Yang, Chue Yee - DNR

From: Patrick Patterson <patrick.patterson@psiusa.com>
Sent: Wednesday, October 18, 2017 3:46 PM
To: Amadi, Eric A - DNR; Norman, Michele R - DNR
Cc: George Marek; Larry Raether
Subject: Midwest Tanning Parcel BRRTS No. 02-41-556117
Attachments: exterior soil borings.pdf; interior soil borings.pdf; A.2. Soil Analytical Results Table (Sigma - Hygenetics).pdf; A.2. Soil Analytical Results Table.pdf

Hi Eric and Michelle,

In regard to your September 15, 2017 email addressed to George Marek and me pertaining to PSI retraction letters, the following is PSI's data interpretation of the Hygienetics analytical test results that were shown in a soil table prepared by Sigma and included in their Phase II ESA report, dated September 30, 2010, which was sent to the WDNR as part of a previous case closure request, which was subsequently denied by the WDNR in 2010.

"In June 2001, Hygienetics Environmental placed twenty-four (24) soil borings around the exterior of the former Midwest Tanning facility and in other areas of the parcel. Further, in July they placed twenty-nine (29) soil borings within the interior of the former facility. The selected soil samples collected from the exterior borings were tested for VOCs, PAHs and RCRA Metals. In addition, fourteen (14) of these samples were tested for Hexavalent Chromium. The results indicated no detectable Hexavalent Chromium. The selected soil samples collected from the interior borings were also tested for VOCs, PAHs, and RCRA Metals. In addition, twenty-six (26) of these samples were tested for Hexavalent and Trivalent Chromium. The results indicated that all of the Total Chromium concentration detected in each sample was attributable to Trivalent Chromium and no Hexavalent Chromium was present in these samples.

In March 2011, PSI placed sixteen (16) soil borings around the exterior of the former facility and in other areas of the parcel. Numerous PSI borings were placed in the general vicinity of several of the Hygienetics borings. In March 2012, PSI placed twenty (20) soil borings within the interior of the facility and were placed near the locations of the previous Hygienetics interior borings. The selected soil samples collected from the PSI borings at similar sampling intervals as the Hygienetics samples were tested for VOCs, PAHs, and RCRA Metals. These samples were not tested for Hexavalent and Trivalent Chromium. However, the Total Chromium levels detected within the selected samples from the PSI borings were generally at concentrations similar to the Total Chromium concentrations detected in the Hygienetics samples. Figures of the Hygienetics and PSI soil borings for the entire parcel and the interior of the facility are attached. I have also attached tables of the Hygienetics and PSI analytical test results.

Due to these similarities regarding Total Chromium levels and boring locations and that no Hexavalent Chromium was detected in the 40 Hygienetics soil samples, it is PSI's interpretation that the detected Total Chromium concentrations within the PSI soil samples are attributable to Trivalent Chromium and not Hexavalent Chromium."

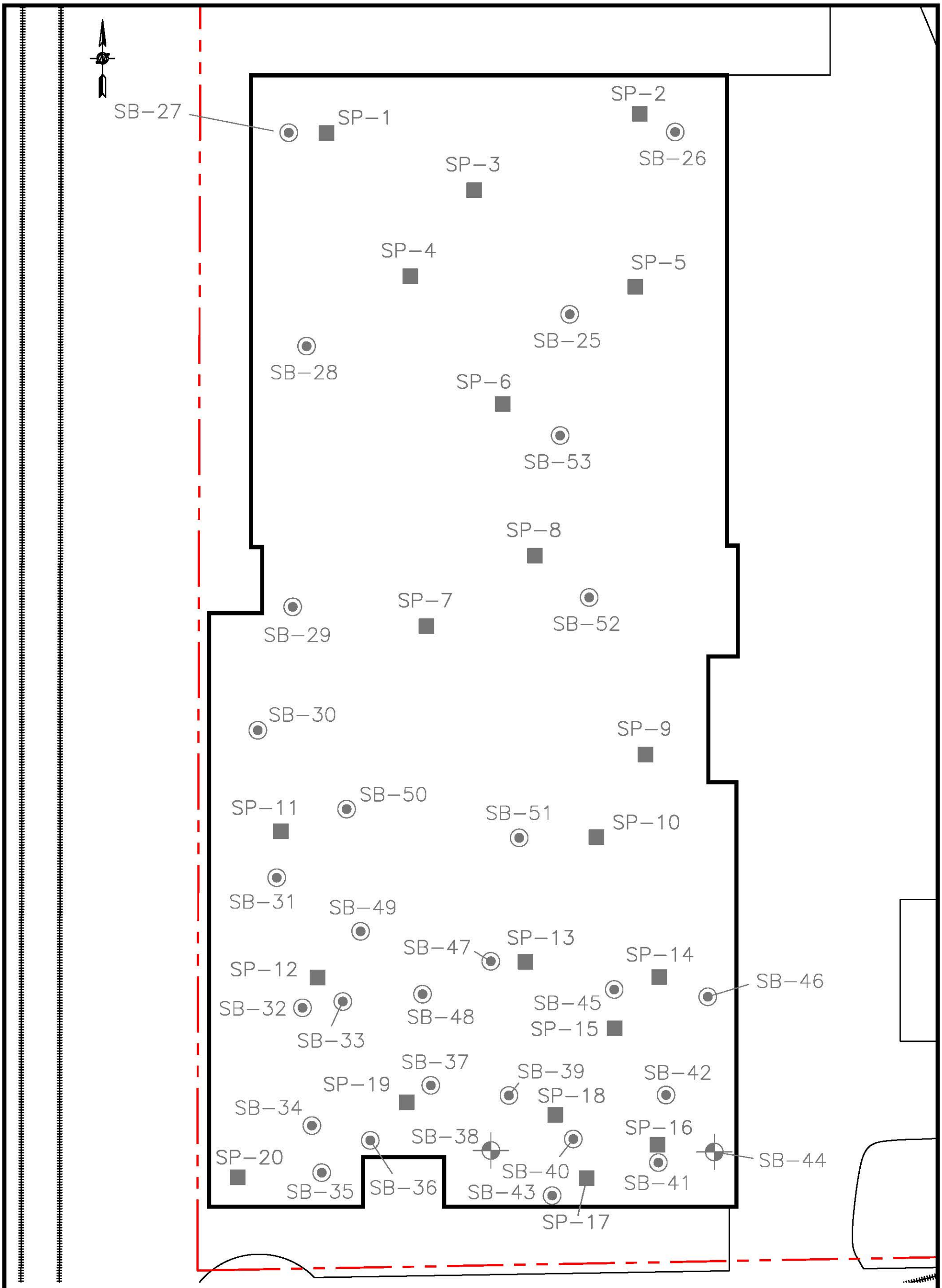
In regard to the Hygienetics laboratory report and chain of custody, no laboratory report or chain of custody for the Hygienetics samples were found in our files. However, the text, boring location plan and analytical table were included in our files and were utilized for our case closure request, which was recently resubmitted to your attention. Let us know if this information satisfies your request and if we can send out the retraction letters to the City of South Milwaukee and the railroad company.

Thanks,
Pat

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

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

---



intertek psi
Total Quality. Assured.

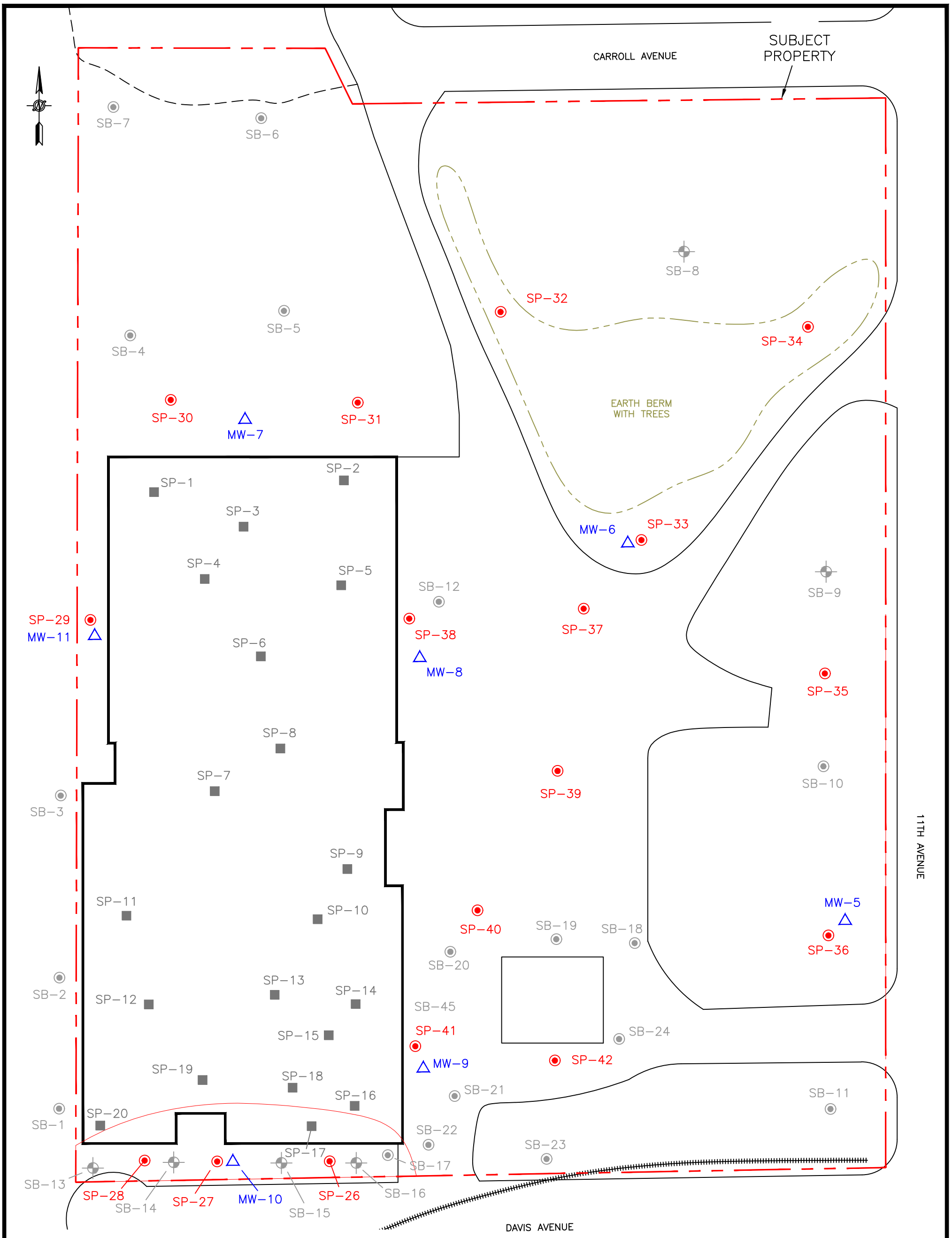
Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 (262) 521-2471 fax

Interior Probe Location Map

Innovations Property
1200 Davis Avenue
South Milwaukee, Wisconsin 53172

Checked:	Scale:	Date:	Figure:
P. Patterson	1" = 30'	Jun 20, 2017	4

Drawn:	Project Number:
C. Moran 0054357-1 2017.dwg	0054357



LEGEND:

- SOIL SAMPLING LOCATION
- MONITORING WELL LOCATION
- INTERIOR PROBE LOCATION
- FORMER SOIL BORING / TEMPORARY WELL SAMPLING LOCATION BY OTHERS
- FORMER SOIL SAMPLING LOCATION BY OTHERS

0' 25' 50'
SCALE: 1" = 50'

ALL LOCATIONS ARE APPROXIMATE

intertek psi
Total Quality. Assured.

Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 (262) 521-2471 fax

Soil Boring / Monitoring Well Location Map

Innovations Property
1200 Davis Avenue
South Milwaukee, Wisconsin 53172

Checked:	Scale:	Date:	Figure:
P. Patterson	1" = 50'	Jan 16, 2017	2

Drawn:	Project Number:
C. Moran 0054357-1 2017.dwg	0054357

CARROLL AVENUE

SUBJECT PROPERTY

EARTH BERM WITH TREES

SP–1
SP–2
SP–3
SP–4
SP–5
SP–6
SP–7
SP–8
SP–9
SP–10
SP–11
SP–12
SP–13
SP–14
SP–15
SP–16
SP–17
SP–18
SP–19
SP–20

11TH AVENUE

DAVIS AVENUE

LEGEND:

- SOIL SAMPLING LOCATION
- MONITORING WELL LOCATION
- INTERIOR PROBE LOCATION
- FORMER SOIL BORING / TEMPORARY WELL SAMPLING LOCATION BY OTHERS
- FORMER SOIL SAMPLING LOCATION BY OTHERS

0' 25' 50'
SCALE: 1" = 50'

ALL LOCATIONS ARE APPROXIMATE

intertek psi
Total Quality. Assured.

Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 (262) 521-2471 fax

Soil Boring / Monitoring Well Location Map

Innovations Property
1200 Davis Avenue
South Milwaukee, Wisconsin 53172

Checked:	Scale:	Date:	Figure:
P. Patterson	1" = 50'	Jan 16, 2017	3

Drawn:	Project Number:
C. Moran 0054357-1 2017.dwg	0054357

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**[MS]
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)	[redacted]																										
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	07/19/01	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[S]**	<23.9[S]	<24[S]	<22.9[S]	<23.2[S]	**134[S]**	<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.

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 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