Information To Build On
Engineering • Consulting • Testing

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 DNRcontact: 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:

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:

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 the notification provided under section 3 and 3.

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	First	MI	Phone Number (include area code)
Vick	Angela	P	(479) 204-2042

Address	City	State	ZIP Code
2001 SE 10th Street	Bentonville	AR	72716

E-mail Angie.Vick@wal-mart.com

Name of Party Receiving Notification:

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

Title	Last Name	First	MI	Phone Number (include area code)
Mr.	Fearnow	Austin		(402) 544-8593

Address	City	State	ZIP Code
1400 Douglas Street	Omaha	NE	68179

Site Name and Source Property Information:

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

Address	City	State	ZIP Code
1200 Davis Avenue (Former)	South Milwaukee	WI	53172

DNR ID # (BRRTS#)	(DATCP) ID #
02-41-556117	

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	First	MI	Phone Number (include area code)
Patterson	Patrick	J	(262) 521-2125

Address	City	State	ZIP Code
821 Corporate Court	Waukesha	WI	53189

E-mail patrick.patterson@psiusa.com

Department Contact:

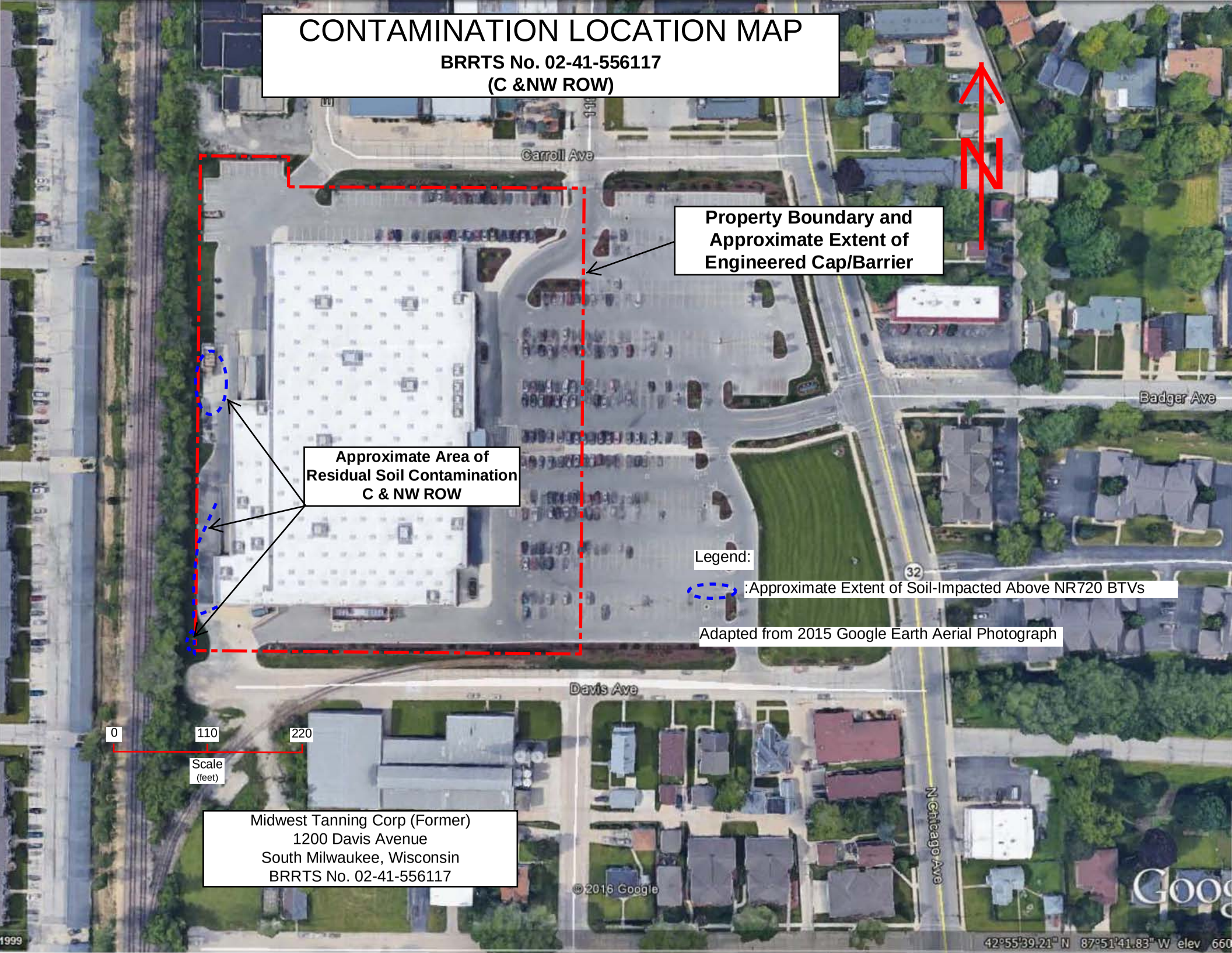
To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

Address	City	State	ZIP Code
2300 N. Dr. Martin Luther King Jr. Drive	Milwaukee	WI	53212

Contact Person Last Name	First	MI	Phone Number (include area code)
Amadi	Eric		(414) 263-8639

E-mail (Firstname.Lastname@wisconsin.gov) eric.amadi@wisconsin.gov


CONTAMINATION LOCATION MAP
BRRTS No. 02-41-556117
(C &NW ROW)
N
Carroll Ave
Badger Ave
Davis Ave
N Chicago Ave
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
0
110
220
Scale (feet)
Midwest Tanning Corp (Former)
1200 Davis Avenue
South Milwaukee, Wisconsin
BRRTS No. 02-41-556117
© 2016 Google
42°55'39.21" N 87°51'41.83" W elev 660

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS

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	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	06/13/01	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
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	**(1,2) 3.3**	NA	**(1,2) 5.6**	NA	NA	**(1,2) 5.7**[MB]
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	**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	<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	**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	**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	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	**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[MS]	NA	<0.046	**0.068**	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	<1.8	NA	<1.8	NA	NA	<1.7[M+]
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	<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[S]	NA	<13[S]	<12[S]	<12[S]	NA	<12[S]	<11[S]	NA	<11[S]	NA	<11[S]	NA	NA	<12[S]	<13[S]	<12[S]	<12[S]	<11[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
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	<300	NA	NA	NA	<290	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	<300	NA	NA	NA	<290	NA	NA	NA	NA	NA	NA	<290	NA	<290	NA	NA	<285
Phenanthrene	µg/kg	1,800	18,000	390,000	NA	NA	<320	NA	NA	NA	NA	NA	NA	<300	NA	NA	NA	<290	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 Paramaters 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 Paramaters 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 analytess)

A.2. SOIL ANALYTICAL RESULTS TABLE
SIGMA - HYGIENETICS

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
METALS	Units	SSL (GW)	NR 720 RCL Table 2 (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	07/19/01	07/19/01	07/19/01
Arsenic	mg/kg	NC	0.039	1.6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	**(1,2) 6.0**	NA	**(1,2) 8.5**	**(1,2) 5.0**	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	**87**	NA	**175**	**60**	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	<0.6	NA	**0.85**	<0.57	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	16,000	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	<5.7	<6.2
Lead	mg/kg	NC	50	500	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	**11**	NA	**19**	**9.6**	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	<0.048	NA	<0.054	<0.045	NA	NA	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	<1.8	NA	<2.0	<1.7	NA	NA	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	<2.4	NA	<2.7	<2.3	NA	NA	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[S]	<23.5[S]	**50.6[a]**	<23.9[S]	<24[S]	<22.9[S]	<23.2[S]	**134[a]**	<22.9[S]	<23.9[S]	<24.9[S]	<23.5[S]	<24.8[S]	NA	<23.2[S]	NA	NA	<22.3[S]	<23.3[S]	<23[S]	<24.4[S]	<22.8[S]	<24[S]	<22.7[S]	<22.9[S]	<24.9[S]
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	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[MS]	NA	NA	NA	NA	NA	NA	NA	<298	NA	**632**	<284	NA	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	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	NA

Notes

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

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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 analytess)

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	5-6	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
VOLATILE ORGANIC COMPOUNDS	Unit	SSL **(3)** GW	SSL **(1)** D.C.-R	NR 746 **(2)** Table 1	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	06/13/01	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/kg	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/kg	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/kg	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/kg	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/kg	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/kg	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/kg	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 Paramaters 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 Paramaters 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

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 **(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	07/19/01	07/19/01	07/19/01
n-Butylbenzene	µg/kg	NC	NC	NS	NA	NA	NA	NA	NA	<5.7	<5.8	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	<5.7	<5.8	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	<5.7	<5.8	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	<5.7	<5.8	NA	NA	NA	NA	NA	NA	<6.0	NA	**726**	<5.7	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	<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	<5.7	<5.8	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	<5.7	**6.8**	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 Paramaters 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 Paramaters 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 1' - 2' 3/15/11	SP-27 1' - 2' 3/15/11	SP-28 1' - 2' 3/15/11	SP-29 1' - 4' 3/14/11	SP-30 1' - 4' 3/14/11	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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**	*1,382.1*	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<10.9	<11.1	165	<25.0	**182,000**	**182,000**		---
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 0' - 4' 3/14/11	SP-32 0' - 4' 3/14/11	SP-33 0' - 4' 3/14/11	SP-34 0' - 4' 3/14/11	SP-35 0' - 4' 3/15/11	SP-36 0' - 4' 3/15/11	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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**	*1,382.1*	---
1,3,5-Trimethylbenzene	ug/kg	<25.0	<25.0	<25.0	<25.0	<11.2	<11.2	**182,000**	**182,000**		---
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 3' - 5' 3/14/11	SP-38 7.5' - 10' 3/14/11	SP-39 3' - 5' 3/14/11	SP-40 3' - 5' 3/15/11	SP-41 3' - 5' 3/15/11	SP-42 3' - 5' 3/15/11	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 0' - 4' 3/19/12	SP-2 0' - 4' 3/19/12	SP-3 0' - 4' 3/19/12	SP-4 0' - 4' 3/19/12	SP-5 0' - 4' 3/19/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 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 0' - 4' 3/19/12	SP-7 0' - 4' 3/23/12	SP-8 0' - 5' 3/19/12	SP-9 0' - 4' 3/22/12	SP-10 2' - 4' 3/22/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 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 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 0' - 4' 3/23/12	SP-12 0' - 2' 3/23/12	SP-13 4' - 6' 3/22/12	SP-14 0' - 4' 3/22/12	SP-15 2' - 4' 3/22/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 4' - 6' 3/19/12	SP-17 6' - 8' 3/19/12	SP-18 0' - 4' 3/22/12	SP-19 0' - 4' 3/22/12	SP-20 0' - 2' 3/23/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 2' - 3' 7/18/12	NSW-2 2' - 3' 7/18/12	NSW-3 2' - 3' 7/18/12	NSW-4 2' - 3' 7/18/12	ESW 2' - 3' 7/18/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 2' - 3' 7/18/12	SSW-2 2' - 3' 7/18/12	SSW-3 2' - 3' 7/18/12	SSW-4 2' - 3' 7/18/12	WSW 2' - 3' 7/18/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 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 4' 7/18/12	BASE-2 4' 7/18/12	BASE-3 4' 7/18/12	BASE-4 4' 7/18/12	BASE-5 4' 7/18/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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 10' - 12' 7/18/12	VSWN 10' - 12' 7/18/12	VSWE 10' - 12' 7/18/12	VSWS 10' - 12' 7/18/12	VBASE 15' 7/18/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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	*28.8J*	<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 6' - 7' 7/23/12	ESP-17 6' - 7' 7/23/12	WSP-17 6' - 7' 7/23/12	SSP-17 6' - 7' 7/23/12	BSP-17 10' 7/23/12	NR 720 RCL DC-I	NR 720 RCL DC-NI	NR 720 RCL GW	NR 720 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