

**LETTER OF TRANSMITTAL**

TO: Wisconsin Department of Natural Resources  
 Southeast Region Headquarters  
 2300 N Martin Luther King Jr Drive  
 Milwaukee, Wisconsin  
 Attn: Ms. Victoria Stovall

FROM: Name Ryan Eckdale-Dudley  
 Company Symbiont  
 Address 6737 W Washington St 3440  
 West Allis, WI 53214  
 Phone 414-755-1131  
 Date May 7, 2015

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Site Name Former Vogue Cleaners  
 Site Address 2578 Wauwatosa Ave., Wauwatosa, WI  
 BRRTS No. 02-41-56047

Please check the type(s) of documents you have enclosed. Submittals will be tracked and filed based on the information you provide. Be sure to include the FID and BRRTS numbers which have been assigned to the site, and identify the intent of the document(s) you are submitting in order to speed processing.

LUST     ERP     Spill     ACT 453 Purchaser Liability^     ACT 453 Municipal^  
 Other (describe) Contained Out Determination Request

√ Check	Purpose of Document/Report:	DNR Code
	Notification of Release	01^
	Tank Closure/Site Assessment <i>where release(s) have been detected*</i>	33
	Site Investigation Work Plan	35
	Site Investigation Report	
	<input type="checkbox"/> groundwater impacts	37
	<input type="checkbox"/> no groundwater impacts	76^
	Off-Site Determination Request	90
	Remedial Action Plan	39
	Site Specific Clean-Up Goal Proposal	90
	NR 718 Landspreading Request	61
	Copy of Notification to Treat or Dispose of Contaminated Soil or Water	99
	Injection/Infiltration Request	63
	Quarterly Report or Update	43
	O & M Form 4400-194	92
	Remedial Action Report	41
	Closure Review Request	79^
	Simple Site Closure Report <i>using NR 700.11 process</i>	79^
	Copy of Draft Deed Affidavit or Restriction required for close-out	51/52
	Well Abandonment form	99
	PECFA Form 4-B (for completed remediation only)	44
√	Contained Out Determination Request	90/99^

\* "Clean" closures should be sent directly to the DNR Remediation and Redevelopment Program, P.O. Box 7921, Madison, WI 53707; Attn: Ms. Julie Weber

Remarks: Please find a check in the amount of \$700 for technical assistance for the review of a contained out determination request. An electronic copy was also sent to the site's RR Project Manager Ms. Gena Larson.

RECEIVED  
 MAY 13 2015  
 Remediation & Redevelopment

RECEIVED  
 MAY 08 2015  
 BY: JB

**Notice:** Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance or liability clarification for property with known or suspected environmental contamination. A fee may be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

### Definitions

**"Property"** refers to the subject property that is perceived to have been or has been impacted by the discharge of hazardous substances.

**"Liability Clarification"** refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a property, as provided in s. 292.55, Wis. Stats.

**"Technical Assistance"** refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

### Select the Correct Form

**Do not use this form if one of the following applies:**

- Request for an **off-site liability exemption or clarification** for property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s. 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for property where the investigation **and cleanup actions** are completed. Use DNR's Case Summary and Closeout Request Form 4400-202.

**All forms, publications and additional information are available on the internet at: [dnr.wi.gov/topic/Brownfields/Pubs.html](http://dnr.wi.gov/topic/Brownfields/Pubs.html).**

### Instructions

1. Complete Sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance; Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless the property is in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise.
4. Send the completed request and supporting materials to the appropriate DNR regional office where the property is located. See the map on the last page. Contact the DNR project manager or call the phone numbers listed with any questions.

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

## Technical Assistance and Environmental Liability Clarification Request

Form 4400-237 (R 10/13)

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### Section 1. Recipient of the Technical Assistance, Liability Clarification or Agreement from the Department

This is the person who is requesting that his or her liability be clarified or who is seeking technical assistance or a specialized agreement and is identified as the applicant in Section 7. DNR will address its response letter to this person.

Last Name	First	MI	Organization/ Business Name	
Eckdale-Dudley	Ryan		Symbiont	
Mailing Address			City	State
6737 West Washington STE 3440			West Allis	WI
			ZIP Code	53214
Phone # (include area code)	Fax # (include area code)	Email		
(414) 291-8840	(414) 291-8841	ryan.dudley@symbiontonline.com		

The applicant listed above: (select all that apply)

- |  |  |
|--|--|
| <input type="checkbox"/> Is currently the owner  | <input type="checkbox"/> Is considering selling the property   |
| <input type="checkbox"/> Is renting or leasing the property  | <input type="checkbox"/> Is considering acquiring the property |
| <input type="checkbox"/> Has mortgagee interest in the property  |  |
| <input checked="" type="checkbox"/> Other. Explain the status of the property with respect to the applicant: |  |

Environmental Consultant representing owner.

### Contact Information (to be contacted with questions about this request)

Contact Last Name	First	MI	Organization/ Business Name	
Eckdale-Dudley	Ryan		Symbiont	
Mailing Address			City	State
6737 West Washington STE 3440			West Allis	WI
			ZIP Code	53214
Phone # (include area code)	Fax # (include area code)	Email		
(414) 291-8840	(414) 291-8841	ryan.dudley@symbiontonline.com		

### Environmental Consultant (if applicable)

Contact Last Name	First	MI	Organization/ Business Name	
Eckdale-Dudley	Ryan		Symbiont	
Mailing Address			City	State
6737 West Washington STE 3440			West Allis	WI
			ZIP Code	53214
Phone # (include area code)	Fax # (include area code)	Email		
(414) 291-8840	(414) 291-8841	ryan.dudley@symbiontonline.com		

### Attorney (if applicable)

Contact Last Name	First	MI	Organization/ Business Name	
Mailing Address			City	State
			ZIP Code	
Phone # (include area code)	Fax # (include area code)	Email		

### Property Owner (if different from applicant)

Contact Last Name	First	MI	Organization/ Business Name	
			Community Development Authority	
Mailing Address			City	State
7725 West North Ave.			Wauwatosa	WI
			ZIP Code	53213
Phone # (include area code)	Fax # (include area code)	Email		

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Section 2. Property Information				
BRRTS ID No. (if known)	FID No. (if known)	Property Name	Tax Parcel #	
02-41-562047		Former Vogue Cleaners	331079200	
Street Address		City	State	ZIP Code
2578 Wauwatosa Ave		Wauwatosa	WI	53213
County	Municipality where the property is located		Property is composed of:	
Milwaukee	<input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of		<input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels	
			Property Size Acres	
			0	

1. Is a response needed by a specific date? (e.g., property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No  Yes

Reason: Demolition is scheduled to begin on 5/6/2015; soil removal follows

2. Is this property currently enrolled in or undergoing cleanup actions under the Voluntary Party Liability Exemption (VPLE) program?

No. **Include fee that is required for your request in Section 3, 4 or 5.**

Yes. If yes, is the recipient listed above also the voluntary party who is currently reenrolled in the VPLE program at that

No. **Include fee that is listed for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request: Section 3. Technical Assistance; Section 4. Liability Clarification; or Section 5. Specialized Agreement.

### Section 3. Property Information

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) [183] - NR 708.09 - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge or discovery of hazardous substance. Generally, these are one-time spill event.
- Review of Site Investigation Work Plan [135] - NR 716.09 - **Include a fee of \$700.**
- Review of Site Investigation Report [137] - NR 716.15 - **Include a fee of \$1050.**
- Approval of a Site Specific Soil Cleanup Standard [67] - NR 720.19 Reports - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report [143] - NR 722.13 - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report [148] - NR 724.09 - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report [152] - NR 724.15 - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan [25] - NR 724.17 - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan [192] - NR 724.13 - **Include a fee of \$425.**

Other Technical Assistance [97] - s. 292.55, Wis. Stats. (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request below or in an attachment.

Technical Assistance and Environmental  
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Skip Sections 4 and 5 if the technical assistance you are requesting is listed above. Complete Sections 6 and 7 of this form.

**Section 4: Request for Liability Clarification**

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. [Numbers in brackets are for DNR Use]

"Lender" liability exemption clarification [686] - s. 292.21, Wis. Stats.

❖ Include a fee of \$700.

Provide the following documentation:

- (1) ownership status; of the property;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of property acquisition;
- (5) documentation showing how the property was acquired;
- (6) a copy of the property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was not conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:

h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.

i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) [686] - s.292.21, Wis. Stats.

❖ Include a fee of \$700.

Provide the following documentation:

- (1) ownership status of the property;
- (2) the date of property acquisition by the representative;
- (3) the means by which the property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the property; and
- (6) a copy of the property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];

hazardous waste - s.292.24 (2), Wis. Stats. [649]; and/or

solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:

- (1) current and proposed ownership status of the property;
- (2) date and means by which the property was acquired by the LGU, where applicable;
- (3) a map and the ¼, ¼ section location of the property;
- (4) summary of current uses of the property;
- (5) intended or potential use(s) of the property;
- (6) descriptions of other investigations that have taken place on the property; and
- (7) (for solid waste clarifications) a summary of the license history of the facility.

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**Section 4: Request for Liability Clarification (cont.)**

Lease liability clarification [646] - s. 292.55, Wis. Stats.

❖ Include a fee of \$700 for a single property, or \$1400 for multiple properties and the information listed below:

- (1) a copy of the proposed lease;
- (2) the name of the current owner of the property and the person who will lease the property;
- (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the property;
- (4) map(s) showing the property location and any suspected or known sources of contamination detected on the property;
- (5) a description of the intended use of the property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the property; and
- (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the property where a discharge has occurred.

General or other environmental liability clarification [682] - s. 292.55, Wis. Stats. - Explain your request below.

❖ Include a fee of \$700 and an adequate summary of relevant environmental work to date.

No Action Required (NAR) [682] - s. NR 716.05

❖ Include a fee of \$700.

Use where an environmental discharge has or has not occurred, and applicant wants DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" property - s. 292.55, Wis. Stats.

❖ Include a fee of \$700.

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

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Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: [dnr.wi.gov/topic/Brownfields/lgu.html#tabx4](http://dnr.wi.gov/topic/Brownfields/lgu.html#tabx4).

Tax cancellation agreement [654] - s. 75.105(2)(d), Wis. Stats.

❖ Include a fee of \$700, and the information listed below:

- (1) Phase I and II Environmental Site Assessment Reports,
(2) a copy of the property deed with the correct legal description; and,
(3) a draft 75.105 agreement based on the DNR's model (dnr.wi.gov/topic/brownfields/documents/mod75-105agrmt.pdf).

Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

❖ Include a fee of \$700, and the information listed below:

- (1) Phase I and II Environmental Site Assessment Reports,
(2) a copy of the property deed with the correct legal description; and,
(3) a draft 75.105 agreement based on the DNR's model (dnr.wi.gov/topic/brownfields/documents/mod75-106agrmt.pdf).

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

❖ Include a fee of \$1400, and the information listed below:

- (1) a draft schedule for remediation; and,
(2) the name, mailing address, phone and email for each party to the agreement.

Section 6. Other Information Submitted

Identify all materials that are included with this request.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The applicant is responsible for contacting other state agencies to obtain appropriate reports or information.

Phase I Environmental Site Assessment Report - Date: \_\_\_\_\_

Phase II Environmental Site Assessment Report - Date: \_\_\_\_\_

Legal Description of Property (required for all liability requests and specialized agreements)

Map of the property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater  Soil  Sediment  Other medium - Describe: \_\_\_\_\_

Date of Collection: \_\_\_\_\_

A copy of the closure letter and submittal materials

Draft tax cancellation agreement

Draft agreement for assignment of tax foreclosure judgment

Other report(s) or information - Describe: Contained-Out Contaminated Media Determination Request

For property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

Yes - Date (if known): \_\_\_\_\_

No

Note: The Fax Notification for Hazardous Substance Discharge (non-emergency) form is available at:

[dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf](http://dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf).

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**Section 7. Certification by the Person who completed this form**

I am the applicant

I prepared this request for: \_\_\_\_\_  
Applicant Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Signature Ben Eckstein-Dudy

Date Signed 5/4/2015

Title Project Manager

Telephone Number (include area code) 414-291-8840



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## Section 8: DNR Contacts and Addresses for Request Submittals

Send or deliver the completed request, supporting materials, and fee to the region where the property is located. Contact the individual listed with any questions about this form or a specific situation involving contaminated property.

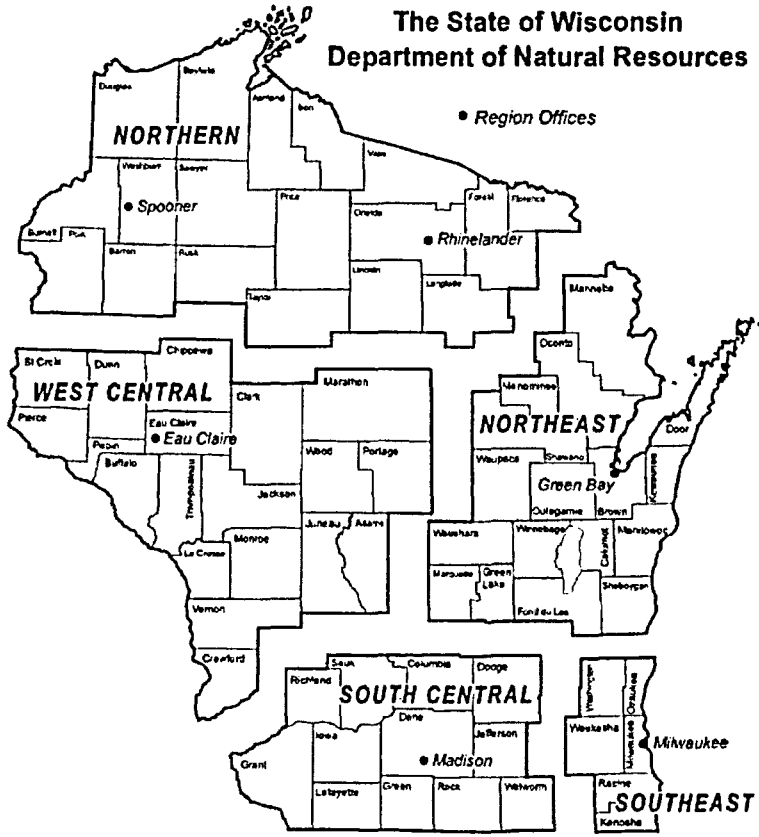
**DNR NORTHERN REGION**  
 Attn: RR Program Assistant  
 Department of Natural Resources  
 223 E Steinfest Rd Antigo, WI 54409  
 Carrie Stoltz (715) 365-8942

**DNR NORTHEAST REGION**  
 Attn: RR Program Assistant  
 Department of Natural Resources  
 2984 Shawano Avenue  
 Green Bay WI 54313  
 Annette Weissbach (920) 662-5165

**DNR SOUTHEAST CENTRAL REGION**  
 Attn: RR Program Assistant  
 Department of Natural Resources  
 3911 Fish Hatchery Road  
 Fitchburg WI 53711  
 Janet DiMaggio (608) 275-3295

**DNR SOUTHWEST REGION**  
 Attn: RR Program Assistant  
 Department of Natural Resources  
 2300 North Martin Luther King Drive  
 Milwaukee WI 53212  
 Margaret Brunette (414) 263-8557

**DNR WEST CENTRAL REGION**  
 Attn: RR Program Assistant  
 Department of Natural Resources  
 1300 Clairemont Ave.  
 Eau Claire WI 54702  
 Loren Brumberg (715) 839-3770



*Note: These are the Remediation & Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.*

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS FID No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		



6737 West Washington Street

414 291 8840

Suite 3440

Fax: 414 291 8841

West Allis, Wisconsin 53214

www.symbiontonline.com

Gena Larson  
Hydrogeologist  
RR Project Manager  
Wisconsin Department of Natural Resources  
P.O. Box 7921  
101 South Webster St  
Madison, WI 53703

May 4, 2015

**RE: Contained-Out Contaminated Media Determination Request  
2578 Wauwatosa Avenue Site- Former Vogue Cleaners  
BRRTS No. 02-41-562047  
Wauwatosa, Wisconsin**

Dear Gena:

On behalf of the City of Wauwatosa we are submitting a "Contained-Out" determination request for contaminated environmental media (soil, asphalt and concrete) that will be generated from the site located at 2578 Wauwatosa, Wisconsin (hereafter referred to as the "Site") during demolition and site restoration efforts that will occur at the Site.

Symbiont completed a Phase I Environmental Site Assessment (ESA) on January 10, 2014 and a Phase II ESA on March 14, 2014 for the Site. These activities were conducted using funding provided through a United States Environmental Protection Agency (USEPA) Community-Wide Brownfield Site Assessment Grant for Hazardous Substances awarded to the City of Wauwatosa from the USEPA (Cooperative Agreement Number BF-00E01045).

According to the Phase I ESA findings, a dry cleaning facility operated at the Site for more than 40 years (1965-2008). Several spills/releases of chlorinated dry cleaning solvents (i.e. trichloroethylene) were documented in Milwaukee County Court records (Case No. 09-CV-13940 and 03-CV-004956). The releases were noted by Mr. Collison, the owner at the time of the release, to have occurred in the basement and around the exterior of the building prior to 1974, the year he purchased the Site. Mr. Collison also stated that a spill occurred in the basement during the time that he operated the dry cleaning facility, but a date for that spill was not noted in the records. The basement floor is in poor condition, and therefore spills may have migrated into the soil below.

The Phase II ESA revealed that several volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) were detected in the soil at concentrations above Wisconsin Department of Natural Resources (WDNR) soil to groundwater contact residual contaminant levels (RCLs) and above WDNR Non-Industrial direct contact RCLs. Several VOCs and PAHs were detected in groundwater at concentrations above the NR 140 Wisconsin Administrative Code (WAC) enforcement standards (ESs). The results of the Phase II ESA are displayed in

attached Table 1 (Detected Constituents in Soil), Table 2 (Detected Constituents in Groundwater), and Figure 4 (Soil Sample Results) from the Phase II ESA report.

Demolition of the building and site restoration are planned to assist in preparing the Site for future development. The project objectives of the demolition and site restoration are as follows:

1. Perform asbestos abatement, building demolition of a 2,346 ft<sup>2</sup> two-story structure, and foundation removal to provide a vacant property free of structures, foundations, and utilities. Note: the northwest portion of the building has a basement.
2. Remove and dispose of all asphalt and concrete on the property.
3. Install a two foot thick clay cap to provide a direct contact cap and prevent infiltration.
4. Restore the Site with topsoil and seeding.

This work will result in approximately 100 cubic yards of excess soil that will require to be taken off-site for disposal in order to achieve the final grading plan with the two foot thick clay cap. This excess soil generated for disposal will come from approximately the existing top two feet of soil. In addition, the parking lot asphalt, the building foundation walls, and the basement floor will be removed from the Site. The final grading plan is shown in Figure 3 (Option 1 Final Grading Plan) from the Site work Bid Specifications.

WDNR's Guidance for Hazardous Waste Remediation (Publication RR-705, dated January 2014) provides guidance for determining if contaminated media is considered a hazardous waste. Wastes are considered hazardous if they are characteristically hazardous and/or are a listed hazardous waste (or contain a listed hazardous waste). The listing of F001, spent halogenated solvents used in degreasing, is a common listing applied to spent solvent from dry cleaning operations. Based on the records reviewed during the Phase I ESA, it appears that recorded spills of chlorinated solvent occurred in the 1970s, prior to November 1980, the date that the listings were promulgated. Because the date of the recorded spills occurred before 1980 and the date of the spill noted by Mr. Collison during his ownership is not known, one could argue that contaminated soil removed from the Site would not contain a listed hazardous waste. The disposal company, however, is requesting formal a "Contained Out" determination because of the possibility that the contaminated media that will be disposed of off-site may contain F001, a listed hazardous waste.

WDNR's guidance lays out the procedure for qualifying for a "Contained Out" determination. Contaminated media will no longer be considered to contain a listed hazardous waste if the concentrations of hazardous constituents that cause the waste to be listed are below the WDNR Industrial RCLs. In addition, for the media to be disposed of off-site as a non-hazardous waste, it must not exhibit the characteristics of a hazardous waste. The soil samples collected during the Phase II were analyzed for total concentrations of VOCs and PAHs. One can multiply the Toxicity

Characteristic Leaching Potential (TCLP) limits by 20 in order to compare total concentrations in a sample to the TCLP limits.

Based on the Phase II ESA sampling, the top four (4) feet of soil exhibited the following characteristics:

Constituent	Concentration Range (mg/kg)	TCLP x 20 (mg/kg)	WDNR Industrial Direct Contact RCLs (mg/kg)
Tetrachloroethene*	<0.025 – 5.97	14	153
Trichloroethene*	<0.025	10	8.8
Vinyl Chloride *	<0.025	4	2

\*Constituents associated with the F001 listing for chlorinated solvents

The laboratory results of the soil samples collected from the top four (4) feet show that the soil does not exhibit hazardous waste characteristics, and can be considered not to contain a F001 listed hazardous waste because the concentrations are below the WDNR Industrial RCLs. Because the top four feet of soil can be classified as non-hazardous waste, the asphalt overlaying the soil should also be able to meet this classification.

There are no plans to remove soil beneath the basement, but the foundation and basement floor is in contact with contaminated soil. Based on the Phase II ESA sampling, the soil under the basement (SB/TW-3 and SB/TW-7) exhibited the following characteristics:

Constituent	Concentration Range (mg/kg)	TCLP x 20 (mg/kg)	WDNR Industrial Direct Contact RCLs (mg/kg)
Tetrachloroethene*	0.037 – 2.0	14	153
Trichloroethene*	<0.025 – 0.0519	10	8.8
Vinyl Chloride *	0.289 – 0.360	4	2

\*Constituents associated with the F001 listing for chlorinated solvents

The laboratory results of the soil samples collected from under the basement floor show that the soil does not exhibit hazardous waste characteristics, and can be considered not to contain a F001 listed hazardous waste because the concentrations are below the WDNR Industrial RCLs. Because the soil under the basement soil can be classified as non-hazardous waste, the concrete foundation and basement floor in contact with the soil should also be able to meet this classification.

Based on the information presented in this letter, we are requesting a "Contained Out" determination for the following contaminated media that will be removed from the Site and disposed off-site in approved landfills:

- 1) Top four feet of soil (only top 2.5 feet will be removed)
- 2) Asphalt
- 3) Foundation walls and basement floor

The contractor is ready to begin the Site work as soon as this request is finalized. We appreciate your immediate attention to this request. Please feel free to contact the undersigned if you have any questions or require anything further.

Sincerely,  
SYMBIONT®



Ryan Eckdale-Dudley, GISP  
Project Manager

C: Jennifer Ferguson, City of Wauwatosa

Table 1  
 Detected Constituents in Soil  
 Phase II ESA  
 2578 Wauwatosa Avenue  
 Wauwatosa, Wisconsin

Constituent	Soil to Groundwater Pathway RCL	Non-Industrial Not-To-Exceed Direct Contact RCL	Basement																	
			SB/TW-1		SB/TW-2			SB/TW-3		SB-4 (1-1.5)			SB/TW-5		SB/TW-6		SB/TW-7		SB/TW-8	
			SB-1 (3-4)	SB-1 (7-8)	SB-2 (2-3)	SB-2 (2-3) FD	SB-2 (7-8)	SB-3 (0-0.5)	SB-3 (3-4)	SB-4 (0-0.75)	SB-4 (1-1.5)	SB-4 (7-8)	SB-5 (3.5-4)	SB-5 (7.5-8)	SB-6 (2.5-3)	SB-6 (10-10.5)	SB-7 (0.5-1.5)	SB-7 (3-4)	SB-8 (3-4)	SB-8 (7.5-8)
1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014	1/30/2014		
Diesel Range Organics (DRO)	NE	NE	NA	NA	NA	NA	NA	<0.93	1.9J	NA	NA	NA	NA	NA	NA	NA	1,050	<0.91	NA	NA
PAHs (ug/kg)																				
1-Methylnaphthalene	NE	15,600	NA	NA	<3.5	<3.6	<3.4	<3.4	<3.4	NA	NA	NA	NA	NA	NA	NA	2,820	<3.3	<3.4	<3.5
2-Methylnaphthalene	NE	229,000	NA	NA	<9.9	<10.1	<9.6	<9.7	<9.6	NA	NA	NA	NA	NA	NA	NA	3,070	<9.4	<9.6	<9.8
Acenaphthene	NE	3,440,000	NA	NA	<9.9	<10.1	<9.6	<9.7	<9.6	NA	NA	NA	NA	NA	NA	NA	455	<9.4	<9.6	<9.8
Acenaphthylene	NE	NE	NA	NA	<9.9	<10.1	<9.6	<9.7	<9.6	NA	NA	NA	NA	NA	NA	NA	116J	<9.4	<9.6	<9.8
Anthracene	196,744.20	17,200,000	NA	NA	<9.9	<10.1	<9.6	<9.7	<9.6	NA	NA	NA	NA	NA	NA	NA	228	<9.4	<9.6	<9.8
Benzo(a)anthracene	NE	148	NA	NA	<9.9	<10.1	<9.6	43.7	<9.6	NA	NA	NA	NA	NA	NA	NA	<102	<9.4	<9.6	<9.8
Benzo(a)pyrene	470	15	NA	NA	<9.9	<3.6	<3.4	61.1	<3.4	NA	NA	NA	NA	NA	NA	NA	<36.2	<9.4	<9.6	<9.8
Benzo(b)fluoranthene	479	148	NA	NA	<9.9	<10.1	<9.6	53	<9.6	NA	NA	NA	NA	NA	NA	NA	<102	<9.4	<9.6	<9.8
Benzo(g,h,i)perylene	NE	NE	NA	NA	<9.9	<10.1	<9.6	38.1	<9.6	NA	NA	NA	NA	NA	NA	NA	<102	<9.4	<9.6	<9.8
Benzo(k)fluoranthene	NE	1,480	NA	NA	<3.5	<3.6	<9.6	62.3	<3.4	NA	NA	NA	NA	NA	NA	NA	<35.8	<3.3	<3.4	<3.4
Chrysene	144.6	14,800	NA	NA	<9.9	<10.1	<9.6	60.7	<9.6	NA	NA	NA	NA	NA	NA	NA	<102	<9.4	<9.6	<9.8
Dibenz(a,h)anthracene	NE	15	NA	NA	<9.9	<10.1	<9.6	12.5J	<9.6	NA	NA	NA	NA	NA	NA	NA	<102	<9.4	<9.6	<9.8
Fluoranthene	88,800	2,290,000	NA	NA	<9.9	<10.1	<9.6	<9.7	<9.6	NA	NA	NA	NA	NA	NA	NA	<102	<9.4	<9.6	<9.8
Fluorene	14,800	2,290,000	NA	NA	<9.9	<10.1	<9.6	<8.9	<9.1	NA	NA	NA	NA	NA	NA	NA	652	<9.4	<8.6	<9.8
Indeno(1,2,3-cd)pyrene	NE	148	NA	NA	<9.9	<10.1	<9.6	32.1	<9.6	NA	NA	NA	NA	NA	NA	NA	<102	<9.4	<9.6	<9.8
Naphthalene	659	5,150	NA	NA	<9.9	<10.1	<9.6	<9.7	<9.6	NA	NA	NA	NA	NA	NA	NA	406	<9.4	<9.6	<9.8
Phenanthrene	NE	NE	NA	NA	<9.9	<10.1	<9.6	10.7J	<9.6	NA	NA	NA	NA	NA	NA	NA	1,540	<9.4	<9.6	<9.8
Pyrene	59,132	1,720,000	NA	NA	<9.9	<10.1	<9.6	58.6	<9.6	NA	NA	NA	NA	NA	NA	NA	190J	<9.4	<9.6	<9.8
VOCs (ug/kg)																				
Ethylbenzene	1,570	7,470	<25	<62.5	<25	<25	<25	135	<25	<25	<25	<25	<25	<312	<30.1	<250	<125	<25	<25	<25
cis-1,2-Dichloroethene	41.2	156,000	<25	<62.5	<25	<25	<25	41.9J	<25	<25	<25	<25	<25	<312	<30.1	<250	350J	1,480	<25	<25
Isopropylbenzene (Cumene)	NE	268,000	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	209	<25	<25	<25
m&p-Xylene	3,940	NE	<50	<125	<50	<50	<50	599	<50	<50	<50	<50	<50	<625	<60.2	<500	<250	<50	<50	<50
Naphthalene	658	5,150	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	1,190	<25	<25	<25
n-Butylbenzene	NE	108,000	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	1,260	<25	<25	<25
n-Propylbenzene	NE	264,000	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	262J	<25	<25	<25
o-Xylene	3,940	434,000	<25	<62.5	<25	<25	<25	197	<25	<25	<25	<25	<25	<25	<30.1	<250	<250	<25	<25	<25
p-Isopropyltoluene	NE	162,000	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<30.1	<250	772	<25	<25	<25
sec-Butylbenzene	NE	145,000	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<30.1	<250	<250	1,130	<25	<25	<25
Tetrachloroethene	4.5	30,700	1,020	17,600	36.6J	<25	<25	37	2,040	37.3J	5,970	1,130	2,820	5,160	76,600	504	66,000	217J	45.5J	79.1
Toluene	1,107	818,000	<25	<62.5	<25	<25	<25	1,370	<25	<25	<25	<25	<25	<312	<30.1	<250	<125	<25	<25	<25
Trichloroethene	3.6	1,260	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	<125	51.9J	<25	<25
1,2,4-Trimethylbenzene	1,382	89,800	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	729	<25	<25	<25
Total Xylenes	3,940	258,000	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	<125	<25	<25	<25
Vinyl chloride	0.07	670	<25	<62.5	<25	<25	<25	<25	<25	<25	<25	<25	<25	<312	<30.1	<250	289J	360	<25	<25

Notes:  
 mg/kg = milligrams per kilogram  
 ug/Kg = microgram per kilogram  
 NA = Not analyzed  
 NE = Not established  
 PAH = Polycyclic Aromatic Hydrocarbons  
 VOC = Volatile Organic Compounds  
 RCL = Residual contaminant level  
 SB = Soil boring  
 J = Estimate concentration above the adjusted method detection limit and below the adjusted reporting limit  
 < = Less than the method detection limit  
 SB- 1 (3-4) = Soil boring location 1; Sample collected 3 to 4 feet below ground surface (bgs)  
 RW-1 (0-3) = Retaining wall soil boring location; Sample collected 0 to 3 feet below ground surface (bgs)

0.1	exceeds soil to groundwater pathway RCL
670	exceeds non-industrial direct contact RCL

Table 1  
 Detected Constituents in Soil  
 Phase II ESA  
 2578 Wauwatosa Avenue  
 Wauwatosa, Wisconsin

Constituent	Soil to Groundwater Pathway RCL	Non-Industrial Not-To-Exceed Direct Contact RCL	RW-1	
			RW-1 (0-3)	RW-1 (3-6)
			7/1/2014	7/1/2014
Diesel Range Organics (DRO)	NE	NE	NA	NA
PAHs (ug/kg)				
1-Methylnaphthalene	NE	15,600	<9.6	<9.2
2-Methylnaphthalene	NE	229,000	7.9 J	<7.0
Acenaphthene	NE	3,440,000	<7.1	<6.8
Acenaphthylene	NE	NE	<5.2	<5.0
Anthracene	196,744.20	17,200,000	<6.6	<6.3
Benzo(a)anthracene	NE	148	44	<5.1
Benzo(a)pyrene	470	15	48	<7.3
Benzo(b)fluoranthene	479	148	77	<8.2
Benzo(g,h,i)perylene	NE	NE	45	<12
Benzo(k)fluoranthene	NE	1,480	35 J	<10
Chrysene	144.6	14,800	63	<10
Dibenz(a,h)anthracene	NE	15	11 J	<7.3
Fluoranthene	88,800	2,290,000	100	<7.0
Fluorene	14,800	2,290,000	<5.5	<5.3
Indeno(1,2,3-cd)pyrene	NE	148	30 J	<9.8
Naphthalene	659	5,150	<6.0	<5.8
Phenanthrene	NE	NE	61	<5.3
Pyrene	59,132	1,720,000	100	<7.5
VOCs (ug/kg)				
Ethylbenzene	1,570	7,470	<9.5	<8.4
cis-1,2-Dichloroethene	41.2	156,000	<9.3	<8.2
Isopropylbenzene (Cumene)	NE	268,000	<19	<17
m&p-Xylene	3,940	NE	NA	NA
Naphthalene	658	5,150	<6.0	<33
n-Butylbenzene	NE	108,000	<9.8	<8.6
n-Propylbenzene	NE	264,000	<13	<12
o-Xylene	3,940	434,000	NA	NA
p-Isopropyltoluene	NE	162,000	<14	<12
sec-Butylbenzene	NE	145,000	<12	<10
Tetrachloroethene	4.5	30,700	1,100	350
Toluene	1,107	818,000	<8.7	<7.7
Trichloroethene	3.6	1,260	<14	<12
1,2,4-Trimethylbenzene	1,382	89,800	<16	<25
Total Xylenes	3,940	258,000	<5.2	<4.6
Vinyl chloride	0.07	670	<7.9	<7.0

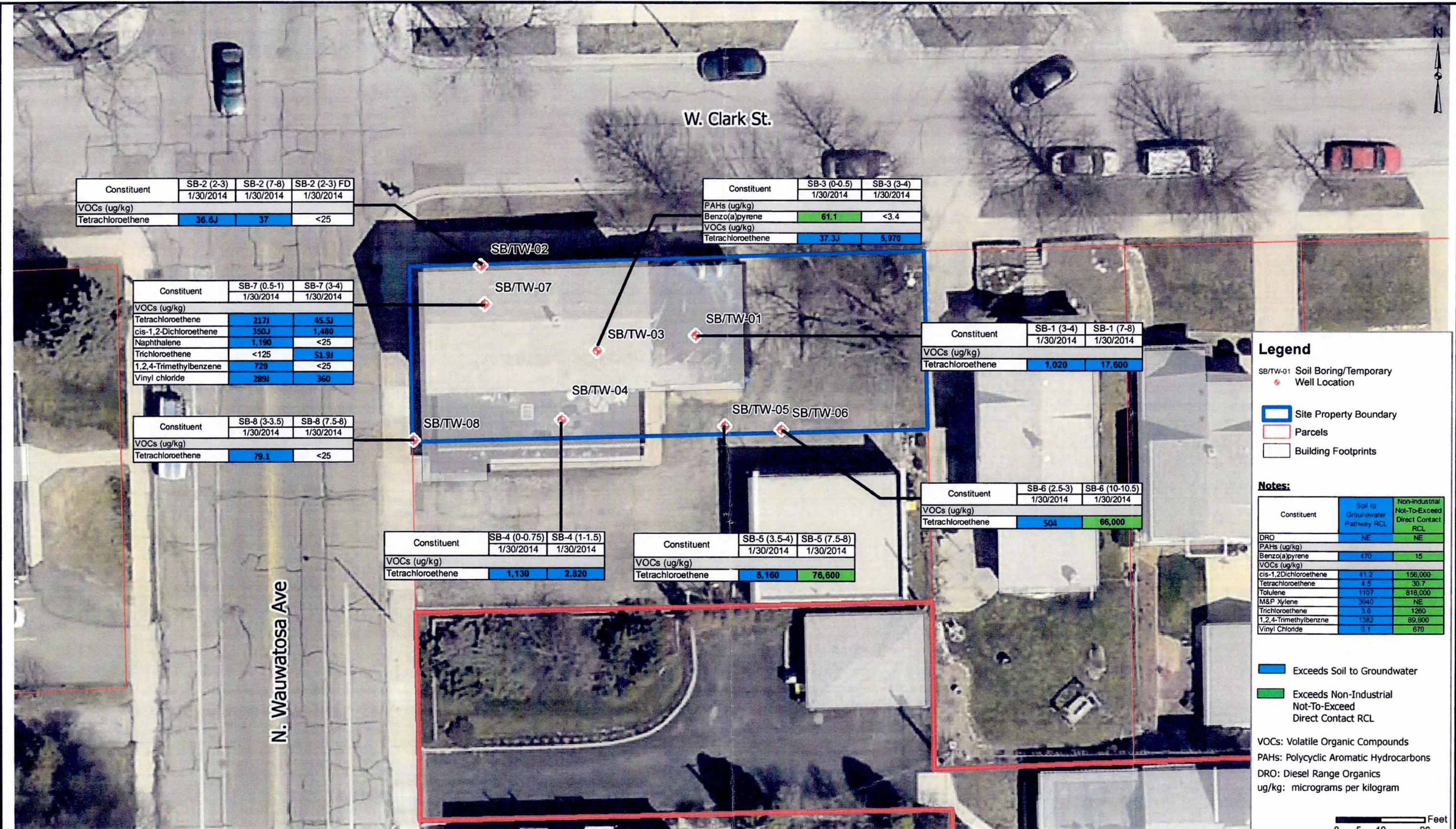
Notes:  
 mg/kg = milligrams per kilogram  
 ug/Kg = microgram per kilogram  
 NA = Not analyzed  
 NE = Not established  
 PAH = Polycyclic Aromatic Hydrocarbons  
 VOC = Volatile Organic Compounds  
 RCL = Residual contaminant level  
 SB = Soil boring  
 J = Estimate concentration above the adjusted method detection limit  
 < = Less than the method detection limit  
 SB- 1 (3-4) = Soil boring location 1; Sample collected 3 to 4 feet below ground surface  
 RW-1 (0-3) = Retaining wall soil boring location; Sample collected 0 to 3 feet below ground surface  
 0.1 exceeds soil to groundwater pathway RCL  
 670 exceeds non-industrial direct contact RCL

Table 2  
 Detected Constituents in Groundwater  
 Phase II ESA  
 2578 Wauwatosa Avenue  
 Wauwatosa, Wisconsin

Constituent	ES	PAL	SB-5/TW-5 (FD)	SB-1/TW-1	SB-2/TW-2	SB-3/TW-3	SB-4/TW-4	SB-5/TW-5	SB-6/TW-6	SB-7/TW-7	SB-8/TW-8	TRIP BLANK
			02/04/2014	02/04/2014	02/04/2014	02/04/2014	02/04/2014	02/04/2014	02/04/2014	02/04/2014	02/04/2014	02/04/2014
PAHs (ug/L)												
1-Methylnaphthalene	NE	NE	0.066	0.10	0.093	0.12	0.16	<0.69	0.040J	257	<0.12	NS
2-Methylnaphthalene	NE	NE	0.10	0.13	0.16	0.2	0.24	<0.67	0.091	275	<0.14	NS
Acenaphthene	NE	NE	0.018 J	0.022 J	0.013J	0.011J	0.018 J	<0.63	0.025J	24.2 J	0.26J	NS
Acenaphthylene	NE	NE	0.0072 J	0.0073 J	0.0073J	<0.0051	0.012 J	<0.52	0.0074J	10.6 J	<0.11	NS
Anthracene	3000	600	0.038 J	0.0082 J	0.025J	0.0091J	0.021 J	1.3 J	0.038J	9.3 J	1.3	NS
Benzo(a)anthracene	NE	NE	0.039 J	0.0067 J	0.0063J	0.017J	0.017 J	6.0	0.13	<3.5	3.1	NS
Benzo(a)pyrene	0.2	0.02	0.042 J	<0.011	0.0070J	0.018J	0.023 J	9.2	0.18	<5.6	2.7	NS
Benzo(b)fluoranthene	0.2	0.02	0.056	0.0085 J	0.011J	0.022J	0.037 J	10.4	0.26	<4.4	3.6	NS
Benzo(g,h,i)perylene	NE	NE	0.040 J	0.011 J	0.014J	0.016J	0.036 J	7.1	0.15	<4.8	2.3	NS
Benzo(k)fluoranthene	NE	NE	0.050 J	<0.012	0.0075J	0.016J	0.029 J	10.7	0.16	<6.1	2.8	NS
Chrysene	0.2	0.02	0.075	0.020 J	0.017J	0.023J	0.028 J	12.5	0.2	<4.3	3.4	NS
Dibenz(a,h)anthracene	NE	NE	0.023 J	<0.0074	<0.013	<0.015	0.014 J	2.4 J	0.048J	<3.9	1.9	NS
Fluoranthene	400	80	0.21	0.014 J	0.017J	0.023J	0.033 J	28.0	0.35	3.7 J	7.6	NS
Fluorene	400	80	0.035 J	0.025 J	0.020J	0.013J	0.043 J	<0.71	0.027J	60.8	0.29J	NS
Indeno(1,2,3-cd)pyrene	NE	NE	0.036 J	<0.0095	0.013J	0.014J	0.033 J	7.0	0.15	<5.1	2.5	NS
Naphthalene	100	10	<2.5	<2.5	0.063	0.081	<2.5	<250	0.015J	<62.5	<0.23	<2.5
Phenanthrene	NE	NE	0.24	0.059	0.067	0.061	0.10	13.0	0.27	132	4.7	NS
Pyrene	250	50	0.16	0.019 J	0.018J	0.023J	0.033 J	19.5	0.31	17.6 J	6.0	NS
VOCs (ug/L)												
1,1,1,2-Tetrachloroethane	70	7	<0.45	<0.45	<0.45	<0.45	<0.45	<45.0	<0.45	<11.3	<0.45	<0.45
1,1,1-Trichloroethane	200	40	<0.44	<0.44	<0.44	<0.44	<0.44	<44.3	0.76 J	<11.1	<0.44	<0.44
1,1,2,2-Tetrachloroethane	0.2	0.02	<0.38	<0.38	<0.38	<0.38	<0.38	<38.4	<0.38	<9.6	<0.38	<0.38
1,1,2-Trichloroethane	5	0.5	<0.39	<0.39	<0.39	<0.39	<0.39	<39.0	<0.39	<9.7	<0.39	<0.39
1,1-Dichloroethane	850	85	<0.28	<0.28	<0.28	<0.28	<0.28	<28.5	<0.28	<7.1	<0.28	<0.28
1,1-Dichloroethene	7	0.7	<0.43	<0.43	<0.43	<0.43	<0.43	<42.7	<0.43	<10.7	<0.43	<0.43
1,1-Dichloropropene	NE	NE	<0.51	<0.51	<0.51	<0.51	<0.51	<50.7	<0.51	<12.7	<0.51	<0.51
1,2,3-Trichlorobenzene	NE	NE	<0.77	<0.77	<0.77	<0.77	<0.77	<76.8	<0.77	<19.2	<0.77	<0.77
1,2,3-Trichloropropane	60	12	<0.47	<0.47	<0.47	<0.47	<0.47	<46.8	<0.47	<11.7	<0.47	<0.47
1,2,4-Trichlorobenzene	70	14	<2.5	<2.5	<2.5	<2.5	<2.5	<250	<2.5	<62.5	<2.5	<2.5
1,2,4-Trimethylbenzene	480	96	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
1,2-Dibromo-3-chloropropane	0.2	0.02	<1.5	<1.5	<1.5	<1.5	<1.5	<150	<1.5	<37.4	<1.5	<1.5
1,2-Dibromoethane (EDB)	0.05	0.005	<0.38	<0.38	<0.38	<0.38	<0.38	<38.1	<0.38	<9.5	<0.38	<0.38
1,2-Dichlorobenzene	600	60	<0.44	<0.44	<0.44	<0.44	<0.44	<43.9	<0.44	<11.0	<0.44	<0.44
1,2-Dichloroethane	5	0.5	<0.48	<0.48	<0.48	<0.48	<0.48	<47.6	<0.48	<11.9	<0.48	<0.48
1,2-Dichloropropane	5	0.5	<0.50	<0.50	<0.50	<0.50	<0.50	<49.8	<0.50	<12.5	<0.50	<0.50
1,3,5-Trimethylbenzene	480	96	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
1,3-Dichlorobenzene	600	120	<0.45	<0.45	<0.45	<0.45	<0.45	<45.1	<0.45	<11.3	<0.45	<0.45
1,3-Dichloropropane	NE	NE	<0.46	<0.46	<0.46	<0.46	<0.46	<46.3	<0.46	<11.6	<0.46	<0.46
1,4-Dichlorobenzene	75	15	<0.43	<0.43	<0.43	<0.43	<0.43	<43.4	<0.43	<10.9	<0.43	<0.43
2,2-Dichloropropane	NE	NE	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
2-Chlorotoluene	NE	NE	<0.48	<0.48	<0.48	<0.48	<0.48	<47.7	<0.48	<11.9	<0.48	<0.48
4-Chlorotoluene	NE	NE	<0.48	<0.48	<0.48	<0.48	<0.48	<48.4	<0.48	<12.1	<0.48	<0.48
Benzene	5	0.5	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
Bromobenzene	NE	NE	<0.48	<0.48	<0.48	<0.48	<0.48	<48.4	<0.48	<12.1	<0.48	<0.48
Bromochloromethane	NE	NE	<0.49	<0.49	<0.49	<0.49	<0.49	<49.2	<0.49	<12.3	<0.49	<0.49
Bromodichloromethane	0.6	0.06	<0.45	<0.45	<0.45	<0.45	<0.45	<45.3	<0.45	<11.3	<0.45	<0.45
Bromoform	4.4	0.44	<0.33	<0.33	<0.33	<0.33	<0.33	<32.7	<0.33	<8.2	<0.33	<0.33
Bromomethane	10	1	<0.43	<0.43	<0.43	<0.43	<0.43	<43.0	<0.43	<10.7	<0.43	<0.43
Carbon tetrachloride	5	0.5	<0.37	<0.37	<0.37	<0.37	<0.37	<36.5	<0.37	<9.1	<0.37	<0.37
Chlorobenzene	100	20	0.37 J	<0.36	<0.36	<0.36	<0.36	<35.8	0.53 J	<9.0	<0.36	<0.36
Chloroethane	400	80	<0.44	<0.44	<0.44	<0.44	<0.44	<44.4	<0.44	<11.1	<0.44	<0.44
Chloroform	6	0.6	<0.69	<0.69	<0.69	<0.69	<0.69	<68.9	<0.69	<17.2	<0.69	<0.69
Chloromethane	30	3	0.49 J	2.0	1.3	1.4	1.6	<38.8	0.61 J	<9.7	0.90 J	<0.39
Dibromochloromethane	60	6	<1.9	<1.9	<1.9	<1.9	<1.9	<190	<1.9	<47.4	<1.9	<1.9
Dibromomethane	NE	NE	<0.48	<0.48	<0.48	<0.48	<0.48	<48.0	<0.48	<12.0	<0.48	<0.48
Dichlorodifluoromethane	1000	200	<0.40	<0.40	<0.40	<0.40	<0.40	<40.1	<0.40	<10.0	<0.40	<0.40
Diisopropyl ether	NE	NE	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
Ethylbenzene	700	140	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
Hexachloro-1,3-butadiene	NE	NE	<1.3	<1.3	<1.3	<1.3	<1.3	<126	<1.3	<31.4	<1.3	<1.3
Isopropylbenzene (Cumene)	NE	NE	<0.34	<0.34	<0.34	<0.34	<0.34	<34.1	<0.34	<8.5	<0.34	<0.34
Methyl-tert-butyl ether	60	12	<0.49	<0.49	<0.49	<0.49	<0.49	<49.4	<0.49	<12.3	<0.49	<0.49
Methylene Chloride	5	0.5	<0.36	<0.36	<0.36	<0.36	<0.36	<35.9	<0.36	<9.0	<0.36	<0.36
Styrene	100	10	<0.35	<0.35	<0.35	<0.35	<0.35	<35.0	<0.35	<8.7	<0.35	<0.35
Tetrachloroethene	5	0.5	10900	25.2	0.66 J	12.7	4.3	9800	7600	<11.8	0.57 J	<0.47
Toluene	800	160	0.50 J	1.0 J	<0.44	3.4	0.53 J	<43.9	<0.44	<11.0	<0.44	<0.44
Trichloroethene	5	0.5	11.8	<0.36	<0.36	<0.36	<0.36	<36.4	11.7	<9.1	<0.36	<0.36
Trichlorofluoromethane	3496	696	<0.48	<0.48	<0.48	<0.48	<0.48	<47.7	<0.48	<11.9	<0.48	<0.48
Vinyl chloride	0.2	0.02	<0.18	<0.18	<0.18	<0.18	<0.18	<18.5	<0.18	1450	<0.18	<0.18
cis-1,2-Dichloroethene	70	7	1.4	<0.42	<0.42	<0.42	<0.42	<41.9	1.1	511	<0.42	<0.42
cis-1,3-Dichloropropene	0.4	0.04	<0.29	<0.29	<0.29	<0.29	<0.29	<29.0	<0.29	<7.3	<0.29	<0.29
m&p-Xylene	NE	NE	<0.82	<0.82	<0.82	<0.82	<0.82	<81.7	<0.82	<20.4	<0.82	<0.82
n-Butylbenzene	NE	NE	<0.40	<0.40	<0.40	<0.40	<0.40	<40.0	<0.40	<10.0	<0.40	<0.40
n-Propylbenzene	NE	NE	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
o-Xylene	NE	NE	<0.50	<0.50	<0.50	<0.50	<0.50	<50.0	<0.50	<12.5	<0.50	<0.50
p-Isopropyltoluene	NE	NE	<0.40	<0.40	<0.40	<0.40	<0.40	<39.7	<0.40	<9.9	<0.40	<0.40
sec-Butylbenzene	NE	NE	<0.60	<0.60	<0.60	<0.60	<0.60	<60.5	<0.60	<15.1	<0.60	<0.60
tert-Butylbenzene	NE	NE	<0.42	<0.42	<0.42	<0.42	<0.42	<42.4	<0.42	<10.6	<0.42	<0.42
trans-1,2-Dichloroethene	100	20	<0.37	<0.37	<0.37	<0.37	<0.37	<37.1	<0.37	<9.3	<0.37	<0.37
trans-1,3-Dichloropropene	0.4	0.04	<0.30	<0.30	<0.30	<0.30	<0.30	<30.3	<0.30	<7.6	<0.30	<0.30



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Constituent	SB-2 (2-3)	SB-2 (7-8)	SB-2 (2-3) FD
	1/30/2014	1/30/2014	1/30/2014
VOCs (ug/kg)			
Tetrachloroethene	36.6J	37	<25

Constituent	SB-3 (0-0.5)	SB-3 (3-4)
	1/30/2014	1/30/2014
PAHs (ug/kg)		
Benzo(a)pyrene	61.1	<3.4
VOCs (ug/kg)		
Tetrachloroethene	37.3J	5,970

Constituent	SB-7 (0.5-1)	SB-7 (3-4)
	1/30/2014	1/30/2014
VOCs (ug/kg)		
Tetrachloroethene	217J	45.5J
cis-1,2-Dichloroethene	350J	1,480
Naphthalene	1,190	<25
Trichloroethene	<125	51.9J
1,2,4-Trimethylbenzene	729	<25
Vinyl chloride	289J	360

Constituent	SB-1 (3-4)	SB-1 (7-8)
	1/30/2014	1/30/2014
VOCs (ug/kg)		
Tetrachloroethene	1,020	17,600

Constituent	SB-8 (3-3.5)	SB-8 (7.5-8)
	1/30/2014	1/30/2014
VOCs (ug/kg)		
Tetrachloroethene	79.1	<25

Constituent	SB-4 (0-0.75)	SB-4 (1-1.5)
	1/30/2014	1/30/2014
VOCs (ug/kg)		
Tetrachloroethene	1,130	2,820

Constituent	SB-5 (3.5-4)	SB-5 (7.5-8)
	1/30/2014	1/30/2014
VOCs (ug/kg)		
Tetrachloroethene	5,160	76,600

Constituent	SB-6 (2.5-3)	SB-6 (10-10.5)
	1/30/2014	1/30/2014
VOCs (ug/kg)		
Tetrachloroethene	504	66,000

**Legend**

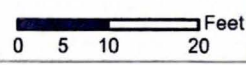
- SB/TW-01 Soil Boring/Temporary Well Location
- Site Property Boundary
- Parcels
- Building Footprints

**Notes:**

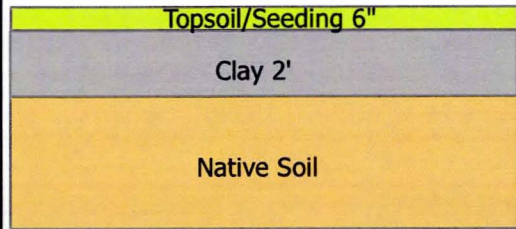
Constituent	Soil to Groundwater Pathway RCL	Non-Industrial Not-To-Exceed Direct Contact RCL
DRO	NE	NE
PAHs (ug/kg)		
Benzo(a)pyrene	470	15
VOCs (ug/kg)		
cis-1,2-Dichloroethene	41.2	156,000
Tetrachloroethene	4.5	30.7
Toluene	1107	818,000
M&P Xylene	3640	NE
Trichloroethene	3.6	1260
1,2,4-Trimethylbenzene	1382	89,800
Vinyl Chloride	0.1	670

- Exceeds Soil to Groundwater
- Exceeds Non-Industrial Not-To-Exceed Direct Contact RCL

VOCs: Volatile Organic Compounds  
 PAHs: Polycyclic Aromatic Hydrocarbons  
 DRO: Diesel Range Organics  
 ug/kg: micrograms per kilogram



Typical Groundfill Cross-Section  
(Not to Scale)



**Legend**

- Contours
- Asphalt Area
- 2578 Wauwatosa Ave.
- Parcels
- Building

0 5 10 20 Feet

Path: G:\Projects\Wauwatosa, City of\W121218\MXD\2578 Wauwatosa\Fig3\_FinalGradingPlan.mxd

6737 West Washington Street  
Suite 3440  
West Allis, Wisconsin 53214  
414.291.8840  
FAX 414.291.8841

- WASTEWATER TREATMENT/CONVEYANCE
- FACILITIES ENGINEERING
- ENVIRONMENTAL MANAGEMENT
- AIR QUALITY
- DESIGN/BUILD CONSTRUCTION MANAGEMENT
- INVESTIGATION, REMEDIATION, AND SITE CLOSURE
- HEALTH CARE FACILITIES DESIGN
- WATER SUPPLY AND DISTRIBUTION
- SOLID AND HAZARDOUS WASTE MANAGEMENT
- PROCESS ENGINEERING
- WATER RESOURCES PLANNING/DESIGN
- STORM WATER MANAGEMENT
- GIS SERVICES
- BROWNFIELDS

DSGN:	KE	CHK:	RED
DR:	KE	APVD:	RED

**CITY OF WAUWATOSA  
2578 N WAUWATOSA AVE  
DEMOLITION**

**FIGURE 3  
FINAL GRADING PLAN**

SCALE	1 inch = 10 feet
DWG	03
DATE	JULY 2014
PROJ NO.	W121218