

August 23, 2017

City of South Milwaukee  
2424 15<sup>th</sup> 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](mailto: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:

**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>  on behalf of Wal-Mart Stores East, LP	Date Signed 10/28/16
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**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

**Include this completed page as an attachment with all notification provided under 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 <b>Angie.Vick@wal-mart.com</b>			

**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 <b>patrick.patterson@psiusa.com</b>			

**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) <b>eric.amadi@wisconsin.gov</b>			

# 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:

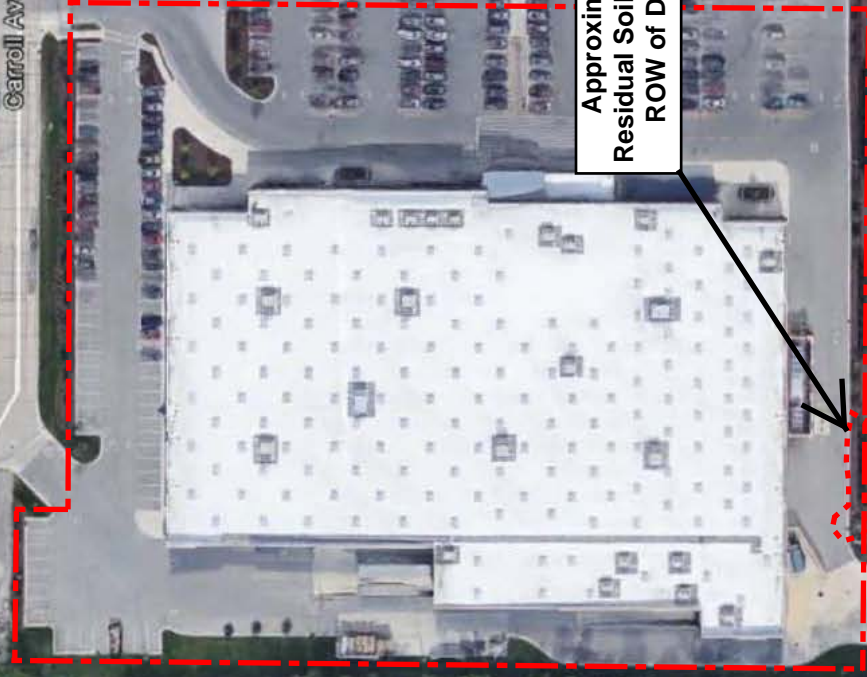
: Approximate Extent of Soil-Impacted Above NR720 DC RCLs

Adapted from 2015 Google Earth Aerial Photograph

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

Scale  
(feet)

0 110 220



Badger Ave

Carroll Ave

32

Davis Ave

N Chicago Ave

© 2016 Google

42°55'29.21" N 87°51'41.83" W elev 660









**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	4-6	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			
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	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	<b>1610</b>	<5.7	NA	NA	NA	NA	NA	NA	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	<b>1750</b>	<5.7	NA	NA	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	<b>188</b>	<5.7	NA	NA	NA	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	<b>726</b>	<5.7	NA	NA	NA	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	<b>148</b>	<17	NA	NA	NA	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	<b>444</b>	<5.7	NA	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	<5.7	<b>6.8</b>	NA	NA	NA	NA	NA	NA	NA	NA	<6.0	NA	<b>2420</b>	<5.7	NA	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  
**BRRS 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	---	---	---	---
<b>Detected VOCs</b>										
sec-Butylbenzene	ug/kg	<25.0	<9.5	<9.7	189	<25.0	<b>145,000</b>	<b>145,000</b>	---	---
Isopropylbenzene	ug/kg	<25.0	<6.5	<6.6	<25.0	<25.0	<b>268,000</b>	<b>268,000</b>	---	---
p-Isopropyltoluene	ug/kg	<25.0	<23.7	<24.0	175	<25.0	<b>162,000</b>	<b>162,000</b>	---	---
Methylene Chloride	ug/kg	<b>53.2J</b>	<b>65.6</b>	<b>49.1J</b>	<b>65.7J</b>	<b>38.4J</b>	<b>1,150,000</b>	<b>61,800</b>	2.6	---
Naphthalene	ug/kg	<25.0	<b>1,830</b>	<18.1	<25.0	<25.0	<b>24,100</b>	<b>5,520</b>	658.2	---
n-Propylbenzene	ug/kg	<25.0	<11.9	<12.1	35.1J	<25.0	<b>264,000</b>	<b>264,000</b>	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<22.6	<22.9	394	<25.0	<b>219,000</b>	<b>219,000</b>	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<10.9	<11.1	165	<25.0	<b>182,000</b>	<b>182,000</b>	---	---
<b>PAHs</b>										
Acenaphthene	ug/kg	<2.7	568	<2.8	<2.8	365J	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<b>1,190</b>	2.9J	<2.8	<b>2,540</b>	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.1	<b>1,120</b>	<3.3	<3.3	<b>2,790</b>	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	931	<3.5	<3.4	<b>2,710</b>	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	<3.5	<b>1,200</b>	4.3J	<3.6	<b>2,840</b>	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<b>175J</b>	<5.5	<5.4	<b>577J</b>	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<9.5	2,930	<10.1	<9.9	7,110	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<4.7	619	<5.0	<4.9	456J	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	402	<2.9	<2.8	<b>1,630</b>	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<2.9	199	7.5J	<3.0	<116	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	<2.9	287	8.2J	<3.0	<116	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	<3.3	587	6.4J	<3.5	<133	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>6.8</b>	<b>(8.5)</b>	<b>3.9</b>	<b>5.0</b>	<b>7.8</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	42.9	83.6	44.1	38	276	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.35J	0.25J	0.18J	0.25J	0.24J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	9.3	32	15.1	9.8	(144)	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.018	0.032	0.030	0.014	0.10	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	0.43J	0.50J	0.50J	0.32J	0.67J	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	0.15J	0.088J	0.10J	0.12J	0.089J	<b>5,840</b>	<b>391</b>	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  
**BRTS 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	---	---	---	---
<b>Detected VOCs</b>											
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<9.7	<9.7	<b>145,000</b>	<b>145,000</b>	---	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<6.6	<6.6	<b>268,000</b>	<b>268,000</b>	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<24.1	<24.1	<b>162,000</b>	<b>162,000</b>	---	---
Methylene Chloride	ug/kg	<i>43.7J</i>	<i>41.1J</i>	<i>47.9J</i>	<i>58.7J</i>	<i>44.3J</i>	<i>65.7</i>	<b>1,150,000</b>	<b>61,800</b>	2.6	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<18.2	<18.2	<b>24,100</b>	<b>5,520</b>	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<12.1	<12.2	<b>264,000</b>	<b>264,000</b>	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<23.0	<23.1	<b>219,000</b>	<b>219,000</b>	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<11.2	<11.2	<b>182,000</b>	<b>182,000</b>		---
<b>PAHs</b>											
Acenaphthene	ug/kg	<3.0	<2.8	6.5J	<2.7	40.8J	12.8J	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<3.1	9.0J	163	<2.8	846	481	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.5	8.7J	<b>180</b>	<3.2	<b>862</b>	<b>685</b>	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.7	8.8J	171	<3.4	967	833	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	<3.9	11.4J	182	3.6J	1,040	549	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.9	<5.4	43.6	<5.3	<b>169</b>	<b>122</b>	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<10.8	16.3J	295	<9.8	1,630	816	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<5.4	<5.0	9.1J	<4.9	54.2J	22J	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<3.1	4.9J	106	<2.8	377	334	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<3.3	<3.1	<3.1	<3.0	140	35.6J	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	<3.3	<3.1	3.7J	<3.0	193	71.0	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	<3.8	<3.5	9.9J	<3.4	161	167	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>											
Arsenic	mg/kg	<b>(11.1)</b>	<b>(11.9)</b>	<b>6.0</b>	<b>4.4</b>	<b>(8.5)</b>	<b>(9)</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	108	60.8	44.1	34.4	63.8	42.7	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.16J	0.17J	0.26J	0.15J	0.26J	0.25J	<b>985</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	14.6	18	13	8.4	27.6	18.3	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.079	0.087	0.037	0.053	0.065	0.037	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	0.42J	0.42J	0.37J	0.41J	<i>0.84J</i>	0.41J	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	0.14J	0.15J	0.14J	0.14J	0.19J	0.23J	<b>5,840</b>	<b>391</b>	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	3' - 5' 3/15/11	DC-I	DC-NI	GW
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	---	---	---	---
<b>Detected VOCs</b>											
sec-Butylbenzene	ug/kg	<25.0	153	<25.0	165	<9.3	<8.8	<b>145,000</b>	<b>145,000</b>	---	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	9.9J	<6.4	<6.0	<b>268,000</b>	<b>268,000</b>	---	---
p-Isopropyltoluene	ug/kg	<25.0	128	<25.0	136	<23.2	<21.8	<b>162,000</b>	<b>162,000</b>	---	---
Methylene Chloride	ug/kg	<u>48.4J</u>	<u>50.7J</u>	<u>59.4J</u>	<u>49.3J</u>	<u>44.3J</u>	<u>39.9J</u>	<b>1,150,000</b>	<b>61,800</b>	2.6	---
Naphthalene	ug/kg	<25.0	274	<25.0	224J	<17.5	<16.5	<b>24,100</b>	<b>5,520</b>	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	25.7J	<11.7	<11.0	<b>264,000</b>	<b>264,000</b>	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	180	<25.0	294	<22.1	<20.9	<b>219,000</b>	<b>219,000</b>	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	191	<10.7	<10.1	<b>182,000</b>	<b>182,000</b>		---
<b>PAHs</b>											
Acenaphthene	ug/kg	<2.7	9.6J	<2.6	<2.9	<2.7	<2.6	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	3.5J	<9.0	<2.7	3.2J	<2.8	5.3J	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	3.3J	<10.4	<3.1	<3.4	<3.2	5.3J	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	3.7J	<11.0	<3.2	<3.6	<3.4	4.2J	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	6.7J	<11.5	<3.4	7.8J	<3.5	6.7J	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.1	<17.3	<5.1	<5.6	<5.3	<5.0	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<9.4	<31.7	<9.4	<10.3	<9.7	10.8J	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<4.7	<15.8	<4.7	<5.1	<4.8	<4.6	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<9.0	<2.7	<2.9	<2.8	3.1J	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<2.9	489	<2.9	33.3	5.1J	<2.8	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	3.9J	716	<2.9	34.2	6.6J	<2.8	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	3.6J	290	<3.3	15.0J	<3.4	<3.2	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>											
Arsenic	mg/kg	<b>5.8</b>	<b>4.6</b>	<b>5.4</b>	<b>(8.5)</b>	<b>5.1</b>	0.42J	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	37.4	29.2	36.1	84.5	65.3	14.2	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.23J	0.22J	0.29J	0.26J	0.37J	0.083J	<b>985</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	8.7	7.4	8.1	15.9	9.0	9.9	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.014	0.015	0.013	0.037	0.012	<0.0011	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	0.26J	0.39J	0.19J	0.29J	0.52J	0.19J	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	0.12J	<0.048	0.069J	0.17J	0.20J	0.055J	<b>5,840</b>	<b>391</b>	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	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	---	---	---	---
<b>Detected VOCs</b>										
n-Butylbenzene	ug/kg	<40.4	<40.4	<40.4	<40.4	<40.4	<b>108,000</b>	<b>108,000</b>	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>145,000</b>	<b>145,000</b>	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>183,000</b>	<b>183,000</b>	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	<b>376,000</b>	<b>376,000</b>	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>268,000</b>	<b>268,000</b>	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>162,000</b>	<b>162,000</b>	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>24,100</b>	<b>5,520</b>	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>264,000</b>	<b>264,000</b>	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	36.2J	<25.0	<25.0	<b>219,000</b>	<b>219,000</b>	1,382.1	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	36.2J	<25.0	<25.0	<b>182,000</b>	<b>182,000</b>	---	---
Total Xylenes	ug/kg	<50.0	<50.0	30.3J	<50.0	<50.0	<b>260,000</b>	<b>260,000</b>	3,960	---
Tetrachloroethene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>145,000</b>	<b>33,000</b>	4.5	---
1,1,1-Trichloroethane	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>640,000</b>	<b>640,000</b>	140.2	---
<b>PAHs</b>										
Acenaphthene	ug/kg	<2.8	<2.9	6.1J	<2.9	<5.3	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.9	4.0J	31.6	<2.9	<5.4	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.3	4.2J	32.3	<3.4	<6.2	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.5	6.5J	48.8	<3.6	<6.6	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	<3.7	6.8J	56.8	<3.8	<6.9	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.5	<5.5	9.0J	<5.6	<10.4	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<10.1	12.8J	72.7	<10.4	<19	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<5.0	<5.0	7.0J	<5.2	<9.5	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.9	<2.9	20.6	<2.9	<5.4	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<3.1	3.7J	93.9	<3.2	<5.8	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	<3.1	3.8J	113	<3.2	9.7J	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	<3.5	8.6J	78.8	<3.6	16.5J	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>7.5</b>	<b>7.1</b>	<b>5.6</b>	<b>4.6</b>	<b>(9.7)</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	68.8	40.3	84	51.6	63.1	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	<0.034	0.22J	0.23J	0.29J	0.18J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	13.5	7.8	41.4	7.8	13	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.049	0.020	0.025	0.015	0.017	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	4.3	<0.52	1.1J	<0.55	<0.48	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.24	<0.24	<0.24	<0.25	<0.22	<b>5,840</b>	<b>391</b>	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 millior  
 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 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	---	---	---	---
<b>Detected VOCs</b>										
n-Butylbenzene	ug/kg	<40.4	<40.4	<40.4	<40.4	<40.4	<b>108,000</b>	<b>108,000</b>	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>145,000</b>	<b>145,000</b>	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>183,000</b>	<b>183,000</b>	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	<b>376,000</b>	<b>376,000</b>	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>268,000</b>	<b>268,000</b>	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>162,000</b>	<b>162,000</b>	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>24,100</b>	<b>5,520</b>	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>264,000</b>	<b>264,000</b>	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>219,000</b>	<b>219,000</b>	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>182,000</b>	<b>182,000</b>	1,382.1	---
Total Xylenes	ug/kg	<50.0	<50.0	<50.0	<50.0	<50.0	<b>260,000</b>	<b>260,000</b>	3,960	---
Tetrachloroethene	ug/kg	<25.0	1,080	<25.0	<25.0	<25.0	<b>145,000</b>	<b>33,000</b>	4.5	---
1,1,1-Trichloroethane	ug/kg	<25.0	73.6	<25.0	<25.0	<25.0	<b>640,000</b>	<b>640,000</b>	140.2	---
<b>PAHs</b>										
Acenaphthene	ug/kg	255	<2.9	<2.8	<2.8	<2.9	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	4.7J	<2.9	<2.9	<3	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.2	<3.3	<3.3	<3.3	<3.4	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	5.5J	<3.5	<3.5	<3.6	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	4.5J	5.5J	<3.7	<3.6	<3.8	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.5	<5.5	<5.5	<5.7	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	27.8	<10.1	<10.1	<10.1	<10.4	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	325	<5.0	<5	<5	<5.2	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.9	<2.9	<2.9	<3	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	546	4.2J	4.3J	<3.1	<3.2	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	7.5J	3.8J	4.5J	<3.1	2.39	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	54.7	5.3J	4.5J	<3.5	<3.6	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>5.1</b>	<b>6.1</b>	<b>7.9</b>	<b>7.6</b>	<b>(8.4)</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	48.7	52.7	75.3	69	67.7	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.24J	0.28J	0.23J	0.12J	0.34J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	7.9	17.4	17.6	15.1	16.1	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.013	0.028	0.033	0.024	0.039	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	<0.50	<0.55	<0.52	<0.58	<0.55	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.23	<0.25	<0.24	<0.27	<0.25	<b>5,840</b>	<b>391</b>	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  
**BRRTS No. 02-41-556117**

Analytical Parameter	Depth Date Units	SP-11	SP-12	SP-13	SP-14	SP-15	NR 720			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	---	---	---	---
<b>Detected VOCs</b>										
n-Butylbenzene	ug/kg	<40.4	<40.4	601	<40.4	<40.4	<b>108,000</b>	<b>108,000</b>	---	---
sec-Butylbenzene	ug/kg	<25.0	<25.0	1,060	<25.0	<25.0	<b>145,000</b>	<b>145,000</b>	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	36.7J	<25.0	<25.0	<b>183,000</b>	<b>183,000</b>	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	82.5	<44.4	<44.4	<b>376,000</b>	<b>376,000</b>	1,168	---
Isopropylbenzene	ug/kg	<25.0	<25.0	168	<25.0	<25.0	<b>268,000</b>	<b>268,000</b>	---	---
p-Isopropyltoluene	ug/kg	<25.0	<25.0	1,410	<25.0	<25.0	<b>162,000</b>	<b>162,000</b>	---	---
Naphthalene	ug/kg	<25.0	<25.0	1,330	<25.0	<25.0	<b>24,100</b>	<b>5,520</b>	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	440	<25.0	<25.0	<b>264,000</b>	<b>264,000</b>	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	1,790	<25.0	<25.0	<b>219,000</b>	<b>219,000</b>	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	97.7	<25.0	<25.0	<b>182,000</b>	<b>182,000</b>	1,382.1	---
Total Xylenes	ug/kg	<50.0	<50.0	214	<50.0	<50.0	<b>260,000</b>	<b>260,000</b>	3,960	---
Tetrachloroethene	ug/kg	<b>77.6J</b>	<25.0	<25.0	<25.0	<25.0	<b>145,000</b>	<b>33,000</b>	4.5	---
<b>PAHs</b>										
Acenaphthene	ug/kg	<3.1	<3	27.9	<2.8	<2.7	<b>45,200,000</b>	<b>3,590,000</b>	---	---
Acenaphthylene	ug/kg	<3.5	<3.4	18.5J	<3.2	<3	---	---	---	---
Anthracene	ug/kg	7J	5.9J	<4.7	<4.7	6.9J	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	19.9J	6.9J	13.1J	<2.9	14.1J	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	21.2J	6.8J	3.4J	<3.3	13.1J	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	30	11.5J	7.4J	<3.5	18.1J	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	28.4	18.9J	81.3	<3.6	18.6J	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<6	<5.8	<5.5	<5.5	<5.2	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	38.3	17J	11.7J	<10	35.9	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<5.5	<5.3	38.3	<5.0	<4.7	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	14.9J	4.4J	<2.9	<2.9	7.1J	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	20.8J	24.2	82.2	6J	8J	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	24.2	33.1	42.6	6.8J	7.9J	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	24	34.7	126	4.7J	6.4J	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>7.4</b>	<b>7.9</b>	<b>(8.4)</b>	<b>5.4</b>	<b>4.2</b>	<b>3</b>	<b>0.677</b>	<b>0.584</b>	<b>(8)</b>
Barium	mg/kg	<b>129</b>	<b>247</b>	<b>44.6</b>	<b>47.5</b>	<b>22.5</b>	<b>100,000</b>	<b>15,300</b>	<b>164.8</b>	<b>(364)</b>
Cadmium	mg/kg	0.12J	0.29J	0.19J	0.10J	0.22J	<b>985</b>	<b>71.1</b>	<b>0.752</b>	<b>(1)</b>
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	<b>100,000</b>	<b>100,000</b>	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	28.3	(58.2)	9.6	11.3	7.1	<b>800</b>	<b>400</b>	<b>27</b>	<b>(52)</b>
Mercury	mg/kg	0.069	0.3	0.18	0.051	0.012	<b>3.13</b>	<b>3.13</b>	<b>0.208</b>	---
Selenium	mg/kg	<0.58	<0.59	<0.58	<0.57	<0.55	<b>5,840</b>	<b>391</b>	<b>0.52</b>	---
Silver	mg/kg	<0.26	<0.27	<0.26	<0.26	<0.25	<b>5,840</b>	<b>391</b>	<b>0.8491</b>	---
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	---	---	---	---
<b>Detected VOCs</b>										
n-Butylbenzene	ug/kg	74.4	226	<40.4	<40.4	<40.4	<b>108,000</b>	<b>108,000</b>	---	---
sec-Butylbenzene	ug/kg	225	251	<25.0	<25.0	<25.0	<b>145,000</b>	<b>145,000</b>	---	---
tert-Butylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>183,000</b>	<b>183,000</b>	---	---
1,2-Dichlorobenzene	ug/kg	<44.4	<44.4	<44.4	<44.4	<44.4	<b>376,000</b>	<b>376,000</b>	1,168	---
Isopropylbenzene (Cumene)	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>268,000</b>	<b>268,000</b>	---	---
p-Isopropyltoluene	ug/kg	<25.0	55.4J	<25.0	<25.0	<25.0	<b>162,000</b>	<b>162,000</b>	---	---
Naphthalene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>24,100</b>	<b>5,520</b>	658.2	---
n-Propylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>264,000</b>	<b>264,000</b>	---	---
1,2,4-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>219,000</b>	<b>219,000</b>	---	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>182,000</b>	<b>182,000</b>	1,382.1	---
Total Xylenes	ug/kg	<50.0	<50.0	<50.0	<50.0	<50.0	<b>260,000</b>	<b>260,000</b>	3,960	---
Tetrachloroethene	ug/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<b>145,000</b>	<b>33,000</b>	4.5	---
<b>PAHs</b>										
Acenaphthene	ug/kg	29.7	254	<2.8	<2.9	65.9	<b>45,200,000</b>	<b>3,590,000</b>	---	---
Acenaphthylene	ug/kg	5J	56.5	<3.1	5J	32.2	---	---	---	---
Anthracene	ug/kg	11.9J	83.4	<4.6	9.1J	188	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.9	<2.8	11J	144	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.2	<3.3	<3.2	16J	114	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.5	<3.4	18.8J	121	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	<3.5	3.9J	<3.6	16J	153	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.6	<5.3	<5.6	20.5J	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<9.6	29.0	<9.8	23.9	416	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	19.5	334	<4.9	<5.1	108	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.9	<2.8	10.4J	49.4	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	18.3J	367	<3	9.1J	86.3	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	<2.9	23.4	<3	7.9J	103	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	8.5J	36.7	<3.4	8.5J	2.39	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>3.0</b>	<b>7.5</b>	<b>5.6</b>	<b>6.4</b>	<b>(9.2)</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	60.5	35.9	68.6	72.4	123	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.13J	0.23J	0.15J	0.22J	0.29J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Chromium, Hexavalent	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	5.6	11.0	11.4	21.1	22.6	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.017	0.014	0.028	0.032	0.074	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	<0.52	<0.54	<0.50	<0.57	<0.62	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.24	<0.25	<0.23	0.27J	0.39J	<b>5,840</b>	<b>391</b>	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	2' - 3' 7/18/12	DC-I	DC-NI	GW
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	---	---	---	---	---	---	---	---	---
DRO	mg/kg	8.7	234	3.3	66.1	2.7	---	---	---	---
<b>Detected VOCs</b>										
sec-Butylbenzene	ug/kg	<25	<25	<25	30.4J	<25	<b>145,000</b>	<b>145,000</b>	---	---
Naphthalene	ug/kg	<25	<25	<25	37.2J	<25	<b>24,100</b>	<b>5,520</b>	658.2	---
1,2,4-Trimethylbenzene	ug/kg	<25	<25	<25	41.2J	<25	<b>219,000</b>	<b>219,000</b>	1,382.1	---
<b>PAHs</b>										
Acenaphthene	ug/kg	<2.8	<2.7	<2.7	19.5J	ND	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	11.5J	<2.7	<2.7	<2.8	35.6	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	10.3J	<3.1	<3.1	<3.2	29.2	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	11.5J	<3.3	<3.3	7.2J	24.3	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	14.0J	12.6J	3.2J	9.2J	40.1	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<2.9	<5.2	<5.2	<5.3	<5.4	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	26.7	<9.5	<9.5	16.5J	70.1	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<2.9	<4.7	<4.7	21.5	<4.7	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.1	<2.7	<2.7	<2.8	14.6J	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	19.7J	<2.9	<2.9	50.1	27.3	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	21.2	<2.9	2.1J	29.7	30.7	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	73.1	<3.3	<3.4	7.7J	26.8	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>5.1</b>	<b>4.2</b>	<b>6.0</b>	<b>5.5</b>	<b>7.9</b>	<b>3</b>	<b>0.677</b>	<b>0.584</b>	(8)
Barium	mg/kg	71.7	46.2	42.7	52.1	143	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.10J	0.069J	0.082J	<0.2	0.25J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	15.9	7.5	7.9	10.8	18.4	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.51	0.012	0.018	0.032	0.042	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	0.63J	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	<b>5,840</b>	<b>391</b>	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 RCL			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	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	---	---	---	---
<b>No VOCs detected in these samples</b>										
<b>PAHs</b>										
Acenaphthene	ug/kg	<2.7	<2.7	<2.7	<2.7	10.7J	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	44.2	<2.7	<2.7	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	56.2	<3.1	<3.1	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	44.4	<3.3	<3.3	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	<3.5	<3.5	51.8	2.4J	<3.5	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.3	<5.2	<5.2	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<9.5	<9.5	78.8	<9.5	<9.5	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.8	<4.7	16.6J	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	31.6	<2.7	<2.8	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.2	<2.9	113	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	<2.9	<2.9	4.7J	4.0J	191	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	<3.3	<3.3	5.3J	4.8J	43.0	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>5.2</b>	<b>4.6</b>	<b>4.4</b>	<b>(8.1)</b>	<b>7.5</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	44.3	46.3	43.9	85.3	96.2	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.050J	0.12J	0.070J	0.089J	0.096J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	6.4	7.0	6.9	14.4	13.4	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.013	0.0096	0.019	0.055	0.076	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.26	<0.25	<0.26	<b>5,840</b>	<b>391</b>	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  
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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 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			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	---	---	---	---
<b>No VOCs detected in these samples</b>										
<b>PAHs</b>										
Acenaphthene	ug/kg	<2.7	<2.7	<2.8	<2.7	<2.7	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	<2.8	<2.7	<2.7	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	<3.1	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	<3.3	<3.3	<3.3	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	2.7J	<3.5	3.3J	<3.5	<3.5	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.3	<5.2	<5.2	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<9.5	<9.5	<9.6	<9.5	<9.5	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.8	<4.7	<4.7	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	<2.7	<2.7	<2.7	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	60.0	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	84.8	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	<3.3	<3.3	<3.4	<3.3	16.8J	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>5.2</b>	<b>4.3</b>	<b>5.5</b>	<b>5.7</b>	<b>3.5</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	<b>38.3</b>	<b>88.2</b>	<b>36.6</b>	<b>33.6</b>	<b>46.9</b>	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.20J	0.12J	0.10J	0.13J	0.035J	<b>985</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	6.7	7.0	6.9	8.6	4.9	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.0046J	0.013	0.0086	0.012	0.012	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.25	0.25J	<0.25	<0.25	<0.25	<b>5,840</b>	<b>391</b>	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 RCL			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	---	---	---	---
<b>Detected VOCs</b>										
Benzene	ug/kg	<25	<25	<u>28.8J</u>	<25	<25	<b>7,070</b>	<b>1,600</b>	5.1	---
<b>PAHs</b>										
Acenaphthene	ug/kg	<2.7	<2.7	<2.7	<2.8	<2.9	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	<2.7	<2.7	<2.7	<2.8	29.4	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	29.1	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	<3.3	<3.3	<3.3	<3.3	20.6	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	<3.5	<3.5	<3.5	2.3J	33.1	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.2	<5.2	<5.2	<5.3	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	<9.5	<9.5	<9.5	<9.5	62.5	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<4.7	<4.7	<4.7	<4.7	<4.8	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.7	<2.7	<2.7	14.7J	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<2.9	<2.9	<2.9	<2.9	<2.10	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	<2.9	3.5J	<2.9	<2.9	2.0J	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	<3.3	4.4J	<3.3	<3.3	<3.4	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>3.7</b>	<b>4.5</b>	<b>4.6</b>	<b>3.9</b>	<b>4.6</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	38.3	41.0	33.3	29.2	32.9	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	0.12J	0.073J	0.064J	0.074J	0.050J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	7.1	6.3	6.8	6.2	6.3	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.012	0.010	0.0089	0.010	0.0083	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	<b>5,840</b>	<b>391</b>	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	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	---	---	---	---
<b>No VOCs detected in these samples</b>										
<b>PAHs</b>										
Acenaphthene	ug/kg	<2.8	11.1J	<2.7	<2.8	<2.9	<b>45,200,000</b>	<b>3,590,000</b>	---	---
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	<b>100,000,000</b>	<b>17,900,000</b>	196,949.2	---
Benzo(a)anthracene	ug/kg	16.6J	<2.8	<2.7	<2.8	<2.9	<b>20,800</b>	<b>1,140</b>	---	---
Benzo(a)pyrene	ug/kg	<3.1	<3.1	<3.1	<3.1	<3.2	<b>2,110</b>	<b>115</b>	470	---
Benzo(b)fluoranthene	ug/kg	12.0J	4.2J	<3.3	<3.3	4.1J	<b>21,100</b>	<b>1,150</b>	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	<b>211,000</b>	<b>11,500</b>	---	---
Chrysene	ug/kg	23.4	5.6J	3.2J	3.7J	6.5J	<b>2,110,000</b>	<b>115,000</b>	144.6	---
Dibenz(a,h)anthracene	ug/kg	<5.2	<5.3	<5.2	<5.2	<5.2	<b>2110</b>	<b>115</b>	---	---
Fluoranthene	ug/kg	29.7	<9.5	<9.5	<9.5	<9.5	<b>30,100,000</b>	<b>2,390,000</b>	88,877.8	---
Fluorene	ug/kg	<4.7	35.0	<4.7	<4.7	<4.7	<b>30,100,000</b>	<b>2,390,000</b>	14,829.9	---
Indeno(1,2,3-cd)pyrene	ug/kg	<2.7	<2.8	<2.7	<2.7	<2.7	<b>21,100</b>	<b>1,150</b>	---	---
1-Methylnaphthalene	ug/kg	<2.8	13.5J	<2.9	<2.9	<2.9	<b>72,700</b>	<b>17,600</b>	---	---
2-Methylnaphthalene	ug/kg	4.7J	10.3J	<2.9	<2.9	2.9J	<b>3,010,000</b>	<b>239,000</b>	---	---
Naphthalene	ug/kg	8.3J	24.4	<3.3	<3.3	<3.4	<b>24,100</b>	<b>5,520</b>	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	<b>22,600,000</b>	<b>1,790,000</b>	54,545.2	---
<b>RCRA Metals</b>										
Arsenic	mg/kg	<b>7.2</b>	<b>7.5</b>	<b>6.5</b>	<b>6.3</b>	<b>6.8</b>	<b>3</b>	<b>0.677</b>	0.584	(8)
Barium	mg/kg	75.0	60.6	32.5	29.9	43.8	<b>100,000</b>	<b>15,300</b>	164.8	(364)
Cadmium	mg/kg	<0.1	<0.1	0.12J	<0.1	0.066J	<b>985</b>	<b>71.1</b>	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	<b>100,000</b>	<b>100,000</b>	---	---
Hexavalent Chromium	mg/kg	d	d	d	d	d	<b>6.36</b>	<b>0.301</b>	---	---
Lead	mg/kg	10.5	11.3	10.0	6.0	11.2	<b>800</b>	<b>400</b>	27	(52)
Mercury	mg/kg	0.022	0.024	0.012	0.0069	0.036	<b>3.13</b>	<b>3.13</b>	0.208	---
Selenium	mg/kg	<0.45	<0.45	<0.45	<0.45	<0.45	<b>5,840</b>	<b>391</b>	0.52	---
Silver	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	<b>5,840</b>	<b>391</b>	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  
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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