

**LETTER OF TRANSMITTAL**

To: Ms. Nancy Ryan  
 C/o Chue Yee Yang - Env. Program Associate  
 Wisconsin Department of Natural Resources  
 2300 N. Dr. Martin Luther King, Jr. Drive  
 Milwaukee, WI 53212-3128

From: Cory Katzban P.E.  
 The Sigma Group, Inc.  
 1300 W. Canal Street  
 Milwaukee, WI 53233

Please check the type(s) of documents you have enclosed. Submittals will be tracked and filed based on the information you provide. **Include the FID and BRRTS numbers which have been assigned to this site, and identify the intent of the document(s) you are submitting in order to speed processing.** Please attach any required fees to this checklist.

Date: April 11, 2018  
 Site Name: BMO Downtown Campus Parking Structure  
 Address: 790 N. Water Street (current) 778 N. Water Street (former)  
Milwaukee, WI 53202  
 FID# 341288970  
 BRRTS # 02-41-579828

<b>IS THIS RELEASE PECFA-ELIGIBLE?</b>		
<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> UNKNOWN AT THIS TIME

**Type of Submittal:**  
 LUST     ERP     VPLE     OTHER

CHECK	Agreements	FEE
	Tax assignment agreement - ss.75.106(2)(d) & 292.55	\$700
	Tax cancellation agreement - ss. 75.106(2)(d) & 292.55	\$700
	Negotiated agreements - s. 292.11(7)(d)2	\$1,400
	<b>Technical Assistance (s. 292.55)</b>	<b>FEE</b>
	NR 708 No Further Action Letter	\$350
	NR 716 No Further Investigation	\$700
	NR 716 Site Investigation Workplan	\$700
	NR 716 Site Investigation Report	\$1,050
	NR 720 Soil Cleanup Standards/Reports	\$1,050
	NR 722 Remedial Action Options Report	\$1,050
	NR 724 Remedial Design Report	\$1,050
	NR 724 Operation and Maintenance Report	\$425
	NR 724 Construction Documentation Reports	\$350
	NR 724 Long-Term Monitoring Plan	\$425
	NR 726 Case Closure Action	\$1,050
	NR 506 Exemption for building on a historic waste site	\$700
	Other Technical Assistance	\$700
	<b>Liability Clarification Letters</b>	<b>FEE</b>
	s. 292.13(3) Off-Site Exemption Letters	\$700
	s. 292.55 Lease Letters - Single Properties	\$700
	s. 292.55 Lease Letters - Multiple Properties	\$1,400
	s. 292.55 General Liability Clarification Letters	\$700
	s. 292.21(1)(c)1.d. Lender Assessments	\$700
	<b>Department Database Fees (ss. 292.12 and 292.57)</b>	<b>FEE</b>
	Sites with groundwater contamination that attains or exceeds ch. NR 140	\$350
	Sites with soil contamination that attains or exceeds ch. 720 RCLs	\$300
	Sites not otherwise addressed in this schedule, where the department imposes any other limitation or condition in accordance with s. 292.12(2)	\$350
	Cases submitted for closure with monitoring wells not properly abandoned, without residual groundwater contamination	\$350
	Modification or removal of a site or property from the database	\$1,050
	<b>Other / Miscellaneous</b>	
<b>X</b>	NR 718.12 Contaminated Soil Management Request	

Remarks: **\$700 check from Sigma enclosed for review fee**

April 11, 2018

Sigma Reference #16722

Ms. Nancy Ryan  
c/o Mr. Chue Yang  
Wisconsin Dept. of Natural Resources  
2300 N. Dr. Martin Luther King, Jr. Drive  
Milwaukee, WI 53121

**RE: NR 718.12 Contaminated Soil Management Request**  
**Generating Site: BMO Downtown Campus Parking Structure**  
**BRRTS No. 02-41-579828 FID: 341288970**  
**Receiving Site: Milwaukee Solvay Coke & Gas-Manufactured Gas Plant Site**  
**BRRTS No. 02-41-466662 FID: 241219880**

Dear Ms. Ryan:

On behalf of Broadway Tierra Partners, LLC the Owner of the property located at 790 N. Water Street in Milwaukee, Wisconsin, The Sigma Group, Inc. (Sigma) has prepared this letter to request Wisconsin Department of Natural Resources (WDNR) approval to manage low level impacted soil at the Solvay Coke & Gas site (the "Solvay site", BRRTS No. 02-41-466662). Soil will be generated at the BMO Downtown Campus Parking Structure site (the "site", BRRTS 02-41-579828) and placed at the Solvay site during excavation activities associated with redevelopment of the site. Site specific information for the proposed soil management is included in the attached document, which follows the recommended format for exemption requests to Wisconsin Administrative Code NR 718.12. Soil excavation activities have commenced as of March 6, 2018 and the proposed soil will be placed at the Solvay site under the regulations provided in WDNR Ch. NR 502.05(3)(j) and other referenced codes in NR 502.04 until approval of this NR 718 request. Upon approval, the soil will be used as soil cap material at the Solvay site. We understand the WDNR is aware of the extensive site investigation and remediation activities at the Solvay site. Soil from the site proposed for use at the Solvay site poses no risk to human health or the environment.

A check for \$700 has been included for the appropriate review fee.

We appreciate your prompt attention to this request and feel free to call us at 414-643-4200 with questions.

Sincerely,

**THE SIGMA GROUP, INC.**



Cory Katzban, P.E.  
Project Engineer



Joshua J. Neudorfer  
Senior Consultant

Cc: Mr. Tim Gasperetti – Irgens (via [TGasperetti@irgens.com](mailto:TGasperetti@irgens.com))  
Mr. Robert Paulson - Wisconsin Gas LLC (via [Robert.Paulson@we-energies.com](mailto:Robert.Paulson@we-energies.com))



## Remediation and Redevelopment Program

April 2017

# Recommended Format for Exemption Request

## Wis. Admin. Code § NR 718.12 or § NR 718.15

### Purpose

The purpose of this document is to provide a consistent format for consultants and responsible parties to demonstrate that the proposed management of solid waste material qualifies for a Wis. Admin. Code §§ NR 718.12 or NR 718.15 exemption and to request written approval of the exemption request. This document may be included as part of a Remedial Action Plan or Post Closure Modification Request, or can be submitted by itself depending on the activities conducted at the site. Using this recommended format will likely result in a faster DNR review. At a minimum, all exemption requests must satisfy the requirements of a soil management plan as outlined in Wis. Admin. Code § 718.12(2)(b).

### Introduction

Soil and other solid waste generated from a response action site as part of an interim or remedial action may be managed at a site or facility that is not an operating licensed landfill if a Wis. Admin. Code §§ NR 718.12 or NR 718.15 exemption is obtained from the Department of Natural Resources (DNR). The site or facility where material will be managed (the receiving property) would be exempted from the Waste and Materials Management Program requirements established in Wis. Stat. § 289 and Wis. Admin. Code §§ NR 500 to NR 538. The “receiving property” may be the same site or facility where the solid waste was generated from, or it may be a different site or facility. An exemption through Wis. Admin. Code § NR 718.12 can be granted when soil is being managed as part of an interim action under Wis. Admin. Code § NR 708 or a remedial action under Wis. Admin. Code § NR 722. An exemption through Wis. Admin. Code § NR 718.15 can be granted when other solid waste material is managed as part of an interim or remedial action on the site from which it was generated. Managing solid waste material with either exemption requires prior written approval from the DNR.

If this exemption request involves contaminated material impacted by a discharge that has not been reported to the DNR, a ‘Notification for Hazardous Substance Discharge (non-emergency)’ form must be completed and submitted immediately as required by Wis. Admin. Code

§ NR 706. This form is located at <http://dnr.wi.gov/files/pdf/forms/4400/4400-225.pdf>.

This form is not intended to be used for immediate actions under Wis. Admin. Code § NR 708 as prior DNR approval is typically not required. Immediate actions do not require prior DNR approval if the requirements of Wis. Admin. Code § NR 718.12(1) are met, contaminant concentrations do not exceed Wis. Admin. Code § NR 720 soil residual contaminant levels, and the quantity of material managed is less than 100 cubic yards total.

Exemptions for projects involving large-scale disposal or requiring items such as a liner system, leachate treatment and an engineered cap, or projects proposing to place the material below the groundwater table, should not be requested using this format. Check with DNR staff before submitting such a proposal.

### Document Instructions

Complete all sections of this document as instructed. Some portions of the document may be filled in directly as indicated, other responses will need to be completed separately and attached. Fully explain why any uncompleted section is not relevant. Submit one hardcopy and one electronic copy of the completed document and all required attachments and fees to the DNR project manager responsible for the site where the waste will be excavated. The request may be submitted to the regional environmental program associate (EPA) if a project manager has not been assigned to this case. A list of EPAs can be found here: <http://dnr.wi.gov/topic/Brownfields/Contact.html>.

## Section 1 – General Information and Fees

Identify the purpose of the exemption by checking each box that applies:

- Manage contaminated soil on the same response action site from which it was generated (§ NR 718.12).  
 Manage contaminated soil at a site or facility that is different from the response action site from which it was generated (§ NR 718.12).  
 Manage other solid waste at the same site from which it was generated (§ NR 718.15).

If none of the above boxes are checked, the proposed waste management activity cannot be exempted through Wis. Admin. Code § NR 718. Management of waste material from a site other than a response action site may be allowed after obtaining a “low hazard exemption” from the DNR Waste and Material Management Program. Guidance on a ‘low hazard exemption’ request is located: <http://dnr.wi.gov/files/PDF/pubs/wa/wa1645.pdf>.

Identify the applicable Wis. Admin. Code § NR 749 DNR review fees for this submittal by checking the applicable “On-Site Management Fee.” If material will be managed at a site or facility other than where it was generated, also select the appropriate “Off-Site Management Fee.” Record the combined fee sums in the space provided below.

NR 749 Fees for Requesting Wis. Admin. Code §§ NR 718.12 Soil or NR 718.15 Exemption			
Soil or Waste Managed on the Generating Property			
Action	Action Fee	WRRD Fee	On-Site MGMT Fee
<b>Interim Actions</b> per NR 708.11, with SMP and CO applied at other site/facility	\$700	No fee	<input type="checkbox"/> \$700
<b>Remedial Action Plan</b> approval, with SMP, without residual soil CO	\$1050	No fee	<input type="checkbox"/> \$1050
<b>Remedial Action Plan</b> approval, with SMP, with residual soil CO	\$1050	\$300	<input type="checkbox"/> \$1350
<b>SMP</b> submitted separately from a RAP or CO modification, without residual soil CO	\$700	No fee	<input type="checkbox"/> \$700
<b>SMP</b> submitted separately from a RAP or CO modification, with residual soil CO	\$700	\$300	<input type="checkbox"/> \$1000
<b>Closed Sites:</b> CO modification action, with SMP, without residual soil CO	\$1050	No fee	<input type="checkbox"/> \$1000
<b>Closed Sites:</b> CO modification action, with SMP, with residual soil CO	\$1050	\$300	<input type="checkbox"/> \$1350
Soil Managed on a Site or Facility other than the Generating Property			
Action	Action Fee	WRRD Fee	Off-Site MGMT Fee
<b>Interim Actions</b> per NR 708.11, with SMP and CO applied at other site/facility	\$700	\$350	<input type="checkbox"/> \$1050
<b>Interim Actions</b> per NR 708.11, with SMP and no CO applied at other site/facility	\$700	No fee	<input checked="" type="checkbox"/> \$700
<b>All other Actions</b> (Remedial actions, modifications to CO, etc.) with residual soil CO	\$700	\$300	<input type="checkbox"/> \$1000
<b>All other Actions</b> (Remedial actions, post closure modifications, etc.) with no residual soil CO	\$700	No fee	<input type="checkbox"/> \$700
<b>Total of On-Site Management Fee and Off-Site Management Fee</b>			<b>\$ 700</b>
<b>Other:</b> If the request does not conform to one of the options above, summarize the request below and the fee that is being paid:			
1) <b>SMP</b> – A Soil Management Plan submitted in accordance with NR 718.12 (1) and (2) or NR 718.15. 2) <b>“With residual soil CO”</b> - site will have a residual soil continuing obligation (e.g. engineering control, cap, or cover) applied at the source property at the end of the applicable action; remedial action approval, or approval by an addendum to the closure letter. 3) <b>“Without residual soil CO”</b> - site that will not have a residual soil continuing obligation applied at the source property at the end of the applicable action. 4) <b>WRRD</b> – Wisconsin Remediation and Redevelopment Database			

## Section 2 –Property and Contact Information

Fill in all applicable portions of this section.

A. Information About the Site or Facility From Which Material is Proposed to be Excavated – Complete all applicable boxes					
<b>BRRTS No.</b> BRRTs No. 02-41-579828			<b>BRRTS Activity (Site) Name</b> BMO Downtown Campus Parking Structure		
<b>Response Action Site Address</b> 778 N. Water Street (BRRTS listed address) 790 N. Water Street (current address)			<b>VPLE No.</b> N/A		
<b>City</b> Milwaukee			<b>Parcel ID No.</b> 392-2992-000 CSM No. 8910, Lot 2		
<b>State</b> Wisconsin			<b>FID No.</b> FID341288970		
<b>County</b> Milwaukee			<b>Zip Code</b> 53212		
<b>WTM Coordinates</b>			<b>WTM <input checked="" type="checkbox"/> Coordinates Represent <input type="checkbox"/></b>		
<b>X:</b> 690352		<b>Y:</b> 287483		<b>Source Area                      Parcel Center                      X</b>	
SE ¼	NE ¼	<b>Sec:</b> 29	<b>T:</b> 07 N	<b>R:</b> 22	<b>E/W:</b> E
<b>Latitude:</b> 43.04094			<b>Longitude:</b> -87.90865		
<b>Current Zoning:</b> CF9(A) – Downtown Districts – Office and Service			<b>Current Land Use:</b> Former bank parking, current redevelopment		

The Wis. Admin. Code §§ NR 718.12 and/or NR 718.15 exemption(s) will be issued to the Wis. Admin. Code § NR 700 responsible party identified below and to the owner of the receiving site or facility, if different than the generating site. If there is more than one responsible party or property owner, include the information requested below for each as a separate document and attach to this document. If the responsible party is not the owner of the site or facility, provide that information below.

<b>B. Responsible Party Information</b>			
<b>Responsible Party (RP) Name(s)</b> Broadway Tierra Partners, LLC (BTP)		<b>Company Name</b> c/o Irgens Development	
<b>Signature(s)</b> 			<b>Date</b> 3/27/18
<b>Mailing Address</b> 833 Michigan Street		<b>City</b> Milwaukee	<b>State</b> WI
			<b>ZIP Code</b> 53202
<b>Phone # (include area code)</b> 414-443-0700		<b>Email</b> <a href="mailto:TGasperetti@irgens.com">TGasperetti@irgens.com</a>	

<b>C. Owner Information for Site or Facility From Which Material is Proposed to be Excavated from, if Different than Responsible Party</b>			
<b>Responsible Party (RP) Name(s)</b> (see Section B. Responsible Party Information)		<b>Company Name</b>	
<b>Signature(s)</b>			<b>Date</b>
<b>Mailing Address</b>		<b>City</b>	<b>State</b>
			<b>ZIP Code</b>
<b>Phone No. (include area code)</b>		<b>Email</b>	

Fill in this next section if someone other than the responsible party and/or facility owner is preparing this submittal.

D. Requestor Information			
<b>Last Name</b> Katzban	<b>First</b> Cory	<b>Organization/Business Name</b> The Sigma Group, Inc.	
<b>Signature(s)</b> 			<b>Date</b> 3/28/18
<b>Mailing Address</b> 1300 W. Canal Street		<b>City</b> Milwaukee	<b>State</b> WI
		<b>ZIP Code</b> 53233	
<b>Phone No. (Include area code)</b> 414-643-4138		<b>Email</b> <a href="mailto:ckatzban@thesigmagroup.com">ckatzban@thesigmagroup.com</a>	
<p><b>Check the box that describes the requestor's relationship to the generating property:</b></p> <p><input checked="" type="checkbox"/> <b>Is the property owner's agent or consultant?</b></p> <p><input type="checkbox"/> <b>Is renting or leasing the property?</b></p> <p><input type="checkbox"/> <b>Is developing the property?</b></p> <p><input type="checkbox"/> <b>Other, describe relationship:</b> _____</p>			

E. Contact Information For Questions About this Request		
<b>Last Name</b> (See D. Requestor Information)	<b>First</b>	<b>Organization/Business Name</b> (See D. Requestor Information)
<b>Mailing Address</b>		<b>Email</b>
<b>City</b>		<b>Phone No. (Include area code)</b>
<b>State</b>	<b>Zip Code</b>	<b>Relationship to Requestor (Same, Consultant, Developer, Etc.):</b>

**F. Information About the Site or Facility Where Contaminated Soil Will Be Disposed, if at a Different Location Than The Site or Facility From Which it Was Generated**

**Select if Same as Generating Property (and skip remainder of section)**

<b>BRRTS No.</b> BRRTS No. 15-41-580686 BRRTS No. 02-41-466662			<b>BRRTS Activity (Site) Name</b> Milwaukee Solvay Coke & Gas - MGP		
<b>Receiving Site or Facility Address</b> 311 E. Greenfield Avenue			<b>VPLE No.</b>		
<b>City</b> Milwaukee			<b>Parcel ID No.</b> 4639995200		
<b>State</b> Wisconsin			<b>FID No.</b> 241219880		
<b>County</b> Milwaukee			<b>Zip Code</b> 53204		
<b>WTM Coordinates</b>			<b>WTM Coordinates Represent</b>		
X: 690465		Y: 284187	Source Area <input type="checkbox"/>		Parcel Center <input type="checkbox"/>
<b>DISPOSAL LOCATION ON RECEIVING SITE</b>					
NW ¼	NW ¼	Sec: 04	T: 06N	R: 22E	E/W: E
<b>Latitude:</b> 43.011294			<b>Longitude:</b> -87.908025		
<b>Current Zoning:</b> IO(2) – Industrial Office			<b>Current Land Use:</b> Undeveloped		



## G. Receiving Site or Facility (Source Property or Off-Site Property) Owner Information

Provide the following information for the owner of the receiving site or facility. If there is more than one property owner include the information requested below for each as a separate document and attach to this form.

<b>Property Owner Name(s)</b> Wisconsin Gas LLC	<b>Company Name</b>		
<b>Mailing Address</b> 231 W. Michigan Street	<b>City</b> Milwaukee	<b>State</b> WI	<b>ZIP Code</b> 53203
<b>Phone Number (include area code)</b> 414-221-3948	<b>Email</b> <a href="mailto:Robert.Paulson@we-energies.com">Robert.Paulson@we-energies.com</a>		

### Section 3 – Waste Characterization

Address the following items to describe the contaminated soil and/or other solid waste material that will be managed under this plan and demonstrate that it has been adequately characterized. Attach your responses to these items at the end of this document.

- A. Describe the material proposed to be managed, including its general makeup, physical characteristics, the homogeneity of the material, the proportion of soil to other solid waste, and any other pertinent descriptors.

The material to be managed will be soil excavated for redevelopment of the property into a 25-story office tower with above-ground parking. Reworked granular fill soil and/or silty clay soil is expected to make up 95% or more of the excavated material.

A select volume of soil from the Auto-Banking Area and Executive Garage Area of the BMO Tower redevelopment at 790 N. Water Street (the "site") is proposed for temporary stockpiling and final beneficial reuse as engineered barrier material (soil cap) at the Solvay Coke & Gas site (the "Solvay site") in Milwaukee, WI.

The Solvay site has indicated the need for soil material for construction of a site-wide soil cap, to be placed in accordance with the Solvay site Administrative Settlement Agreement and Order on Consent for Site Fencing/Security, Engineering Evaluation/Cost Analysis and Non-time Critical Removal Action at the Uplands (ASAOC, U.S. EPA Docket No. V-W-17-C-010).

- B. Describe the historic and current land use of the site or facility where the contaminated soil or other solid waste originates. State how this site or facility is zoned.

Historic and current land use information was previously submitted in the *Site Investigation & Remedial Action Plan Report (SI/RAP)* submitted to the WDNR by The Sigma Group, Inc. (Sigma) January 4, 2018.

Current Land Use: The lot is currently being redeveloped. A BMO Harris Bank auto-bank drive-in and parking structure previously occupied the property.

Zoning: The Site is currently zoned CF9(A) – Downtown District – Office and Zoning

A Redevelopment Plan Map is included as **Figure 4**.

Additional land use Information is available in the *SI/RAP* submitted to the WDNR by Sigma January 4, 2018.

C. Total volume of contaminated soil and/or other solid waste to be managed (cubic yards):

Estimated volumes of soil to be managed under NR 718.12 include the following:

Auto-Banking Area	1,100 CY
Executive Garage Area	400 CY
Appx. Total:	1,500 CY

General cut / fill conditions for the proposed redevelopment are shown on **Figure 10**.

D. Describe identified contaminants and the source(s). Indicate whether contaminant concentrations exceed Wis. Admin. Code § NR 720 Residual Contaminant Levels. Include a summary table, map with sample locations, and relevant laboratory data.

The following describes the soil proposed for placement at the Solvay site:

**Auto-Banking Area**

An estimated 1,470 cubic yards of reworked granular fill and silty clay soils will be excavated from the auto-banking area of the site. Nineteen soil samples were collected from the auto-banking area of the site (refer to **Figures 4, 6, 7, and 8**) and analyzed for volatile organic compounds (VOCs, composite sample only), polynuclear aromatic hydrocarbons (PAHs), and/or Resource Conservation and Recovery Act (RCRA) metals or lead. Multiple samples collected from the northern half of the auto-banking area contained concentrations of PAHs, RCRA metals, and/or lead at levels reported greater than applicable WDNR Chapter NR 720 (NR 720) Residual Contaminant Levels (RCLs) for the protection of groundwater (groundwater pathway) and/or protection of human health by direct contact (direct contact pathway, at a non-industrial site). The groundwater pathway and direct contact risks associated with PAH and select RCRA metals impacts exist within the northern half of the auto-banking area (refer to **Figures 7 & 8**) and extend to an approximate depth of 8 to 10 feet below ground surface (bgs, refer to **Figure 5**). Low-level concentrations of PAHs and select RCRA metals were detected below applicable NR 720 RCLs and/or Background Threshold Values (BTVs) within multiple samples collected from the southern half of the auto-banking area. VOCs were not detected within the composite sample and no photoionization detector (PID) readings exceeded background during site investigation activities.

Based on the soil analytical results for soil samples collected from the auto-banking area (refer to **Table 1** for representative samples), approximately 1,100 cubic yards of soil from just below ground surface (bgs) to the depth of cut (approximately 18 feet bgs) within the southern half of the auto-banking area, and from 10 feet bgs to the depth of cut (approximately 18 feet bgs) within the northern half of the auto-banking area does not contain VOCs above detection limits, or PAHs and RCRA metals at concentrations above applicable NR 720 RCLs or BTVs. This material meets the requirements outlined in the

Solvay site ASAOC and is proposed for beneficial reuse as clean soil cap material, without placement restrictions, at the Solvay site.

#### **Executive Garage Area**

An estimated 600 cubic yards of reworked granular fill and silty clay soils will be excavated from the western portion of the executive garage area of the site during redevelopment. The depth of cut within this area is expected to be from below the existing executive garage floor slab to 10 feet below the slab (refer to **Figure 10**). The general area east of SB-20 and 22 is fill area. Sixteen discrete soil samples were collected from the proposed cut area of the executive garage (**Figure 4**). Impacts identified within the executive garage cut area include RCRA metals above applicable NR 720 RCLs (northwest corner, **Figure 8**). Material cut from this portion of the executive garage area will be disposed of at a licensed landfill or WDNR approved alternative disposal facility. Material in the southwest cut area of the executive garage may contain VOC impacts associated with the VOCs identified in off-site soil boring SB-24. Given the generally undefined extent of VOC impacts identified in soil boring SB-24, the material from this area of the excavation will be disposed of at a licensed landfill facility. Soil samples collected from soil borings SB-6 and TW-7 did not contain detected concentrations of VOCs, PAHs, or PCBs, and lead concentrations were below NR 720 RCLs and background concentrations; therefore, the northern extent of excavated material in this area restricted to landfill disposal is defined by these two borings.

Based on the soil analytical results for soil samples collected from executive garage (refer to **Table 1** for representative samples), approximately 400 cubic yards of soil from just below the executive garage floor slab to the depth of cut (approximately 0 to 10 feet below the slab) within the central portion of the executive garage area does not contain VOCs or PAHs above detection limits, and RCRA metals concentrations are below applicable NR 720 RCLs or BTVs. This material meets the requirements outlined in the Solvay site ASAOC and is proposed for final beneficial reuse as clean soil cap material, without placement restrictions, at the Solvay site.

Source(s): Low-level PAHs and RCRA metals detected within the soil proposed for placement at the Solvay site are attributed to elements of historic fill material (little to trace amounts) that were mixed into the subsurface material during historic redevelopment(s) of the property and surrounding area.

In general, soil impacted by low-level PAHs and RCRA metals below applicable NR 720 RCLs and BTV's is proposed for unrestricted placement and beneficial reuse at the Solvay site.

- E. Describe the sampling activities conducted to characterize the material including where the samples were collected from, how sample locations were chosen, the sampling methods used, and when sampling activities were conducted.

Sigma advanced thirty-seven direct push soil borings across the site. A total of fifty-six discrete soil samples (up to three per soil boring) were collected for laboratory analysis VOCs, PAHs, RCRA metals or lead, PCBs, and/or ethylene glycol. Sampling activities were completed throughout 2017.

Further details and results of the site investigation work described above is available in Sigma's approved *SIR/RAP*, submitted January 4, 2018.

- F. Explain how the sampling activities adequately characterized the contaminated soil or other solid waste proposed to be managed. Indicate whether the samples were analyzed for all contaminants previously identified at the site or facility where the material will be generated and analyzed for all contaminants potentially present at the site or facility considering current and historic land use. Discuss how samples were collected from areas most likely to be contaminated and from material that will actually be managed under this exemption.

Soil samples were collected from across generally the entire site as part of Phase II Environmental Site Assessment (ESA) and site investigation activities, as well as for evaluating soil quality for purposes of soil management planning prior to redevelopment. Soil samples were collected from areas of the site that will be excavated during redevelopment (i.e. the auto-banking, basement level, executive garage areas, and off-site earth retention areas).

The material proposed for off-site management under NR 718.12 was sampled for one or more of the contaminants described in Section E above, as appropriate based on Phase I ESA, Phase II ESA, and site investigation information, and characterized to the extent practicable.

Historic information did not suggest the need to sample for other environmental contaminants of concern.

Further details and results of the site investigation work described above is available in Sigma's approved *SIR/RAP* and *SIR/RAP Addendum*, submitted to the WDNR January 4 and February 14, 2018, respectively.

Contaminants of concern at the Solvay site, as listed on the WDNR BRRTS website (BRRTS #02-41-466662), include PAHs, VOCs, mercury, chromium, metals (lead), and cyanide. These contaminants were sampled for, with the exception of cyanide, at select locations where appropriate at the site.

- G. Total number of samples collected from this material and analyzed for contaminants of concern.

The total number of samples collected from the material within cut areas of the site, which will be placed at the Solvay site as clean soil cap, is 15 samples, analyzed for VOC, PAHs, RCRA metals, PCBs, and/or lead. All soil samples collected during soil boring advancement were also screened in the field with a calibrated PID.

Auto-Banking Area	1,100 CY	<b>(7 samples)</b>
Executive Garage Area	400 CY	<b>(8 samples)</b>
Appx. Total:	1,500 CY	<b>(15 samples)</b>

- H. Rate of sample collection per volume (samples/cubic yard).

The rate of sample collection per total volume of material is approximately 1 sample per 150 cubic yards of auto-banking area soil and 1 sample per 50 cubic yards of executive garage area soil.

Wis. Admin. Code § NR 718.12(1)(e) requires that samples collected to characterize soil be collected at a rate of one sample per 100 yards (for the first 600 yards) and one sample for each additional 300 yards of material, with a minimum of 2 samples. If DNR pre-approved an alternative sampling plan, describe how the sampling that was conducted complied with a pre-approved plan. Provide the date the sampling plan was pre-approved and the name of the DNR

person who approved the plan.

No WDNR pre-approved alternative sampling plan with a variance to the requirements of Wis. Admin Code NR 718.12(1)(e) was obtained or implemented; however, given the approved site investigation activities completed at the site, and approved remedial actions, there did not appear to be the need for additional sampling to adequately characterize the material off-site management at the Solvay site.

An average sampling frequency of 1 sample per 100 cubic yards was generally used to characterize the material proposed for excavation and placement at the Solvay site.

## **Section 4 – Project Description/Material Management Plan**

*Address the following items to describe the material management activities proposed to take place. Attach your responses to these items at the end of this document.*

- A. Describe the waste management activities that will require a Wis. Admin. Codes §§ NR 718.12 or NR 718.15 exemption. Provide details on how and where waste material will be generated, transported and placed. Describe the depth of the proposed excavation of contaminated soil or other solid waste, and the depth that it will be placed at the receiving site. Describe any response actions proposed for the receiving site or facility to address the relocated contaminated material (such as the construction of a cap). Confirm the proposed material management will comply with Wis. Admin. Code § NR 726.13(1)(b) 1 through 5. Discuss how material management activities will fit in with the overall property remediation and/or development plans.

Soil within the auto-banking area impacted with low-level PAHs below applicable NR 720 RCLs will be excavated during redevelopment. Soil within the north half of the auto-banking area from a depth of 10 to 18 feet bgs will be excavated, transported to the Solvay site, and placed for construction of a site soil cap. Soil within the south half of the auto-banking area from a depth of 0 to 18 feet bgs will be excavated, transported to the Solvay site, and placed for construction of a site soil cap. Soil containing concentrations of RCRA metals below NR 720 RCLs and/or RCRA metals will be excavated from the executive garage area during redevelopment, transported to the Solvay site, and placed for construction of a site soil cap.

No response action is necessary for the receiving site to address the relocated material. The material does not pose a risk to human health or the environment.

The soil material will be beneficially reused for construction of a protective soil cap across a portion of the Solvay site.

- B. Summarize the proposed schedule for implementation of the material management plan including anticipated start and end dates.

Soil excavation and transport to Solvay began on March 6, 2018. The soil will be excavated as needed during redevelopment and transported to the Solvay site with an accompanying manifest to track load count and stockpiled at the location provided in **Attachment 1**. The material will be stockpiled at the Solvay site in compliance with WDNR Ch. NR 502.05(3)(j) and other referenced codes in NR 502.04 until this NR 718.12 request is approved by the WDNR. Following approval the material will be used as needed as cap material across the Solvay site. It is expected that the soil will be spread to a thickness of 2 feet or more (cap requirements) within the general area of the stockpile.

- C. Describe any procedures that have been established, or methods that will be used, to identify previously undocumented contamination during the completion of this project (such as instrument

field screening, visual inspections, etc.). Also describe any contingency procedures that have been established to address unexpected contamination. The discovery of a previously unknown contaminant release on a property must be immediately reported to the DNR using the 'Notification for Hazardous Substance Discharge (non-emergency)' form.

If concrete rubble, asphalt rubble, or wood is encountered during the excavation, this material shall be segregated (if possible) for off-site recycling and/or hauled to a licensed landfill facility for disposal.

Concrete slabs and foundations from the existing building will be cleaned of loose soil and transported off-site for recycling.

Minimal asphalt pavement is present at the site. Asphalt pavement will be stripped, segregated from underlying soil, and transported off-site for recycling.

Although not anticipated or previously identified, if buried construction debris is encountered during the excavation that may potentially contain asbestos containing materials (ACMs), work will be stopped in that area, access to the work area will be restricted with caution tape and/or signage, and the general contractor/earthworks contractor shall contact BTP. The earthworks subcontractor may continue work in another location if feasible. BTP shall contact Sigma to evaluate the building debris by a state-licensed Asbestos Inspector and direct the transportation to a licensed landfill facility for disposal as conditions merit.

Although not anticipated, undocumented underground storage tanks (USTs) may be encountered during excavation activities. If an undocumented UST is discovered, work will be stopped in that area, access to the work area will be restricted with caution tape and/or signage, and the general contractor/earthworks contractor shall contact BTP. The earthworks subcontractor may continue work in another location if feasible. BTP shall contact Sigma to notify the appropriate authorities and coordinate with a licensed tank removal contractor to clean and remove the UST in accordance with WDNR rules and regulations, including the completion of a Tank System Site Assessment. Waste materials generated during the UST removal and cleaning process will be disposed of in accordance with local, state, and federal requirements. The UST closure process will be documented by the tank removal contractor and Sigma. Sigma will coordinate any over-excavation services required of the tank removal contractor and the proper disposal of waste materials (e.g., tank sludge).

- D. Summarize how the proposed management activities will prevent or minimize adverse environmental impacts and potential threats to human health and welfare, including worker safety, by assessing how all potential exposure and migration pathways of concern, including direct contact exposure, vapor intrusion, ground water, surface water, sediment and any other relevant pathway will be addressed by the proposed management.

A 40-hour OSHA trained environmental professional will be on-site to identify and direct the proper segregation and disposal of impacted soil excavated during redevelopment, as well to document proper impacted soil management activities.

## **Section 5 - Receiving Site or Facility Information**

*Describe the site or facility receiving the waste material by addressing the following items. Where applicable, attach your responses to these items at the end of this document.*

- A. Is the receiving site or facility the same as the generating site? \_\_\_\_\_ Yes     X  \_\_\_\_\_ No

- B. Describe the historic, current and proposed land use of the site(s) or facility(s) where the

contaminated soil or other solid waste will be managed. How are these site(s) or facility(s) zoned?

Between 1873 and 1983, various portions of the Solvay site were used for a variety of industrial purposes including coke and manufactured gas production, coal storage, tannery and blast furnace operations, a service yard for Milwaukee's electric trolley system, and a railcar ferry terminal. Between 1983 and 2003, portions of the Solvay site were used for stockpiling construction and demolition materials such as asphalt and concrete. The Solvay site currently contains remnants of its former industrial infrastructure including abandoned buildings, foundations of former structures and stockpiles of construction and demolition materials, coke/ coal, and debris from former structures.

Zoning: The site is currently zoned IO2 – Industrial Office

C. Identify current uses of all properties adjacent to the site or facility. Check all that apply.

<b>Agricultural</b>	<input type="checkbox"/> N	<input type="checkbox"/> S	<input type="checkbox"/> E	<input type="checkbox"/> W	<input type="checkbox"/> NE	<input type="checkbox"/> NW	<input type="checkbox"/> SE	<input type="checkbox"/> SW
<b>Industrial</b>	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/> S	<input type="checkbox"/> E	<input checked="" type="checkbox"/> W	<input type="checkbox"/> NE	<input type="checkbox"/> NW	<input type="checkbox"/> SE	<input type="checkbox"/> SW
<b>Recreational</b>	<input type="checkbox"/> N	<input type="checkbox"/> S	<input type="checkbox"/> E	<input type="checkbox"/> W	<input type="checkbox"/> NE	<input type="checkbox"/> NW	<input type="checkbox"/> SE	<input type="checkbox"/> SW
<b>Residential</b>	<input type="checkbox"/> N	<input type="checkbox"/> S	<input type="checkbox"/> E	<input type="checkbox"/> W	<input type="checkbox"/> NE	<input type="checkbox"/> NW	<input type="checkbox"/> SE	<input type="checkbox"/> SW
<b>Undeveloped</b>	<input type="checkbox"/> N	<input type="checkbox"/> S	<input type="checkbox"/> E	<input type="checkbox"/> W	<input type="checkbox"/> NE	<input type="checkbox"/> NW	<input type="checkbox"/> SE	<input type="checkbox"/> SW
<b>Commercial</b>	<input type="checkbox"/> N	<input type="checkbox"/> S	<input type="checkbox"/> E	<input type="checkbox"/> W	<input type="checkbox"/> NE	<input type="checkbox"/> NW	<input type="checkbox"/> SE	<input type="checkbox"/> SW
<b>Other</b>	<input type="checkbox"/> N	<input type="checkbox"/> S	<input checked="" type="checkbox"/> E	<input type="checkbox"/> W	<input type="checkbox"/> NE	<input type="checkbox"/> NW	<input type="checkbox"/> SE	<input type="checkbox"/> SW

Describe 'Other' property use below:

The Kinnickinnic River borders the site to the east.

D. Briefly describe any previous environmental site investigations or remedial actions conducted at the site or facility. Describe the environmental condition of the portion of the receiving site or facility where waste will be placed including what contaminants are present, the environmental sampling conducted in that area, and whether identified contaminant concentrations exceed applicable standards.

The site, being a former coke and manufactured gas plant site with significant environmental impacts, has a long history of environmental site investigation, and a recently completed combined Remedial Investigation/Feasibility Study through USEPA and WDNR programs. The site is listed on the WDNR BRRTS site (02-41-466662, activity page included as **Attachment 2**) and is a listed superfund site with the USEPA, designated as a non-National Priority List Superfund Alternative in the remedial process.

A Remedial Investigation Report recently completed by Arcadis is available for download from the USEPA Superfund website, along with other pertinent documents. The website link is provided below:

<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0508215&doc=Y&colid=30931&region=05&type=SC>

PAHs, select metals, VOCs, and cyanide are listed contaminants on the WDNR BRRTS activity page and are expected to present in varying degrees within the area of proposed soil placement, along with several other contaminants and fill related impacts. Concentration maps are available for download using the link above.

The low-level PAH and RCRA metals or lead concentrations detected below applicable NR 720

RCLs and/or BTVs within soil proposed for placement at the Solvay site do not pose any further risk to human health or the environment that does not already exist at the Solvay site.

- E. Describe any environmentally sensitive areas at or near the site or facility where the contaminated soil will be managed.

REVIEW OF CHAPTER NR 718.12 CRITERIA

1. Within a floodplain. The proposed soil relocation areas are not located within a floodplain as determined by FEMA.

2. Within 100 feet of any wetland or critical habitat area. The proposed soil relocation areas are not located within 100 feet of any wetland or critical habitat area.

3. Within 300 feet of any navigable river, stream, lake, pond or flowage. The nearest navigable water body is the Kinnickinnic River, which runs along the northeast boundary of the Site. Soil may be placed within less than 300 feet of the river. However, the soil proposed for placement does not pose a risk to surface or ground water.

4. Within 100 feet of any on-site water supply well or 300 feet of any off-site water supply well. No potable water supply wells are located on-site or within 300 feet of the project site.

5. Within 3 feet of high groundwater level. The placement of the soil will be at or above the existing ground surface. The minimum distance above the high groundwater level will be greater than 3 feet.

6. At a depth greater than the depth of the original excavation from which the contaminated soil is removed. The soil will be placed at or above the existing ground surface within the proposed placement areas.

7. Where the contaminated soil poses a threat to public health, safety, or welfare or the environment. Based on analytical data collected from samples of the soil to be relocated, no soil contaminant concentrations exceed NR 720 RCLs for the migration to groundwater and direct contact pathways. The soil poses no threat to human health or the welfare of the environment.

- F. Describe any other features of this property not addressed above that influence its suitability for the disposal of the contaminated soil or other solid waste.

No other features of the site influence its suitability for the disposal of the minimally impacted soil.

- G. Briefly discuss the geology and hydrogeology of the receiving site or facility, including information from any previous remedial investigations and well logs or well construction records from nearby wells. Also, provide the information requested below indicating whether the response is based on regional or site-specific information:

Depth to Bedrock (ft. below ground surface): 132 feet      Regional    Site Specific

Bedrock Type:      Sandstone    Limestone/Dolomite    Metamorphic/Igneous

High Groundwater Level (ft. below ground surface): 6-12 feet      Regional    Site Specific



Groundwater Flow Direction:

Toward the Kinnickinnic River

Regional Site Specific

## Section 6 – Locational Criteria

Indicate if excavated waste material will be placed in any of the following locations:

- Within a floodplain.
- Within 100 feet of any wetland or critical habitat area.
- Within 300 feet of any navigable river, stream, lake, pond, or flowage.
- Within 100 feet of any on-site water supply well or 300 feet of any off-site water supply well.
- Within 3 feet of the high groundwater level.
- At a depth greater than the depth of the original excavation from which the contaminated soil was removed.

If any of the above boxes are checked, an exemption from the indicated criteria must be requested as described below. If none of the above boxes are checked, and the proposed placement of waste material will not otherwise pose a threat to the public health, safety, or welfare of the environment, the proposed management activities will comply with the location criteria of Wis. Admin. Code § NR 718.12(1)(c) and you may skip ahead to Section 7.

Include an explanation of why granting an exemption to the Wis. Admin. Code § NR 718.12(1)(c) locational criteria will not cause a threat to public health, safety, welfare and the environment by assessing how all potential exposure and migration pathways of concern, including direct contact exposure, vapor intrusion, ground water, surface water, sediment and any other relevant pathway will be addressed by the proposed management. Consider the quantity and characteristics of the waste being managed, the geologic and hydrogeological characteristics of the receiving site, the unavailability of other environmentally suitable alternatives, and whether the activities will comply with other state and federal regulations including other portions of Wis. Admin. Code §§ NR 700 to NR 754. Attach your response to the end of this document.

Based on the analytical data for samples collected from soil to be relocated, no contaminant concentrations exceed NR 720 RCLs for the migration to groundwater and direct contact pathways. The soil will be used for construction of an engineered barrier at the Solvay site.

## Section 7 – Additional Information Required for Non-Metallic Mine Receiving Sites or Facilities

*Complete this section if the proposed disposal facility is a non-metallic mine. **NOT APPLICABLE***

A. Current depth to groundwater at facility (feet below ground surface): \_\_\_\_\_

B. Has the facility been dewatered to allow mining?  Yes  No

If yes, indicate the expected natural groundwater level when dewatering is terminated (feet below ground surface): \_\_\_\_\_

C. Is waste proposed to be placed within 10 feet of the natural water table?  Yes\*  No

*\* If yes, placement of the waste will not comply with Wis. Admin. Code §§ NR 503.08(1)(e) and NR 503.08(2)(d).*

D. Include a copy of the reclamation plan indicating the placement of low level contaminated material is acceptable.

E. Describe any design criteria established for the disposal site, include restrictions on material placement, engineered barrier requirements, etc. Attach your response to this item at the end of this

document.

## **Section 8 – Continuing Obligations at Receiving Site or Facility**

*Check the applicable boxes to indicate which continuing obligations will be specifically required to address the waste material being managed on the receiving property:*

No Continuing Obligations

Residual Soil Contamination:

If contaminated soil managed under this soil management plan is excavated in the future, the property owner at the time of excavation will be responsible for the following:

- determine if contamination is present,
- determine whether the material would be considered solid or hazardous waste,
- ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.

Contaminated soil may be managed in accordance with Wis. Admin. Code § NR 718, with prior DNR approval. In addition, all current and future property owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose a hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans. A historic fill exemption is required prior to construction of any structures over fill materials.

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

Maintenance of a cover:

A soil cover/engineered cover/other has been placed over remaining contamination and this cover must be maintained. Inspections will be required, and submittal of inspection reports may be required. Certain activities which would disturb the cover or barrier will be prohibited. If the cover is approved for industrial land use, notification of the DNR is required before changing to a non-industrial use, to determine if the cover will be protective for that use. A maintenance plan is attached, which describes the maintenance activities to be required. If the DNR requires changes to the maintenance plan, an updated maintenance plan must be provided at the completion of the soil disposal action. A map is attached which shows the location of the extent of contaminated materials and the extent of the cover.

Use of Industrial Land Use Soil Standards:

Industrial soil standards have been applied for the site receiving the contaminated materials. The DNR must be notified if the property land use will change from industrial use to a non-industrial land use. Additional investigation and remediation may be required prior to the change in land use to ensure the site conditions are protective for the planned land use.

Vapor: Future Actions to Address Vapor Intrusion:

While vapor intrusion does not currently exist, if a building is constructed on this property, or reconstructed, or if use of a building is changed to a non-industrial use, vapor intrusion may be a concern. The DNR must be notified before construction of a building or changing the use of an existing building to non-industrial use. The use of vapor control technologies or an assessment of the potential for vapor intrusion will be required at that time.

Site specific condition:

Describe the site-specific condition:

## Section 9 – Figures

Attach to this form figures that clearly depict the items listed below. All maps should be drawn to scale not larger than 1 inch equal to 100 feet and labeled with the site or facility name and address. The location of the property and the specific disposal area must be provided in sufficient detail to allow DNR personnel to inspect these areas in the future. Providing a 'cut/fill' map that clearly depicts how much material will be removed or added to different areas of the involved property(ies) and depicting how material will be moved across the site is highly recommended. Providing cross sections that depict site conditions before and after soil management activities is also recommended.

- The boundaries of each property involved in the project as well as named and unnamed roads or access points, buildings and other surface features, underground utilities, land uses on adjacent properties, and known and potential sources of hazardous substances. **See attached figures.**
- The location of wetlands, critical habitat areas, floodplains, surface water bodies, water supply wells, or other possible receptors located near or within the area where material will be managed. **Not applicable. The material does not pose a risk to nearby receptors.**
- The lateral extent and depth of planned excavation, grading, or otherwise disturbed areas. **See attached figures.**
- The lateral extent and thickness of excavated material placement locations. **See attached.**
- Soil sample locations at the generating and receiving sites. Depict applicable soil contaminant concentration data and sample depths. Indicate the extent of contamination exceeding a RCL. **See attached figures for generating site. Receiving site contaminant concentration data and sample depths/figures available at USEPA site: <https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0508215&doc=Y&colid=30931&region=05&type=SC>**
- Depth to groundwater. **Estimated at 15 to 16 feet bgs at generating site, 6 feet bgs at receiving site.**
- The extent of any performance standards (such as a barrier or cap) that will be required at the completion of management activities. **No barriers / caps are necessary. The proposed material will be serving as a soil cap at the receiving site.**

## Section 10 - Additional Attachments

The following documents are recommended for inclusion with a Wis. Admin. Code § NR 718.12 or a Wis. Admin. Code § 718.15 exemption request. Indicate which of these documents are applicable to this request by checking the boxes below. Submit copies of the indicated documents with this document.

- A table summarizing the analytical results of all soil/waste samples collected at the generating site or facility that meets the requirements of Wis. Admin. Code § 716.15(4)(e). Clearly indicate which of these samples were collected from material that is proposed to be managed. **See attached.**
- The analytical package for all samples listed on the above table. The package should include the sample results, chain of custody, sampling methods, and QA/QC data. **Submitted with Sigma SI/RAP and SI/RAP Addendum.**
- A maintenance plan for any performance standard needed to address the material proposed to be managed. The plan should follow the format found in [DNR Form 4400-202, Attachment D](#) **Not applicable.**

- A copy of the reclamation plan for the receiving site or facility if it is a nonmetallic mine. Confirm the plan allows for acceptance of contaminated soil by marking relevant plan sections. **Not applicable.**
- Power of Attorney (if applicable, see Section 12). **Not applicable.**
- Deed for the property receiving the contaminated soil and or waste. If a certified survey map or plat map is referenced by this deed then also include those documents. If a map is not referenced in the deed, provide a copy of a parcel map depicting the property boundaries. **See attached.**

## Section 11 - Certification Statements

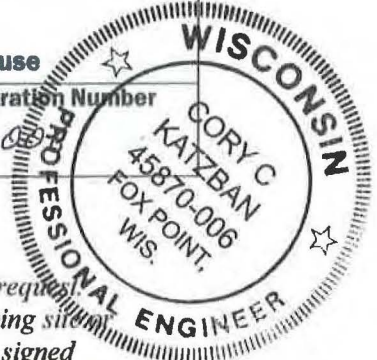
*All exemption requests submitted to manage contaminated soil or other solid waste as an interim action or remedial action under Wis. Admin. Code §§ NR 708 or NR 722 must be prepared by, or prepared under, the supervision of a professional engineer. The professional engineer who prepared or supervised this exemption request should complete the following section.*

Environmental Consultant Information	
<b>Firm Name</b> The Sigma Group, Inc.	
<b>Mailing Address</b> 1300 W. Canal Street	<b>State</b> Wisconsin
<b>City</b> Milwaukee	<b>ZIP Code</b> 53233

Wis. Admin. Code § NR 712, entitled “Personnel Qualifications for Conducting Environmental Response Actions,” establishes minimum standards for experience and professional qualifications for persons who perform certain environmental services. This law applies to work conducted under Wis. Admin. Code § NR 718, unless specifically exempted.


**Note:** The following certification must be attached to confirm the Wis. Admin. Code § NR 718 exemption request was prepared by or under the supervision of a professional engineer under Wis. Admin. Code § NR 712.07.

Professional Engineer Information			
<b>Last Name</b> Katzban		<b>First Name</b> Cory	
<b>Mailing Address</b> The Sigma Group, Inc. 1300 W. Canal Street		<b>City</b> Milwaukee	<b>State</b> WI
<b>Phone No. (include area code)</b> (414) 643-4200		<b>Email</b> ckatzban@thesigmagroup.com	
<p><b>"I hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.</b></p> <p><b>It is my professional opinion that the proposed soil management activity will not cause</b></p>			
<b>Signature</b> 	<b>Date</b> 3/27/18	<b>Wisconsin Registration Number</b> 45878 - 006	



**Section 12 - Signatures**

*Each receiving site or facility property owner's signature must be included as part of this request. Attach additional copies of the signature page, if needed. If one of the owners of the receiving site or facility is acting on behalf of other owners, a power of attorney form or statement must be signed and attached to this agreement clearly granting the agent the authority to accept the contaminated soils on behalf of all other owners of the receiving site or facility whose signatures are not included*

Owner(s) of Property Where Material is Placed		
Print Name	Signature	Date
Robert A. Garello		3/20/18

I understand that by signing this application I certify that I will follow the conditions and limitations required by law and specified in the exemption issued to me as owner of the site or facility that will receive the contaminated soil. Further, I certify that the contaminated soil proposed to be managed under this exemption will be at a property that meets the definition of “site” or “facility” under Wis. Stats. Chapter 292 and Wis. Admin. Code Chapters §§ NR 700 – 754, and I understand that the material must be managed any time in the future as a solid waste with the department’s approval. I understand that this exemption will be tracked in the Wisconsin Remediation and Redevelopment Database, and if required, will include maintenance and inspection by me of any continuing obligations, such as maintaining an engineering control or barrier over the contaminated material, and will also be subject to inspection by the department. I understand that the conditions on my site or facility may be subject to Wis. Stats. Chapter 709, Disclosures by Owners of Real Estate. I believe that the legal description for all properties where material will be managed is included with this submittal.

*on this agreement.*

## RR Program Contacts

General questions regarding Wis. Admin. Code §§ NR 718.12 and 718.15 exemptions should be made to:

- Statewide: Paul Grittner, [Paul.Grittner@wisconsin.gov](mailto:Paul.Grittner@wisconsin.gov), (608) 266-0941
- Northeast Region: Kristen Dufresne, [Kristen.Dufresne@wisconsin.gov](mailto:Kristen.Dufresne@wisconsin.gov), (920) 662-5443
- Northern Region: Chris Saari, [Chris.Saari@wisconsin.gov](mailto:Chris.Saari@wisconsin.gov), (715) 685-2920
- South Central Region: Mike Schmoller, [Michael.Schmoller@wisconsin.gov](mailto:Michael.Schmoller@wisconsin.gov), (608) 275-3303
- Southeast Region:
  - Nancy Ryan, [Nancy.Ryan@wisconsin.gov](mailto:Nancy.Ryan@wisconsin.gov), (414) 263-8533
  - Linda Michalets, [Linda.Michalets@wisconsin.gov](mailto:Linda.Michalets@wisconsin.gov), (414) 263-8757
- West Central Region: Matt Thompson, [Matthew.Thompson@wisconsin.gov](mailto:Matthew.Thompson@wisconsin.gov), (715) 839-3750

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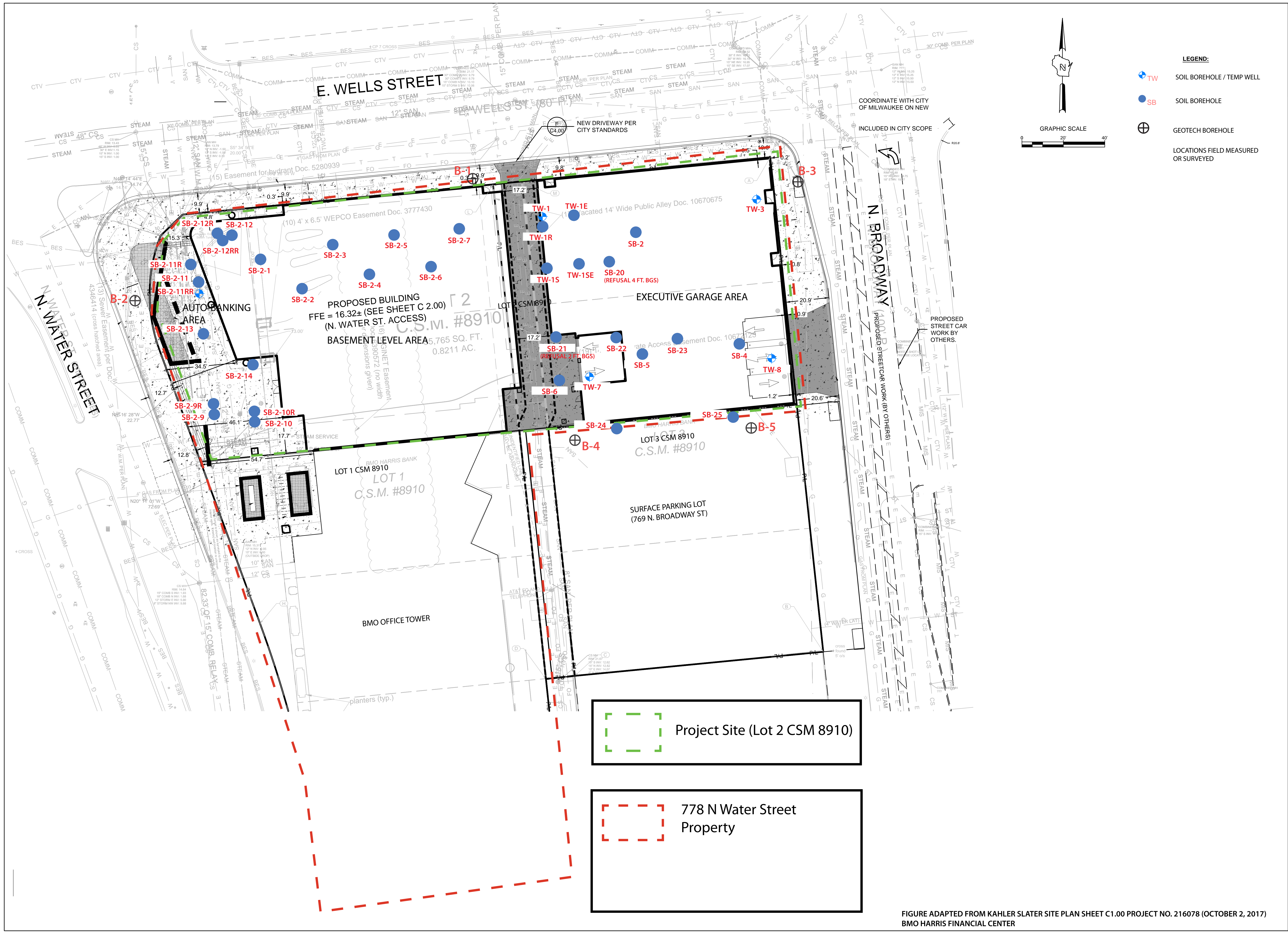
This document is intended solely as guidance and does not include any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any manner addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

The Wisconsin Department of Natural Resources provides equal opportunity in its employment, programs, services, and functions under an Affirmative Action Plan. If you have any questions, please write to Chief, Public Civil Rights, Office of Civil Rights, U.S. Department of the Interior, 1849 C. Street, NW, Washington, D.C. 20240.

This publication is available in alternative format (large print, Braille, etc.) upon request. Please call for more information. Note: If you need technical assistance or more information, call the Accessibility Coordinator at 608-267-7490 / TTY Access via relay – 711

**Section 9: FIGURES**





**LEGEND:**

	SOIL BOREHOLE / TEMP WELL
	SOIL BOREHOLE
	GEOTECH BOREHOLE
	LOCATIONS FIELD MEASURED OR SURVEYED

BMO TOWER  
 MILWAUKEE, WISCONSIN  
 (LOT 2 - CSM 8910)  
**REDEVELOPMENT PLAN**  
**BMO CAMPUS PARKING STRUCTURE**  
**NORTH NEW CONSTRUCTION**

7. REDEVELOPMENT PLAN	12-20-2017
6. Drawing Update	12-6-2017
5. Site Plan Map Update	9-12-2017
4. Site Plan Map Update	6-7-2017
3. Site Plan Map Update	5-8-2017
2. REVISED BORING LOCATION	1-12-2017
1. REVISED BORING LOCATION	1-6-2017
NO. REVISION	DATE BY

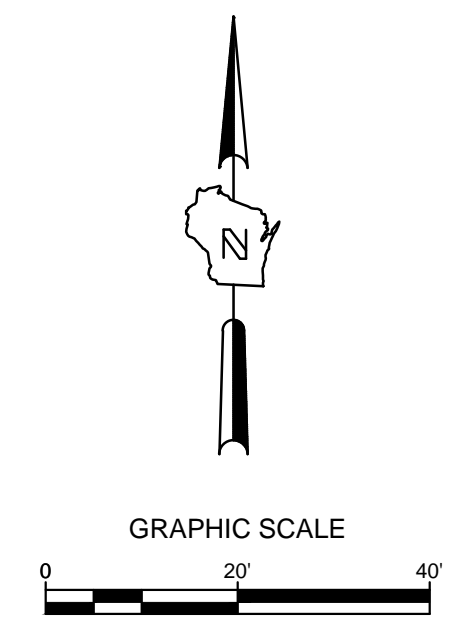
DRAWING NO.:	Sigma Boring Fig.dwg
DRAWN BY:	PRF/CCK (Site Plan Map Update)
DATE:	12/22/16
PROJECT NO.:	---
CHECKED BY:	---
APPROVED BY:	
FIGURE NO.:	

Project Site (Lot 2 CSM 8910)

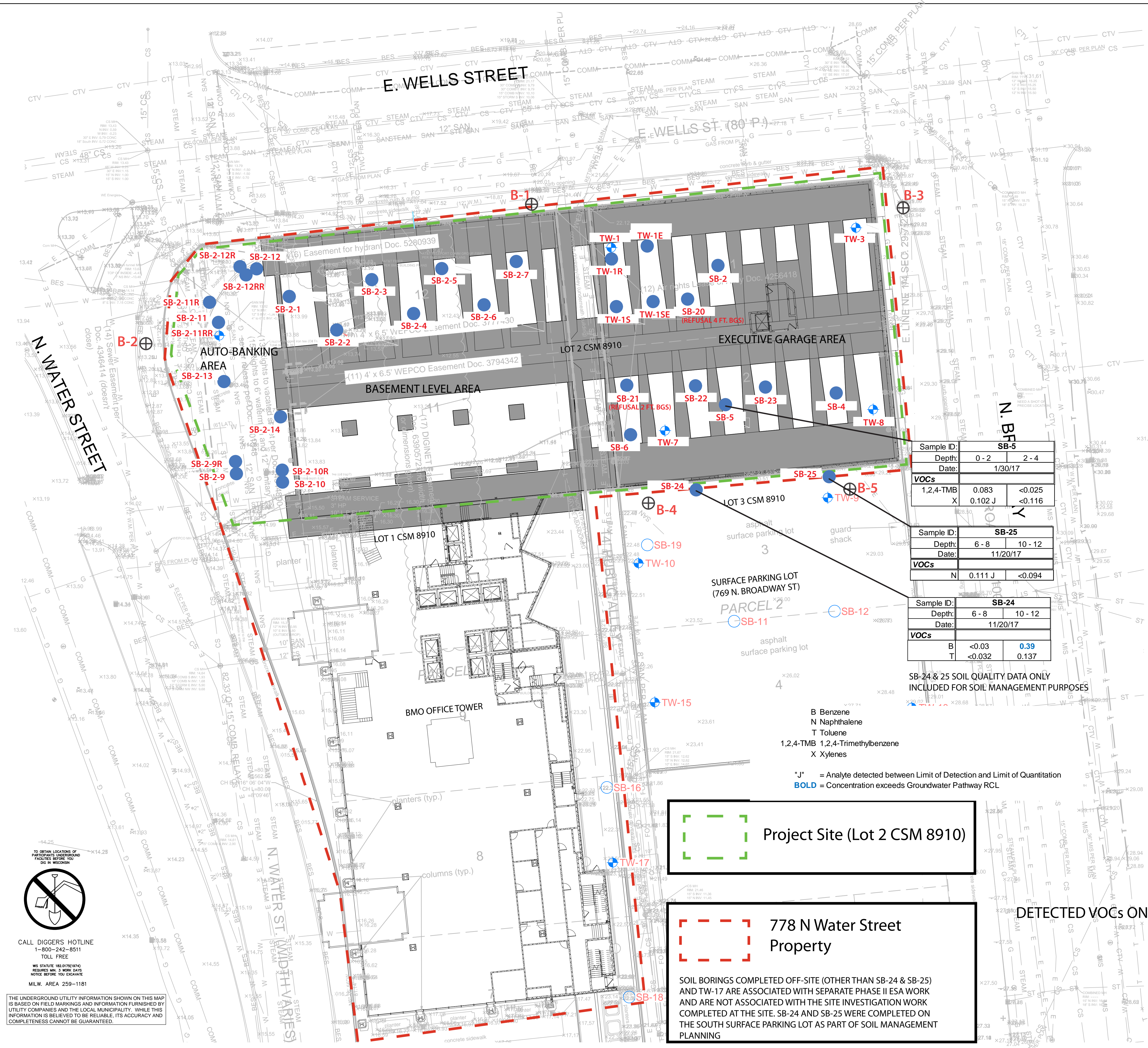
778 N Water Street Property

FIGURE ADAPTED FROM KAHLER SLATER SITE PLAN SHEET C1.00 PROJECT NO. 216078 (OCTOBER 2, 2017)  
BMO HARRIS FINANCIAL CENTER





- LEGEND:**
- + TW SOIL BOREHOLE / TEMP WELL
  - SB SOIL BOREHOLE
  - ⊕ GEOTECH BOREHOLE
  - ⊕ LOCATIONS FIELD MEASURED OR SURVEYED
  - BUILDING FOUNDATION ELEMENTS FOOTPRINT - FOOTINGS AND GRADE BEAMS (APPROXIMATE)



Sample ID:	SB-5	
Depth:	0 - 2	2 - 4
Date:	1/30/17	
VOCs		
1,2,4-TMB	0.083	<0.025
X	0.102 J	<0.116

Sample ID:	SB-25	
Depth:	6 - 8	10 - 12
Date:	11/20/17	
VOCs		
N	0.111 J	<0.094

Sample ID:	SB-24	
Depth:	6 - 8	10 - 12
Date:	11/20/17	
VOCs		
B	<0.03	<b>0.39</b>
T	<0.032	0.137

SB-24 & 25 SOIL QUALITY DATA ONLY INCLUDED FOR SOIL MANAGEMENT PURPOSES

- B Benzene
- N Naphthalene
- T Toluene
- 1,2,4-TMB 1,2,4-Trimethylbenzene
- X Xylenes

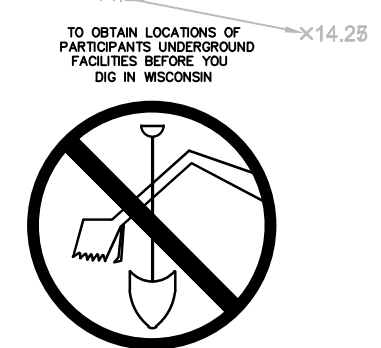
"J" = Analyte detected between Limit of Detection and Limit of Quantitation  
**BOLD** = Concentration exceeds Groundwater Pathway RCL

Project Site (Lot 2 CSM 8910)

778 N Water Street Property

SOIL BORINGS COMPLETED OFF-SITE (OTHER THAN SB-24 & SB-25) AND TW-17 ARE ASSOCIATED WITH SEPARATE PHASE II ESA WORK AND ARE NOT ASSOCIATED WITH THE SITE INVESTIGATION WORK COMPLETED AT THE SITE. SB-24 AND SB-25 WERE COMPLETED ON THE SOUTH SURFACE PARKING LOT AS PART OF SOIL MANAGEMENT PLANNING

DETECTED VOCs ONLY



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 TOLL FREE  
 WE STATE: (420787974)  
 REQUIRES MIN. 3 WORK DAYS  
 NOTICE BEFORE YOU DIG  
 MILW. AREA 259-1181

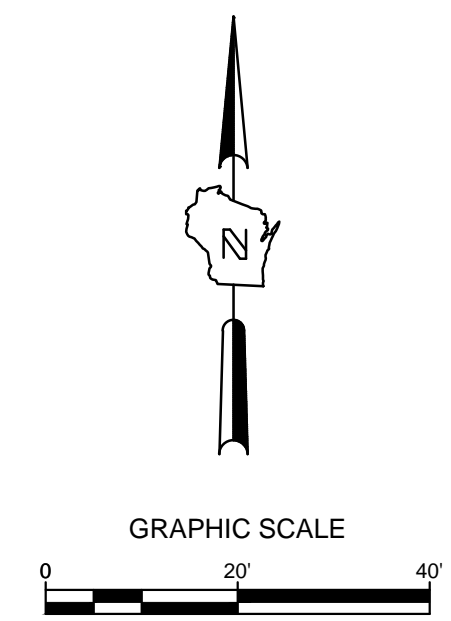
THE UNDERGROUND UTILITY INFORMATION SHOWN ON THIS MAP IS BASED ON FIELD MARKINGS AND INFORMATION FURNISHED BY UTILITY COMPANIES AND THE LOCAL MUNICIPALITY. WHILE THIS INFORMATION IS BELIEVED TO BE RELIABLE, ITS ACCURACY AND COMPLETENESS CANNOT BE GUARANTEED.

**SOIL QUALITY MAP - VOLATILE ORGANIC COMPOUNDS**  
**BMO CAMPUS PARKING STRUCTURE**  
**NORTH NEW CONSTRUCTION**

BMO TOWER  
 MILWAUKEE, WISCONSIN  
 (LOT 2 - CSM 8910)

7. SOIL QUALITY MAP-VOCs	12-20-2017
6. Drawing Update	12-6-2017
5. Site Plan Map Update	9-12-2017
4. Site Plan Map Update	6-7-2017
3. Site Plan Map Update	5-8-2017
2. REVISED BORING LOCATION	1-12-2017
1. REVISED BORING LOCATION	1-6-2017
NO. REVISION	DATE BY

DRAWING NO.	Sigma Boring Fig.dwg
DRAWN BY:	PRF/CCK (Site Plan Map Update)
DATE:	12/22/16
PROJECT NO.:	---
CHECKED BY:	---
APPROVED BY:	---
FIGURE NO.:	---



- LEGEND:**
- + TW SOIL BOREHOLE / TEMP WELL
  - SB SOIL BOREHOLE
  - ⊕ GEOTECH BOREHOLE
  - ⊕ LOCATIONS FIELD MEASURED OR SURVEYED
  - BUILDING FOUNDATION ELEMENTS  
FOOTPRINT - FOOTINGS AND GRADE BEAMS (APPROXIMATE)



Sample ID:	SB-2-12R
Depth:	2 - 3
Date:	11/17/17
PAHs	
B(a)A	{ [ 27.2 ] }
B(a)P	{ [ 15.7 ] }
B(b)F	{ [ 22.9 ] }
C	15.4
D(a,h)A	[ 3.5 ]
I(1,2,3-cd)P	[ 8.5 ]
N	3.6

Sample ID:	SB-2-12RR
Depth:	3 - 5
Date:	11/22/17
PAHs	
B(a)A	[ 1.36 ]
B(a)P	[ 1.01 ]
B(b)F	[ 1.48 ]
C	1.11
D(a,h)A	[ 0.165 ]

Sample ID:	SB-2-1
Depth:	4-6
Date:	4/14/17
PAHs	NE

Sample ID:	SB-2-2
Depth:	5-7
Date:	4/14/17
PAHs	ND

Sample ID:	SB-2-3
Depth:	5-7
Date:	4/14/17
PAHs	ND

Sample ID:	SB-2-4
Depth:	4-6
Date:	4/14/17
PAHs	ND

Sample ID:	SB-2-5
Depth:	4-6
Date:	4/14/17
PAHs	NE

Sample ID:	SB-2-6
Depth:	5-7
Date:	4/14/17
PAHs	ND

Sample ID:	SB-2-7
Depth:	2-4
Date:	4/14/17
PAHs	ND

Sample ID:	TW-1
Depth:	0 - 2   4 - 6
Date:	1/30/17
PAHs	ND

Sample ID:	TW-3
Depth:	0 - 2   2 - 4
Date:	1/30/17
PAHs	ND

Sample ID:	SB-2
Depth:	2 - 4   6 - 8
Date:	1/30/17
PAHs	NE

Sample ID:	SB-4
Depth:	0 - 2   4 - 6
Date:	1/30/17
PAHs	ND

Sample ID:	TW-8
Depth:	0 - 2   2 - 4
Date:	1/30/17
PAHs	ND

Sample ID:	SB-25
Depth:	6 - 8   10 - 12
Date:	11/20/17
PAHs	
B(a)A	{ [ 23.4 ] } 0.0206 J
B(a)P	{ [ 19.8 ] } 0.0123 J
B(b)F	{ [ 26.1 ] } 0.0149 J
C	19 0.0164 J
D(a,h)A	[ 3.3 ] <0.0078
I(1,2,3-cd)P	[ 1 ] <0.0114

Sample ID:	SB-24
Depth:	6 - 8   10 - 12
Date:	11/20/17
PAHs	NE

Sample ID:	SB-5
Depth:	0 - 2   2 - 4
Date:	1/30/17
PAHs	NE

Sample ID:	SB-2-11R
Depth:	2 - 4   4 - 6   8 - 10
Date:	11/17/17
PAHs	
B(a)A	[ 10.5 ] [ 1.81 ] 0.12
B(a)P	{ [ 7.7 ] } [ 1.97 ] [ 0.135 ]
B(b)F	[ 11.2 ] [ 2.44 ] 0.163
C	1.6 0.109
D(a,h)A	[ 1.24 ] [ 0.33 ] 0.0213 J
I(1,2,3-cd)P	[ 3.8 ] 1.08 0.075
N	1.77 0.055 <0.0153

Sample ID:	SB-2-11RR
Depth:	0 - 2
Date:	11/22/17
PAHs	
B(a)P	[ 0.16 ]
C	0.197

Sample ID:	SB-2-13
Depth:	0 - 2   2 - 4
Date:	11/22/17
PAHs	NE

Sample ID:	SB-2-14
Depth:	0 - 2   2 - 4
Date:	11/22/17
PAHs	NE

Sample ID:	SB-2-9R
Depth:	0 - 2   2 - 4
Date:	11/22/17
PAHs	NE

Sample ID:	SB-2-10R
Depth:	0 - 2   2 - 4
Date:	11/22/17
PAHs	NE

Sample ID:	SB-6
Depth:	2 - 4   6 - 8
Date:	1/30/17
PAHs	ND

Sample ID:	TW-7
Depth:	0 - 2   2 - 4
Date:	1/30/17
PAHs	ND

**Analytical Key**

B(a)A = Benzo(a)anthracene      D(a,h)A = Dibenzo(a,h)anthracene  
 B(a)P = Benzo(a)pyrene      I(1,2,3-cd)P = Indeno(1,2,3-cd)pyrene  
 B(b)F = Benzo(b)fluoranthene      N = Naphthalene  
 C = Chrysene

"J" = Analyte detected between Limit of Detection and Limit of Quantitation  
**BOLD** = Concentration exceeds Groundwater Pathway RCL  
 [ ] = Concentration exceeds Non-Industrial Direct Contact RCL (any depth)  
 { } = Concentration exceeds Industrial Direct Contact RCL (any depth)

ND = No PAHs detected  
 NE = No PAHs present at concentrations greater than RCLs

All concentrations in units of mg/kg (milligrams per kilogram)

Project Site (Lot 2 CSM 8910)

778 N Water Street Property

SOIL BORINGS COMPLETED OFF-SITE (OTHER THAN SB-24 & SB-25) AND TW-17 ARE ASSOCIATED WITH SEPARATE PHASE II ESA WORK AND ARE NOT ASSOCIATED WITH THE SITE INVESTIGATION WORK COMPLETED AT THE SITE. SB-24 AND SB-25 WERE COMPLETED ON THE SOUTH SURFACE PARKING LOT AS PART OF SOIL MANAGEMENT PLANNING

ESTIMATED EXTENT OF SOIL PAH IMPACTS GREATER THAN NR 720 RCL FOR NON-INDUSTRIAL DIRECT CONTACT

ESTIMATED EXTENT OF SOIL PAH IMPACTS GREATER THAN NR 720 RCL FOR PROTECTION OF GROUNDWATER

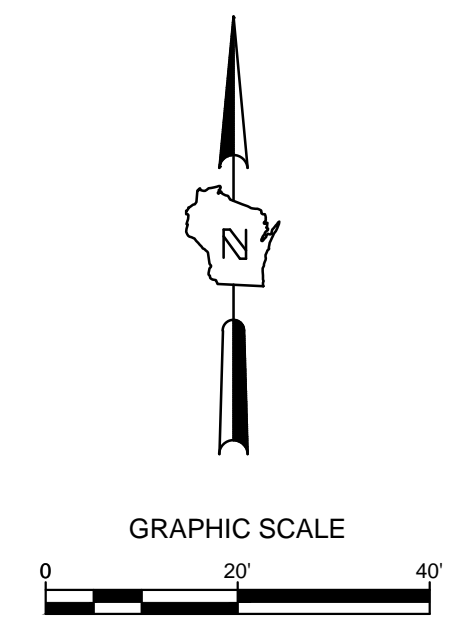
- ONLY DATA EXCEEDING NR 720 RCLs INCLUDED IN DATA BOXES  
 - SAMPLES NOT ANALYZED FOR PAHs NOT INCLUDED

BMO TOWER  
 MILWAUKEE, WISCONSIN  
 (LOT 2 - CSM 8910)

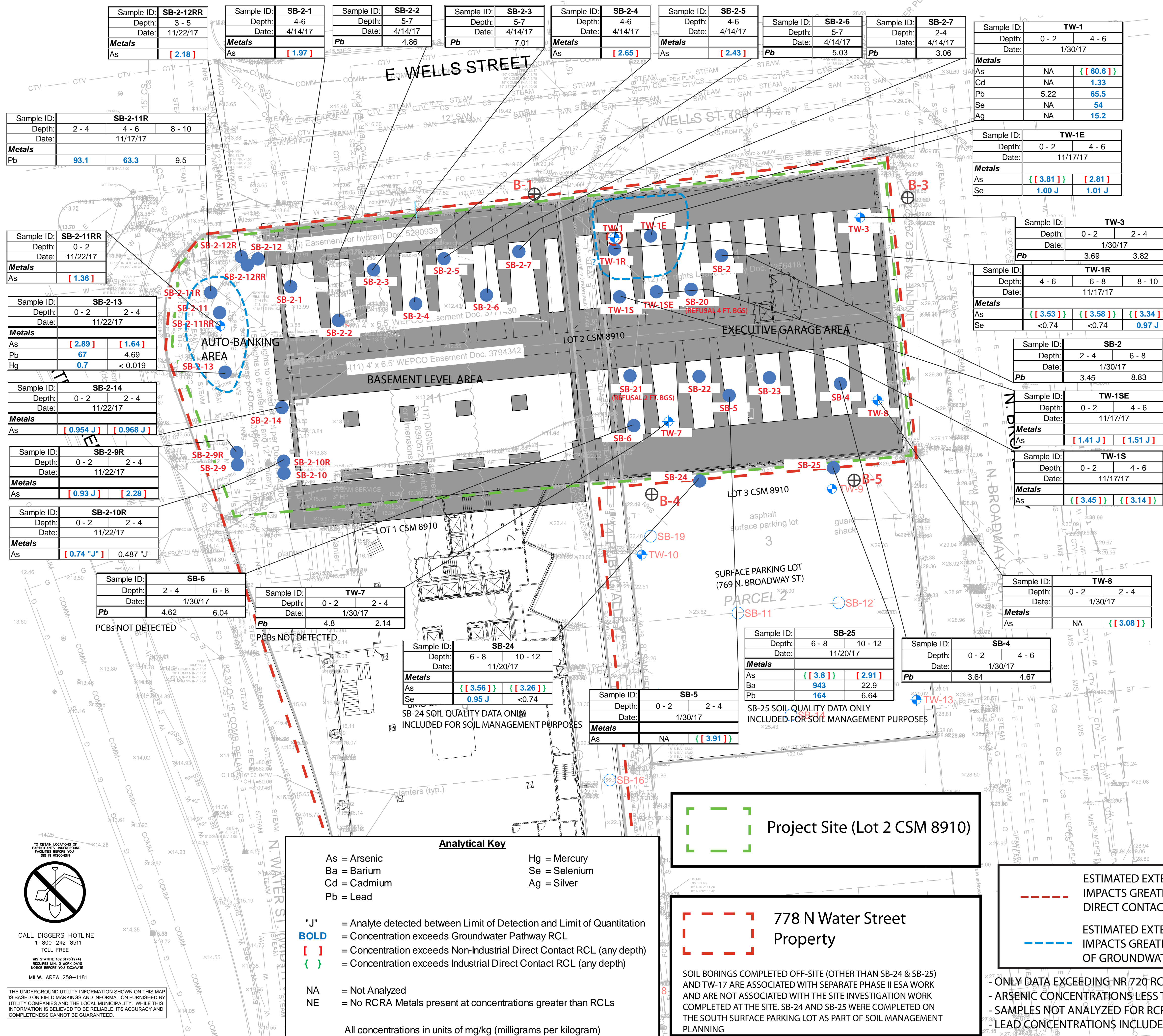
SOIL QUALITY MAP - POLYNUCLEAR AROMATIC HYDROCARBONS  
 BMO CAMPUS PARKING STRUCTURE  
 NORTH NEW CONSTRUCTION

7. SOIL QUALITY MAP-PAHs	12-20-2017
6. Drawing Update	12-6-2017
5. Site Plan Map Update	9-12-2017
4. Site Plan Map Update	6-7-2017
3. Site Plan Map Update	5-8-2017
2. REVISED BORING LOCATION	1-12-2017
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NO. REVISION	DATE BY

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DATE:	12/22/16
PROJECT NO.:	---
CHECKED BY:	---
APPROVED BY:	
FIGURE NO.:	



- LEGEND:**
- + TW SOIL BOREHOLE / TEMP WELL
  - SB SOIL BOREHOLE
  - ⊕ GEOTECH BOREHOLE
  - ⊕ LOCATIONS FIELD MEASURED OR SURVEYED
  - BUILDING FOUNDATION ELEMENTS FOOTPRINT - FOOTINGS AND GRADE BEAMS (APPROXIMATE)



**SOIL QUALITY MAP - RCRA METALS - LEAD - PCBs**  
**BMO CAMPUS PARKING STRUCTURE**  
**NORTH NEW CONSTRUCTION**

BMO TOWER  
 MILWAUKEE, WISCONSIN  
 (LOT 2 - CSM 8910)

7. SOIL QUALITY MAP-RCRA/Pb/PCB	12-20-2017
6. Drawing Update	12-6-2017
5. Site Plan Map Update	9-12-2017
4. Site Plan Map Update	6-7-2017
3. Site Plan Map Update	5-8-2017
2. REVISED BORING LOCATION	1-12-2017
1. REVISED BORING LOCATION	1-6-2017
NO. REVISION	DATE BY

DRAWING NO.	Sigma Boring Fig.dwg
DRAWN BY:	PRF/CCK (Site Plan Map Update)
DATE:	12/22/16
PROJECT NO.:	---
CHECKED BY:	---
APPROVED BY:	---
FIGURE NO.:	---

**Analytical Key**

As = Arsenic	Hg = Mercury
Ba = Barium	Se = Selenium
Cd = Cadmium	Ag = Silver
Pb = Lead	

"J"	= Analyte detected between Limit of Detection and Limit of Quantitation
<b>BOLD</b>	= Concentration exceeds Groundwater Pathway RCL
[ ]	= Concentration exceeds Non-Industrial Direct Contact RCL (any depth)
{ }	= Concentration exceeds Industrial Direct Contact RCL (any depth)

NA	= Not Analyzed
NE	= No RCRA Metals present at concentrations greater than RCLs

All concentrations in units of mg/kg (milligrams per kilogram)

- - - - Project Site (Lot 2 CSM 8910)

- - - - 778 N Water Street Property

SOIL BORINGS COMPLETED OFF-SITE (OTHER THAN SB-24 & SB-25) AND TW-17 ARE ASSOCIATED WITH SEPARATE PHASE II ESA WORK AND ARE NOT ASSOCIATED WITH THE SITE INVESTIGATION WORK COMPLETED AT THE SITE. SB-24 AND SB-25 WERE COMPLETED ON THE SOUTH SURFACE PARKING LOT AS PART OF SOIL MANAGEMENT PLANNING

- - - - ESTIMATED EXTENT OF SOIL RCRA METALS AND/OR LEAD IMPACTS GREATER THAN NR 720 RCL FOR NON-INDUSTRIAL DIRECT CONTACT  
- - - - ESTIMATED EXTENT OF SOIL RCRA METALS AND/OR LEAD IMPACTS GREATER THAN NR 720 RCL FOR PROTECTION OF GROUNDWATER

- ONLY DATA EXCEEDING NR 720 RCLs INCLUDED IN RCRA METALS DATA BOXES
- ARSENIC CONCENTRATIONS LESS THAN BTV OF 8 mg/kg CONSIDERED BACKGROUND
- SAMPLES NOT ANALYZED FOR RCRA METALS, LEAD AND/OR PCBs NOT INCLUDED
- LEAD CONCENTRATIONS INCLUDED AT LOCATIONS ONLY SAMPLED FOR LEAD

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 TOLL FREE

WE STATE: 182.07(1)(b) REQUIRES MIN. 3 WORK DAYS NOTICE BEFORE YOU DIG  
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THE UNDERGROUND UTILITY INFORMATION SHOWN ON THIS MAP IS BASED ON FIELD MARKINGS AND INFORMATION FURNISHED BY UTILITY COMPANIES AND THE LOCAL MUNICIPALITY. WHILE THIS INFORMATION IS BELIEVED TO BE RELIABLE, ITS ACCURACY AND COMPLETENESS CANNOT BE GUARANTEED.

**LEGEND:**

- + TW SOIL BOREHOLE / TEMP WELL
- SB SOIL BOREHOLE
- ⊕ GEOTECH BOREHOLE
- ⊕ LOCATIONS FIELD MEASURED OR SURVEYED

GRAPHIC SCALE  
 0 20 40

**SOIL MANAGEMENT AREAS SUMMARY**

**RESTRICTED OFF-SITE DISPOSAL**

- Auto-Banking Area
- Appx. 1,470 cubic yards excess
- NR 718 regulated material to be taken to licensed landfill or Solvay site

**RESTRICTED OFF-SITE DISPOSAL**

- Executive Garage Area
- Appx. 591 cubic yards excess
- NR 718 regulated material to be taken to licensed landfill or Solvay site

**UNRESTRICTED**

- Basement Level Area
- Appx. 5,169 cubic yards
- Unrestricted material to be taken offsite and managed at generator discretion

**LANDFILL DISPOSAL**

- Earth Retention/Foundation Excavation
- Appx. 100-150 cubic yards
- Fill - Off-site material to be disposed of at licensed landfill facility.

- SOIL MANAGEMENT PLAN NOTES:**
1. IF GROSSLY IMPACTED SOIL (e.g. FREE PRODUCT, STRONG ODORS, DISCOLORATION, OR ELEVATED FIELD SCREEN RESULTS) IS ENCOUNTERED DURING EXCAVATION ACTIVITIES, SIGMA MUST BE NOTIFIED. THE SOIL WILL BE EVALUATED BY SIGMA AND IF APPROPRIATE, EXCAVATED, TEMPORARILY STOCKPILED, CHARACTERIZED AND POSSIBLY DISPOSED OF OFF-SITE.
  2. ALL SOIL IMPORTED TO SITE MUST BE APPROVED BY SIGMA, THE OWNER, AND POSSIBLY THE WDNR. CONTACT SIGMA AT LEAST 60 DAYS BEFORE TO BEGIN APPROVAL PROCESS
  3. IN THE EVENT THAT UNDERGROUND STORAGE TANKS (USTs) ARE DISCOVERED, SIGMA MUST BE NOTIFIED IMMEDIATELY. SIGMA WILL DIRECT THE REMOVAL AND OFF-SITE DISPOSAL IN ACCORDANCE WITH CURRENT REGULATIONS.

- MATERIAL PROPOSED FOR OFF-SITE DISPOSAL AT LOW-HAZARD EXEMPTION SITE OR LICENSED LANDFILL (IF EXCAVATED)
- MATERIAL PROPOSED FOR UNRESTRICTED USE OFF-SITE
- MATERIAL PROPOSED FOR LICENSED LANDFILL DISPOSAL
- MATERIAL PROPOSED FOR PLACEMENT AT SOLVAY SITE

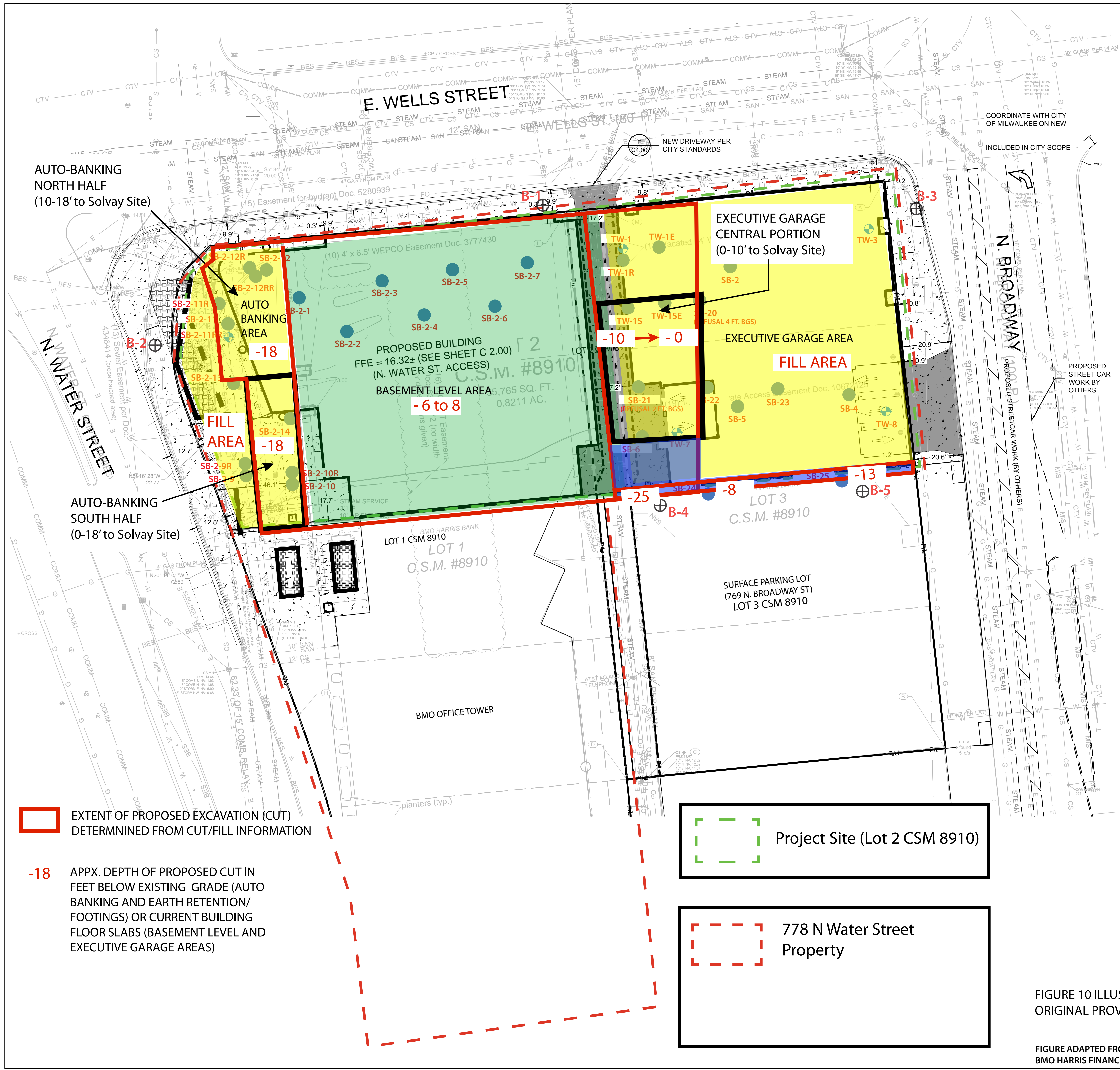


FIGURE 10 ILLUSTRATES REVISED SOIL MANAGEMENT PLAN FROM ORIGINAL PROVIDED IN SIGMA SI/RAP & SI/RAP ADDENDUM

FIGURE ADAPTED FROM KAHLER SLATER SITE PLAN SHEET C1.00 PROJECT NO. 216078 (OCTOBER 2, 2017) BMO HARRIS FINANCIAL CENTER

BMO TOWER  
 MILWAUKEE, WISCONSIN  
 (LOT 2 - CSM 8910)  
 REVISED SOIL MANAGEMENT PLAN  
 NR718 REQUEST TO SOLVAY SITE  
 BMO CAMPUS PARKING STRUCTURE  
 REDEVELOPMENT

NO.	REVISION	DATE	BY
6.	Drawing Update	12-6-2017	
5.	Site Plan Map Update	9-12-2017	
4.	Site Plan Map Update	6-7-2017	
3.	Site Plan Map Update	5-8-2017	
2.	REVISED BORING LOCATION	1-12-2017	
1.	REVISED BORING LOCATION	1-6-2017	

DRAWING NO.:	Sigma Boring Fig.dwg
DRAWN BY:	PRF/CCK (Site Plan Map Update)
DATE:	12/22/16
PROJECT NO.:	---
CHECKED BY:	---
APPROVED BY:	
FIGURE NO.:	

**Section 10: ADDITIONAL ATTACHMENTS**

**Table 1**  
**Soil Analytical Results - North New Construction - Former Executive Garage**  
**WWB Development, LLC/Broadway Tierra Partners, LLC - BMO Site - 778 N Water Street, Milwaukee, Wisconsin**  
**Sigma Project No. 16722**

Soil Sample Location:	TW-1		TW-1R			TW-1E		TW-1SE		TW-1S		SB-2		TW-3		Groundwater Pathway RCL <sup>4</sup>	Non-Industrial Direct Contact RCL <sup>5</sup>	Industrial Direct Contact RCL <sup>6</sup>	Background Threshold Value <sup>7</sup>	
Sample Depth (feet bgs):	0 - 2	4 - 6	4 - 6	6 - 8	8 - 10	0 - 2	4 - 6	0 - 2	4 - 6	0 - 2	4 - 6	2 - 4	6 - 8	0 - 2	2 - 4					
Sample Collection Date:	1/30/17		11/17/17			11/17/17		11/17/17		11/17/17		1/30/17		1/30/17						
Depth to Groundwater (feet bgs):	5		7			NA		NA		NA		NA		3						
Unsaturated/Smear Zone (U) or Saturated (S):	U	U/S	U	U/S	S	U	U	U	U/S	U	S	U	S	U	U/S					
Soil / Material Composition	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Silty Clay	Granular Fill	Silty Clay	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Silty Clay	Granular Fill	Granular Fill					
Organic Vapor Monitor	ppm	0.8	1.1	3.7	3.5	4.0	1.1	1.5	1.4	1.1	3.4	2.1	1.1	13.1	0.7	1.2	NS	NS	NS	NS
<b>Detected VOCs</b>																				
Benzene	mg/kg	<0.03	<0.03	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.03	<0.03	<0.03	<0.03	0.0051	1.6	7.07	NS
Naphthalene	mg/kg	<0.094	<0.094	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.094	<0.094	<0.094	<0.094	0.6582	5.52	24.1	NS
Toluene	mg/kg	<0.032	<0.032	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.032	<0.032	<0.032	<0.032	1.1072	818	818	NS
1,2,4-Trimethylbenzene	mg/kg	<0.025	<0.025	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.025	<0.025	<0.025	<0.025	1.3821	219	219	NS
Xylenes (total)	mg/kg	<0.116	<0.116	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.116	<0.116	<0.116	<0.116	3.96	260	260	NS
<b>PAHs</b>																				
Acenaphthene	mg/kg	<0.0135	<0.0135	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0135	<0.0135	<0.0135	<0.0135	NS	3,590	45,200	NS
Acenaphthylene	mg/kg	<0.012	<0.012	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.012	<0.012	<0.012	<0.012	NS	NS	NS	NS
Anthracene	mg/kg	<0.0124	<0.0124	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0124	<0.0124	<0.0124	<0.0124	196.9492	17,900	100,000	NS
Benzo(a)anthracene	mg/kg	<0.0116	<0.0116	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0116	<0.0116	<0.0116	<0.0116	NS	1.14	20.8	NS
Benzo(a)pyrene	mg/kg	<0.0113	<0.0113	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0113	<0.0113	<0.0113	<0.0113	0.47	0.115	2.11	NS
Benzo(b)fluoranthene	mg/kg	<0.013	<0.013	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.013	<0.013	<0.013	<0.013	0.4793	1.15	21.1	NS
Benzo(ghi)perylene	mg/kg	<0.0114	<0.0114	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0114	<0.0114	<0.0114	<0.0114	NS	NS	NS	NS
Benzo(k)fluoranthene	mg/kg	<0.0117	<0.0117	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0117	<0.0117	<0.0117	<0.0117	NS	11.5	211	NS
Chrysene	mg/kg	<0.0138	<0.0138	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0138	<0.0138	<0.0138	<0.0138	0.1446	115	2,110	NS
Dibenzo(a,h)anthracene	mg/kg	<0.0142	<0.0142	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0142	<0.0142	<0.0142	<0.0142	NS	0.115	2.11	NS
Fluoranthene	mg/kg	<0.0131	<0.0131	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0131	<0.0131	<0.0131	<0.0131	88.8778	2,390	30,100	NS
Fluorene	mg/kg	<0.0135	<0.0135	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0135	<0.0135	<0.0135	<0.0135	14.8299	2,390	30,100	NS
Indeno(1,2,3-cd)pyrene	mg/kg	<0.015	<0.015	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.015	<0.015	<0.015	<0.015	NS	1.15	21.1	NS
1-Methylnaphthalene	mg/kg	<0.0143	<0.0143	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0143	0.0211 J	<0.0143	<0.0143	NS	17.6	72.7	NS
2-Methylnaphthalene	mg/kg	<0.0119	<0.0119	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0119	<0.0119	<0.0119	<0.0119	NS	239	3,010	NS
Naphthalene	mg/kg	<0.0122	<0.0122	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0122	<0.0122	<0.0122	<0.0122	0.6582	5.52	24.1	NS
Phenanthrene	mg/kg	<0.0109	<0.0109	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0109	0.0128 J	<0.0109	<0.0109	NS	NS	NS	NS
Pyrene	mg/kg	<0.0126	<0.0126	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0126	<0.0126	<0.0126	<0.0126	54.5455	1,790	22,600	NS
<b>RCRA Metals</b>																				
Arsenic	mg/kg	NA	{ [ 60.6 ] }	{ [ 3.53 ] }	{ [ 3.58 ] }	{ [ 3.34 ] }	{ [ 3.81 ] }	[ 2.81 ]	[ 1.41 J ]	[ 1.51 J ]	{ [ 3.45 ] }	{ [ 3.14 ] }	NA	NA	NA	NA	0.584	0.677	3	8
Barium	mg/kg	NA	132	13	17.4	36.2	16.8	29.1	10.7	15.2	17.7	13.6	NA	NA	NA	NA	164.8	15,300	100,000	364
Cadmium	mg/kg	NA	1.33	0.162 J	0.193 J	0.163 J	0.159 J	0.189	0.137 J	0.138 J	0.190 J	0.140 J	NA	NA	NA	NA	0.752	71.1	985	1
Chromium	mg/kg	NA	20.7	7.68	6.6	17	6.07	15.6	4.69	5.22	6.35	6.22	NA	NA	NA	NA	360,000	NS	NS	44
Lead	mg/kg	5.22	65.5	7.23	8.2	7.03	7.85	7.58	5.01	5.17	7.8	6.63	3.45	8.83	3.69	3.82	27	400	800	52
Mercury	mg/kg	NA	<0.0131	<0.0028	<0.0028	0.0072 J	0.0043 J	0.0070 J	<0.0028	<0.0028	0.0032 J	<0.0028	NA	NA	NA	NA	0.208	3.13	3.13	NS
Selenium	mg/kg	NA	54	<0.74	<0.74	0.97 J	1.00 J	1.01 J	<0.74	<0.74	<0.74	<0.74	NA	NA	NA	NA	0.52	391	5,840	NS
Silver	mg/kg	NA	15.2	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	NA	NA	NA	NA	0.8491	391	5,840	NS
<b>PCBs</b>																				
PCB-1016	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	4.11	28	NS
PCB-1221	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.213	0.883	NS
PCB-1232	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.19	0.792	NS
PCB-1242	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.235	0.972	NS
PCB-1248	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.236	0.975	NS
PCB-1254	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.239	0.988	NS
PCB-1260	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.243	1	NS

- Notes:  
1. Unsaturated/smear zone versus saturated soil conditions based on: (1) measured water levels in adjacent/nearby monitoring wells, or (2) soil moisture conditions recorded on soil boring logs during drilling.  
2. Analytical units: mg/kg = milligrams per kilogram (equivalent to parts per million, ppm)  
3. NA = not analyzed

4. Groundwater Pathway RCL = Residual Contaminant Level for protection of groundwater as presented on the WDNR's RCL Spreadsheet (dated March 2017) referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014  
5. Non-Industrial Direct Contact RCL = Residual Contaminant Level for protection of direct contact at a non-industrial property as presented on the WDNR's RCL Spreadsheet (dated March 2017) with default input parameters as referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014  
6. Industrial Direct Contact RCL = Residual Contaminant Level for protection of direct contact at an industrial property as presented on the WDNR's RCL Spreadsheet (dated March 2017) with default input parameters as referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014  
7. Background Threshold Value = Non-outlier trace element maximum levels in Wisconsin surface soils from USGS report "Distribution and Variation of Arsenic in Wisconsin Surface Soils, With Data on Other Trace Elements" (revised February 2013)  
8. NS = no standard established  
9. Laboratory flags: "J" = Analyte detected between Limit of Detection and Limit of Quantitation  
10. Exceedances: **BOLD** = Concentration exceeds Groundwater Pathway RCL  
[ ] = Concentration exceeds Non-Industrial Direct Contact RCL (any depth)  
{ } = Concentration exceeds Industrial Direct Contact RCL (any depth)

Soil Data for Solway site NR 718



**Table 1**  
**Soil Analytical Results - North New Construction - Former Executive Garage**  
**WWB Development, LLC/Broadway Tierra Partners, LLC - BMO Site - 778 N Water Street, Milwaukee, Wisconsin**  
**Sigma Project No. 16722**

Soil Sample Location:	SB-4		SB-5		SB-6		TW-7		TW-8		SB-22	SB-23	SB-24		SB-25		Groundwater Pathway RCL <sup>4</sup>	Non-Industrial Direct Contact RCL <sup>5</sup>	Industrial Direct Contact RCL <sup>6</sup>	Background Threshold Value <sup>7</sup>	
	Sample Depth (feet bgs):	0 - 2	4 - 6	0 - 2	2 - 4	2 - 4	6 - 8	0 - 2	2 - 4	0 - 2	2 - 4	4 - 6	0 - 4	6 - 8	10 - 12	6 - 8					10 - 12
Sample Collection Date:	1/30/17		1/30/17		1/30/17		1/30/17		1/30/17		11/17/17	11/17/17	11/20/17		11/20/17						
Depth to Groundwater (feet bgs):	NA		NA		NA		6.5		0.5		NA	NA	NA		NA						
Unsaturated/Smear Zone (U) or Saturated (S):	U	S	U	U	U	U/S	U	U	U/S	S	U/S	U/S	U	U	U	U					
Soil / Material Composition	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Mixed Fill	Silty Clay	Mixed Fill	Silty Clay					
Organic Vapor Monitor	ppm	1.5	1.2	19.8	1.7	1.5	1.9	0.7	0.9	0.6	1.3	1.2	3.3	4.4	485	3.1	NS	NS	NS	NS	
<b>Detected VOCs</b>																					
Benzene	mg/kg	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	0.39	<0.03	<0.03	0.0051	1.6	7.07	NS
Naphthalene	mg/kg	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	<0.094	0.111 J	<0.094	0.6582	5.52	24.1	NS
Toluene	mg/kg	<0.032	<0.032	<0.032	<0.032	<0.032	<0.032	<0.032	<0.032	<0.032	<0.032	<0.032	<0.032	0.137	<0.032	<0.032	1.1072	818	818	219	NS
1,2,4-Trimethylbenzene	mg/kg	<0.025	<0.025	0.083	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	1.3821	219	219	NS
Xylenes (total)	mg/kg	<0.116	<0.116	0.102 J	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	<0.116	3.96	260	260	NS
<b>PAHs</b>																					
Acenaphthene	mg/kg	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	NA	NA	<0.0151	<0.0151	1.93	<0.0151	NS	3,590	45,200	NS	
Acenaphthylene	mg/kg	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	NA	NA	<0.0159	<0.0159	2.59	<0.0159	NS	NS	NS	NS	
Anthracene	mg/kg	<0.0124	<0.0124	<0.0124	<0.0124	<0.0124	<0.0124	<0.0124	<0.0124	<0.0124	NA	NA	<0.0109	<0.0109	10.2	<0.0109	196.9492	17,900	100,000	NS	
Benzo(a)anthracene	mg/kg	<0.0116	<0.0116	0.0118 J	<0.0116	<0.0116	<0.0116	<0.0116	<0.0116	<0.0116	NA	NA	0.012 J	<0.0116	{ [ 23.4 ] }	0.0206 J	NS	1.14	20.8	NS	
Benzo(a)pyrene	mg/kg	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	NA	NA	<0.0113	<0.0113	{ [ 19.8 ] }	0.0123 J	0.47	0.115	2.11	NS	
Benzo(b)fluoranthene	mg/kg	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	NA	NA	<0.013	<0.013	{ [ 26.1 ] }	0.0149 J	0.4793	1.15	21.1	NS	
Benzo(ghi)perylene	mg/kg	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	NA	NA	<0.0114	<0.0114	13.4	<0.0114	NS	NS	NS	NS	
Benzo(k)fluoranthene	mg/kg	<0.0117	<0.0117	<0.0117	<0.0117	<0.0117	<0.0117	<0.0117	<0.0117	<0.0117	NA	NA	<0.0147	<0.0147	7.7	<0.0147	NS	11.5	211	NS	
Chrysene	mg/kg	<0.0138	<0.0138	0.015 J	<0.0138	<0.0138	<0.0138	<0.0138	<0.0138	<0.0138	NA	NA	<0.0121	<0.0121	19	0.0164 J	0.1446	115	2,110	NS	
Dibenzo(a,h)anthracene	mg/kg	<0.0142	<0.0142	<0.0142	<0.0142	<0.0142	<0.0142	<0.0142	<0.0142	<0.0142	NA	NA	<0.0078	<0.0078	{ [ 3.3 ] }	<0.0078	NS	0.115	2.11	NS	
Fluoranthene	mg/kg	<0.0131	<0.0131	0.0273 J	<0.0131	<0.0131	<0.0131	<0.0131	<0.0131	<0.0131	NA	NA	<0.0147	<0.0147	49	0.0288 J	88.8778	2,390	30,100	NS	
Fluorene	mg/kg	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	<0.0135	NA	NA	<0.0179	<0.0179	1.99	<0.0179	14.8299	2,390	30,100	NS	
Indeno(1,2,3-cd)pyrene	mg/kg	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	NA	NA	<0.0114	<0.0114	{ [ 11 ] }	<0.0114	NS	1.15	21.1	NS	
1-Methylnaphthalene	mg/kg	<0.0143	<0.0143	0.017 J	<0.0143	<0.0143	<0.0143	<0.0143	<0.0143	<0.0143	NA	NA	<0.0203	<0.0203	0.49 J	<0.0203	NS	17.6	72.7	NS	
2-Methylnaphthalene	mg/kg	<0.0119	<0.0119	0.0148 J	<0.0119	<0.0119	<0.0119	<0.0119	<0.0119	<0.0119	NA	NA	<0.0113	<0.0113	0.36 J	<0.0113	NS	239	3,010	NS	
Naphthalene	mg/kg	<0.0122	<0.0122	<0.0122	<0.0122	<0.0122	<0.0122	<0.0122	<0.0122	<0.0122	NA	NA	<0.0153	<0.0153	0.56	<0.0153	0.6582	5.52	24.1	NS	
Phenanthrene	mg/kg	<0.0109	<0.0109	0.0168 J	<0.0109	<0.0109	<0.0109	<0.0109	<0.0109	<0.0109	NA	NA	0.0134 J	<0.0111	33	0.0188 J	NS	NS	NS	NS	
Pyrene	mg/kg	<0.0126	<0.0126	0.0245 J	<0.0126	<0.0126	<0.0126	<0.0126	<0.0126	<0.0126	NA	NA	<0.0153	<0.0153	46	0.0254 J	54.5455	1,790	22,600	NS	
<b>RCRA Metals</b>																					
Arsenic	mg/kg	NA	NA	NA	{ [ 3.91 ] }	NA	NA	NA	NA	NA	{ [ 3.08 ] }	NA	NA	{ [ 3.56 ] }	{ [ 3.26 ] }	{ [ 3.8 ] }	{ [ 2.91 ] }	0.584	0.677	3	8
Barium	mg/kg	NA	NA	NA	21.8	NA	NA	NA	NA	NA	15.8	NA	NA	35.6	60	943	22.9	164.8	15,300	100,000	364
Cadmium	mg/kg	NA	NA	NA	<0.02	NA	NA	NA	NA	NA	<0.02	NA	NA	0.158 J	0.137 J	0.281	0.164 J	0.752	71.1	985	1
Chromium	mg/kg	NA	NA	NA	8.21	NA	NA	NA	NA	NA	7.22	NA	NA	16.2	18	17	10	360,000	NS	NS	44
Lead	mg/kg	3.64	4.67	1.3	9.45	4.62	6.04	4.8	2.14	3.52	4.86	NA	NA	7.38	7.37	164	6.64	27	400	800	52
Mercury	mg/kg	NA	NA	NA	<0.0131	NA	NA	NA	NA	NA	<0.0131	NA	NA	0.0070 J	0.0076 J	0.085	0.0043 J	0.208	3.13	3.13	NS
Selenium	mg/kg	NA	NA	NA	<0.52	NA	NA	NA	NA	NA	<0.52	NA	NA	0.95 J	<0.74	<0.74	<0.74	0.52	391	5,840	NS
Silver	mg/kg	NA	NA	NA	<0.57	NA	NA	NA	NA	NA	<0.57	NA	NA	<0.28	<0.28	<0.28	<0.28	0.8491	391	5,840	NS
<b>PCBs</b>																					
PCB-1016	mg/kg	NA	NA	NA	NA	<0.0035	<0.0035	NA	<0.0035	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	4.11	28	NS
PCB-1221	mg/kg	NA	NA	NA	NA	<0.0054	<0.0054	NA	<0.0054	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.213	0.883	NS
PCB-1232	mg/kg	NA	NA	NA	NA	<0.0042	<0.0042	NA	<0.0042	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.19	0.792	NS
PCB-1242	mg/kg	NA	NA	NA	NA	<0.0032	<0.0032	NA	<0.0032	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.235	0.972	NS
PCB-1248	mg/kg	NA	NA	NA	NA	<0.0032	<0.0032	NA	<0.0032	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.236	0.975	NS
PCB-1254	mg/kg	NA	NA	NA	NA	<0.0047	<0.0047	NA	<0.0047	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.239	0.988	NS
PCB-1260	mg/kg	NA	NA	NA	NA	<0.0049	<0.0049	NA	<0.0049	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	0.243	1	NS

- Notes:  
1. Unsaturated/smear zone versus saturated soil conditions based on: (1) measured water levels in adjacent/nearby monitoring wells, or (2) soil moisture conditions recorded on soil boring logs during drilling.  
2. Analytical units: mg/kg = milligrams per kilogram (equivalent to parts per million, ppm)  
3. NA = not analyzed

4. Groundwater Pathway RCL = Residual Contaminant Level for protection of groundwater as presented on the WDNR's RCL Spreadsheet (dated March 2017) referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014  
5. Non-Industrial Direct Contact RCL = Residual Contaminant Level for protection of direct contact at a non-industrial property as presented on the WDNR's RCL Spreadsheet (dated March 2017) with default input parameters as referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014  
6. Industrial Direct Contact RCL = Residual Contaminant Level for protection of direct contact at an industrial property as presented on the WDNR's RCL Spreadsheet (dated March 2017) with default input parameters as referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014  
7. Background Threshold Value = Non-outlier trace element maximum levels in Wisconsin surface soils from USGS report "Distribution and Variation of Arsenic in Wisconsin Surface Soils, With Data on Other Trace Elements" (revised February 2013).  
8. NS = no standard established  
9. Laboratory flags: "J" = Analyte detected between Limit of Detection and Limit of Quantitation  
10. Exceedances: **BOLD**  
[ ]  
{ }

*Soil Data for Solway Site NR 718*

**Table 1**  
**Soil Analytical Results - North New Construction - Auto Banking Area**  
**WWB Development, LLC/Broadway Tierra Partners, LLC - BMO Site - 778 N Water Street, Milwaukee, Wisconsin**  
**Sigma Project No. 16722**

Soil Sample Location:	SB-2-9	SB-2-9R		SB-2-10	SB-2-10R		SB-2-11	SB-2-11R			SB-2-11RR	SB-2-12	SB-2-12R	SB-2-12RR	SB-2-13		SB-2-14		Groundwater Pathway RCL <sup>4</sup>	Non-Industrial Direct Contact RCL <sup>5</sup>	Industrial Direct Contact RCL <sup>6</sup>	Background Threshold Value <sup>7</sup>		
Sample Depth (feet bgs):	2-4	0-2	2-4	2-4	0-2	2-4	2-4	2-4	4-6	8-10	0-2	2-4	2-3	3-5	0-2	2-4	0-2	2-4						
Sample Collection Date:	4/13/17	11/22/17		4/13/17	11/22/17		4/13/17	11/17/17			11/22/17	4/13/17	11/17/17	11/22/17	11/22/17		11/22/17							
Depth to Groundwater (feet bgs):	NA	NA		NA	NA		NA	NA			15.5	NA	NA	NA	NA		NA							
Unsaturated/Smear Zone (U) or Saturated (S):	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U						
Soil / Material Composition	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Mixed Fill / Silty Clay	Silty Clay	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill	Granular Fill						
Photoionization Detector	ppm	0.1	0.1	0.2	0.1	0	0.1	0.1	1.7	1.6	1.0	0.5	0.1	1.6	0.7	0.1	0.6	0	0.1	NS	NS	NS	NS	
<b>VOCs</b>		NA	NA		NA	NA		NA	NA			NA	NA	NA	NA	NA		NA						
<b>PAHs</b>																								
Acenaphthene	mg/kg	NA	< 0.0151	< 0.0151	NA	< 0.0151	< 0.0151	NA	2.42	0.06	< 0.0151	0.0279 "J"	NA	8.3	0.42	0.0154 "J"	< 0.0151	< 0.0151	< 0.0151	NS	3,590	45,200	NS	
Acenaphthylene	mg/kg	NA	< 0.0159	< 0.0159	NA	< 0.0159	< 0.0159	NA	0.44	0.314	0.0306 J	< 0.0159	NA	< 0.159	< 0.0159	< 0.0159	< 0.0159	< 0.0159	< 0.0159	NS	NS	NS	NS	
Anthracene	mg/kg	NA	0.0165 "J"	0.0131 "J"	NA	< 0.0109	< 0.0109	NA	5.9	0.83	0.084	0.085	NA	15.8	0.79	0.04	< 0.0109	< 0.0109	0.0145 "J"	196,9492	17,900	100,000	NS	
Benzo(a)anthracene	mg/kg	NA	0.058	0.033 "J"	NA	< 0.0116	0.0134 "J"	NA	{ 10.5 }	{ 1.81 }	0.12	0.187	NA	{ 27.2 }	{ 1.36 }	0.123	< 0.0116	< 0.0116	0.042	NS	1.14	20.8	NS	
Benzo(a)pyrene	mg/kg	NA	0.044	0.0267 "J"	NA	< 0.0113	< 0.0113	NA	{ 7.7 }	{ 1.97 }	{ 0.135 }	{ 0.16 }	NA	{ 15.7 }	{ 1.01 }	0.105	< 0.0113	< 0.0113	0.0268 "J"	0.47	0.115	2.11	NS	
Benzo(b)fluoranthene	mg/kg	NA	0.071	0.038 "J"	NA	< 0.013	< 0.013	NA	{ 11.2 }	{ 2.44 }	0.163	0.251	NA	{ 22.9 }	{ 1.48 }	0.151	< 0.013	< 0.013	0.041	0.4793	1.15	21.1	NS	
Benzo(ghi)perylene	mg/kg	NA	0.036	0.024 "J"	NA	< 0.0114	< 0.0114	NA	4.2	1.18	0.086	0.103	NA	11.1	0.58	0.056	< 0.0114	< 0.0114	0.0177 "J"	NS	NS	NS	NS	
Benzo(k)fluoranthene	mg/kg	NA	0.0292 "J"	0.0173 "J"	NA	< 0.0147	< 0.0147	NA	3.04	0.76	0.05	0.075	NA	7.7	0.51	0.054	< 0.0147	< 0.0147	0.0181 "J"	NS	11.5	211	NS	
Chrysene	mg/kg	NA	0.054	0.033 "J"	NA	< 0.0121	< 0.0121	NA	7.5	1.6	0.108	0.197	NA	15.4	1.11	0.115	< 0.0121	< 0.0121	0.033 "J"	0.1446	115	2,110	NS	
Dibenzo(a,h)anthracene	mg/kg	NA	< 0.0078	< 0.0078	NA	< 0.0078	< 0.0078	NA	{ 1.24 }	{ 0.33 }	0.0213 J	0.0267	NA	{ 3.5 }	{ 0.165 }	0.0183 "J"	< 0.0078	< 0.0078	< 0.0078	NS	0.115	2.11	NS	
Fluoranthene	mg/kg	NA	0.106	0.053	NA	< 0.0147	0.0164 "J"	NA	22.4	3.8	0.266	0.43	NA	47	2.92	0.239	< 0.0147	< 0.0147	0.08	88,8778	2,390	30,100	NS	
Fluorene	mg/kg	NA	< 0.0179	< 0.0179	NA	< 0.0179	< 0.0179	NA	2.51	0.16	0.0267 J	0.0201 "J"	NA	7.1	0.306	< 0.0179	< 0.0179	< 0.0179	< 0.0179	14,8299	2,390	30,100	NS	
Indeno(1,2,3-cd)pyrene	mg/kg	NA	0.0238 "J"	0.0162 "J"	NA	< 0.0114	< 0.0114	NA	{ 3.8 }	1.08	0.075	0.085	NA	{ 8.5 }	0.5	0.054	< 0.0114	< 0.0114	0.0153 "J"	NS	1.15	21.1	NS	
1-Methylnaphthalene	mg/kg	NA	< 0.0203	< 0.0203	NA	< 0.0203	< 0.0203	NA	0.62	< 0.0203	< 0.0203	< 0.0203	NA	0.92	0.041 "J"	< 0.0203	< 0.0203	< 0.0203	< 0.0203	NS	17.6	72.7	NS	
2-Methylnaphthalene	mg/kg	NA	< 0.0113	< 0.0113	NA	< 0.0113	< 0.0113	NA	0.65	0.0165 J	< 0.0113	< 0.0113	NA	1.09	0.0262 "J"	< 0.0113	< 0.0113	< 0.0113	< 0.0113	NS	239	3,010	NS	
Naphthalene	mg/kg	NA	< 0.0153	< 0.0153	NA	< 0.0153	< 0.0153	NA	1.77	0.055	< 0.0153	< 0.0153	NA	3.6	0.056	< 0.0153	< 0.0153	< 0.0153	< 0.0153	0.6582	5.52	24.1	NS	
Phenanthrene	mg/kg	NA	0.056	0.037	NA	< 0.0111	< 0.0111	NA	23.5	2.09	0.22	0.242	NA	44	2.4	0.173	< 0.0111	< 0.0111	0.056	NS	NS	NS	NS	
Pyrene	mg/kg	NA	0.084	0.049	NA	< 0.0153	< 0.0153	NA	17.4	3.3	0.218	0.32	NA	35	2.21	0.196	< 0.0153	< 0.0153	0.062	54,5455	1,790	22,600	NS	
<b>RCRA Metals</b>																								
Arsenic	mg/kg	NA	{ 0.93 J }	{ 2.28 }	NA	{ 0.74 "J" }	0.487 "J"	NA	NA	NA	NA	{ 1.36 }	NA	NA	{ 2.18 }	{ 2.89 }	{ 1.64 }	{ 0.954 "J" }	{ 0.968 "J" }	0.584	0.677	3	8	
Barium	mg/kg	NA	14.7	14.8	NA	14.5	13.4	NA	NA	NA	NA	15.6	NA	NA	15.1	54	12.4	19.4	13.3	164.8	15,300	100,000	364	
Cadmium	mg/kg	NA	< 0.08	< 0.08	NA	< 0.08	< 0.08	NA	NA	NA	NA	< 0.08	NA	NA	< 0.08	< 0.08	< 0.08	< 0.08	< 0.08	0.752	71.1	985	1	
Chromium	mg/kg	NA	5.52	8.12	NA	5.37	7.04	NA	NA	NA	NA	7.57	NA	NA	5.7	10.7	6.9	7.73	6.43	360,000	NS	NS	44	
Lead	mg/kg	NA	4.8	17.7	NA	3.3	4.69	NA	93.1	63.3	9.5	11	NA	12.4	7.72	67	4.69	3.53	3.36	27	400	800	52	
Mercury	mg/kg	NA	< 0.019	0.0682	NA	< 0.019	< 0.019	NA	NA	NA	NA	< 0.019	NA	NA	< 0.019	0.7	< 0.019	< 0.019	< 0.019	0.208	3.13	3.13	NS	
Selenium	mg/kg	NA	< 0.52	< 0.52	NA	< 0.52	< 0.52	NA	NA	NA	NA	< 0.52	NA	NA	< 0.52	< 0.52	< 0.52	< 0.52	< 0.52	0.52	391	5,840	NS	
Silver	mg/kg	NA	< 0.57	< 0.57	NA	< 0.57	< 0.57	NA	NA	NA	NA	< 0.57	NA	NA	< 0.57	< 0.57	< 0.57	< 0.57	< 0.57	0.8491	391	5,840	NS	
<b>Organic Compounds</b>																								
Ethylene Glycol	mg/kg	< 1.3	NA	NA	< 1.3	NA	NA	< 1.4	NA	NA	NA	NA	< 1.3	NA	NA	NA	NA	NA	NA	2.8279	122,000	1,230,000	NS	

- Notes:
- Unsaturated/smear zone versus saturated soil conditions based on: (1) measured water levels in adjacent/nearby monitoring wells, or (2) soil moisture conditions recorded on soil boring logs during drilling.
  - Analytical units: mg/kg = milligrams per kilogram (equivalent to parts per million, ppm)
  - NA = not analyzed
  - Groundwater Pathway RCL = Residual Contaminant Level for protection of groundwater (dilution factor of 2) as presented on the WDNr's RCL Spreadsheet (dated March 2017) referenced in WDNr guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014
  - Non-Industrial Direct Contact RCL = Residual Contaminant Level for protection of direct contact at a non-industrial property as presented on the WDNr's RCL Spreadsheet (dated March 2017) with default input parameters as referenced in WDNr guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014
  - Industrial Direct Contact RCL = Residual Contaminant Level for protection of direct contact at an industrial property as presented on the WDNr's RCL Spreadsheet (dated March 2017) with default input parameters as referenced in WDNr guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014
  - Background Threshold Value = Non-outlier trace element maximum levels in Wisconsin surface soils from USGS report "Distribution and Variation of Arsenic in Wisconsin Surface Soils, With Data on Other Trace Elements" (revised February 2013)
  - NS = no standard established
  - Laboratory flags: "J" = Analyte detected between Limit of Detection and Limit of Quantitation
  - Exceedances:
    - BOLD** = Concentration exceeds Groundwater Pathway RCL
    - { } = Concentration exceeds Non-Industrial Direct Contact RCL (any depth)
    - [ ] = Concentration exceeds Industrial Direct Contact RCL (any depth)

Soil  
 Material data for Solway site NR 718

**Table 1**  
**Soil Analytical Results - Basement Level Sub-Slab Area**  
**WWB Development, LLC/Broadway Tierra Partners, LLC - BMO Site - 778 N Water Street, Milwaukee, Wisconsin**  
**Sigma Project No. 16722**

Soil Sample Location:	SB-2-1	SB-2-2	SB-2-3	SB-2-4	SB-2-5	SB-2-6	SB-2-7	Groundwater Pathway RCL <sup>4</sup>	Non-Industrial Direct Contact RCL <sup>5</sup>	Industrial Direct Contact RCL <sup>6</sup>	Background Threshold Value <sup>7</sup>	
Sample Depth (feet bgs):	4-6	5-7	5-7	4-6	4-6	5-7	2-4					
Sample Collection Date:	4/14/17											
Depth to Groundwater (feet bgs):	NA											
Unsaturated/Smear Zone (U) or Saturated (S):	U	U	U	U	U	U	U					
Soil / Material Composition	Granular Fill	Silty Clay	Granular Fill / Silty Clay	Granular Fill	Granular Fill	Granular Fill	Granular Fill					
Organic Vapor Monitor	ppm	0.0	0.0	0.0	0.0	0.0	0.0	NS	NS	NS	NS	
<b>Detected VOCs</b>		<b>NONE DETECTED</b>										
<b>PAHs</b>												
Acenaphthene	mg/kg	<0.0151	<0.0151	<0.0151	<0.0151	<0.0151	<0.0151	NS	3,590	45,200	NS	
Acenaphthylene	mg/kg	<0.0159	<0.0159	<0.0159	<0.0159	<0.0159	<0.0159	NS	NS	NS	NS	
Anthracene	mg/kg	<0.0109	<0.0109	<0.0109	<0.0109	<0.0109	<0.0109	196.9492	17,900	100,000	NS	
Benzo(a)anthracene	mg/kg	<0.0116	<0.0116	<0.0116	<0.0116	0.0145 J	<0.0116	NS	1.14	20.8	NS	
Benzo(a)pyrene	mg/kg	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	0.47	0.115	2.11	NS	
Benzo(b)fluoranthene	mg/kg	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0.4793	1.15	21.1	NS	
Benzo(ghi)perylene	mg/kg	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	NS	NS	NS	NS	
Benzo(k)fluoranthene	mg/kg	<0.0147	<0.0147	<0.0147	<0.0147	<0.0147	<0.0147	NS	11.5	211	NS	
Chrysene	mg/kg	<0.0121	<0.0121	<0.0121	<0.0121	<0.0121	<0.0121	0.1446	115	2,110	NS	
Dibenzo(a,h)anthracene	mg/kg	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	<0.0078	NS	0.115	2.11	NS	
Fluoranthene	mg/kg	0.0197 J	<0.0147	<0.0147	<0.0147	<0.0147	<0.0147	88.8778	2,390	30,100	NS	
Fluorene	mg/kg	<0.0179	<0.0179	<0.0179	<0.0179	<0.0179	<0.0179	14.8299	2,390	30,100	NS	
Indeno(1,2,3-cd)pyrene	mg/kg	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	<0.0114	NS	1.15	21.1	NS	
1-Methylnaphthalene	mg/kg	<0.0203	<0.0203	<0.0203	<0.0203	<0.0203	<0.0203	NS	17.6	72.7	NS	
2-Methylnaphthalene	mg/kg	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	<0.0113	NS	239	3,010	NS	
Naphthalene	mg/kg	<0.0153	<0.0153	<0.0153	<0.0153	<0.0153	<0.0153	0.6582	5.52	24.1	NS	
Phenanthrene	mg/kg	<0.0111	<0.0111	<0.0111	<0.0111	<0.0111	<0.0111	NS	NS	NS	NS	
Pyrene	mg/kg	<0.0153	<0.0153	<0.0153	<0.0153	<0.0153	<0.0153	54.5455	1,790	22,600	NS	
<b>RCRA Metals</b>												
Arsenic	mg/kg	[ 1.97 ]	NA	NA	[ 2.65 ]	[ 2.43 ]	NA	NA	0.584	0.677	3	8
Barium	mg/kg	50.0	NA	NA	14.4	12.8	NA	NA	164.8	15,300	100,000	364
Cadmium	mg/kg	<0.08	NA	NA	<0.08	<0.08	NA	NA	0.752	71.1	985	1
Chromium	mg/kg	19.4	NA	NA	7.59	6.23	NA	NA	360,000	NS	NS	44
Lead	mg/kg	7.94	4.86	7.01	5.24	5.24	5.03	3.06	27	400	800	52
Mercury	mg/kg	<0.019	NA	NA	<0.019	<0.019	NA	NA	0.208	3.13	3.13	NS
Selenium	mg/kg	<0.52	NA	NA	<0.52	<0.52	NA	NA	0.52	391	5,840	NS
Silver	mg/kg	<0.57	NA	NA	<0.57	<0.57	NA	NA	0.8491	391	5,840	NS

Notes:

- Unsaturated/smear zone versus saturated soil conditions based on: (1) measured water levels in adjacent/nearby monitoring wells, or (2) soil moisture conditions recorded on soil boring logs during drilling.
- Analytical units: mg/kg = milligrams per kilogram (equivalent to parts per million, ppm)
- NA = not analyzed
- Groundwater Pathway RCL = Residual Contaminant Level for protection of groundwater as presented on the WDNR's RCL Spreadsheet (dated March 2017) referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014
- Non-Industrial Direct Contact RCL = Residual Contaminant Level for protection of direct contact at a non-industrial property as presented on the WDNR's RCL Spreadsheet (dated March 2017) with default input parameters as referenced in WDNR guidance document PUB-RR-890 "Soil Residual Contaminant Level Determinations Using the US EPA Regional Screening Level Web Calculator", dated June 2014
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- Background Threshold Value = Non-outlier trace element maximum levels in Wisconsin surface soils from USGS report "Distribution and Variation of Arsenic in Wisconsin Surface Soils, With Data on Other Trace Elements" (revised February 2013).
- NS = no standard established
- Laboratory flags: "J" = Analyte detected between Limit of Detection and Limit of Quantitation
- Exceedances:
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  - [ ] = Concentration exceeds Non-Industrial Direct Contact RCL (any depth)
  - { } = Concentration exceeds Industrial Direct Contact RCL (any depth)

# Milwaukee Solvay Coke and Gas Site

311 East Greenfield Ave, Milwaukee, WI.



Wisconsin Department of Natural Resources

Environmental Cleanup & Brownfields Redevelopment

BRRTS on the Web

Click the Location Name below to view the Location Details page for this Activity. Other Activities, if present, may be viewed from that page.

[Basic Search](#) >> 02-41-466662 Activity Details

02-41-466662 MILWAUKEE SOLVAY COKE & GAS - MGP (ALT SF)						
<b>OPEN ERP</b>						
Location Name (Click Location Name to View Location Details)				County	WDNR Region	
<a href="#">311 E GREENFIELD AVE</a>				MILWAUKEE	SOUTHEAST	
Address				Municipality		
311 E GREENFIELD AVE				MILWAUKEE		
Public Land Survey System			Latitude	Google Maps	RR Sites Map	
NW 1/4 of the NW 1/4 of Sec 04, T06N, R22E			43.0168861	<a href="#">CLICK TO VIEW</a>	<a href="#">CLICK TO VIEW</a>	
Additional Location Description			Longitude	Facility ID	Size (Acres)	
			-87.9080059	241219880	UNKNOWN	
Jurisdiction	PECFA No.	EPA Cerclis ID	Start Date	End Date	Last Action	
DNR RR		WIN000508215	2001-12-12		2018-01-17	
<b>Comments</b>						
MILWAUKEE SOLVAY COKE & GAS CO (FORMER)						
<b>Characteristics</b>						
PECFA Tracked?	EPA NPL Site?	Eligible for PECFA Funds?	Above Ground Storage Tank?	Drycleaner?	Co-Contamination?	On GIS Registry?
No	No	No	No	No	No	No
<b>Actions</b>						
Place Cursor Over Action Code to View Description						
Date	Code	Name	Comment			
2001-12-12	1	Notification				
2002-09-30	352	Superfund Preliminary Assessment/Site Inspection				
2002-09-30	301	Superfund NPL, NPL-proposed or Superfund Alternatives Site	SUPERFUND ALTERNATIVE - 301 DATE BASED ON NPL PRELIMINARY ASSESSMENT SITE INSPECTION DATE			
2003-06-16	2	RP Letter Sent				
2003-07-03	43	Status Report Received				
2006-09-24	99	Miscellaneous	REC'D DRAFT RI/FS WKPLN			
2007-06-11	43	Status Report Received	REC'D MTHLY PROGRESS REPT FOR MAY, 2007			
2007-06-25	99	Miscellaneous	REC'D TECH LTR REPT ADDENDUM #1			
2007-07-16	43	Status Report Received	REC'D MONTHLY PROGRESS REPORT FOR JUNE 2007			
2007-08-06	43	Status Report Received	REC'D MTHLY PROGRESS REPT FOR JULY 2007			
2007-09-14	43	Status Report Received	REC'D MTHLY PROGRESS REPT FOR AUGUST 2007			
2007-09-24	99	Miscellaneous	REC'D RI/FS WKPLN			
2007-09-24	99	Miscellaneous	REC'D QUALITY MANAGEMENT PLAN			
2007-09-24	304	Superfund: Site Investigation Federal Consent Decree				
2007-09-24	99	Miscellaneous	REC'D QUALITY ASSURANCE PROJ PLN			
2007-11-12	43	Status Report Received	REC'D MTHLY PROGRESS REPT FOR OCT. - 2007			
2007-11-28	36	Site Investigation Workplan Approved	VERBAL COMMENTS GIVEN TO EPA			
2008-01-09	43	Status Report Received				

2008-03-07	43	Status Report Received	REC'D MTHLY PROGRESS REPT 02/08
2008-04-11	43	Status Report Received	REC'D MTHLY REPT 03/2008
2008-05-02	43	Status Report Received	REC'D INF ON ASBESTOS IN STOCKPILED DEMOLITION DEBRIS
2008-05-12	43	Status Report Received	REC'D MTHLY REPT 03/08
2008-06-10	43	Status Report Received	REC'D MTHLY PROGRESS REPT FOR 05/08
2008-06-26	99	Miscellaneous	REC'D REVISED R1/FS WORKPLAN
2008-06-26	99	Miscellaneous	REC'D REVISED HEALTH & SAFETY PLN
2008-06-26	99	Miscellaneous	REC'D REVISED QUALITY ASSURANCE PROJECT PLN
2008-07-11	43	Status Report Received	MTHLY PROGRESS REPT JUNE 2008
2008-08-12	43	Status Report Received	REC'D SI - SPECIFIC HEALTH & SAFETY PLAN
2008-08-13	43	Status Report Received	REC'D CONDITIONAL APPROVAL OF REM INV/FEASIBILITY STUDY WORK PLN
2008-08-13	43	Status Report Received	REC'D PARTIAL APPROV. OF REM INV/FEASIBILITY STUDY PLN
2008-08-13	43	Status Report Received	REC'D STATUS REPT/MTHLY PROGRESS REPT
2008-09-11	43	Status Report Received	REC'D MTHLY PROGRESS REPT FOR 08/08
2008-10-13	43	Status Report Received	
2008-11-11	43	Status Report Received	REC'D MTHLY PROGRESS REPT 10/08
2008-11-13	43	Status Report Received	EPA CONTRACTOR WEEKLY FIELD OVERSIGHT REPT - 10/10/08
2008-11-13	43	Status Report Received	EPA CONTRACTOR WEEKLY FIELD OVERSIGHT REPT - 10/17/08
2008-11-13	43	Status Report Received	EPA CONTRACTOR WEEKLY FIELD OVERSIGHT REPT - 10/24/08
2008-11-13	43	Status Report Received	EPA CONTRACTOR WEEKLY FIELD OVERSIGHT REPT - 10/31/08
2008-12-01	43	Status Report Received	REC'D EPA CONTRACTOR WEEKLY FIELD OVERSIGHT REPORT 12-12-2008
2008-12-01	43	Status Report Received	REC'D WEEKLY TECHNICAL OVERSIGHT REPORT 11/10 - 11/14/08
2008-12-05	43	Status Report Received	REC'D TECHNICAL OVERSIGHT REPT
2008-12-12	43	Status Report Received	
2008-12-12	43	Status Report Received	REC'D SEDIMENT SAMPLING WORK PLAN
2008-12-19	43	Status Report Received	REC'D QUALITY ASSURANCE PROJ. PLN, ADDENDUM, FINAL REV SEDIMENT SAMPLING WK PLN & CD W QAPP
2008-12-23	43	Status Report Received	REC'D LIMITED ASBESTOS REMOVAL REPT
2009-02-17	35	Site Investigation Workplan Received (w/out Fee)	UPDATED SEDIMENT SAMPLING WORKPLAN
2009-03-02	81	Site Investigation Workplan Not Approved	COMMENT LETTER TO EPA
2009-04-06	43	Status Report Received	REC'D TECH OVERSIGHT REPT 03/12/ - 03/13/09
2009-04-15	43	Status Report Received	
2009-05-06	43	Status Report Received	REC'D TECH OVERSIGHT REPT 02-23 - 02-27-09
2009-05-06	43	Status Report Received	REC'D TECH OVERSIGHT REPT 03/14/ - 03/18/2009
2009-05-06	43	Status Report Received	REC'D TECH OVERSIGHT REPT 03/02 - 03/04/09
2010-04-12	43	Status Report Received	MONTHLY PROGRESS REPORT FOR MARCH 2010
2010-05-10	43	Status Report Received	
2010-08-04	305	Superfund Site Investigation	RI/FS WORKPLAN ADDENDUM
2011-09-07	130	DNR Regulatory Reminder Sent	Vapor Intrusion (VI) Assessment Notification Ltr Sent
Linked to Code 130: <a href="#">0241466662_VI_Letter.pdf</a> Click to Download or Open			
2011-11-11	43	Status Report Received	
2014-05-09	43	Status Report Received	STATUS UPDATE
2014-06-18	305	Superfund Site Investigation	RI RPT
2014-07-11	43	Status Report Received	STATUS UPDATE
2014-08-20	43	Status Report Received	MONTHLY PROGRESS RPT - JULY 2014
2015-03-02	99	Miscellaneous	UPDATES FROM 9/14-3/15:RP SUBMIT RESPONSE TO AGENCY COMMENTS ON DRAFT RI. AGENCIES REVIEW ONGOING
2015-07-16	99	Miscellaneous	REC'D MONTHLY PROGRESS REPORT FOR JUNE 2015

2015-12-23	305	Superfund Site Investigation	RI RPT REC'D
2016-07-25	317	Superfund Site Assessment Reassessment (SR)	SR RPT
Linked to Code 317: <a href="#">20160725 317 SF SR.pdf</a> Click to Download or Open			
2016-08-29	315	Superfund Site Assessment Transmittal Memos	SR TRANS MEMO
Linked to Code 315: <a href="#">20160826 315 SF Assess Memo.pdf</a> Click to Download or Open			
2016-10-31	99	Miscellaneous	ALTERNATIVES SCREENING TECHNICAL MEMO SUBMITTED
2018-01-17	195	<a href="#">Semi-Annual/PECFA Cost Reporting Requirement Met</a>	Period: 7/1/2017 - 12/31/2017
Click 195 Action Name above to view the NR700 report			
<b>Other Documents and Images</b> Not Linked to Actions Above Click File Name to Download or Open			
<b>Category</b>	<b>File Name</b>	<b>Size (bytes)</b>	<b>Type</b>
NPL Webpage	<a href="http://www.epa.gov/region5/cleanup/solvaycoke/index.htm">http://www.epa.gov/region5/cleanup/solvaycoke/index.htm</a>	URL	url
<b>Impacts</b>			
<b>Type</b>	<b>Comment</b>		
Concrete/Asphalt	-		
Direct Contact	-		
Groundwater Contamination	-		
Soil Contamination	-		
Surface Water Contamination	sediment		
<b>Substances</b>			
<b>Substance</b>	<b>Type</b>	<b>Amount Released</b>	<b>Units</b>
Polynuclear Aromatic Hydrocarbons	Petroleum		
Chromium	Metals		
Cyanide	Industrial Chem		
Mercury	Metals		
Metals (Lead)	Metals		
Volatile Organic Compounds	VOC		
<b>Who</b>			
<b>Role</b>	<b>Name/Address</b>		
Responsible Party	GOLDEN MARINE CAUSEWAY LLC 1933 S 1ST ST MILWAUKEE, WI 53204		
Project Manager	<a href="#">MARGARET BRUNETTE</a> 2300 N MARTIN LUTHER KING DR MILWAUKEE, WI 53212		

BRRTS data comes from various sources, both internal and external to DNR. There may be omissions and errors in the data and delays in updating new information. Please see the [disclaimers page](#) for more information. We welcome your [Feedback](#).

The Official Internet site for the Wisconsin Department of Natural Resources  
 101 S. Webster Street . PO Box 7921 . Madison, Wisconsin 53707-7921 . 608.266.2621

Release 2.6.3 | 09/28/2017 | [Release Notes](#)

DOC # 10673698

RECORDED  
05/15/2017 10:45 AM

JOHN LA FAVE  
REGISTER OF DEEDS  
Milwaukee County, WI  
AMOUNT: 30.00

TRANSFER FEE: 12000.00

FEE EXEMPT #:

\*\*\*This document has been  
electronically recorded and  
returned to the submitter. \*\*

QUITCLAIM DEED

PREPARED BY:

Jeffrey A. Burger, Esq.  
The Law Office of Jeffrey A. Burger, LLC  
105 West Madison Street  
Suite 1500  
Chicago, Illinois 60602

AFTER RECORDING RETURN TO:

Joseph Puchner, Esq.  
Quarles & Brady  
411 East Wisconsin Avenue  
Suite 2350  
Milwaukee, Wisconsin 53202-4426

*The above space for Recorder's Use Only*

THIS Quitclaim Deed is made as of the 10th day of May, 2017, by GOLDEN MARINA CAUSEWAY, LLC, a Wisconsin limited liability company, debtor-in-possession under Bankruptcy Case No. 16-03587 pending in the U.S. Bankruptcy Court for the Northern District of Illinois Eastern Division and having an address of 5611 Walnut Avenue, Downers Grove, Illinois 60516 (the "Grantor"), to WISCONSIN GAS LLC, a Wisconsin limited liability company, doing business as We Energies, having an address at 231 West Michigan Street, Milwaukee, Wisconsin 53203 (the "Grantee").

The Grantor, for and in consideration of the sum of Ten Dollars (\$10.00) and other valuable consideration, receipt whereof is hereby acknowledged, hereby quitclaims unto the Grantee the Real Estate more particularly described on *Exhibit "A"* attached hereto, together with all rents, profits, fixtures and other appurtenant rights, title and interests belonging thereto.

Attached as *Exhibit "B"* hereto is a copy of the "Order Authorizing Sale of Greenfield Properties" entered by U.S. Bankruptcy Court for the Northern District of Illinois Eastern Division on April 5, 2017 under Bankruptcy Case No. 16-03587.



**QUITCLAIM DEED**

**PREPARED BY:**

Jeffrey A. Burger, Esq.  
The Law Office of Jeffrey A. Burger, LLC  
105 West Madison Street  
Suite 1500  
Chicago, Illinois 60602

**AFTER RECORDING RETURN TO:**

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Milwaukee, Wisconsin 53202-4426

*The above space for Recorder's Use Only*

THIS Quitclaim Deed is made as of the 10th day of May, 2017, by GOLDEN MARINA CAUSEWAY, LLC, a Wisconsin limited liability company, debtor-in-possession under Bankruptcy Case No. 16-03587 pending in the U.S. Bankruptcy Court for the Northern District of Illinois Eastern Division and having an address of 5611 Walnut Avenue, Downers Grove, Illinois 60516 (the "Grantor"), to WISCONSIN GAS LLC, a Wisconsin limited liability company, doing business as We Energies, having an address at 231 West Michigan Street, Milwaukee, Wisconsin 53203 (the "Grantee").

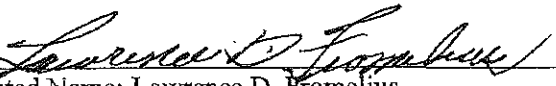
The Grantor, for and in consideration of the sum of Ten Dollars (\$10.00) and other valuable consideration, receipt whereof is hereby acknowledged, hereby quitclaims unto the Grantee the Real Estate more particularly described on *Exhibit "A"* attached hereto, together with all rents, profits, fixtures and other appurtenant rights, title and interests belonging thereto.

Attached as *Exhibit "B"* hereto is a copy of the "Order Authorizing Sale of Greenfield Properties" entered by U.S. Bankruptcy Court for the Northern District of Illinois Eastern Division on April 5, 2017 under Bankruptcy Case No. 16-03587.

IN WITNESS WHEREOF, the Grantor has caused its name to be signed to these presents the day and year first above written.

GOLDEN MARINA CAUSEWAY, LLC, a Wisconsin limited liability company, debtor-in-possession under Bankruptcy Case No. 16-03587 pending in the U.S. Bankruptcy Court for the Northern District of Illinois Eastern Division

By: East Greenfield Investors, LLC, an Illinois limited liability company  
Its: Sole Member

By:   
Printed Name: Lawrence D. Fromelius  
Its: Manager



ACKNOWLEDGEMENT

STATE OF ILLINOIS     )  
                                  )  
COUNTY OF COOK     )     SS

The foregoing instrument was acknowledged before me this 10th day of May, 2017 by Lawrence D. Fromelius, in his individual capacity as the Manager of East Greenfield Investors, LLC which is the sole member of Golden Marina Causeway, LLC, that he signed the foregoing instrument as his free and voluntary act and as the free and voluntary act of East Greenfield Investors, LLC and Golden Marina Causeway, LLC, for the purposes set forth in the foregoing instrument.



*Jennifer Meier*  
Printed Name: Jennifer Meier  
Notary Public

(Seal)

My Commission Expires: 10/03/2019

EXHIBIT "A" TO QUITCLAIM DEED

LEGAL DESCRIPTION OF REAL ESTATE

PARCEL 1:

THAT PART OF THE NORTHWEST ¼ AND THE SOUTHWEST ¼ OF SECTION 4 IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN, WHICH IS BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT A POINT IN THE SOUTH LINE OF THE NORTHWEST ¼ OF SAID SECTION 40.00 FEET SOUTH 89 DEGREES 47 MINUTES 45 SECONDS EAST OF THE SOUTHWEST CORNER OF THE NORTHWEST ¼ OF SAID SECTION; RUNNING THENCE NORTH 00 DEGREES 46 MINUTES 58 SECONDS EAST ON A LINE WHICH IS 40.00 FEET EAST OF AND PARALLEL TO THE WEST LINE OF THE NORTHWEST ¼ OF SAID SECTION 333.35 FEET TO THE SOUTHWEST CORNER OF LOT 14 IN THE PARTITION OF THAT PART OF THE NORTHWEST ¼ OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, WHICH LIES WEST OF THE ¼ SECTION LINE; THENCE SOUTH 89 DEGREES 47 MINUTES 45 SECONDS EAST ALONG THE SOUTH LINE OF LOT 14 AFORESAID 50.00 FEET TO A POINT; THENCE NORTH 00 DEGREES 46 MINUTES 58 SECONDS EAST ALONG THE EAST LINE OF LOT 14 AFORESAID 151.42 FEET TO THE NORTHEAST CORNER OF SAID LOT 14; THENCE SOUTH 89 DEGREES 47 MINUTES 45 SECONDS EAST ALONG THE SOUTH LINE OF LOT 7 IN SAID SUBDIVISION 26.00 FEET TO A POINT; THENCE NORTH 00 DEGREES 46 MINUTES 58 SECONDS EAST ALONG A LINE WHICH IS 116.00 FEET EAST OF AND PARALLEL TO THE WEST LINE OF THE NORTHWEST ¼ OF SAID SECTION 455.75 FEET TO A POINT WHICH LIES 200.00 FEET NORTH 00 DEGREES 46 MINUTES 58 SECONDS EAST OF THE SOUTH LINE OF LOT 5 IN SAID SUBDIVISION; THENCE SOUTH 56 DEGREES 39 MINUTES 10 SECONDS EAST 365.79 FEET TO A POINT IN THE SOUTH LINE OF SAID LOT 5 WHICH IS 424.30 FEET EAST OF THE SOUTHWEST CORNER OF SAID LOT 5; THENCE SOUTH 74 DEGREES 49 MINUTES 58 SECONDS EAST 464.11 FEET TO A POINT IN THE DOCK LINES OF THE KINNICKINNIC RIVER; THENCE SOUTH 20 DEGREES 59 MINUTES 55 SECONDS WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 3.93 FEET TO A POINT; THENCE SOUTH 16 DEGREES 11 MINUTES 31 SECONDS WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 296.93 FEET TO A POINT; THENCE SOUTH 20 DEGREES 45 MINUTES 27 SECONDS WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 354.07 FEET TO A POINT IN THE SOUTH LINE OF THE NORTHWEST ¼ OF SAID SECTION, SAID POINT BEING 672.66 FEET SOUTH 89 DEGREES 47 MINUTES 45 SECONDS EAST OF THE SOUTHWEST CORNER OF THE NORTHWEST ¼ OF SAID SECTION; THENCE SOUTH 17 DEGREES 29 MINUTES 34 SECONDS WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 343.01 FEET TO A POINT; THENCE SOUTH 60 DEGREES 49 MINUTES 25 SECONDS WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 42.79 FEET TO A POINT IN THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 IN THE SUBDIVISION OF THE WEST

½ OF THE SOUTHWEST ¼ OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, COUNTY OF MILWAUKEE, STATE OF WISCONSIN; THENCE SOUTH 89 DEGREES 47 MINUTES 45 SECONDS EAST ALONG THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 AFORESAID 30.75 FEET TO A POINT IN THE OLD ESTABLISHED DOCK LINE OF THE KINNICKINNIC RIVER; THENCE SOUTH 17 DEGREES 29 MINUTES 34 SECONDS WEST ALONG THE OLD ESTABLISHED DOCK LINE OF THE KINNICKINNIC RIVER 6.00 FEET TO A POINT; THENCE SOUTH 55 DEGREES 44 MINUTES 25 SECONDS WEST ALONG THE OLD ESTABLISHED DOCK LINE OF THE KINNICKINNIC RIVER 427.24 FEET TO A POINT THENCE NORTH 21 DEGREES 28 MINUTES 30 SECONDS WEST ALONG A LINE WHICH IS 44.00 FEET NORTHEASTERLY OF AND PARALLEL TO THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE 57.58 FEET TO A POINT IN THE DOCK LINE OF THE KINNICKINNIC RIVER; THENCE SOUTH 60 DEGREES 49 MINUTES 25 SECONDS WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 44.40 FEET TO A POINT IN THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE; THENCE NORTH 21 DEGREES 28 MINUTES 30 SECONDS WEST ALONG THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE 232.30 FEET TO A POINT IN THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 IN THE SUBDIVISION OF THE WEST ½ OF THE SOUTHWEST ¼ OF SECTION 4; THENCE SOUTH 89 DEGREES 47 MINUTES 45 SECONDS EAST ALONG THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 AFORESAID 47.35 FEET TO A POINT; THENCE NORTH 21 DEGREES 28 MINUTES 30 SECONDS WEST ALONG A LINE WHICH IS 44.00 FEET NORTHEASTERLY OF AND PARALLEL TO THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE 199.62 FEET TO A POINT WHICH IS 40.00 FEET EAST OF THE WEST LINE OF THE SOUTHWEST ¼ OF SAID SECTION; THENCE NORTH 00 DEGREES 53 MINUTES 55 SECONDS EAST ALONG A LINE WHICH IS 40 FEET EAST OF AND PARALLEL TO THE WEST LINE OF THE SOUTHWEST ¼ OF SAID SECTION 163.01 FEET TO THE POINT OF COMMENCEMENT.

BEING LOTS 13 AND 17 AND PART OF LOTS 5, 7, 8, 9, 10, 11 AND 12 IN THE PARTITION OF THAT PART OF THE NORTHWEST ¼ OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, WHICH LIES WEST OF THE ¼ SECTION LINE AND PART OF LOTS 1 AND 2 IN SUBDIVISION INTO LOTS OF THE WEST ½ OF THE SOUTH ¼ OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN.

ALSO:

THAT PART OF LOTS 2, 3, 4, 5, AND 7 IN THE PARTITION OF THAT PART OF THE NORTHWEST ¼ OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN, LYING WEST OF THE ¼ SECTION LINE WHICH LIES WITHIN THE LIMITS OF THE FOLLOWING DESCRIBED PARCEL OF LAND: COMMENCING AT A POINT IN THE NORTH LINE OF SAID ¼ SECTION 116.01 FEET NORTH 89 DEGREES 56 MINUTES 29 SECONDS EAST OF THE NORTHWEST CORNER OF SAID ¼ SECTION; RUNNING THENCE NORTH 89 DEGREES 56 MINUTES 29 SECONDS EAST ALONG THE NORTH LINE OF SAID ¼ SECTION 1460.07 FEET TO A POINT IN THE WESTERLY DOCK LINE OF THE

KINNICKINNIC RIVER; THENCE SOUTH 21 DEGREES 32 MINUTES 49 SECONDS WEST ALONG THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER 842.70 FEET TO A POINT; THENCE SOUTH 89 DEGREES 25 MINUTES 22 SECONDS WEST 359.42 FEET TO A POINT IN THE NORTHEASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD TRANSPORTATION COMPANY RIGHT OF WAY, SAID POINT BEING 770.75 FEET SOUTH OF THE SOUTH LINE OF EAST GREENFIELD AVENUE; THENCE SOUTH 39 DEGREES 06 MINUTES 20 SECONDS EAST ALONG THE NORTHEASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD TRANSPORTATION COMPANY RIGHT OF WAY 381.98 FEET TO A POINT IN THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER; THENCE SOUTH 21 DEGREES 32 MINUTES 49 SECONDS WEST ALONG WEST DOCK LINE OF THE KINNICKINNIC RIVER 57.25 FEET TO A POINT; THENCE SOUTH 16 DEGREES 01 MINUTES 51 SECONDS WEST ALONG THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER 54.28 FEET TO A POINT; THENCE SOUTH 20 DEGREES 59 MINUTES 55 SECONDS WEST ALONG THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER 736.17 FEET TO A POINT; THENCE NORTH 74 DEGREES 49 MINUTES 58 SECONDS WEST 464.11 FEET TO A POINT IN THE NORTH LINE OF LOT 7 AFORESAID, SAID POINT BEING 424.30 FEET EAST OF THE NORTHWEST CORNER OF LOT 7; THENCE NORTH 56 DEGREES 39 MINUTES 10 SECONDS WEST 365.79 FEET TO A POINT IN THE EAST LINE OF CHICAGO, MILWAUKEE, ST. PAUL AND PACIFIC RAILROAD COMPANY RIGHT OF WAY, SAID POINT BEING 200 FEET NORTH OF THE NORTH LINE OF LOT 7 AND 116.00 FEET EAST OF THE WEST LINE OF SAID ¼ SECTION; THENCE NORTH 00 DEGREES 46 MINUTES 58 SECONDS EAST ALONG THE EAST LINE OF THE CHICAGO, MILWAUKEE, ST. PAUL AND PACIFIC RAILROAD COMPANY RIGHT OF WAY ON A LINE WHICH IS 116.00 FEET EAST OF AND PARALLEL TO THE WEST LINE OF THE SAID ¼ SECTION 1552.68 FEET TO THE POINT OF COMMENCEMENT; EXCEPTING THEREFROM THE RIGHT OF WAY OF THE CHICAGO AND NORTHWESTERN RAILROAD TRANSPORTATION COMPANY 100.00 FEET IN WIDTH RUNNING NORTHWESTERLY THROUGH SAID LANDS; AND EXCEPTING THEREFROM THE NORTH 16.00 FEET AS TAKEN FOR EAST GREENFIELD AVENUE AND THOSE LANDS LYING NORTHEAST OF SAID RAILROAD RIGHT OF WAY.

ALSO EXCEPTING FROM THE ABOVE PARCELS THAT PART CONTAINED IN QUIT CLAIM DEED RECORDED AS DOCUMENT NO. 4421152.

PARCEL 2:

THE FOLLOWING DESCRIBED PARCEL IS SITUATED IN THE COUNTY OF MILWAUKEE AND THE STATE OF WISCONSIN, TO WIT:

THAT PART OF THE SOUTHWEST ¼ OF SECTION 33, TOWNSHIP 7 NORTH, RANGE 22 EAST AND THE SOUTHEAST ¼ OF SECTION 32, TOWNSHIP 7 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN, WHICH IS BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTH SECTION CORNER BETWEEN SECTIONS 32 AND 33 AFORESAID; RUNNING THENCE NORTH 00 DEGREES 16 MINUTES 36 SECONDS EAST ALONG THE SECTION LINE BETWEEN

SECTIONS 32 AND 33 AFORESAID 388.00 FEET TO A POINT, SAID POINT LYING IN THE CENTER LINE EXTENDED EAST OF EAST MADISON STREET; THENCE SOUTH 89 DEGREES 56 MINUTES 29 SECONDS WEST ALONG THE CENTER LINE EXTENDED EAST OF EAST MADISON STREET 49.70 FEET TO A POINT, THEN NORTH 03 DEGREES 31 MINUTES 36 SECONDS EAST AND PARALLEL TO THE EAST LINE OF THE CHICAGO, MILWAUKEE, ST. PAUL AND PACIFIC RAILROAD COMPANY RIGHT OF WAY 310.0 FEET, MORE OR LESS, TO A POINT IN THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY, SAID POINT BEING 125.2 FEET WESTERLY, AS MEASURED RADially FROM THE EASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY; THENCE SOUTHERLY ALONG THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY 503.64 FEET ON THE ARC OF THE CURVE WHOSE CENTER LIES TO THE EAST, WHOSE RADIUS IS 2694.29 FEET AND WHOSE CHORD BEARS SOUTH 11 DEGREES 52 MINUTES 26 SECONDS EAST 602.90 FEET TO A POINT, SAID POINT BEING 155.15 FEET NORTH OF THE NORTH LINE OF EAST GREENFIELD AVENUE; THENCE NORTH 89 DEGREES 56 MINUTES 29 SECONDS EAST AND PARALLEL TO THE NORTH LINE OF EAST GREENFIELD AVENUE 26.39 TO A POINT ON THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY, SAID POINT BEING 100 FEET WESTERLY AS MEASURED RADially, FROM THE EASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY; THENCE SOUTHERLY ALONG THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY 217.91 FEET ON THE ARC OF A CURVE WHOSE CENTER LIES TO THE EAST, WHOSE RADIUS IS 2669.09 FEET AND WHOSE CHORD BEARS SOUTH 19 DEGREES 44 MINUTES 06 SECONDS EAST 217.85 FEET TO A POINT IN THE SOUTH LINE OF SECTION 33; THENCE SOUTH 89 DEGREES, 56 MINUTES 29 SECONDS WEST ALONG THE SOUTH LINE OF SECTION 33 AFORESAID 174.67 FEET TO THE POINT OF COMMENCEMENT; EXCEPTING THEREFROM THE SOUTH 50.00 FEET AS TAKEN FOR EAST GREENFIELD AVENUE.

TAX KEY NOS. 430-9997-100-3 and 463-9995-200-X.

ADDRESS: 302 and 311 EAST GREENFIELD AVENUE, MILWAUKEE, WISCONSIN.

EXHIBIT "B" TO QUITCLAIM DEED

ORDER AUTHORIZING SALE OF GREENFIELD PROPERTIES



UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re:

Golden Marina Causeway LLC,

Debtor.

Chapter 11

Bankruptcy No. 16-03587

Hon. Donald R. Cassling

**ORDER AUTHORIZING SALE OF  
GREENFIELD PROPERTIES**

This matter coming to be heard on the Debtor's Motion to (I) Set Bidding Procedures for Sale of Greenfield Properties and to Sell Greenfield Properties, (II) Approve the Form of Asset Purchase Agreement, and (III) Approve Break-Up Fee, (the "Sale Motion") [Dkt. Nos. 93, 102] filed by Golden Marina Causeway LLC, as Debtor and Debtor-in-Possession (the "*Debtor*") in bankruptcy case number 16-03587 (the "*Case*") for entry of a Sale Order substantially in this form ("Sale Order") authorizing the Debtor (i) to enter into the Purchase and Sale Agreement with Wisconsin Gas LLC, a Wisconsin limited liability company doing business as WE Energies ("Buyer") (the "Sale Agreement") appended hereto as Exhibit 1 and incorporated herein by reference and (ii) to sell (the "Sale") the Greenfield Properties<sup>1</sup> to Buyer for \$4,000,000, free and clear of all liens, claims and encumbrances on the terms and conditions set forth in the Sale Agreement (with liens to attach to the proceeds of the sale); and notice of the initial presentation of the Sale Motion having been given to all known creditors and other known parties in interest, as well as through publication in the Milwaukee Journal Sentinel, and the Milwaukee Business Journal, among other channels, and further notice of the Sale and the opportunity to acquire the Greenfield Properties having been provided in the manner set forth in the Sale Motion; and the Court having considered the Sale Motion and having heard the statements of counsel and

<sup>1</sup> Capitalized terms not otherwise defined in this Sale Order have the meaning set forth in the Sale Motion.

otherwise being adequately advised in the premises; and the Court finding and concluding that good cause exists for the entry of this Sale Order;

**The Court hereby<sup>2</sup>**

1. Finds and concludes that (a) the Court has jurisdiction to approve the Sale and the transaction contemplated in the Sale Agreement and to enter this Sale Order pursuant to 28 U.S.C. § 1334; (b) approval of the Sale is a core proceeding under 28 U.S.C. §§ 157(b)(2)(A), (N), and (O); and (c) the relief requested herein is authorized pursuant to Bankruptcy Code §§105, 363, and Bankruptcy Rules 2002 (including, without limitation, Bankruptcy Rule 2002(i)), 6004, and 6006.

2. Finds and concludes based upon the certificates of service filed with the Court and the representations of counsel that the notice (the "Notice") with respect to the entry of this Sale Order constitutes good and sufficient notice of, and a reasonable opportunity to object or be heard regarding such matters, under Bankruptcy Code §§ 102(1), 363, and Bankruptcy Rules 2002 (including, without limitation, 2002(f)), 6004, and 6006 and that no other or further notice of, opportunity to object to, or other opportunity to be heard regarding such matters need be given to any entity.

3. Finds and concludes that the Debtor adequately marketed the Greenfield Properties. The Sale to Buyer was subject to higher or better offers, ("Competing Bids") and no higher or better offer was submitted. The Buyer's offer was thus the highest and best offer submitted for the Greenfield Properties. Buyer is the lone and thus the Winning Bidder for the Greenfield Properties.

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<sup>2</sup> The findings and conclusions set forth herein constitute the Court's findings of fact and conclusions of law pursuant to Bankruptcy Rule 7052, made applicable to this proceeding pursuant to Bankruptcy Rule 9014. To the extent that any of the following findings of fact constitute conclusions of law, they are adopted as such. Pursuant to Bankruptcy Rule 7052, to the extent any of the following conclusions of law constitute findings of fact, they are adopted as such. Statements made by the Court from the bench during the Sale Hearing shall constitute additional conclusions of law and findings of fact, as appropriate.

4. Finds and concludes, based on the Debtor's representations that (a) the Debtor has demonstrated that it is a sound exercise of its business judgment to enter the transaction set forth in the Sale Agreement and this Sale Order, (b) good and sufficient reasons for approval of the Sale have been articulated and (c) the relief requested in the Sale Motion and this Sale Order is in the best interests of Debtor, its estate, creditors, and other parties-in-interest.

5. Finds that the offer of the Buyer to purchase the Greenfield Properties for (i) a cash payment of \$4,000,000 (the "Purchase Price") under the terms and conditions set forth in the Sale Agreement: (a) represents the highest and otherwise best offer obtained for the Greenfield Properties; (b) is fair, adequate, and sufficient consideration that constitutes reasonably equivalent value for the Greenfield Properties, and (c) would not have been made by Buyer absent the protections afforded to Buyer by the Bankruptcy Code and this Sale Order. The Debtor's determination that the Sale to Buyer, provides the highest or otherwise best offer for the Greenfield Properties and constitutes a reasonable exercise of the discretion afforded to the Debtor under the business judgment rule. The Debtor's representation of that determination to the Court and request for entry of this Sale Order constitute reasonable exercises of the Debtor's sound business judgment and is in the best interests of the Debtor, its estate, creditors, and other parties in interest.

6. Finds and concludes that a sale of the Greenfield Properties other than one free and clear of (a) all prepetition and postpetition liens (including, without limitation, any "lien" as defined in Bankruptcy Code section 101(37)), (b) claims (including, without limitation, any "claim" as defined in Bankruptcy Code section 101(5)), (c) encumbrances, (d) defenses (including, without limitation, rights of setoff and recoupment) and (e) interests, in each instance, with respect to the Greenfield Properties, other than liability (if any) under Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act, 41 U.S.C. § 9607(a), arising exclusively under facts unrelated to, and existing prior to, the acquisition of title by the Buyer (collectively, "Interests"), would impact materially and adversely

on Debtor's bankruptcy estate, would yield substantially less value for Debtor's estate, and would provide less certainty than the available alternatives.

7. Finds that each entity with an Interest in any of the Greenfield Properties to be transferred on the closing date has (a) consented to, or is deemed to have consented to, the Sale free and clear of such Interests, (b) could be compelled in a legal or equitable proceeding to accept money satisfaction of such Interest, or (c) otherwise falls within the provisions of Bankruptcy Code section 363(f), and therefore, in each case, one or more of the standards set forth in Bankruptcy Code section 363(f) has been satisfied as to all such Interests. All holders of Interests who (x) did not object to the Sale Motion, (y) who withdrew their objections to the Sale Motion, and/or (z) whose objections to the Sale Motion were overruled are deemed to have consented to entry of this Sale Order pursuant to Bankruptcy Code section 363(f)(2). All holders of Interests are adequately protected by having their Interests, if any, attach to the cash proceeds of the Sale ultimately attributable to the property against or in which they claim an Interest, with the same validity and priority, and to the same extent, as existed before the Sale, and subject to the terms of the instruments that created such Interest. Therefore, approval of the Sale Agreement and consummation of the Sale at this time free and clear of Interests is appropriate pursuant to Bankruptcy Code section 363(f).

8. Finds that the Debtor and the Buyer negotiated the Sale Agreement and the transactions contemplated by the Sale Agreement at arm's length, without collusion, and in good faith within the meaning of Bankruptcy Code section 363(m). The Buyer proceeded in good faith in connection with all aspects of the Sale. As a result of the foregoing, Buyer is a good faith purchaser and is entitled to the protections of Bankruptcy Code section 363(m) with respect to all aspects of the Sale Agreement and the Sale. Debtor and Buyer have not engaged in any conduct that would cause or permit the Sale Agreement to be avoided pursuant to Bankruptcy Code § 363(n).

9. In the absence of a stay pending appeal, Buyer will be acting in good faith pursuant to Bankruptcy Code section 363(m) in concluding the transactions

contemplated by the Sale Agreement and the Motion at any time on or after the entry of this Sale Order. The Court being satisfied that (1) no objections have been raised of a nature that should prevent the immediate entry of this Sale Order, (2) the Sale Agreement contains deadlines with which the parties must comply, and (3) the transfer of the Greenfield Properties without delay beyond a time selected by the parties will help preserve the value of the Greenfield Properties for Debtors' estates, the Court finds cause to lift the stays provided in Bankruptcy Rules 6004(h) and 6006(d).

10. Finds and concludes, after all parties in interest in the case were provided notice of the Sale, the nature of the assets to be sold at the Sale, and the scheduled Sale Hearing and no parties objecting to the Sale, and on the Debtor's representations in the Sale Motion, that the Debtor has good, valid, and marketable title to all of the Greenfield Properties and finds that the transfer of the Greenfield Properties to the Buyer pursuant to this Sale Order shall constitute legal, valid, binding, and effective transfers of the Greenfield Properties and upon the Closing, shall vest the Buyer with good and valid title to the Greenfield Properties pursuant to sections 105(a), 363(b), and 363(f) of the Bankruptcy Code, free and clear of all Interests therein.

**For all of the foregoing reasons and after due deliberation, the Court ORDERS, ADJUDGES AND DECREES THAT:**

11. Wisconsin Gas LLC is the Winning Bidder for the Greenfield Properties.

12. The terms and conditions of the Sale Agreement are hereby approved and the sale of the Greenfield Properties is authorized under Bankruptcy Code § 363(b) and the Debtor is authorized to consummate the terms of the Sale Agreement and sell the Greenfield Properties to Buyer for \$4,000,000, on the terms and conditions set forth in Sale Agreement appended hereto as Exhibit 1.

13. The Buyer shall acquire the Greenfield Properties on the terms, representations, and warranties specifically set forth in the Sale Agreement.

14. The Buyer is a good faith Buyer within the meaning of Section 363(m) and entitled to all protections accorded by that statute.

15. All Interests in the Greenfield Properties shall attach to the Sale proceeds with the same force, validity, effect, priority and enforceability as such Interests had prior to the Sale, the sole and exclusive right and remedy available to any person or entity that asserts any Interest in any way related to the Greenfield Properties that is incurred or otherwise arises prior to the date of the Closing, or by reason of the sale of the Greenfield Properties to the Buyer, shall be a right to assert such Interest against the Sale proceeds and the Debtor's estate. Except as otherwise expressly provided in the Sale Agreement, all Persons are enjoined from asserting any Interests in or against the Greenfield Properties existing prior to the Closing (as such term is defined in the Sale Agreement) against Buyer, its successors or assigns, their property or the Greenfield Properties.

16. Pursuant to Bankruptcy Code §363(f), the Sale of the Greenfield Properties shall be free and clear of all Interests and the Debtor may sell the Greenfield Properties free and clear of all Interests because one or more of the standards set forth in §§ 363(f)(1)-(5) of the Bankruptcy Code has been satisfied. Among other things, no Holder of an Interest filed or raised any objection to the sale of the Greenfield Properties free and clear of Interests and has thus consented to the sale of the Greenfield Properties free and clear of Interests. Further, any Interests in the Greenfield Properties shall attach to the Sale Proceeds and are thereby protected.

17. Pursuant to §§ 105, 362(d) and 363(b) of the Bankruptcy Code, the Debtor, the Buyer and each other person or entity having duties or responsibilities under any agreements related to this Sale Order are hereby authorized and empowered to take any and all actions and execute all documents and instruments that the Debtor or the Buyer reasonably deems necessary or appropriate to (i) consummate the Sale of the Greenfield Properties to the Buyer pursuant to and in

accordance with the terms of this Sale Order, (ii) close the Sale as contemplated by this Sale Order, and (iii) execute and deliver, perform under, implement, effectuate, and close fully the transaction contemplated by this Sale Order and the Sale Agreement and all additional documents and instruments that may be reasonably necessary or desirable to implement the Sale.

18. There is cause to lift the stays provided in Bankruptcy Rules 6004(h) and 6006(d) with respect to the Sale in that (i) no objections have been raised of a nature that should prevent the immediate entry of this Sale Order, (ii) the Sale Agreement contains deadlines with which the parties must comply, and (iii) the Debtor's bankruptcy estate does not have sufficient resources to retain ownership of the Greenfield Properties, and thus this Sale Order shall be effective and enforceable immediately upon entry and its provisions shall be self-executing and in the absence of any entity obtaining a stay pending appeal, the Trustee and the Buyer are free to close the Sale.

19. Buyer is a good faith Buyer, as that term is used in Bankruptcy Code section 363(m), and is entitled to and hereby granted the protections provided to a good-faith Buyer under Bankruptcy Code section 363(m). The consideration provided by Buyer for the Greenfield Properties under the Sale Agreement is fair and reasonable and may not be avoided under Bankruptcy Code section 363(n).

20. The Sale Agreement and any related agreements may be modified, amended, or supplemented by agreement of the Debtor and Buyer without further action of the Court; provided that any such modification, amendment, or supplement is not material and substantially conforms to and effectuates the Sale Agreement and this Sale Order.

21. As of the Closing, as such term is defined in the Sale Agreement, this Sale Order shall be construed as, and shall constitute for any and all purposes, a full and complete general assignment, conveyance and transfer of the Greenfield Properties to the Buyer. Buyer shall not be deemed, solely as result of entering into the Sale Agreement, the consummation of the transaction contemplated by the Sale Agreement, or the transfer ownership of the Greenfield Properties to (a) be a legal

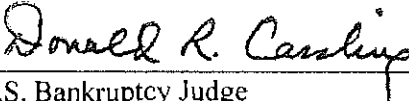
successor, or otherwise be deemed a successor to Debtor; (b) have, *de facto* or otherwise, merged with or into Debtor; or (c) be an alter ego or mere continuation or substantial continuation of Debtor.

22. The Court shall retain jurisdiction to (a) enforce this Sale Order, (b) resolve any disputes arising under or relating to this Sale Order, (c) enjoin and adjudicate the assertion of any Interest against or in respect of the Buyer or the Greenfield Properties and (d) otherwise interpret, implement, and enforce the provisions of this Sale Order. The Sale Agreement and all other documents, agreements and instruments necessary to effectuate and consummate the transaction contemplated by the Sale Agreement, together with the terms and provisions of this Sale Order, shall be binding in all respects upon and shall inure to the benefit of the Debtor, the Buyer and their respective successors and assigns, and any subsequent trustee appointed in the Debtor's chapter 11 case, or upon conversion to chapter 7 under the Bankruptcy Code and shall not be subject to rejection.

23. Any contradictions between the terms of this Sale Order and the Sale Motion shall be resolved by reference first to the terms of this Sale Order.

Dated: APR 04 2017

ENTER:

  
\_\_\_\_\_  
U.S. Bankruptcy Judge



Electronic Real Estate Transfer Receipt



Wisconsin Department of Revenue  
Instructions

- 1. Grantors and grantees must review this receipt, noting grantor and grantee responsibilities
- 2. Mail or deliver the following items:

**Milwaukee County Register of Deeds, 901 N 9TH ST, RM 103, MILWAUKEE, WI 53233-1458**

- This receipt page and a transfer fee of \$12,000.00
- The deed or instrument of conveyance and a recording fee of \$30.00 (regardless of the number of pages)

To view real estate transfer return details online, visit:

<https://ww2.revenue.wi.gov/RETRWebPublic/application>. You will need your receipt number, total value of real estate transferred, and the last name of one grantor or grantee.

Receipt **4M9AA**. Filed May 11, 2017, 10:17 AM - **Milwaukee County**. Conveyance date **2017-05-10**.

Value transferred	<b>\$4,000,000</b>	Transfer fee	<b>\$12,000.00</b>
Value subject to fee	<b>\$4,000,000</b>	Fee exemption number	

Grantors Golden Marina Causeway, LLC  
 Grantees Wisconsin Gas LLC d/b/a We Energies

Tax bill address Attn: Prop Rights Wisconsin Gas LLC dba WE Energies, 231 W. Michigan Street, Milwaukee, Wisconsin 53203

Property Location 302 E GREENFIELD AV (**City of Milwaukee**)  
 Parcels 430-9997-100 (S33/T7N/R22E), 463-9995-200 (S4/T6N/R22E)

Legal description PARCEL 1: THAT PART OF THE NORTHWEST 1/4 AND THE SOUTHWEST 1/4 OF SECTION 4 IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN, WHICH IS BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT A POINT IN THE SOUTH

**Grantor responsibilities:** Grantors are responsible for paying the proper fee amount—verify the total property value, fee amount and fee exemption before sending this receipt to the county Register of Deeds.

**Grantee responsibilities:** Grantees assert that this property is not a primary residence, and that the property is not subject to weatherization standards with exclusion code "W-7".

Preparer First American Title Insurance, 414-224-1778, [zdominguez@firstam.com](mailto:zdominguez@firstam.com)  
 Grantor agent Jeffrey Burger, 312-273-1541  
 Grantee agent James T. Raabe, 414-221-2731, [James.Raabe@we-energies.com](mailto:James.Raabe@we-energies.com)

If you have questions on the Real Estate Transfer Return (RETR), visit the Wisconsin Department of Revenue's Real Estate Transfer Fee web page at: [revenue.wi.gov/retr/index.html](http://revenue.wi.gov/retr/index.html), or contact your County Register of Deeds. To locate your Register of Deeds, visit: [wrdaonline.org](http://wrdaonline.org).

Information on a real estate transfer return is used to administer various Wisconsin laws, including: income tax, real estate transfers, rental unit energy efficiency, lottery tax credit, and general property tax. Whether you are a resident, part-year resident, or non-resident, you must report the transfer of Wisconsin real estate in a taxable transaction on your Wisconsin income tax return. If you are a non-resident, you must file Form 1NPR to report the sale.

Penalties imposed under the following Wisconsin Statutes or Administrative Code:  
 Using an improper exemption - sec. 77.26(8), Wis. Stats.; falsifying the property value - sec. 77.27, Wis. Stats.;  
 weatherization claim - sec. 101.122(7), Wis. Stats, ch. SPS367.08, Wis. Adm. Code; improperly claiming lottery and gaming credit as primary residence - chapter tax 20.12, Wis. Adm. Code.

eRETR - Electronic Real Estate Transfer Return  
Wisconsin Department of Revenue

This return was filed on May 11, 2017 at 10:17 AM with receipt 4M9AA.  
The transfer has not been recorded by the Milwaukee County Register of Deeds.  
This return was filed electronically.

^ **Grantors**

**Golden Marina Causeway, LLC** (Limited Liability Company)

*Address:* 5611 Walnut Avenue, Downers Grove, Illinois 60516  
*Phone number:* 312-273-1541  
*Email:*  
*Relationship with some grantee is:* None  
*Grantor type:* Limited Liability Company  
*Ownership interest transferred:* Full  
*Grantor retains the right:* None

^ **Grantees**

**Wisconsin Gas LLC d/b/a We Energies** (Limited Liability Company)

*Address:* 231 W Michigan Street, Milwaukee, Wisconsin 53203  
*Phone number:* 414-221-2731  
*Email:*  
*Grantee type:* Limited Liability Company

^ **Parcels**

*County:* Milwaukee  
*Property legal description:* PARCEL 1: THAT PART OF THE NORTHWEST 1/4 AND THE SOUTHWEST 1/4 OF SECTION 4 IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN, WHICH IS BOUNDED AND DESCRIBED AS FOLLOWS:  
COMMENCING AT A POINT IN THE SOUTH

All of parcel **430-9997-100** in the CITY OF MILWAUKEE

*Physical property address:* **302 E GREENFIELD AV**  
*Section/Township/Baseline/Range/Meridian:* S33 / T7N / R22E  
*Subdivision or condo/Lot or unit#/Block:*  
*Primary residence of grantee:* No

All of parcel **463-9995-200** in the CITY OF MILWAUKEE

*Physical property address:* **311 E GREENFIELD AV**  
*Section/Township/Baseline/Range/Meridian:* S4 / T6N / R22E  
*Subdivision or condo/Lot or unit#/Block:*  
*Primary residence of grantee:* No

^ **Fee computation**

*Total value of real estate transferred:* \$4,000,000.00  
*Value subject to fee:* \$4,000,000.00  
*Transfer fee due:* \$12,000.00  
*Transfer fee exemption number:*  
*Personal property value excluded from total value:* \$0.00  
*Property value exempt from local property tax:* \$0.00

^ **Tax bill mailing address**

*Send tax bill to:* Attn: Prop Rights Wisconsin Gas LLC dba WE Energies  
 231 W. Michigan Street  
 Milwaukee, Wisconsin 53203

^ **Transfer and financing**


*Transfer type:* Sale |  
*Conveyance document type:* Quit Claim Deed  
*Conveyance date:* May 10, 2017  
*Grantee's financing:* None |

^ **Physical description**


*Property type:* Land, Buildings  
*Predominant use:* Commercial  
*Predominant use explanation:* Abandoned Buildings  
*Lot square footage:* 0  
*Total acres:* 45.8  
*MFL/PFC acres:* 0  
*Feet of water frontage:* 0

^ **Agents and preparer**

**Grantors' agent**

*Name:* Jeffrey Burger  
*Address:* 105 West Madison Steet Suite 1500, Chicago, Illinois 60602  
*Phone number:* 312-273-1541   
*Email:*

**Grantees' agent**

*Name:* James T. Raabe  
*Address:* 231 W Michigan Street, Milwaukee, Wisconsin 53203  
*Phone number:* 414-221-2731   
*Email:* James.Raabe@we-energies.com

**Preparer**

*Name:* First American Title Insurance  
*Phone number:* 414-224-1778   
*Email:* zdominguez@firstam.com

^ **Weatherization**

*Is property subject to residential rental weatherization standards?*

No, with exclusion code W-7 .

^ **System information**

*Filed on:*

May 11, 2017 at 10:17 AM

^ **Full legal description**

PARCEL 1: THAT PART OF THE NORTHWEST 1/4 AND THE SOUTHWEST 1/4 OF SECTION 4 IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN, WHICH IS BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT A POINT IN THE SOUTH LINE OF THE NORTHWEST 1/4 OF SAID SECTION 40.00 FEET SOUTH 89° 47' 45" EAST OF THE SOUTHWEST CORNER OF THE NORTHWEST 1/4 OF SAID SECTION; RUNNING THENCE NORTH 00° 46' 58" EAST ON A LINE WHICH IS 40.00 FEET EAST OF AND PARALLEL TO THE WEST LINE OF THE NORTHWEST 1/4 OF SAID SECTION 333.35 FEET TO THE SOUTHWEST CORNER OF LOT 14 IN PARTITION OF THAT PART OF THE NORTHWEST 1/4 OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, WHICH LIES WEST OF THE 1/4 SECTION LINE; THENCE SOUTH 89° 47' 45" EAST ALONG THE SOUTH LINE OF LOT 14 AFORESAID 50.00 FEET TO A POINT; THENCE NORTH 00° 46' 58" EAST ALONG THE EAST LINE OF LOT 14 AFORESAID 151.42 FEET TO THE NORTHEAST CORNER OF SAID LOT 14; THENCE SOUTH 89° 47' 45" EAST ALONG THE SOUTH LINE OF LOT 7 IN SAID SUBDIVISION 26.00 FEET TO A POINT; THENCE NORTH 00° 46' 58" EAST ALONG A LINE WHICH IS 116.00 FEET EAST OF AND PARALLEL TO THE WEST LINE OF THE NORTHWEST 1/4 OF SAID SECTION 455.75 FEET TO A POINT WHICH LIES 200.00 FEET NORTH 00° 46' 58" EAST OF THE SOUTH LINE OF LOT 5 IN SAID SUBDIVISION; THENCE SOUTH 56° 39' 10" EAST 365.79 FEET TO A POINT IN THE SOUTH LINE OF SAID LOT 5 WHICH IS 424.30 FEET EAST OF THE SOUTHWEST CORNER OF SAID LOT 5; THENCE SOUTH 74° 49' 58" EAST 464.11 FEET TO A POINT IN THE DOCK LINES OF THE KINNICKINNIC RIVER; THENCE SOUTH 20° 59' 55" WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 3.93 FEET TO A POINT; THENCE SOUTH 16° 11' 31" WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 296.93 FEET TO A POINT; THENCE SOUTH 20° 45' 27" WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 354.07 FEET TO A POINT IN THE SOUTH LINE OF THE NORTHWEST 1/4 OF SAID SECTION, SAID POINT BEING 672.66 FEET SOUTH 89° 47' 45" EAST OF THE SOUTHWEST CORNER OF THE NORTHWEST 1/4 OF SAID SECTION; THENCE SOUTH 17° 29' 34" WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 343.01 FEET TO A POINT; THENCE SOUTH 60° 49' 25" WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 42.79 FEET TO A POINT IN THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 IN THE SUBDIVISION OF THE WEST 1/2 OF THE SOUTHWEST 1/4 OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, COUNTY OF MILWAUKEE, STATE OF WISCONSIN; THENCE SOUTH 89° 47' 45" EAST ALONG THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 AFORESAID 30.75 FEET TO A POINT IN THE OLD ESTABLISHED DOCK LINE OF THE KINNICKINNIC RIVER; THENCE SOUTH 17° 29' 34" WEST ALONG THE OLD ESTABLISHED DOCK LINE OF THE KINNICKINNIC RIVER 6.00 FEET TO A POINT; THENCE SOUTH 55° 44' 25" WEST ALONG THE OLD ESTABLISHED DOCK LINE OF THE KINNICKINNIC RIVER 427.24 FEET TO A POINT THENCE NORTH 21° 28' 30" WEST ALONG A LINE WHICH IS 44.00 FEET NORTHEASTERLY OF AND PARALLEL TO THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE 57.58 FEET TO A POINT IN THE DOCK LINE OF THE KINNICKINNIC RIVER; THENCE SOUTH 60° 49' 25" WEST ALONG THE DOCK LINE OF THE KINNICKINNIC RIVER 44.40 FEET TO A POINT IN THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE; THENCE NORTH 21° 28' 30" WEST ALONG THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE 232.30 FEET TO A POINT IN THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 IN THE SUBDIVISION OF THE WEST 1/2 OF THE SOUTHWEST 1/4 OF SECTION 4; THENCE SOUTH 89° 47' 45" EAST ALONG THE NORTH LINE OF THE SOUTH 50.00 FEET OF LOT 1 AFORESAID 47.35 FEET TO A POINT; THENCE NORTH 21° 28' 30" WEST ALONG A LINE WHICH IS 44.00 FEET NORTHEASTERLY OF AND PARALLEL TO THE NORTHEASTERLY LINE OF SOUTH KINNICKINNIC AVENUE 199.62 FEET TO A POINT WHICH IS 40.00 FEET EAST OF THE WEST LINE OF THE SOUTHWEST 1/4 OF SAID SECTION; THENCE NORTH 00° 53' 55" EAST ALONG A LINE WHICH IS 40 FEET EAST OF AND PARALLEL TO THE WEST LINE OF THE SOUTHWEST 1/4 OF SAID SECTION 163.01 FEET TO THE POINT OF COMMENCEMENT. BEING LOTS 13 AND 17 AND PART OF LOTS 5, 7, 8, 9, 10, 11 AND 12 IN PARTITION OF THAT PART OF THE NORTHWEST 1/4 OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, WHICH LIES WEST OF THE 1/4 SECTION LINE AND PART OF LOTS 1 AND 2 IN SUBDIVISION INTO LOTS OF THE WEST 1/2 OF THE SOUTH 1/4 OF SECTION 4, IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN. THAT PART OF LOTS 2, 3, 4, 5 AND 7 IN THE PARTITION OF THAT PART OF THE NORTHWEST 1/4 OF SECTION 4 IN TOWN 6 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, COUNTY OF MILWAUKEE, STATE OF WISCONSIN, LYING WEST OF THE 1/4 SECTION LINE WHICH LIES WITHIN THE LIMITS OF THE FOLLOWING DESCRIBED PARCEL OF LAND: COMMENCING AT A POINT IN THE NORTH LINE OF SAID 1/4 SECTION 116.01 FEET NORTH 89° 56' 29" EAST OF THE NORTHWEST CORNER OF SAID 1/4 SECTION; RUNNING THENCE NORTH 89° 56' 29" EAST ALONG THE NORTH LINE OF SAID 1/4 SECTION

1460.07 FEET TO A POINT IN THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER; THENCE SOUTH 21° 32' 49" WEST ALONG THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER 842.70 FEET TO A POINT; THENCE SOUTH 89° 25' 22" WEST 359.42 FEET TO A POINT IN THE NORTHEASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD TRANSPORTATION COMPANY RIGHT OF WAY, SAID POINT BEING 770.75 FEET SOUTH OF THE SOUTH LINE OF EAST GREENFIELD AVENUE; THENCE SOUTH 39° 06' 20" EAST ALONG THE NORTHEASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD TRANSPORTATION COMPANY RIGHT OF WAY 381.98 FEET TO A POINT IN THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER; THENCE SOUTH 21° 32' 49" WEST ALONG THE WEST DOCK LINE OF THE KINNICKINNIC RIVER 57.25 FEET TO A POINT; THENCE SOUTH 16° 01' 51" WEST ALONG THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER 54.28 FEET TO A POINT; THENCE SOUTH 20° 59' 55" WEST ALONG THE WESTERLY DOCK LINE OF THE KINNICKINNIC RIVER 736.17 FEET TO A POINT; THENCE NORTH 74° 49' 58" WEST 464.11 FEET TO A POINT IN THE NORTH LINE OF LOT 7 AFORESAID, SAID POINT BEING 424.30 FEET EAST OF THE NORTHWEST CORNER OF LOT 7; THENCE NORTH 56° 39' 10" WEST 365.79 FEET TO A POINT IN THE EAST LINE OF THE CHICAGO, MILWAUKEE, ST. PAUL AND PACIFIC RAILROAD COMPANY RIGHT OF WAY, SAID POINT BEING 200.00 FEET NORTH OF THE NORTH LINE OF SAID LOT 7 AND 116.00 FEET EAST OF THE WEST LINE OF SAID 1/4 SECTION; THENCE NORTH 00° 46' 58" EAST ALONG THE EAST LINE OF THE CHICAGO, MILWAUKEE, ST. PAUL AND PACIFIC RAILROAD COMPANY RIGHT OF WAY ON A LINE WHICH IS 116.00 FEET EAST OF AND PARALLEL TO THE WEST LINE OF SAID 1/4 SECTION 1552.68 FEET TO THE POINT OF COMMENCEMENT; EXCEPTING THEREFROM THE RIGHT OF WAY OF THE CHICAGO AND NORTHWESTERN RAILROAD TRANSPORTATION COMPANY 100.00 FEET IN WIDTH RUNNING NORTHWESTERLY THROUGH SAID LANDS; AND EXCEPTING THEREFROM THE NORTH 16.00 FEET AS TAKEN FOR EAST GREENFIELD AVENUE AND THOSE LANDS LYING NORTHEAST OF SAID RAILROAD RIGHT OF WAY. ALSO EXCEPTING FROM THE ABOVE PARCELS THAT PART CONTAINED IN QUIT CLAIM DEED RECORDED AS DOCUMENT NO. 4421152. PARCEL 2: THE FOLLOWING DESCRIBED PARCEL IS SITUATED IN THE COUNTY OF MILWAUKEE AND THE STATE OF WISCONSIN, TO WIT: THAT PART OF THE SOUTHWEST 1/4 OF SECTION 33, TOWNSHIP 7 NORTH, RANGE 22 EAST AND THE SOUTHEAST 1/4 OF SECTION 32, TOWNSHIP 7 NORTH, RANGE 22 EAST, IN THE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN, WHICH IS BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTH SECTION CORNER BETWEEN SECTIONS 32 AND 33 AFORESAID; RUNNING THENCE NORTH 00° 16' 36" EAST ALONG THE SECTION LINE BETWEEN SECTIONS 32 AND 33 AFORESAID 388.00 FT. TO A POINT, SAID POINT LYING IN THE CENTER LINE EXTENDED EAST OF EAST MADISON STREET; THENCE SOUTH 89° 56' 29" WEST ALONG THE CENTER LINE EXTENDED EAST OF EAST MADISON STREET 49.70 FT. TO A POINT, THEN NORTH 03° 31' 36" EAST AND PARALLEL TO THE EAST LINE OF THE CHICAGO, MILWAUKEE, ST. PAUL AND PACIFIC RAILROAD COMPANY RIGHT OF WAY 310.00 FT., MORE OR LESS, TO A POINT IN THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY, SAID POINT BEING 125.2 FT. WESTERLY, AS MEASURED RADially FROM THE EASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY; THENCE SOUTHERLY ALONG THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY 503.64 FT. ON THE ARC OF A CURVE WHOSE CENTER LIES TO THE EAST, WHOSE RADIUS IS 2694.29 FT. AND WHOSE CHORD BEARS SOUTH 11° 52' 26" EAST 602.90 FT. TO A POINT, SAID POINT BEING 155.15 FT. NORTH OF THE NORTH LINE OF EAST GREENFIELD AVENUE; THENCE NORTH 89° 56' 29" EAST AND PARALLEL TO THE NORTH LINE OF EAST GREENFIELD AVENUE 26.39 FT. TO A POINT ON THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY, SAID POINT BEING 100.00 FT. WESTERLY AS MEASURED RADially, FROM THE EASTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY; THENCE SOUTHERLY ALONG THE WESTERLY LINE OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY RIGHT OF WAY 217.91 FT. ON THE ARC OF A CURVE WHOSE CENTER LIES TO THE EAST, WHOSE RADIUS IS 2669.09 FT. AND WHOSE CHORD BEARS SOUTH 19° 44' 06" EAST 217.85 FT. TO A POINT IN THE SOUTH LINE OF SAID SECTION 33; THENCE SOUTH 89° 56' 29" WEST ALONG THE SOUTH LINE OF SECTION 33 AFORESAID 174.67 FT. TO THE POINT OF COMMENCEMENT; EXCEPTING THEREFROM THE SOUTH 50.00 FT. AS TAKEN FOR EAST GREENFIELD AVENUE.