I M P O R T A N T

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GILES ENGINEERING ASSOCIATES, INC.

Supplemental Monitoring Results and Request for Case Closure

3070 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin

FID No. 341072820
BRRTS No. 03-41-521452
Commerce No. 53212-2007-70

Prepared for:

Redevelopment Authority of the City of Milwaukee
Milwaukee, Wisconsin

February 12, 2007
Project No. 1E-0402011

GILES
ENGINEERING ASSOCIATES, INC.

February 12, 2007

Wisconsin Department of Commerce
101 West Pleasant Street, Suite 100A
Milwaukee, WI 53212

Attention: Ms. Linda Michalets
Hydrogeologist

Subject: Supplemental Monitoring Results and
Request for Case Closure
3070 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin
BRRTS No. 03-41-521452
Giles Project No. 1E-0402011

Dear Ms. Michalets:

On behalf of our client, the Redevelopment Authority of the City of Milwaukee (RACM), Giles Engineering Associates, Inc. (Giles) performed supplemental monitoring activities at 3070 North Dr. Martin Luther King Jr. Drive, in the City of Milwaukee, Milwaukee County, Wisconsin ("Site"). The Site is a 4,560-square foot (0.10 acre) commercial property with asphalt driving and parking areas and a small (319-square foot) building. The Site was repaved during 2005. Topographically, the Site slopes to the south. The site is bordered by North Burleigh Street to the north, a church to the east, an automotive repair facility to the south, and North Dr. Martin Luther King Jr. Drive to the west. The location of the Site is shown on Figure 1. The features of the Site are shown on Figure 2.

The Site was historically occupied by a gasoline filling station. One 1,000-gallon gasoline underground storage tank (UST) was removed from the Site in November 2002. Results of the UST closure assessment indicate that a release from the UST had occurred. Giles completed a *Site Investigation Report* for the Site, dated April 28, 2006. Nine Geoprobe® soil borings and seven NR 141-compliant groundwater monitoring wells were installed on the Site as part of the Site Investigation (SI) activities.

Petroleum-impacted soil and groundwater were detected at the Site. As a remedial strategy, 130 tons of petroleum-impacted source soil were excavated and removed from the former UST basin and vicinity to facilitate improvement in groundwater quality. An improvement in groundwater quality was achieved at the Site following the source soil excavation. However, Giles recommended additional groundwater monitoring in order to better evaluate plume trends at the property boundaries.

Three additional groundwater monitoring events were performed in June 2006, September 2006, and December 2006 (select wells). The monitoring activities are described in detail below.

MONITORING PROCEDURES

Wisconsin Administrative Code (WAC) Natural Resources Chapter 141 (NR 141)-compliant monitoring wells MW1, MW2, MW3R, and MW4 through MW6 were sampled on June 21, 2006 and September 7, 2006. Monitoring wells MW2, MW3R, MW4, and MW6 were also sampled on December 27, 2006. The monitoring wells were purged and sampled with plastic, disposable bailers. A new, manufacturer-packaged bailer was dedicated to each well. Groundwater levels and water quality parameters were measured and recorded prior to monitoring well purging and sampling. Groundwater was sampled for petroleum volatile organic compound (PVOC) laboratory analysis (method 8020). Groundwater samples were submitted to TestAmerica Analytical Testing Corporation (TestAmerica). Groundwater sample collection, preservation, storage, and transportation were performed in accordance with applicable state, federal, and ASTM standards.

Purge water generated during the June 2006 sampling event was transported by Giles to National Tank Service in West Allis, Wisconsin. Purge water generated during the September and December 2006 sampling events was transported by Giles to Waukesha Wastewater Treatment Plant for disposal. The purge water disposal documents are included in Appendix A.

RESULTS

Hydrogeologic Conditions

Groundwater levels vary across the Site, from 0 (spring recharge) to 16 feet bgs. This variation is most likely due to soil conditions consisting of fill material underlain by native clay soil. As presented in the SI report, groundwater flow at the Site has been demonstrated to be generally in a southwesterly direction, with mounding occurring at the former UST basin. Static groundwater level measurements and relative groundwater elevations are presented in Table 1. A groundwater table contour map, generated from the September 7, 2006 static groundwater level measurements is included as Figure 3.

Groundwater Analytical Results

Review of the laboratory analytical results from the NR 141-compliant monitoring wells indicates that PVOCs were not detected above laboratory method detection limits (MDLs) in groundwater samples collected from MW1, located in the northeastern portion of the Site, and MW5, located in the southwestern portion, during the June 21, 2006 and September 7, 2006 sampling events. PVOCs were not detected above laboratory method quantitation limits (MQLs) in groundwater samples collected from MW2, located in the northwestern portion of the Site, and MW4, located in the eastern portion of the Site, during the most recent groundwater sampling event on December 27, 2006.

Review of the laboratory analytical results from monitoring well MW3R in the former UST source area indicates the detection of PVOCs above NR 140 enforcement standards (ES) and/or preventive action limits (PAL). However, concentrations of these compounds have generally exhibited stable to

decreasing trends. Benzene has been detected above the NR 140 ES in groundwater samples collected from MW6 installed along the western property boundary (downgradient of the source area). The groundwater laboratory analytical results are summarized in Table 2 and are shown on Figure 4. The groundwater analytical laboratory reports from the June 2006, September 2006, and December 2006 monitoring events are included in Appendix B.

Mann-Kendall statistical analysis was performed on groundwater data assembled from the sampling of monitoring wells MW3R (former source area), MW4 (eastern property boundary), and MW6 (western property boundary and true downgradient). The results of the Mann-Kendall statistical analyses indicate that the groundwater contaminant trends in the monitoring wells are either stable or decreasing. The Mann-Kendall statistical spreadsheets for MW3R, MW4, and MW6 are included in Appendix C.

Additionally, benzene concentration in groundwater collected from MW3R and MW6 during the December 2006 sampling event was plotted versus (vs.) distance downgradient from the source well (See Appendix B of PUB-RR-614, *Guidance of Natural Attenuation of Petroleum Releases*, March 2003). This exercise was performed in order to determine how far the benzene-impacted groundwater plume extends into the North Dr. Martin Luther King Jr. Drive Right-of-Way (ROW). North Dr. Martin Luther King Jr. Drive at Burleigh Street is approximately 92 feet wide and contains a high concentration of underground electric and communications utilities. The intersection is also highly traveled, further prohibiting investigation within the ROW areas. The concentration vs. distance analysis shows that the benzene-impacted plume at or above the ES (5 micrograms per kilogram [ug/kg]) extends approximately 61 feet downgradient of MW3R. This distance is approximately 21 feet from the Site property line and 23 feet from the centerline of the street ROW. The plot of benzene concentration vs. distance is shown on Graph 1.

Review of the natural attenuation (NA) field data from the recent groundwater sampling events (dissolved oxygen and oxidation-reduction potential [ORP]) indicates that the groundwater is generally oxygen limited. Additionally, oxygen is more depleted within the plume (MW3R and MW6). Oxygen is consumed by microorganisms during aerobic degradation of contaminants. Temperature and pH appear generally conducive for seasonal biological activity and natural attenuation. Review of the NA field data indicates that pH has increased in MW3/3R following backfilling activities with recycled concrete. The remaining NA measurements appear generally inconclusive. The NA field parameters are summarized in Table 3.

NR 746 RISK EVALUATION

The Wisconsin Department of Natural Resources (WDNR) promulgated WAC Chapter NR 746 in order to develop Site-specific risk screening criteria and to facilitate Site remediation and case closure. The following section provides the risk-screening criteria of NR 746.06(2) for closure consideration. Italicized text indicates Site-specific comments related to the NR 746.06(2) criteria.

a) None of the following environmental factors are present at the Site:

1. Documented expansion of a plume margin.

2. Verified contaminant concentration in a private or public potable well that attains or exceeds the preventive action limit.

3. Contamination within bedrock or within one meter of bedrock.

4. Petroleum product that is not in dissolved phase is present with a thickness of 0.01 feet or more, and has been verified by more than one sampling event.

5. Documented contamination discharges to a surface water or wetland.

b) Soil contamination does remain at the Site that exceeds the soil-screening levels in NR 746.06 Table 1.

NR 746.06 Table 1 Indicators of Residual Petroleum Product in Soil Pores	
Substance	Soil Screening Levels
Benzene	8.5 mg/kg
1,2 DCA	0.6 mg/kg
Ethylbenzene	4.6 mg/kg
Toluene	38.0 mg/kg
Xylene	42.0 mg/kg
1,2,4-Trimethylbenzene	83.0 mg/kg
1,3,5-Trimethylbenzene	11.0 mg/kg
Naphthalene	2.7 mg/kg

One or more of the substances in Table 1, except for 1,2 DCA, have been detected above the listed values in seven of the submitted soil samples (borings) and in three of five excavation soil samples.

c) No soil contamination currently exists within the top 4 feet of the Site that exceeds any of the soil screening levels in NR 746.06 Table 2.

NR 746.06 Table 2 Protection of Human Health from Direct Contact with Contaminated Soil	
Substance	Soil Screening Levels
Benzene	1.10 mg/kg
1,2 DCA	0.54 mg/kg

A concentration of soil exceeding the direct-contact soil screening level for benzene was detected in the shallow sample collected from boring MW-3; however, this area of soil has been excavated and removed.

d) For substances not listed in Table 2 that are present within four feet of the ground surface and have been approved by the agency with administrative authority for the Site as contaminants of concern as defined in NR 720.03(2), the potential human health risk from direct contact has been addressed.

Residual petroleum and lead-impacted soil exists within the top 4 feet of the northern portion of the Site. Human health will be protected through regular maintenance of existing asphalt pavement.

e) There is no human health risk from direct contact for a substance listed in Table 1, if the substance's concentration is below the Table 1 soil screening level.

f) Release of a petroleum product to the soil or groundwater at the Site may have occurred within the last 10 years.

One 1,000-gallon gasoline UST was removed from the Site in 2002.

g) There is no evidence of migration of petroleum product contamination within a utility corridor or within a permeable material or soil along which vapors, free product or contaminated water may flow.

Groundwater at the western property line is present at a depth beneath nearby telecommunications, electric, and water utility trenches. Additionally, based on distance projections, the benzene-impacted groundwater plume is not believed to intersect sewer utilities located at the center of the North Dr. Martin Luther King Drive ROW.

h) There is no evidence of migration or imminent migration of petroleum product contamination to building foundation drain tile, sumps, or other points of entry into a basement or other enclosed structure where petroleum vapors could collect and create odors or an adverse impact on indoor air quality or where the contaminants may pose an explosion hazard.

The existing Site building does not contain a basement or other points of entry for subsurface volatile vapors. The basement of the Church adjacent to east is believed to be at a significant-enough distance away from the receding benzene-impacted groundwater plume to not be of concern.

i) No enforcement standard is exceeded in any groundwater within 1,000 feet of a well operated by a public utility, as defined in s. 196.01(5), Stats., or within 100 feet of any other well used to provide water for human consumption.

Drinking water in the area including the Site is from Lake Michigan and is treated and supplied by the City of Milwaukee.

An NR 716-compliant Site investigation and a NR 746 risk screening evaluation have been completed. The following considerations were used in determining the best technical and most cost-effective method for evaluating a remedial closure strategy at the Site:

1) The Site meets the requirements of NR 746.08(2) *Groundwater Contamination within Low-Permeability Material*, following the completion of an NR 716-compliant Site investigation.

a) The Site meets all of the risk-screening criteria in NR 746.06(2).

Soil-screening levels presented in Table 1 were exceeded. However, no free petroleum product has been detected in the monitoring wells.

b) The requirements of NR 726 have been satisfied.

c) All groundwater is contained within low-permeability material and there is at least a 5-foot separation between the contamination in the low-permeability material and any underlying or downgradient permeable material.

Additionally, the groundwater-contaminant plume is defined and is stable and/or decreasing.

CONCLUSIONS AND RECOMMENDATIONS

An NR 716-compliant subsurface investigation and an NR 746 risk-screening evaluation have been performed at 3070 North Dr. Martin Luther King Jr. Drive in Milwaukee, Wisconsin. Additionally, 130 tons of petroleum-impacted source soil has been removed from the former UST basin. No significant risk to human health or the environment has been identified as a result of the release(s) from the former UST(s) or any potential spills at the Site. It is Giles' opinion that although the groundwater is oxygen-limited, the petroleum-impacted groundwater will continue to be remediated via natural attenuation.

Therefore, Giles, on behalf of the RACM, requests that the Wisconsin Department of Commerce (Commerce) grant case closure for the Site, subject to the condition that the Site is placed on the soil and groundwater Geographic Information System (GIS) Registry of Closed Remediation Sites, and conditional upon the abandonment of the monitoring wells in accordance with Chapter NR 141 following case closure.

The soil GIS Registry packet and the Case Summary and Close Out Form are included under a separate cover. The GIS Registry fees have been forwarded to the WDNR. Should you have any questions, or require any additional information, please do not hesitate to contact us at (262) 544-0118.

Respectfully submitted,

GILES ENGINEERING ASSOCIATES, INC.

Erika L. Biemann, CHMM
Project Environmental Scientist

Kevin T. Bugel P.G., C.P.G.
Project Manager

Enclosures:

Figures
Figure 1. Site Location Map
Figure 2. Site Features, Soil Boring and Monitoring Well Location Plan
Figure 3. Groundwater Contour Map (9/7/06)
Figure 4. Groundwater Analytical Results

Tables
Table 1. Groundwater Elevation Summary
Table 2. Groundwater Analytical Results (Pb and VOCs)
Table 3. Natural Attenuation Field Measurements Summary

Graph 1. Benzene Concentration vs. Distance

Appendices

Appendix A: Purge Water Disposal Documents
Appendix B: Groundwater Laboratory Analytical Reports
Appendix C: Mann-Kendall Statistical Spreadsheets

Distribution: Wisconsin Department of Commerce
Attn: Ms. Linda Michalets (1 mail)
Redevelopment Authority of the City of Milwaukee
Attn: Mr. Benjamin Timm (1 bound copy, 1 electronic copy)

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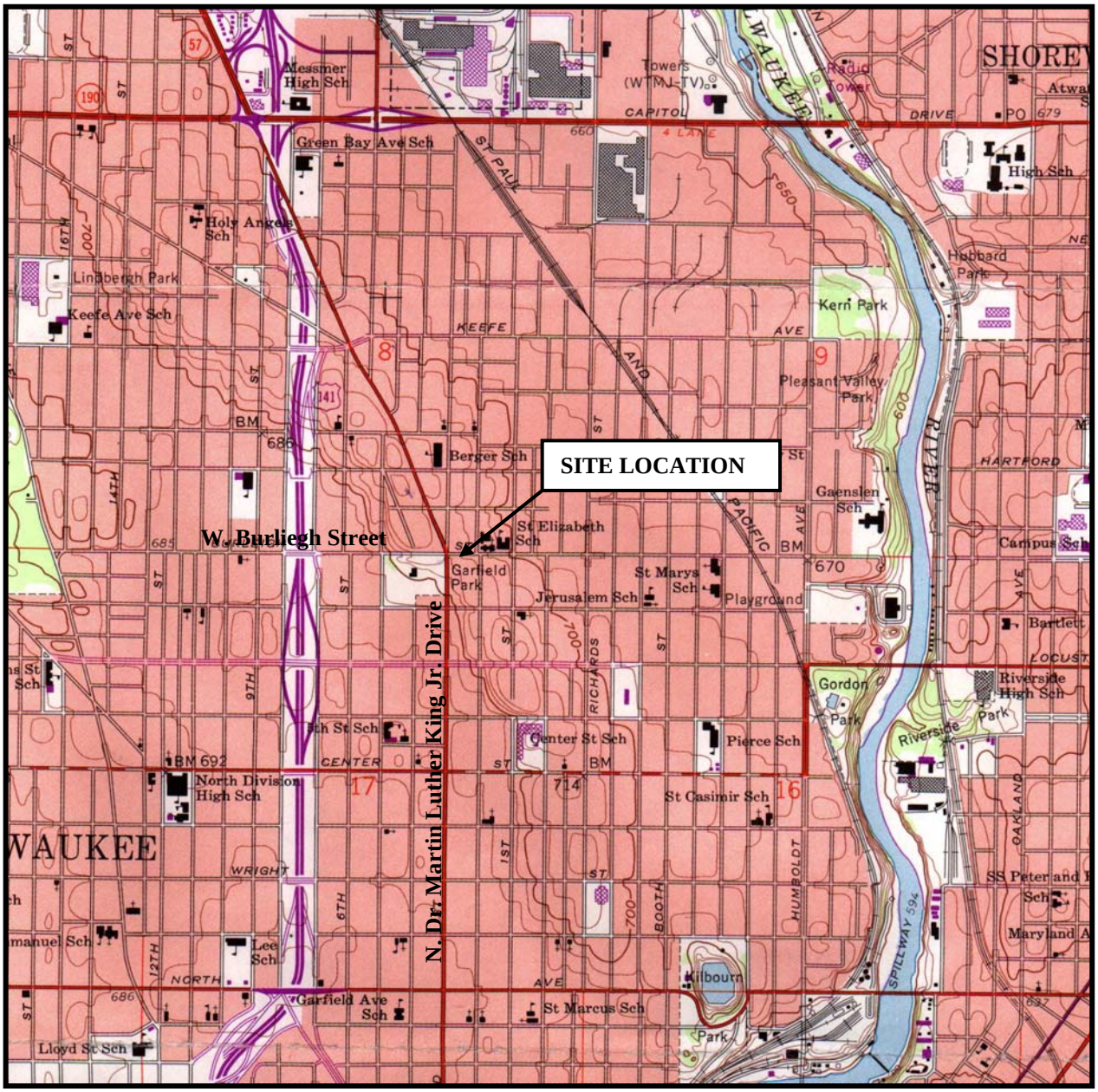
1E-0402011-LtrReport/04envr01/elb/se



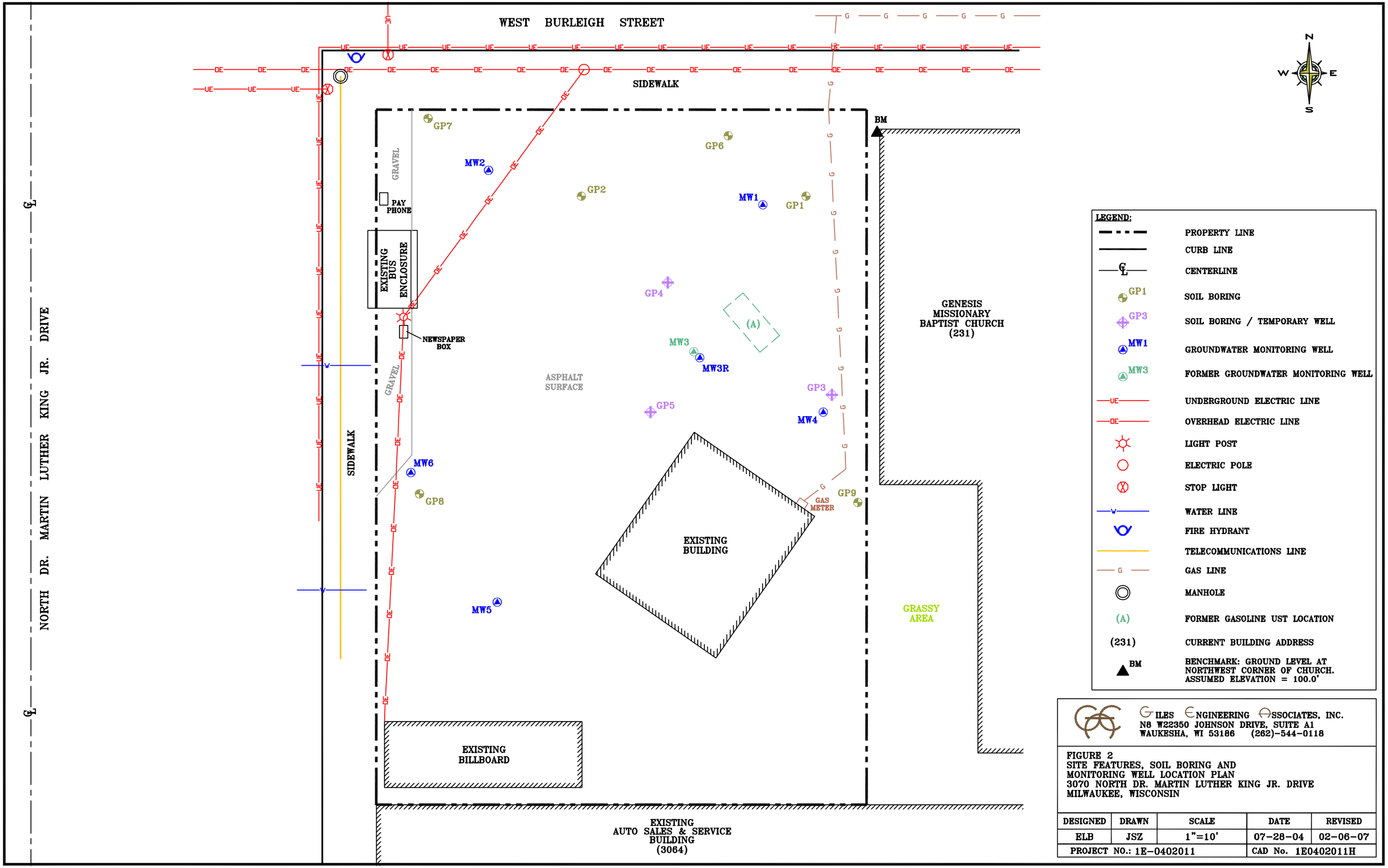
Source: USGS Milwaukee, Wisconsin 1958 (photorevised 1971) 7.5 Minute Series (topographic) Quadrangle Map

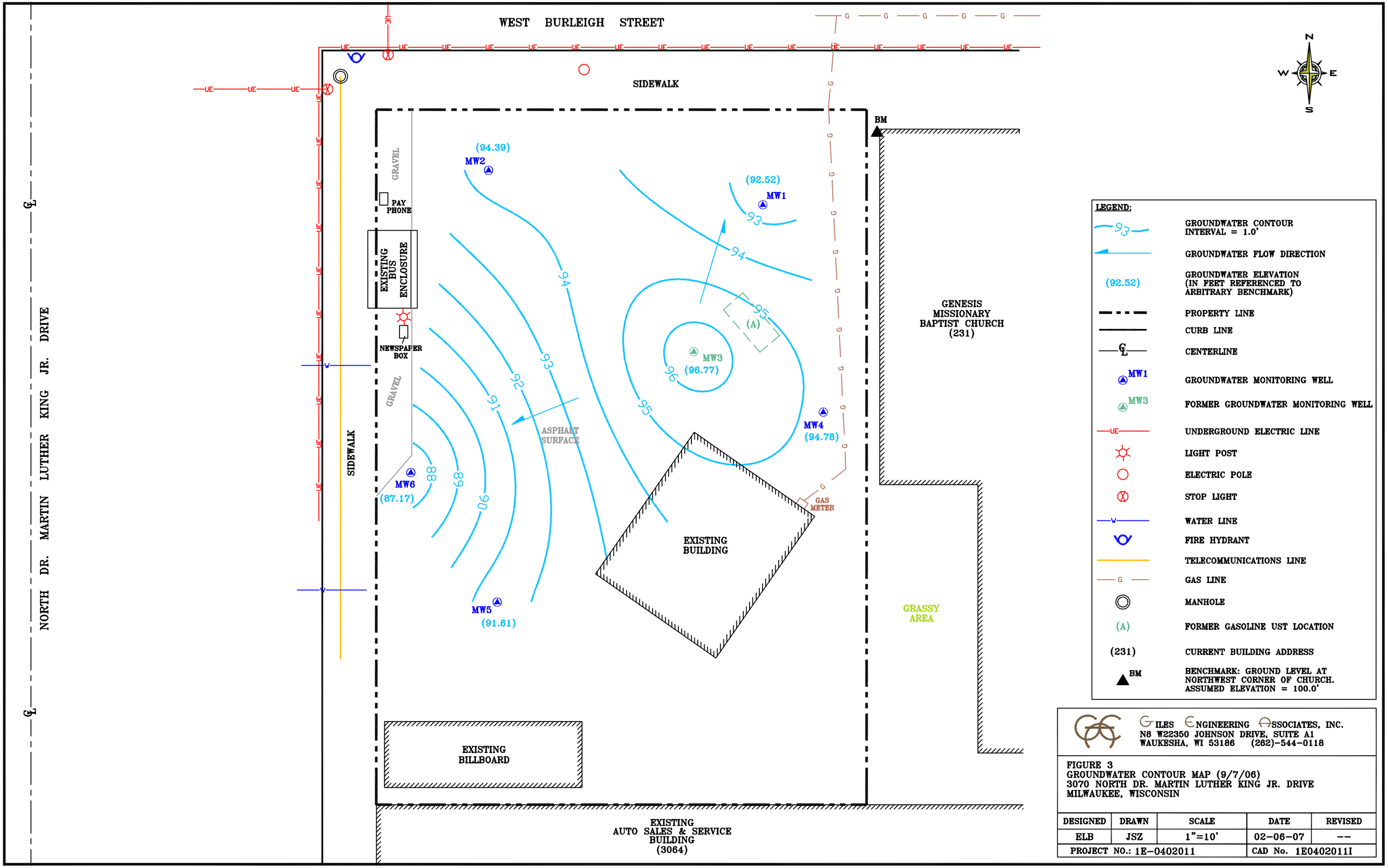
Scale: 1”=2000’
Contour Interval: 10 Feet

FIGURE 1
SITE LOCATION MAP

3070 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin
Project No. 1E-0402011

GILES
ENGINEERING ASSOCIATES, INC.

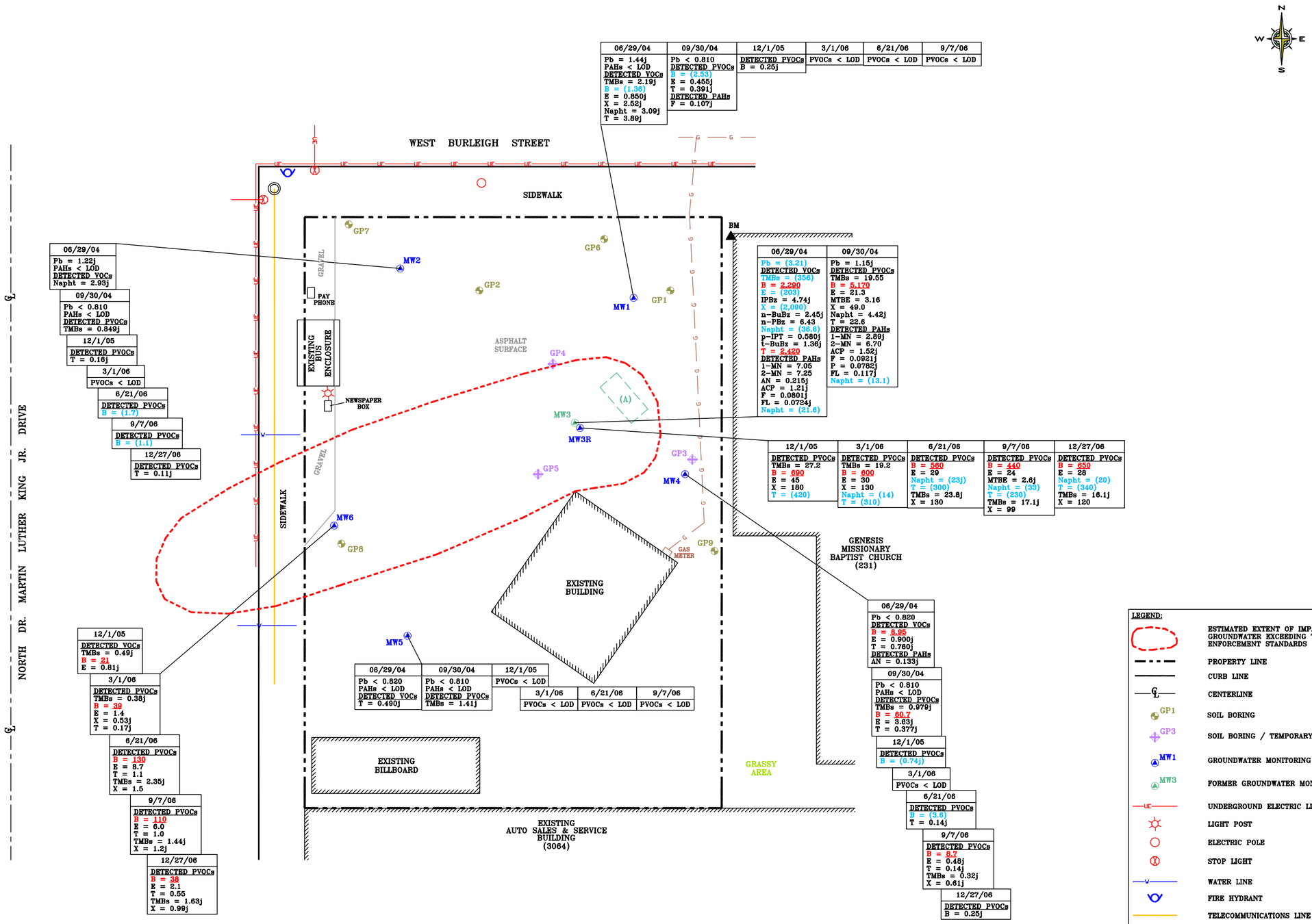

WEST BURLEIGH STREET
SIDEWALK
NORTH DR. MARTIN LUTHER KING JR. DRIVE
SIDEWALK
GRAVEL
GRAVEL
PAY PHONE
EXISTING BUS ENCLOSURE
NEWSPAPER BOX
GP7
GP6
GP2
GP1
GP4
GP3
GP5
GP8
GP9
MW1
MW2
MW3
MW3R
MW4
MW5
MW6
(A)
ASPHALT SURFACE
EXISTING BUILDING
GAS METER
BM
GENESIS MISSIONARY BAPTIST CHURCH (231)
GRASSY AREA
EXISTING BILLBOARD
EXISTING AUTO SALES & SERVICE BUILDING (3064)
N
S
E
W
LEGEND:
PROPERTY LINE
CURB LINE
CENTERLINE
GP1 SOIL BORING
GP3 SOIL BORING / TEMPORARY WELL
MW1 GROUNDWATER MONITORING WELL
MW3 FORMER GROUNDWATER MONITORING WELL
UNDERGROUND ELECTRIC LINE
OVERHEAD ELECTRIC LINE
LIGHT POST
ELECTRIC POLE
STOP LIGHT
WATER LINE
FIRE HYDRANT
TELECOMMUNICATIONS LINE
GAS LINE
MANHOLE
(A) FORMER GASOLINE UST LOCATION
(231) CURRENT BUILDING ADDRESS
BM BENCHMARK: GROUND LEVEL AT NORTHWEST CORNER OF CHURCH. ASSUMED ELEVATION = 100.0'
GILES ENGINEERING ASSOCIATES, INC.
N8 W22350 JOHNSON DRIVE, SUITE A1
WAUKESHA, WI 53186 (262)-544-0118
FIGURE 2
SITE FEATURES, SOIL BORING AND
MONITORING WELL LOCATION PLAN
3070 NORTH DR. MARTIN LUTHER KING JR. DRIVE
MILWAUKEE, WISCONSIN
DESIGNED ELB
DRAWN JSZ
SCALE 1"=10'
DATE 07-28-04
REVISED 02-06-07
PROJECT NO.: 1E-0402011
CAD No. 1E0402011H



GILES ENGINEERING ASSOCIATES, INC.
N8 W22350 JOHNSON DRIVE, SUITE A1
WAUKESHA, WI 53186 (262)-544-0118

FIGURE 3
GROUNDWATER CONTOUR MAP (9/7/06)
3070 NORTH DR. MARTIN LUTHER KING JR. DRIVE
MILWAUKEE, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
ELB	JSZ	1"=10'	02-06-07	--
PROJECT NO.: 1E-0402011			CAD No. 1E0402011I	



06/29/04	09/30/04	12/1/05	3/1/06	6/21/06	9/7/06
Pb = 1.44j PAHs < LOD DETECTED VOCs TMBs = 2.19j B = (1.38) E = 0.850j X = 2.52j Napht = 3.09j T = 3.89j	Pb < 0.810 DETECTED PVOCs B = (2.53) E = 0.455j T = 0.391j DETECTED PAHs F = 0.107j	DETECTED PVOCs B = 0.25j	PVOCs < LOD	PVOCs < LOD	PVOCs < LOD

06/29/04
Pb = 1.22j PAHs < LOD DETECTED VOCs Napht = 2.93j

09/30/04
Pb < 0.810 PAHs < LOD DETECTED PVOCs TMBs = 0.849j

12/1/05
DETECTED PVOCs T = 0.16j

3/1/06
PVOCs < LOD

6/21/06
DETECTED PVOCs B = (1.7)

9/7/06
DETECTED PVOCs B = (1.1)

12/27/06
DETECTED PVOCs T = 0.11j

06/29/04	09/30/04
Pb = (3.21) DETECTED VOCs TMBs = (356) B = 2,290 E = (203) IPBz = 4.74j X = (2,090) n-BuBz = 2.45j n-PBz = 6.43 Napht = (36.6) p-IPT = 0.580j t-BuBz = 1.36j T = 2,420 DETECTED PAHs 1-MN = 7.05 2-MN = 7.25 AN = 0.215j ACP = 1.21j F = 0.0801j FL = 0.0724j Napht = (21.6)	Pb = 1.15j DETECTED PVOCs TMBs = 19.55 B = 5,170 E = 21.3 MTBE = 3.16 X = 49.0 Napht = 4.42j T = 22.6 DETECTED PAHs 1-MN = 2.89j 2-MN = 6.70 ACP = 1.52j F = 0.0921j P = 0.0782j FL = 0.117j Napht = (13.1)

12/1/05	3/1/06	6/21/06	9/7/06	12/27/06
DETECTED PVOCs TMBs = 27.2 B = 690 E = 45 X = 180 T = (420)	DETECTED PVOCs TMBs = 19.2 B = 600 E = 30 X = 130 Napht = (14) T = (310)	DETECTED PVOCs B = 580 E = 29 Napht = (23j) T = (300) TMBs = 23.8j X = 130	DETECTED PVOCs B = 440 E = 24 MTBE = 2.6j Napht = (33) T = (230) TMBs = 17.1j X = 99	DETECTED PVOCs B = 650 E = 26 Napht = (20) T = (340) TMBs = 16.1j X = 120

12/1/05
DETECTED VOCs TMBs = 0.49j B = 21 E = 0.81j

3/1/06
DETECTED PVOCs TMBs = 0.38j B = 39 E = 1.4 X = 0.53j T = 0.17j

6/21/06
DETECTED PVOCs B = 130 E = 8.7 T = 1.1 TMBs = 2.35j X = 1.5

9/7/06
DETECTED PVOCs B = 110 E = 6.0 T = 1.0 TMBs = 1.44j X = 1.2j

12/27/06
DETECTED PVOCs B = 38 E = 2.1 T = 0.55 TMBs = 1.63j X = 0.99j

MW5

06/29/04	09/30/04	12/1/05
Pb < 0.820 PAHs < LOD DETECTED VOCs T = 0.490j	Pb < 0.810 PAHs < LOD DETECTED PVOCs TMBs = 1.41j	PVOCs < LOD

3/1/06	6/21/06	9/7/06
PVOCs < LOD	PVOCs < LOD	PVOCs < LOD

06/29/04
Pb < 0.820 DETECTED VOCs B = 8.95 E = 0.900j T = 0.760j DETECTED PAHs AN = 0.133j

09/30/04
Pb < 0.810 PAHs < LOD DETECTED PVOCs TMBs = 0.979j B = 60.7 E = 3.63j T = 0.377j

12/1/05
DETECTED PVOCs B = (0.74j)

3/1/06
PVOCs < LOD

6/21/06
DETECTED PVOCs B = (3.6) T = 0.14j

9/7/06
DETECTED PVOCs B = 8.7 E = 0.48j T = 0.14j TMBs = 0.32j X = 0.61j

12/27/06
DETECTED PVOCs B = 0.25j

CHEMICAL KEY:

- -ACP: ACENAPTHYLENE
- -AN: ACENAPHTHENE
- -B: BENZENE
- -E: ETHYLBENZENE
- -F: FLUORANTHENE
- -FL: FLUORENE
- -IPBz: ISOPROPYLBENZENE
- -MN: METHYLNAPHTHALENE
- -n-BuBz: n-BUTYLBENZENE
- -n-PBz: n-PROPYLBENZENE
- -Napht: NAPHTHALENE
- -P: PYRENE
- -Pb: LEAD
- -p-IPT: p-ISOPROPYLTOLUENE
- -T: TOLUENE
- -t-BuBz: TERT-BUTYLBENZENE
- -TMBs: TOTAL TRIMETHYLBENZENE
- -X: TOTAL XYLENES

ABBREVIATIONS:

- -LOD: LIMIT OF DETECTION
- -NR: NATURAL RESOURCES
- -PAH: POLYNUCLEAR AROMATIC HYDROCARBON
- -PVOCs: PETROLEUM VOLATILE ORGANIC COMPOUND
- -VOC: VOLATILE ORGANIC COMPOUND
- -WAC: WISCONSIN ADMINISTRATIVE CODE

NOTES:

VOC, PVOC, PAH AND LEAD RESULTS EXPRESSED IN MICROGRAMS PER LITER (ug/l) EQUIVALENT TO PARTS PER BILLION (ppb)

RESULTS INDICATED IN BLUE/PARENTHESIS EXCEED THE WAC NR 140 PREVENTIVE ACTION LIMIT

RESULTS INDICATED IN RED/UNDERLINED EXCEED THE WAC NR 140 ENFORCEMENT STANDARD

-j: CONCENTRATION BETWEEN LABORATORY LIMIT OF DETECTION AND QUANTITATION LIMIT.

LEGEND:

- ESTIMATED EXTENT OF IMPACTED GROUNDWATER EXCEEDING THE NR 140 ENFORCEMENT STANDARDS
- PROPERTY LINE
- CURB LINE
- CENTERLINE
- GP1 — SOIL BORING
- GP3 — SOIL BORING / TEMPORARY WELL
- MW1 — GROUNDWATER MONITORING WELL
- MW3 — FORMER GROUNDWATER MONITORING WELL
- UNDERGROUND ELECTRIC LINE
- LIGHT POST
- ELECTRIC POLE
- STOP LIGHT
- WATER LINE
- FIRE HYDRANT
- TELECOMMUNICATIONS LINE
- GAS LINE
- MANHOLE
- (A) — FORMER GASOLINE UST LOCATION
- (231) — CURRENT BUILDING ADDRESS
- BM — BENCHMARK: GROUND LEVEL AT NORTHWEST CORNER OF CHURCH. ASSUMED ELEVATION = 100.0'

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N8 W22350 JOHNSON DRIVE, SUITE A1
WAUKESHA, WI 53186 (262)-544-0118

FIGURE 4
GROUNDWATER ANALYTICAL RESULTS
3070 NORTH DR. MARTIN LUTHER KING JR. DRIVE
MILWAUKEE, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
ELB	JSZ	1"=10'	01-12-06	02-06-07
PROJECT NO.: 1E-0402011			CAD No. 1E0402011J	

Table 1

Groundwater Elevation Summary

3070 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin
Project No. 1E-0402011

Date	MW1		MW2		MW3		MW3R		MW4		MW5		MW6	
	TOC Elevation = 100.17		TOC Elevation = 99.55		TOC Elevation = 99.80		TOC Elevation = 99.75		TOC Elevation = 100.36		TOC Elevation = 97.93		TOC Elevation = 98.47	
	TOS Elevation = 95.44		TOS Elevation = 95.15		TOS Elevation = 95.07		TOS Elevation = 95.10		TOS Elevation = 96.11		TOS Elevation = 93.50		TOS Elevation = 94.09	
	Depth to Water (ft)	Elevation	Depth to Water (ft)	Elevation	Depth to Water (ft)	Elevation	Depth to Water (ft)	Elevation	Depth to Water (ft)	Elevation	Depth to Water (ft)	Elevation	Depth to Water (ft)	Elevation
6/29/2004	9.04	91.13	5.63	93.92	3.55	96.25	NA	NA	8.13	92.23	14.82	83.11	NA	NA
9/30/2004	10.03	90.14	7.42	92.13	9.98	89.82	NA	NA	10.43	89.93	11.38	86.55	NA	NA
12/1/2005	6.90	93.27	3.96	95.59	NA	NA	2.74	97.01	3.64	96.72	8.31	89.62	12.76	85.71
3/1/2006	6.82	93.35	4.89	94.66	NA	NA	2.95	96.80	6.79	93.57	6.19	91.74	15.84	82.63
6/21/2006	5.81	94.36	3.35	96.20	NA	NA	2.51	97.24	1.91	98.45	0.00	97.93	11.88	86.59
9/7/2006	7.65	92.52	5.16	94.39	NA	NA	2.98	96.77	5.58	94.78	6.32	91.61	11.30	87.17
12/27/2007	NA	NA	3.20	96.35	NA	NA	2.99	96.76	3.66	96.70	NA	NA	11.91	86.56

NOTES:

TOC: Top of casing
TOS: Top of screen
ft: Feet
NA: Not Available / Not Applicable
Benchmark: Northwest corner of church building

Table 2

Groundwater Analytical Results
(Pb and VOCs)

3070 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin
Project No. 1E-0402011

SAMPLE LOCATION	DATE	Lead (Pb) (ug/L)	Detected Volatile Organic Compounds (VOCs) (ug/L)											
			B	E	MTBE	Napht	T	TMBs	X	n-PBz	IPBz	p-IPT	tert-BuBz	n-BuBz
MW1	6/29/04	1.44j	(1.36)	0.850j	<0.511	3.09j	3.89j	2.19j	2.52j	<0.137	<0.106	<0.157	<0.129	<0.121
	9/30/04	<0.810	(2.53)	0.455j	<0.511	<0.985	0.391j	<1.156	<1.61	--	--	--	--	--
	12/1/05	--	0.25j	<0.22	<0.23	--	<0.11	<0.44	<0.39	--	--	--	--	--
	3/1/06	--	<0.50	<0.44	<0.46	<1.0	<0.22	<0.88	<0.78	--	--	--	--	--
	6/21/06	--	<0.25	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	9/7/06	--	<0.25	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	12/27/06	--	--	--	--	--	--	--	--	--	--	--	--	--
MW2	6/29/04	1.22j	<0.498	<0.106	<0.511	2.93j	<0.120	<0.376	<0.340	<0.137	<0.106	<0.157	<0.129	<0.121
	9/30/04	<0.810	<0.239	<0.446	<0.511	<0.985	<0.261	0.849j	<1.61	--	--	--	--	--
	12/1/05	--	<0.25	<0.22	<0.23	--	0.16j	<0.44	<0.39	--	--	--	--	--
	3/1/06	--	<0.25	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	6/21/06	--	(1.7)	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	9/7/06	--	(1.1)	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	12/27/06	--	<0.25	<0.22	<0.23	<0.50	0.11j	<0.44	<0.39	--	--	--	--	--
MW3	6/29/04	(3.21)	2,290	(203)	<0.511	(36.6)	2,420	(356)	(2,090)	6.43	4.74j	0.580j	1.36j	2.45j
	9/30/04	1.15j	5,170	21.3	3.16	4.42j	22.6	19.55	49.0	--	--	--	--	--
MW3R	12/1/05	--	690	45	<1.2	--	(420)	27.2	180	--	--	--	--	--
	3/1/06	--	600	30	<4.6	(14)	(310)	19.2	130	--	--	--	--	--
	6/21/06	--	560	29	<4.6	(23j)	(300)	23.8j	130	--	--	--	--	--
	9/7/06	--	440	24	2.6j	(33)	(230)	17.1j	99	--	--	--	--	--
	12/27/06	--	650	28	<2.3	(20)	(340)	16.1j	120	--	--	--	--	--
MW4	6/29/04	<0.820	8.95	0.900j	<0.511	<0.159	0.760j	<0.376	<0.340	<0.137	<0.106	<0.157	<0.129	<0.121
	9/30/04	<0.810	60.7	3.63j	<0.511	<0.985	0.377j	0.979j	<1.61	--	--	--	--	--
	12/1/05	--	(0.74j)	<0.22	<0.23	--	<0.11	<0.44	<0.39	--	--	--	--	--
	3/1/06	--	<0.50	<0.44	<0.46	<1.0	<0.22	<0.88	<0.78	--	--	--	--	--
	6/21/06	--	(3.6)	<0.22	<0.23	<0.50	0.14j	<0.44	<0.39	--	--	--	--	--
	9/7/06	--	8.7	0.48j	<0.23	<0.50	0.14j	0.32j	0.61j	--	--	--	--	--
	12/27/06	--	0.25j	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
MW5	6/29/04	<0.820	<0.498	<0.106	<0.511	<0.159	0.490j	<0.376	<0.340	<0.137	<0.106	<0.157	<0.129	<0.121
	9/30/04	<0.810	<0.239	<0.446	<0.511	<0.985	<0.261	1.41j	<1.61	--	--	--	--	--
	12/1/05	--	<0.25	<0.22	<0.23	--	<0.11	<0.44	<0.39	--	--	--	--	--
	3/1/06	--	<0.25	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	6/21/06	--	<0.25	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	9/7/06	--	<0.25	<0.22	<0.23	<0.50	<0.11	<0.44	<0.39	--	--	--	--	--
	12/27/06	--	--	--	--	--	--	--	--	--	--	--	--	--
MW6	12/1/05	--	21	0.81j	<0.50	<0.25	<0.20	0.49j	<0.50	<0.50	<0.20	<0.20	<0.20	<0.20
	3/1/06	--	39	1.4	<0.23	<0.50	0.17j	0.38j	0.53j	--	--	--	--	--
	6/21/06	--	130	8.7	<0.23	<0.50	1.1	2.35j	1.5	--	--	--	--	--
	9/7/06	--	110	6.0	<0.23	<0.50	1.0	1.44j	1.2j	--	--	--	--	--
	12/27/06		38	2.1	<0.23	<0.50	0.55	1.63j	0.99j	--	--	--	--	--
NR 140 PAL		1.5	0.5	140	12	8	200	96	1,000	NS	NS	NS	NS	NS
NR 140 ES		15	5	700	60	40	1,000	480	10,000	NS	NS	NS	NS	NS

NOTES:

NR: Natural Resources Chapter of the Wisconsin Administrative Code (WAC)
NS: No Established Standard
ug/L: Micrograms per liter; equivalent to parts per billion (ppb)
--: Not Anlayzed
j: Concentration measured between the laboratory detection limit and the quantitation limit
PAL: NR 140 Preventive Action Limit
ES: NR 140 Enforcement Standard
TMBs: 1,2,4 and 1,3,5-Trimethylbenzene
Results indicated in red/underline exceed the WAC NR 140 ES
Results indicated in blue/parenthesis exceed the WAC NR 140 PAL

B: Benzene
E: Ethylbenzene
IPBz: Isopropylbenzene
n-BuBz: n-Butylbenzene
n-PBz: n-Propylbenzene
p-IPT: p-Isopropyltoluene
tert-BuBz: tert-Butylbenzene
MTBE: Methyl tert-butyl ether

Napht: Naphthalene
T: Toluene
X: Total Xylenes

Table 3

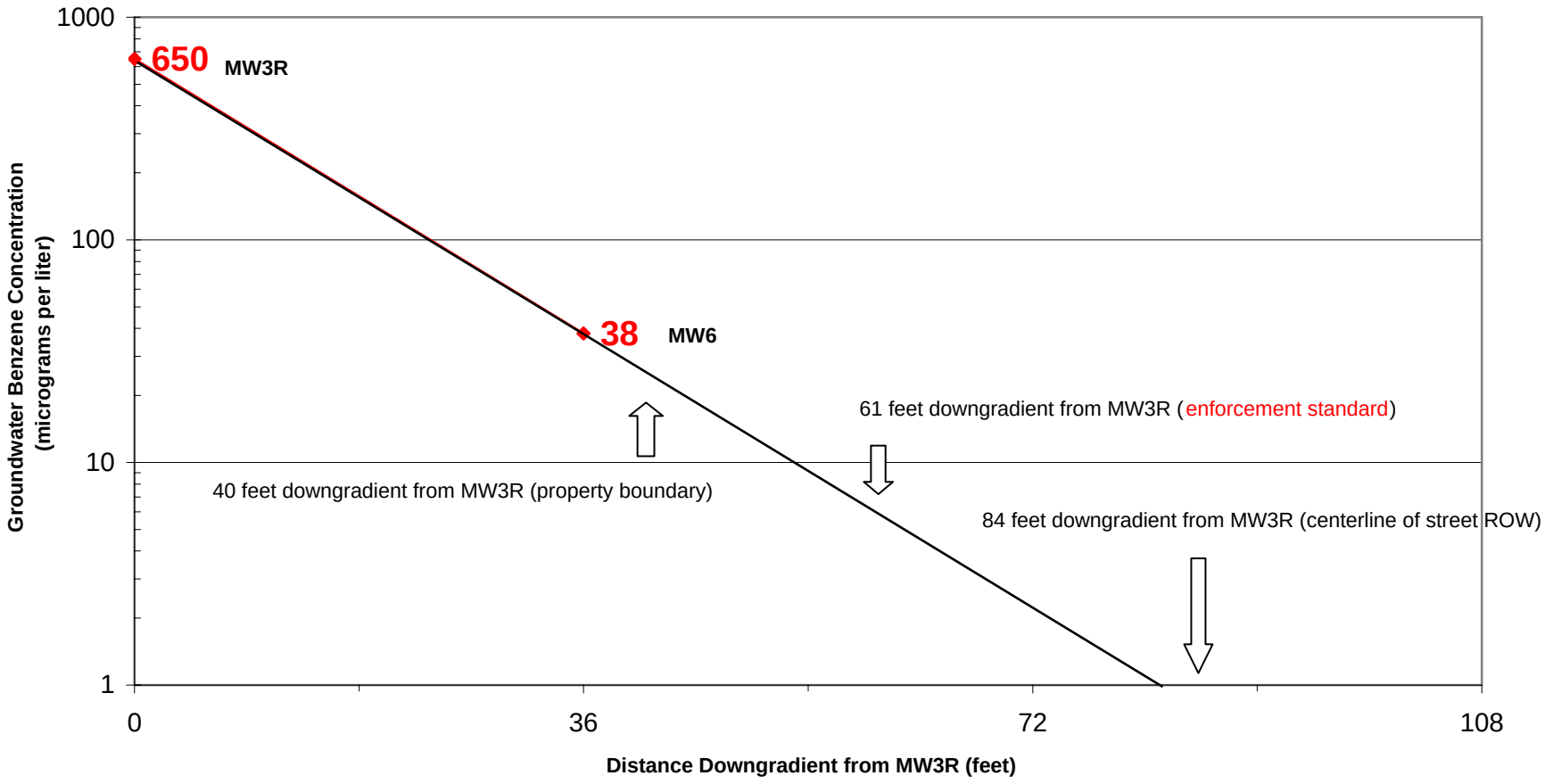
Natural Attenuation Field Measurements Summary

3070 North Dr. Martin Luther King Jr. Drive
Milwaukee, Wisconsin
Project No. 1E-0402011

Well Number	Date Collected	Field Measurements					
		D.O. (mg/L)	ORP (mv)	Conductivity (us/cm)	PH (S.U.)	Temperature (degrees C)	Ferrous Iron (mg/L)
MW1	6/29/04	2.06	282	1,640	8.74	10.95	0.00
	9/30/04	0.73	374	2,945	7.01	14.68	0.00
	12/1/05	0.49	273	3,336	7.28	14.20	--
	3/1/06	1.48	357	2,731	7.63	11.33	0.20
	6/21/06	0.28	262	3,447	7.41	17.48	--
	9/7/06	0.33	206	3,545	7.62	19.73	--
	12/27/06	--	--	--	--	--	--
MW2	6/29/04	2.17	-130	2,224	7.82	10.90	0.00
	9/30/04	0.35	381	2,885	6.91	16.38	0.00
	12/1/05	1.10	227	404	8.19	13.13	--
	3/1/06	3.20	349	1,325	7.99	9.47	0.20
	6/21/06	0.99	207	368	8.41	20.86	--
	9/7/06	0.26	10	2,619	7.74	22.08	--
	12/27/06	0.86	37	1,725	6.90	10.34	--
MW3	6/29/04	0.54	-177	1,615	8.47	11.06	0.00
	9/30/04	0.21	209	1,415	7.01	14.53	1.80
MW3R	12/1/05	1.29	185	10,457	11.62	11.98	--
	3/1/06	1.94	262	9,881	12.82	7.40	0.70
	6/21/06	0.74	180	6,665	12.66	21.98	--
	9/7/06	0.25	-44	10,142	13.22	22.78	--
	12/27/06	0.17	-278	10,490	12.90	10.92	--
MW4	6/29/04	1.81	266	1,134	8.85	11.00	0.00
	9/30/04	0.65	366	1,032	7.12	14.33	0.00
	12/1/05	5.29	260	586	8.14	12.09	--
	3/1/06	2.20	329	2,033	7.39	10.16	0.50
	6/21/06	3.35	235	243	10.04	22.32	--
	9/7/06	0.27	35	1,898	7.87	21.26	--
	12/27/06	10.37	162	148	6.42	9.49	--
MW5	6/29/04	1.22	274	1,192	9.04	12.62	0.00
	9/30/04	0.51	370	1,277	7.32	15.69	0.00
	12/1/05	0.28	330	3,840	7.70	14.79	--
	3/1/06	1.37	348	1,236	7.74	9.27	0.20
	6/21/06	0.78	281	383	9.19	24.62	--
	9/7/06	0.11	8	2,513	7.84	20.43	--
	12/27/06	--	--	--	--	--	--
MW6	6/29/04	--	--	--	--	--	--
	9/30/04	--	--	--	--	--	--
	12/1/05	0.19	227	2,028	7.54	14.64	--
	3/1/06	0.35	324	1,870	7.13	12.10	0.60
	6/21/06	0.46	204	2,144	7.40	14.92	--
	9/7/06	0.11	40	2,449	7.43	16.99	--
	12/27/06	0.20	-218	2,189	6.78	13.65	--

NOTES:

D.O.: Dissolved Oxygen
ORP: Oxidation-Reduction Potential
mg\L: Milligrams per liter
us\cm: Microsiemens per centimeter
mv: Millivolts
C: Celsius
S.U.: Standard Units
--: Not Measured

Graph 1
Benzene Concentration vs. Distance

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