14J	0.15J	0.14J	0.14J	0.19J	0.23J	5,840	391	0.8491	---
Cumulative Hazard Index		0.3283	0.3521	0.0025	0.053	0.2541	0.2668	---	---	---	---
Cumulative Cancer Risk		1.8E-05	1.9E-05	1.8E-05	0	9.9E-05	8.1E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Italicized concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 3 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-37	SP-38	SP-39	SP-40	SP-41	SP-42	NR 720 RCL			NR 720
		3' - 5' 3/14/11	7.5' - 10' 3/14/11	3' - 5' 3/14/11	3' - 5' 3/15/11	3' - 5' 3/15/11	3' - 5' 3/15/11	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	u	---	---	---	---
PID	i.u.	0	38.2	0	0	0	0	---	---	---	---
DRO	mg/kg	61.4	0.91J	0.74J	41.3	6.2	3.1	---	---	---	---
GRO	mg/kg	<2.8	127	<2.8	37.0	<1.3	<1.2	---	---	---	---
Detected VOCs											
sec-Butylbenzene	ug/kg	<25.0	153	<25.0	165	<9.3	<8.8	145,000	145,000	---	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	9.9J	<6.4	<6.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	128	<25.0	136	<23.2	<21.8	162,000	162,000	---	---
Methylene Chloride	ug/kg	48.4J	50.7J	59.4J	49.3J	44.3J	39.9J	1,150,000	61,800	2.6	---
Naphthalene	ug/kg	<25.0	274	<25.0	224J	<17.5	<16.5	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	25.7J	<11.7	<11.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	180	<25.0	294	<22.1	<20.9	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	191	<10.7	<10.1	182,000	182,000	---	---
PAHs											
Acenaphthene	ug/kg	<2.7	9.6J	<2.6	<2.9	<2.7	<2.6	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<10.1	<3.0	<3.3	<3.1	<2.9	---	---	---	---
Anthracene	ug/kg	<4.4	<14.8	<4.4	<4.8	<4.5	<4.3	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	3.5J	<9.0	<2.7	3.2J	<2.8	5.3J	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	3.3J	<10.4	<3.1	<3.4	<3.2	5.3J	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	3.7J	<11.0	<3.2	<3.6	<3.4	4.2J	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	2.5J	<8.4	<2.5	<2.7	<2.6	4.2J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<11.8	<3.5	<3.8	<3.6	6.5J	211,000	11,500	---	---
Chrysene	ug/kg	6.7J	<11.5	<3.4	7.8J	<3.5	6.7J	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.1	<17.3	<5.1	<5.6	<5.3	<5.0	2110	115	---	---
Fluoranthene	ug/kg	<9.4	<31.7	<9.4	<10.3	<9.7	10.8J	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<15.8	<4.7	<5.1	<4.8	<4.6	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<9.0	<2.7	<2.9	<2.8	3.1J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	489	<2.9	33.3	5.1J	<2.8	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	3.9J	716	<2.9	34.2	6.6J	<2.8	3,010,000	239,000	---	---
Naphthalene	ug/kg	3.6J	290	<3.3	15.0J	<3.4	<3.2	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.1	<14.0	<4.1	10.1J	<4.3	6.7J	---	---	---	---
Pyrene	ug/kg	4.5J	<11.6	<3.4	5.3J	<3.6	10.4J	22,600,000	1,790,000	54,545.2	---
RCRA Metals											
Arsenic	mg/kg	5.8	4.6	5.4	(8.5)	5.1	0.42J	3	0.677	0.584	(8)
Barium	mg/kg	37.4	29.2	36.1	84.5	65.3	14.2	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.23J	0.22J	0.29J	0.26J	0.37J	0.083J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	17.8	15.5	15.2	31.9	26.7	8.3	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	17.8	15.5	15.2	31.9	26.7	8.3	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	8.7	7.4	8.1	15.9	9.0	9.9	800	400	27	(52)
Mercury	mg/kg	0.014	0.015	0.013	0.037	0.012	<0.0011	3.13	3.13	0.208	---
Selenium	mg/kg	0.26J	0.39J	0.19J	0.29J	0.52J	0.19J	5,840	391	0.52	---
Silver	mg/kg	0.12J	<0.048	0.069J	0.17J	0.20J	0.055J	5,840	391	0.8491	---
Cumulative Hazard Index		0.0008	0.0076	0.0008	0.2535	0.0008	0	---	---	---	---
Cumulative Cancer Risk		0	0	0	1.4E-05	0	0	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 4 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-1	SP-2	SP-3	SP-4	SP-5	NR 720			NR 720
		0' - 4' 3/19/12	0' - 4' 3/19/12	0' - 4' 3/19/12	0' - 4' 3/19/12	0' - 4' 3/19/12	0' - 4' 3/19/12	DC-I	DC-NI	GW
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	2.6	6.8	66.7	1.2J	<0.96	---	---	---	---
GRO	mg/kg	<3.0	<3.0	5.2	<3.1	<2.9	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	<40.4	<40.4	<40.4	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	376,000	376,000	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	36.2J	<25.0	<25.0	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	36.2J	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	30.3J	<50.0	<50.0	260,000	260,000	3,960	---
Tetrachloroethene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	33,000	4.5	---
1,1,1-Trichloroethane	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	640,000	640,000	140.2	---
PAHs										
Acenaphthene	ug/kg	<2.8	<2.9	6.1J	<2.9	<5.3	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.2	<3.2	7.3J	<3.3	<6.1	---	---	---	---
Anthracene	ug/kg	<4.7	<4.7	16.5J	<4.8	<8.9	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.9	4.0J	31.6	<2.9	<5.4	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.3	4.2J	32.3	<3.4	<6.2	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.5	6.5J	48.8	<3.6	<6.6	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.7	4.3J	32.8	<2.7	<5.0	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.8	4.4J	23.4	<3.8	<7.1	211,000	11,500	---	---
Chrysene	ug/kg	<3.7	6.8J	56.8	<3.8	<6.9	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.5	<5.5	9.0J	<5.6	<10.4	2110	115	---	---
Fluoranthene	ug/kg	<10.1	12.8J	72.7	<10.4	<19	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<5.0	<5.0	7.0J	<5.2	<9.5	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.9	<2.9	20.6	<2.9	<5.4	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<3.1	3.7J	93.9	<3.2	<5.8	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<3.1	3.8J	113	<3.2	9.7J	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.5	8.6J	78.8	<3.6	16.5J	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.4	10.6J	105	<4.6	<8.4	---	---	---	---
Pyrene	ug/kg	<3.7	8.4J	62.9	<3.8	<7	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	7.5	7.1	5.6	4.6	(9.7)	3	0.677	0.584	(8)
Barium	mg/kg	68.8	40.3	84	51.6	63.1	100,000	15,300	164.8	(364)
Cadmium	mg/kg	<0.034	0.22J	0.23J	0.29J	0.18J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	38.3	20.8	(1,030)	23.7	27.4	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	38.3	20.8	1,030	23.7	27.4	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	13.5	7.8	41.4	7.8	13	800	400	27	(52)
Mercury	mg/kg	0.049	0.020	0.025	0.015	0.017	3.13	3.13	0.208	---
Selenium	mg/kg	4.3	<0.52	1.1J	<0.55	<0.48	5,840	391	0.52	---
Silver	mg/kg	<0.24	<0.24	<0.24	<0.25	<0.22	5,840	391	0.8491	---
Cumulative Hazard Index		0.0029	0.0012	0.0025	0.0009	0.2838	---	---	---	---
Cumulative Cancer Risk		0	0	2.9E-06	0	1.6E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value
--- Not analyzed/Not Established
J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
i.u. - instrument units
mg/kg - milligrams per kilogram, parts per million
ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOCs - volatile organic compounds
RCRA - resource conservation and recovery act
BTV - background threshold value
DC-I - direct contact industrial
DC-NI - direct contact non-industrial
GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 5 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-6	SP-7	SP-8	SP-9	SP-10	NR 720			NR 720
		0' - 4' 3/19/12	0' - 4' 3/23/12	0' - 5' 3/19/12	0' - 4' 3/22/12	2' - 4' 3/22/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	1.6J	1.5J	2.0J	1,400	25.7	---	---	---	---
GRO	mg/kg	<2.9	<3.0	<3.0	<3.0	<3.1	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	<40.4	<40.4	<40.4	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	376,000	376,000	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	<50.0	<50.0	<50.0	260,000	260,000	3,960	---
Tetrachloroethene	ug/kg	<25.0	1,080	<25.0	<25.0	<25.0	145,000	33,000	4.5	---
1,1,1-Trichloroethane	ug/kg	<25.0	73.6	<25.0	<25.0	<25.0	640,000	640,000	140.2	---
PAHs										
Acenaphthene	ug/kg	255	<2.9	<2.8	<2.8	<2.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	64.3	<3.2	<3.2	<3.2	<3.3	---	---	---	---
Anthracene	ug/kg	96.3	<4.7	<4.7	<4.7	<4.8	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	4.7J	<2.9	<2.9	<3	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.2	<3.3	<3.3	<3.3	<3.4	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	5.5J	<3.5	<3.5	<3.6	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	2.9J	<2.7	<2.7	<2.7	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.6	<3.8	<3.7	<3.7	<3.9	211,000	11,500	---	---
Chrysene	ug/kg	4.5J	5.5J	<3.7	<3.6	<3.8	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.5	<5.5	<5.5	<5.7	2110	115	---	---
Fluoranthene	ug/kg	27.8	<10.1	<10.1	<10.1	<10.4	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	325	<5.0	<5	<5	<5.2	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.9	<2.9	<2.9	<3	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	546	4.2J	4.3J	<3.1	<3.2	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	7.5J	3.8J	4.5J	<3.1	2.39	3,010,000	239,000	---	---
Naphthalene	ug/kg	54.7	5.3J	4.5J	<3.5	<3.6	24,100	5,520	658.2	---
Phenanthrene	ug/kg	243	9.4J	<4.4	<4.4	<4.6	---	---	---	---
Pyrene	ug/kg	81.7	7.1J	<3.7	<3.7	6.7J	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	5.1	6.1	7.9	7.6	(8.4)	3	0.677	0.584	(8)
Barium	mg/kg	48.7	52.7	75.3	69	67.7	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.24J	0.28J	0.23J	0.12J	0.34J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	21.9	18.1	29.2	25.2	(503)	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	21.9	18.1	29.2	25.2	503	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	7.9	17.4	17.6	15.1	16.1	800	400	27	(52)
Mercury	mg/kg	0.013	0.028	0.033	0.024	0.039	3.13	3.13	0.208	---
Selenium	mg/kg	<0.50	<0.55	<0.52	<0.58	<0.55	5,840	391	0.52	---
Silver	mg/kg	<0.23	<0.25	<0.24	<0.27	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0019	0.0111	0.002	0.0014	0.2472	---	---	---	---
Cumulative Cancer Risk		4.6E-08	3.5E-08	0	0	1.4E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value

--- Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation

i.u. - instrument units

mg/kg - milligrams per kilogram, parts per million

ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons

GRO - gasoline range organics

DRO - diesel range organics

PID - photoionization detector

RCL - residual contaminant level

VOCs - volatile organic compounds

RCRA - resource conservation and recovery act

BTV - background threshold value

DC-I - direct contact industrial

DC-NI - direct contact non-industrial

GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 6 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-11	SP-12	SP-13	SP-14	SP-15	NR 720 RCL			NR 720
		0' - 4' 3/23/12	0' - 2' 3/23/12	4' - 6' 3/22/12	0' - 4' 3/22/12	2' - 4' 3/22/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	60	0	7.5	---	---	---	---
DRO	mg/kg	19.6	44.7	1,850	13.2	6.4	---	---	---	---
GRO	mg/kg	<3.3	<3.2	456	<3.0	<2.8	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	<40.4	<40.4	601	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	1,060	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	36.7J	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	82.5	<44.4	<44.4	376,000	376,000	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	168	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	1,410	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	1,330	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	440	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	1,790	<25.0	<25.0	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	97.7	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	214	<50.0	<50.0	260,000	260,000	3,960	---
Tetrachloroethene	ug/kg	77.6J	<25.0	<25.0	<25.0	<25.0	145,000	33,000	4.5	---
PAHs										
Acenaphthene	ug/kg	<3.1	<3	27.9	<2.8	<2.7	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.5	<3.4	18.5J	<3.2	<3	---	---	---	---
Anthracene	ug/kg	7J	5.9J	<4.7	<4.7	6.9J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	19.9J	6.9J	13.1J	<2.9	14.1J	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	21.2J	6.8J	3.4J	<3.3	13.1J	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	30	11.5J	7.4J	<3.5	18.1J	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	18.8J	7.9J	3J	6.6J	10.4J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	16.5J	7.1J	<3.8	<3.7	9.4J	211,000	11,500	---	---
Chrysene	ug/kg	28.4	18.9J	81.3	<3.6	18.6J	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<6	<5.8	<5.5	<5.5	<5.2	2110	115	---	---
Fluoranthene	ug/kg	38.3	17J	11.7J	<10	35.9	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<5.5	<5.3	38.3	<5.0	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	14.9J	4.4J	<2.9	<2.9	7.1J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	20.8J	24.2	82.2	6J	8J	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	24.2	33.1	42.6	6.8J	7.9J	3,010,000	239,000	---	---
Naphthalene	ug/kg	24	34.7	126	4.7J	6.4J	24,100	5,520	658.2	---
Phenanthrene	ug/kg	43.6	24	26.5	6.6J	25.2	---	---	---	---
Pyrene	ug/kg	37.2	14.4J	7.9J	<3.7	30.9	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	7.4	7.9	(8.4)	5.4	4.2	3	0.677	0.584	(8)
Barium	mg/kg	129	247	44.6	47.5	22.5	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.12J	0.29J	0.19J	0.10J	0.22J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	(5,150)	(361)	34.6	22.8	17.9	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	5,150	361	34.6	22.8	17.9	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	28.3	(58.2)	9.6	11.3	7.1	800	400	27	(52)
Mercury	mg/kg	0.069	0.3	0.18	0.051	0.012	3.13	3.13	0.208	---
Selenium	mg/kg	<0.58	<0.59	<0.58	<0.57	<0.55	5,840	391	0.52	---
Silver	mg/kg	<0.26	<0.27	<0.26	<0.26	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0044	0.0181	0.2835	0.003	0.0007	---	---	---	---
Cumulative Cancer Risk		2.1E-07	8.3E-09	1.4E-05	0	0	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs

Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs

Underlined concentrations exceed NR 720 groundwater pathway RCL

Concentrations in () exceed NR 720 background threshold value

--- Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation

i.u. - instrument units

mg/kg -milligrams per kilogram, parts per million

ug/kg -micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons

GRO - gasoline range organics

DRO - diesel range organics

PID - photoionization detector

RCL - residual contaminant level

VOCs - volatile organic compounds

RCRA - resource conservation and recovery act

BTV - background threshold value

DC-I - direct contact industrial

DC-NI - direct contact non-industrial

GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 7 of 12)

Midwest Tanning Corp. (Former)
222 N. Chicago Avenue (Formerly 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRS No. 02-41-556117

Analytical Parameter	Depth Date Units	SP-16	SP-17	SP-18	SP-19	SP-20	NR 720 RCL			NR 720
		4' - 6' 3/19/12	6' - 8' 3/19/12	0' - 4' 3/22/12	0' - 4' 3/22/12	0' - 2' 3/23/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u	---	---	---	---
PID	i.u.	0	0	0	0	0	---	---	---	---
DRO	mg/kg	82.7	613	1.8J	2.8	25.6	---	---	---	---
GRO	mg/kg	12.8	141	<2.9	<3.1	<3.4	---	---	---	---
Detected VOCs										
n-Butylbenzene	ug/kg	74.4	226	<40.4	<40.4	<40.4	108,000	108,000	---	---
sec-Butylbenzene	ug/kg	225	251	<25.0	<25.0	<25.0	145,000	145,000	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	183,000	183,000	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	376,000	376,000	1,168	---
Isopropylbenzene (Cumene)	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	268,000	268,000	---	---
p-Isopropyltoluene	ug/kg	<25.0	55.4J	<25.0	<25.0	<25.0	162,000	162,000	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	24,100	5,520	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	264,000	264,000	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	219,000	219,000	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	182,000	182,000	---	---
Total Xylenes	ug/kg	<50.0	<50.0	<50.0	<50.0	<50.0	260,000	260,000	3,960	---
Tetrachloroethene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	145,000	33,000	4.5	---
PAHs										
Acenaphthene	ug/kg	29.7	254	<2.8	<2.9	65.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	5J	56.5	<3.1	5J	32.2	---	---	---	---
Anthracene	ug/kg	11.9J	83.4	<4.6	9.1J	188	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.9	<2.8	11J	144	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.2	<3.3	<3.2	16J	114	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.5	<3.4	18.8J	121	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.7	<2.6	15.6J	54.4	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.6	<3.8	<3.6	10.7J	59.7	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	3.9J	<3.6	16J	153	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.6	<5.3	<5.6	20.5J	2110	115	---	---
Fluoranthene	ug/kg	<9.6	29.0	<9.8	23.9	416	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	19.5	334	<4.9	<5.1	108	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.9	<2.8	10.4J	49.4	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	18.3J	367	<3	9.1J	86.3	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	23.4	<3	7.9J	103	3,010,000	239,000	---	---
Naphthalene	ug/kg	8.5J	36.7	<3.4	8.5J	2.39	24,100	5,520	658.2	---
Phenanthrene	ug/kg	17.6J	191	<4.3	17.5J	542	---	---	---	---
Pyrene	ug/kg	13.3J	69.8	<3.6	22.1	313	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	3.0	7.5	5.6	6.4	(9.2)	3	0.677	0.584	(8)
Barium	mg/kg	60.5	35.9	68.6	72.4	123	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.13J	0.23J	0.15J	0.22J	0.29J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	19.2	18.0	18.8	20.3	(128)	---	---	360,000 (b)	(44) (c)
Chromium, Trivalent	mg/kg	19.2	18.0	18.8	20.3	128	100,000	100,000	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	5.6	11.0	11.4	21.1	22.6	800	400	27	(52)
Mercury	mg/kg	0.017	0.014	0.028	0.032	0.074	3.13	3.13	0.208	---
Selenium	mg/kg	<0.52	<0.54	<0.50	<0.57	<0.62	5,840	391	0.52	---
Silver	mg/kg	<0.24	<0.25	<0.23	0.27J	0.39J	5,840	391	0.8491	---
Cumulative Hazard Index		0.0007	0.0016	0.0017	0.002	0.2733	---	---	---	---
Cumulative Cancer Risk		0	3.1E-08	0	0	1.7E-05	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value
--- - Not analyzed/Not Established
J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
i.u. - instrument units
mg/kg - milligrams per kilogram, parts per million
ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOCs - volatile organic compounds
RCRA - resource conservation and recovery act
BTV - background threshold value
DC-I - direct contact industrial
DC-NI - direct contact non-industrial
GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
c: BTV applies to Total Chromium
d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 8 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	NSW-1	NSW-2	NSW-3	NSW-4	ESW	NR 720			NR 720
		2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	8.7	234	3.3	66.1	2.7	---	---	---	---
Detected VOCs										
sec-Butylbenzene	ug/kg	<25	<25	<25	30.4J	<25	145,000	145,000	---	---
Naphthalene	ug/kg	<25	<25	<25	37.2J	<25	24,100	5,520	658.2	---
1,2,4-Trimethylbenzene	ug/kg	<25	<25	<25	41.2J	<25	219,000	219,000	1,382.1	---
PAHs										
Acenaphthene	ug/kg	<2.8	<2.7	<2.7	19.5J	ND	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<2.9	<3.0	<3.0	<3.1	ND	---	---	---	---
Anthracene	ug/kg	9.4J	<4.4	<4.4	8.1J	14.3J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	11.5J	<2.7	<2.7	<2.8	35.6	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	10.3J	<3.1	<3.1	<3.2	29.2	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	11.5J	<3.3	<3.3	7.2J	24.3	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.9	<2.5	<2.5	<2.6	15.8J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	11.8J	<2.6	<2.7	<2.8	31.2	211,000	11,500	---	---
Chrysene	ug/kg	14.0J	12.6J	3.2J	9.2J	40.1	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<2.9	<5.2	<5.2	<5.3	<5.4	2110	115	---	---
Fluoranthene	ug/kg	26.7	<9.5	<9.5	16.5J	70.1	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<2.9	<4.7	<4.7	21.5	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.1	<2.7	<2.7	<2.8	14.6J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	19.7J	<2.9	<2.9	50.1	27.3	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	21.2	<2.9	2.1J	29.7	30.7	3,010,000	239,000	---	---
Naphthalene	ug/kg	73.1	<3.3	<3.4	7.7J	26.8	24,100	5,520	658.2	---
Phenanthrene	ug/kg	43.3	<4.2	5.7J	68.0	59.9	---	---	---	---
Pyrene	ug/kg	19.2J	<3.5	<3.6	21.1	46.1	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	5.1	4.2	6.0	5.5	7.9	3	0.677	0.584	(8)
Barium	mg/kg	71.7	46.2	42.7	52.1	143	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.10J	0.069J	0.082J	<0.2	0.25J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	31.3	20.6	20.7	24.1	20.1	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	31.3	20.6	20.7	24.1	20.1	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	15.9	7.5	7.9	10.8	18.4	800	400	27	(52)
Mercury	mg/kg	0.51	0.012	0.018	0.032	0.042	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	0.63J	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0307	0.0007	0.0011	0.0021	0.0028	---	---	---	---
Cumulative Cancer Risk		1.4E-08	0	0	3.2E-09	2.4E-06	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established
 J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg -milligrams per kilogram, parts per million
 ug/kg -micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 9 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	SSW-1	SSW-2	SSW-3	SSW-4	WSW	NR 720			NR 720
		2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	2' - 3' 7/18/12	DC-I	RCL DC-NI	GW
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	1.7J	1.6J	4.6	<3.0	<3.0	---	---	---	---
No VOCs detected in these samples										
PAHs										
Acenaphthene	ug/kg	<2.7	<2.7	<2.7	<2.7	10.7J	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<3.0	<3.0	<3.0	<3.1	---	---	---	---
Anthracene	ug/kg	<4.4	<4.4	10.4J	<4.4	3.1J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	44.2	<2.7	<2.7	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	56.2	<3.1	<3.1	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	44.4	<3.3	<3.3	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.5	38.7	<2.5	<2.5	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<3.5	48.3	<3.5	<3.5	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	<3.5	51.8	2.4J	<3.5	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.3	<5.2	<5.2	2110	115	---	---
Fluoranthene	ug/kg	<9.5	<9.5	78.8	<9.5	<9.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.8	<4.7	16.6J	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	31.6	<2.7	<2.8	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.2	<2.9	113	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	<2.9	4.7J	4.0J	191	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	<3.3	5.3J	4.8J	43.0	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	<4.2	27.6	4.3J	33.0	---	---	---	---
Pyrene	ug/kg	<3.5	<3.5	65.7	<3.5	<3.6	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	5.2	4.6	4.4	(8.1)	7.5	3	0.677	0.584	(8)
Barium	mg/kg	44.3	46.3	43.9	85.3	96.2	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.050J	0.12J	0.070J	0.089J	0.096J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	18.7	18.5	(60.7)	33.1	(88)	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	18.7	18.5	60.7	33.1	88	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	6.4	7.0	6.9	14.4	13.4	800	400	27	(52)
Mercury	mg/kg	0.013	0.0096	0.019	0.055	0.076	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.26	<0.25	<0.26	5,840	391	0.8491	---
Cumulative Hazard Index		0.0008	0.0006	0.0012	0.0033	0.0056	---	---	---	---
Cumulative Cancer Risk		0	0	4.6E-06	0	1.6E-08	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
 Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
 Underlined concentrations exceed NR 720 groundwater pathway RCL
 Concentrations in () exceed NR 720 background threshold value
 --- - Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
 i.u. - instrument units
 mg/kg - milligrams per kilogram, parts per million
 ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
 GRO - gasoline range organics
 DRO - diesel range organics
 PID - photoionization detector
 RCL - residual contaminant level
 VOCs - volatile organic compounds
 RCRA - resource conservation and recovery act
 BTV - background threshold value
 DC-I - direct contact industrial
 DC-NI - direct contact non-industrial
 GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
 b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
 c: BTV applies to Total Chromium
 d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 10 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	BASE-1	BASE-2	BASE-3	BASE-4	BASE-5	NR 720 RCL			NR 720
		4' 7/18/12	4' 7/18/12	4' 7/18/12	4' 7/18/12	4' 7/18/12	4' 7/18/12	DC-I	DC-NI	GW
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	81.5	2.0	15.7	3.7	1.5J	---	---	---	---
No VOCs detected in these samples										
PAHs										
Acenaphthene	ug/kg	<2.7	<2.7	<2.8	<2.7	<2.7	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<3.0	<3.1	<3.0	<3.0	---	---	---	---
Anthracene	ug/kg	<4.4	<4.4	<4.5	<4.4	<4.4	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	<2.8	<2.7	<2.7	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	<3.1	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	<3.3	<3.3	<3.3	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.5	<2.6	<2.5	<2.5	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<3.5	<3.6	<3.5	<3.5	211,000	11,500	---	---
Chrysene	ug/kg	2.7J	<3.5	3.3J	<3.5	<3.5	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.3	<5.2	<5.2	2110	115	---	---
Fluoranthene	ug/kg	<9.5	<9.5	<9.6	<9.5	<9.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.8	<4.7	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	<2.7	<2.7	<2.7	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	60.0	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	84.8	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	<3.3	<3.4	<3.3	16.8J	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	<4.2	<4.3	<4.2	<4.3	---	---	---	---
Pyrene	ug/kg	<3.5	<3.5	<3.6	<3.5	<3.6	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	5.2	4.3	5.5	5.7	3.5	3	0.677	0.584	(8)
Barium	mg/kg	38.3	88.2	36.6	33.6	46.9	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.20J	0.12J	0.10J	0.13J	0.035J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	17.2	29.3	17.7	17.6	19.7	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	17.2	29.3	17.7	17.6	19.7	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	6.7	7.0	6.9	8.6	4.9	800	400	27	(52)
Mercury	mg/kg	0.0046J	0.013	0.0086	0.012	0.012	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	0.25J	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0	0.0008	0.0051	0.0007	0.0011	---	---	---	---
Cumulative Cancer Risk		0	0	0	0	3.8E-09	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs

Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs

Underlined concentrations exceed NR 720 groundwater pathway RCL

Concentrations in () exceed NR 720 background threshold value

--- - Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation

i.u. - instrument units

mg/kg -milligrams per kilogram, parts per million

ug/kg -micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons

GRO - gasoline range organics

DRO - diesel range organics

PID - photoionization detector

RCL - residual contaminant level

VOCs - volatile organic compounds

RCRA - resource conservation and recovery act

BTV - background threshold value

DC-I - direct contact industrial

DC-NI - direct contact non-industrial

GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 11 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	VSWW	VSWN	VSWE	VSWS	VBASE	NR 720			NR 720
		10' - 12' 7/18/12	10' - 12' 7/18/12	10' - 12' 7/18/12	10' - 12' 7/18/12	15' 7/18/12	DC-I	RCL DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	3.5	5.8	5.7	1.7	4.6	---	---	---	---
Detected VOCs										
Benzene	ug/kg	<25	<25	<u>28.8J</u>	<25	<25	7,070	1,600	5.1	---
PAHs										
Acenaphthene	ug/kg	<2.7	<2.7	<2.7	<2.8	<2.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<3.0	<3.0	<3.0	<3.1	<3.2	---	---	---	---
Anthracene	ug/kg	<4.4	<4.4	<4.4	<4.5	9.1J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	<2.7	<2.8	29.4	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	29.1	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	<3.3	<3.3	20.6	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.5	<2.5	<2.6	17.1J	---	---	---	---
Benzo(k)fluoranthene	ug/kg	<3.5	<3.5	<3.5	<3.6	27.6	211,000	11,500	---	---
Chrysene	ug/kg	<3.5	<3.5	<3.5	2.3J	33.1	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.2	<5.2	<5.3	2110	115	---	---
Fluoranthene	ug/kg	<9.5	<9.5	<9.5	<9.5	62.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.7	<4.7	<4.8	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	<2.7	<2.7	14.7J	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	<2.10	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	<2.9	3.5J	<2.9	<2.9	2.0J	3,010,000	239,000	---	---
Naphthalene	ug/kg	<3.3	4.4J	<3.3	<3.3	<3.4	24,100	5,520	658.2	---
Phenanthrene	ug/kg	<4.2	<4.3	<4.2	<4.2	31.7	---	---	---	---
Pyrene	ug/kg	<3.5	<3.6	<3.5	<3.5	48.7	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	3.7	4.5	4.6	3.9	4.6	3	0.677	0.584	(8)
Barium	mg/kg	38.3	41.0	33.3	29.2	32.9	100,000	15,300	164.8	(364)
Cadmium	mg/kg	0.12J	0.073J	0.064J	0.074J	0.050J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	18.8	22.2	18.6	18.6	24.7	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	18.8	22.2	18.6	18.6	24.7	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	7.1	6.3	6.8	6.2	6.3	800	400	27	(52)
Mercury	mg/kg	0.012	0.010	0.0089	0.010	0.0083	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0007	0.0006	0.0005	0.0006	0.0005	---	---	---	---
Cumulative Cancer Risk		0	0	0	0	2.3E-06	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value
--- - Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
i.u. - instrument units
mg/kg - milligrams per kilogram, parts per million
ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOCs - volatile organic compounds
RCRA - resource conservation and recovery act
BTV - background threshold value
DC-I - direct contact industrial
DC-NI - direct contact non-industrial
GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium
b: use 360,000 mg/kg for GW RCL, if no CR-VI is present
c: BTV applies to Total Chromium
d: In review of the Hygienics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium

A.2. SOIL ANALYTICAL RESULTS TABLE (Page 12 of 12)

Midwest Tanning Corp. (Former) (Hotspot #5)
222 N. Chicago Avenue (Former 1200 Davis Avenue)
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117

Analytical Parameter	Depth Date Units	NSP-17	ESP-17	WSP-17	SSP-17	BSP-17	NR 720			NR 720
		6' - 7' 7/23/12	6' - 7' 7/23/12	6' - 7' 7/23/12	6' - 7' 7/23/12	10' 7/23/12	DC-I	DC-NI	GW	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	1.1J	83.4	2.1	14.2	2.5	---	---	---	---
GRO	mg/kg	<3.0	69.2	<3.0	<3.1	<3.2	---	---	---	---
No VOCs detected in these samples										
PAHs										
Acenaphthene	ug/kg	<2.8	11.1J	<2.7	<2.8	<2.9	45,200,000	3,590,000	---	---
Acenaphthylene	ug/kg	<2.9	21.0J	<3.0	<3.1	<3.2	---	---	---	---
Anthracene	ug/kg	3.9J	<4.5	<4.4	<4.5	2.3J	100,000,000	17,900,000	196,949.2	---
Benzo(a)anthracene	ug/kg	16.6J	<2.8	<2.7	<2.8	<2.9	20,800	1,140	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	<3.2	2,110	115	470	---
Benzo(b)fluoranthene	ug/kg	12.0J	4.2J	<3.3	<3.3	4.1J	21,100	1,150	479.3	---
Benzo(g,h,i)perylene	ug/kg	<2.5	<2.6	<2.5	<2.6	<2.7	---	---	---	---
Benzo(k)fluoranthene	ug/kg	15.6J	<3.6	<3.5	<3.6	<3.7	211,000	11,500	---	---
Chrysene	ug/kg	23.4	5.6J	3.2J	3.7J	6.5J	2,110,000	115,000	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.3	<5.2	<5.2	<5.2	2110	115	---	---
Fluoranthene	ug/kg	29.7	<9.5	<9.5	<9.5	<9.5	30,100,000	2,390,000	88,877.8	---
Fluorene	ug/kg	<4.7	35.0	<4.7	<4.7	<4.7	30,100,000	2,390,000	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.8	<2.7	<2.7	<2.7	21,100	1,150	---	---
1-Methylnaphthalene	ug/kg	<2.8	13.5J	<2.9	<2.9	<2.9	72,700	17,600	---	---
2-Methylnaphthalene	ug/kg	4.7J	10.3J	<2.9	<2.9	2.9J	3,010,000	239,000	---	---
Naphthalene	ug/kg	8.3J	24.4	<3.3	<3.3	<3.4	24,100	5,520	658.2	---
Phenanthrene	ug/kg	10.2J	16.3J	4.3J	<3.4	8.0J	---	---	---	---
Pyrene	ug/kg	23.8	<3.6	<3.6	<3.7	<3.8	22,600,000	1,790,000	54,545.2	---
RCRA Metals										
Arsenic	mg/kg	7.2	7.5	6.5	6.3	6.8	3	0.677	0.584	(8)
Barium	mg/kg	75.0	60.6	32.5	29.9	43.8	100,000	15,300	164.8	(364)
Cadmium	mg/kg	<0.1	<0.1	0.12J	<0.1	0.066J	985	71.1	0.752	(1)
Chromium (a)	mg/kg	(82.5)	(117)	14.9	29.3	35.3	---	---	360,000 (b)	(44) (c)
Trivalent Chromium	mg/kg	82.5	117	14.9	29.3	35.3	100,000	100,000	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	6.36	0.301	---	---
Lead	mg/kg	10.5	11.3	10.0	6.0	11.2	800	400	27	(52)
Mercury	mg/kg	0.022	0.024	0.012	0.0069	0.036	3.13	3.13	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	5,840	391	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	5,840	391	0.8491	---
Cumulative Hazard Index		0.0014	0.0015	0.0007	0.0004	0.0021	---	---	---	---
Cumulative Cancer Risk		1.6E-09	4.7E-09	0	0	0	---	---	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed and bold concentrations exceed NR 720 industrial direct contact RCLs
Underlined concentrations exceed NR 720 groundwater pathway RCL
Concentrations in () exceed NR 720 background threshold value
--- - Not analyzed/Not Established

J - estimated concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
i.u. - instrument units
mg/kg - milligrams per kilogram, parts per million
ug/kg - micrograms per kilogram, parts per billion

PAHs - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOCs - volatile organic compounds
RCRA - resource conservation and recovery act
BTV - background threshold value
DC-I - direct contact industrial
DC-NI - direct contact non-industrial
GW - groundwater pathway

a - Total Chromium laboratory analytical results may be comprised of trivalent (Cr III) and/or Hexavalent (Cr VI) Chromium

b: use 360,000 mg/kg for GW RCL, if no CR-VI is present

c: BTV applies to Total Chromium

d: In review of the Hygienetics data within the Sigma letter report, dated 9/30/10, detected Chromium levels are attributable to Trivalent Chromium with no detectable Hexavalent Chromium