PRE-DEMOLITION HAZARDOUS MATERIALS ASSESSMENT REPORT
FORMER T.C. ESSER PAINT MANUFACTURING SITE
1542-46 N. 32ND AND 3131 W. GALENA STREETS
MILWAUKEE, WISCONSIN 53208

PREPARED FOR:

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PROJECT REFERENCE #11525

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1. INTRODUCTION

The City of Milwaukee Department of City Development (DCD) retained Sigma Environmental Services, Inc. (Sigma) to perform additional pre-demolition hazardous materials assessment activities at the former T.C. Esser Paint facility (the "site") located at 1542-46 North 32nd Street and 3131 West Galena Street, Milwaukee (refer to **Figure 1**) and to update the previous hazardous materials assessment reports[1] to reflect current (as of the date of this report) site conditions. The hazardous materials assessment activities described in Sigma's proposal, dated September 15, 2009, were limited to the buildings located at 1542-46 North 32nd Street and 3131 West Galena Street. This updated report will be used by the City of Milwaukee Department of Neighborhood Services (DNS) for soliciting site demolition bids.

The facility was vacant at the date and time of this inspection. Site plan maps indicating approximate floor layouts for the 1890, 1910, 1931, 1931A, 1950, and Garage buildings are included. (The main building complex includes five buildings constructed at different times from the 1890s to the 1950s. The numeric building nomenclature is based on the date of the Sanborn fire insurance map on which each successive building is first present.)

2. BACKGROUND

Galena Redevelopment Corporation (Galena) originally retained Sigma to perform a pre-demolition hazardous materials inspection at the site in early 2008. Hazardous materials and other items of environmental concern were identified so that they could be properly managed in accordance with federal, state, and local regulations during subsequent site demolition work. In general, the following materials must be identified and properly managed prior to initiating demolition activities: CFC/HCFC-containing devices (refrigerants); electrical transformers; floor drains (hazardous materials); fluorescent light bulbs; heaters; high intensity discharge light bulbs; lighting ballasts and other PCB-containing devices; mercury-containing devices (thermostats); and radioactive devices (exit signs and smoke detectors).

Subsequent to Sigma's initial 2008 work, wooden floor blocks were identified on the first floor of the 1931 building as potentially hazardous materials due to the apparent use of wood preservatives and the potential for past material spills to have soaked into the wood. Additionally, mercury-containing switches and two PCB-containing capacitors were removed from the site in August and September 2008 and recycled/disposed of in accordance with applicable regulations. Finally, hydraulic oil associated with an elevator in the basement of the 1910 building was removed from an above ground tank, characterized, and disposed. As such, this report has been updated to reflect these changes in the site conditions.

[1] "Pre-Demolition Hazardous Material, Galena Redevelopment Corp. / Former T.C. Esser Paint Site, 1542-46 North 32nd Street and 3131 West Galena Street, Milwaukee, Wisconsin 53208" report by Sigma (dated June 2008 and Nov 2009).

3. METHODOLOGY

Sigma conducted the assessment and inventory in general accordance with the Wisconsin Department of Natural Resource's (WDNR) *Pre-Demolition Environmental Checklist* (Publication WA-651-03). The assessment was completed for the purpose of identifying hazardous materials which will require proper management prior to building demolition and include the following materials and/or systems:

- Chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and halon-containing devices such as air conditioners, chiller, and fire suppression systems;
- Mercury-containing devices such as thermostats and switches;
- Potential PCB-containing devices such as light ballasts and transformers;
- Radioactive devices such as smoke detectors and exit signs; and
- Other regulated materials including stored chemicals, heaters, light bulbs, and televisions.

It should be noted that Sigma's scope of work was limited to those areas that were reasonably accessible at the date and time of the inspection. This report does not constitute an ASTM E 1527-00, Phase I Environmental Site Assessment.

4. FINDINGS AND RECOMMENDATIONS

The following section provides a summary of findings and recommendations based on the completion of the hazardous material assessment conducted in February 2008 and subsequent site visits by Sigma. **Table 1** provides the location and estimated quantities of the observed hazardous materials. **Figures 2** through **8** depict building layouts and room designations.

AST/USTs/Hoists

Aboveground storage tanks (ASTs) and underground storage tanks (USTs) may contain chemicals such as oil, solvents, petroleum products, and other hazardous (toxic or flammable) materials. These materials should be managed according to WDNR rules and regulations.

Findings: Sigma observed one small metal container in room B02 (boiler room) at the west end of the 1890 Building. The metal container may be associated with the boiler system as it has several pipes protruding from it, but is contents are unknown and should be characterized and managed in accordance with federal and state regulations.

An oil reservoir, apparently associated with an adjacent hydraulic elevator, is located in the west end of the basement (B01) of the 1910 Building. The oil was characterized and found to contain PCBs. The oil was removed from the reservoir and disposed at Veolia Environmental Services. Additional oil likely remains in the hydraulic cylinder located beneath the elevator car and will not be removed prior to demolition. The oil will need to be managed and disposed in accordance with federal and state rules and regulations. Demolition contractors should include allowances in demolition bids provided to DNS for the proper handling, and disposal/

recycling of this equipment and fluids. Oil testing and disposal information is included as Appendix B.

Two ASTs are located in room 21 in the basement of the 1931 Building (refer to **Figure 3**). Residual paint and varnish sludge (0 to 3 inches) are present in these ASTs. It is not practical to clean these ASTs in their current basement location. The selected demolition contractor should include allowances for removing these ASTs from the basements during building demolition and staging them at a remote location on-site for cleaning and disposal by others.

Two additional ASTs are located in a basement/containment structure on the west side of the 1950 Building, room B01. These ASTs were emptied and cleaned by others prior to demolition. The demolition contractor may salvage these ASTs for scrap metal.

USTs located in the south tank farm (south of the 1931 building), central tank farm (south of the Garage), and north tank farm (west of the 1890 building) and one additional AST located in room 8 on the first floor of the 1931 building (refer to **Figure 4**) were removed under the direction of Sigma in September through November 2009. Documentation regarding the tank removal, soil sampling, and waste disposal activities will be prepared by Sigma.

Pits, Sumps and Catch Basins

Pits, sumps, and catch basins can provide a conduit for hazardous materials to enter the subsurface and should be abandoned according to applicable rules and regulations. Additionally, hazardous materials such as mercury may accumulate in plumbing traps.

Findings: Sigma observed pits/sumps in rooms 20 and 21 in the basement of the 1931 Building and room B01 of the 1910 Building. Another pit/sump is present in the floor of the garage building; approximately 6-inches of oil/oily water is present in the bottom of this sump that will require proper handling and disposal. Any plumbing associated with the pits/sumps shall also be properly abandoned in accordance with state, county, and local plumbing codes.

Miscellaneous Items / Chemicals

All chemicals and equipment should be properly removed prior to building renovation and/or demolition. Chemicals should be characterized and managed in accordance with Wisconsin Administrative Code (WAC) Chapter NR 500 and 600.

Findings: Sigma observed three unlabeled 55-gallon drums; the drum contents and material volumes are unknown. One drum was located in room 22 in the basement of the 1931A building and two drums were located in room 2 on the third floor of the 1931A building. Demolition contractors should include allowances in demolition bids provided to DNS for the proper disposal of these items.

Approximately 25 1-gallon cans of paint were observed in three rooms at the site (refer to **Table 1** for details). Again, demolition contractors should include costs in demolition bids provided to DNS for the proper disposal of remnant paint cans.

Light Bulbs and Other Mercury-Containing Devices

Fluorescent, high intensity discharge (HID) and neon bulbs, and thermostats may contain mercury which may be hazardous, and therefore, should be recycled or disposed of at a licensed facility. Intact mercury-containing devices and bulbs are considered "universal wastes" and must be handled, managed, and disposed in accordance with WAC Chapter NR 673. Other examples of mercury-containing devices include thermostats, float or level controls, and switches. Any control used for measurement of vacuum, pressure, fluid level, temperature, or flow rate could also contain mercury.

Findings: Sigma observed various types of lamps and potential mercury-containing devices in early 2008; however, the mercury-containing switches were removed and disposed of in August and September 2008 by Jensen Environmental Management, Inc. In general, potential mercury-containing devices at the site currently include approximately 343 fluorescent light bulbs throughout the site (refer to **Table 1** for details).

Polychlorinated Biphenyls (PCBs)-Containing Materials

Fluorescent light ballasts and electrical transformers may contain PCB-containing oils. Other materials where PCBs may be found include capacitors, heat transfer equipment, and sumps or oil traps in maintenance and manufacturing areas. Proper characterization of the potential PCB-containing light ballasts, transformers, and other potential PCB-containing materials is required to determine appropriate handling and disposal requirements prior to demolition of the structure. All PCB-containing ballasts and other PCB-containing materials must be managed and disposed of in accordance with WAC Chapter NR 157.

Findings: Potential PCB-containing ballasts were observed throughout the site, and four transformers/capacitors were observed in early 2008. Two of the PCB-containing capacitors from the 1931 building were removed and disposed of under the direction of Galena in the fall of 2008. The elevator oil previously discussed in the report should also be evaluated for PCBs and handled in accordance with all applicable regulations. **Table 1** provides the estimated quantities and locations of potential PCB-containing items currently at the site. As previously discussed, hydraulic oil in the Building 1910 elevator cylinder also contains PCBs.

Exit Signs and Smoke Alarms

Self-illuminating exit signs and smoke detectors may contain radioactive materials including tritium. All self-luminous exit signs and certain smoke detectors are required to have a permanent label affixed to the sign that identifies it as containing radioactive material. It is illegal to abandon or dispose of self-illuminating exit signs and smoke detectors which contain radioactive materials. Exit signs and smoke detectors containing radioactive tritium must be transferred to the manufacturer or others licensed by the U.S. Nuclear Regulatory Commission for proper management.

Findings: Sigma observed approximately 26 exit signs throughout the buildings. These exit signs need to be evaluated during the initial site demolition process to determine if they are self-illuminating or lighted by electrical light bulbs. The locations and quantities of exit signs are provided in **Table 1**.

Wooden Floor Blocks

Findings: Sigma collected representative samples of the wooden blocks on the first floor of the 1931 building and submitted the samples for laboratory analysis of Protocol B parameters. Laboratory analytical results indicate that the wooden blocks are not characteristically hazardous and can be disposed of as special, non-hazardous solid waste. A summary table and a copy of the laboratory analytical report are included in **Appendix A**.

5. CONCLUSION

All hazardous substances and materials identified on **Table 1** require removal from the structure and immediate area prior to demolition. Proper handling and disposal documentation of these materials is also required. It is also recommended that prior to heavy demolition a final walk-through be conducted to verify that such materials have been removed from the structure. In the event that additional chemicals and/or hazardous materials are found during the walk-through, they should be brought to a centralized staging area for proper characterization, packaging, transportation, and recycling/disposal.

6. QUALIFICATIONS OF REPORT

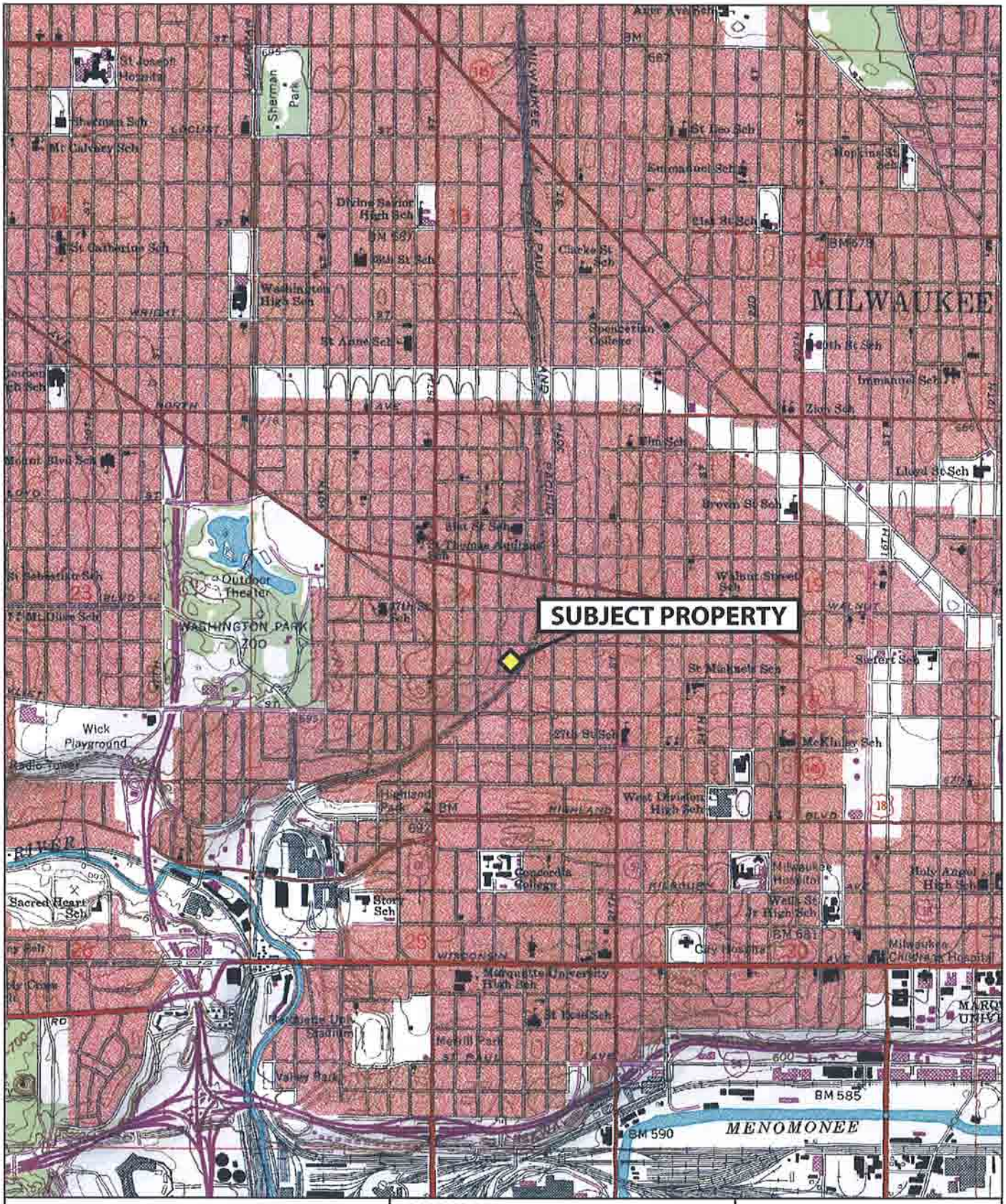
The findings and recommendations included herein are based on information obtained during site visits through May 2010 and from previous experience. Sigma's scope of work was limited to those areas that were reasonably accessible at the dates and times of the inspections. During demolition, a potential exists for encountering hazardous materials not previously identified to become revealed. During demolition of the subject structure, further sampling may be required to confirm the presence and quantities of other items of environmental concern within walls and other areas that would require destructive methods for inspection and evaluation.

TABLE

TABLE 1
HAZARDOUS MATERIAL SUMMARY BY ROOM
Former T.C. Esser Paint Property
1542-46 N. 32nd and 3131 W. Galena Streets
Milwaukee, WI 53208
Project # 11314

Building / Floor	Fluorescent Bulbs	Ballasts (PCB containing)	Exit Signs/ Smoke Alarms	Paint - 1 gal.	Drum 55-gal. Unknown Contents	ASTs	Pit/Sump	Elevator - Oil Reservoir, Piping, Hydraulic Cylinder	Metal Container	Transformer / Capacitor	Comments
1890 Building											
Basement											
Rm B01											No items observed
Rm B02	15								1		
1st Floor											
Rm 101	32	16	2								
2nd Floor											
Rm 201	6	10	2								
Rm 202	4	2									Inaccessible
Rm 203											
Rm 204	20	10	1								
1910 Building											
Basement											
	23	12					1	1			
1st Floor											
Rm 101	110	200									
2nd Floor											
Rm 201	24	12									
Rm 202			1								
Rm 203	8	6									
Rm 204		2	12								
Rm 205		4	4								
Rm 206			2								
Rm 207											No items observed
Rm 208											
Rm 209		2	1								
1931 Building											
Basement											
Rm 20		1					1				
Rm 21						2	1				
1st Floor											
Rm 8	7	13	1								
Rm 10											
2nd Floor											
Rm 4		4									
3rd Floor											
Rm 1				10						2	
1931A Building											
Basement											
Rm 22				5	1						
Rm 23											
1st Floor											
Rm 12		2									
Rm 13	26	13									
Rm 14 (Mezz)	2			10							
17 (Locker Rm)											
2nd Floor											
Rm 5	20	15									
3rd Floor											
Rm 2	6	3			2						
1950 Building											
Basement											
Rm B01						2					
1st Floor											
Rm 15											No items observed
Rm 16											No items observed
2nd Floor											
Rm 6	8	4									
Rm 7	20	10									
Rm 8	12	4									
3rd Floor Rm 3											
Garage											
1st Floor							1				
											No items observed
2nd Floor											
											Inaccessible
Total:	**343**	**345**	**26**	**25**	**3**	**4**	**4**	**1**	**1**	**2**	

FIGURES



THE SIGMA GROUP

SIGMA ENVIRONMENTAL SERVICES, INC.
SIGMA DEVELOPMENT, INC.
SIGMA LEASING, INC.

GALENA REDEVLOPMENT CORPORATION

Former T.C Esser Paint Manufacturing Site
1542-46 North 32nd Street, Milwaukee, WI

Part of the Walnut Hill Subdivision, located in the Southeast 1/4 of Section 24, T7N, R21E, Milwaukee County, Wisconsin.

FIGURE 1

SITE LOCATION MAP

DELORME

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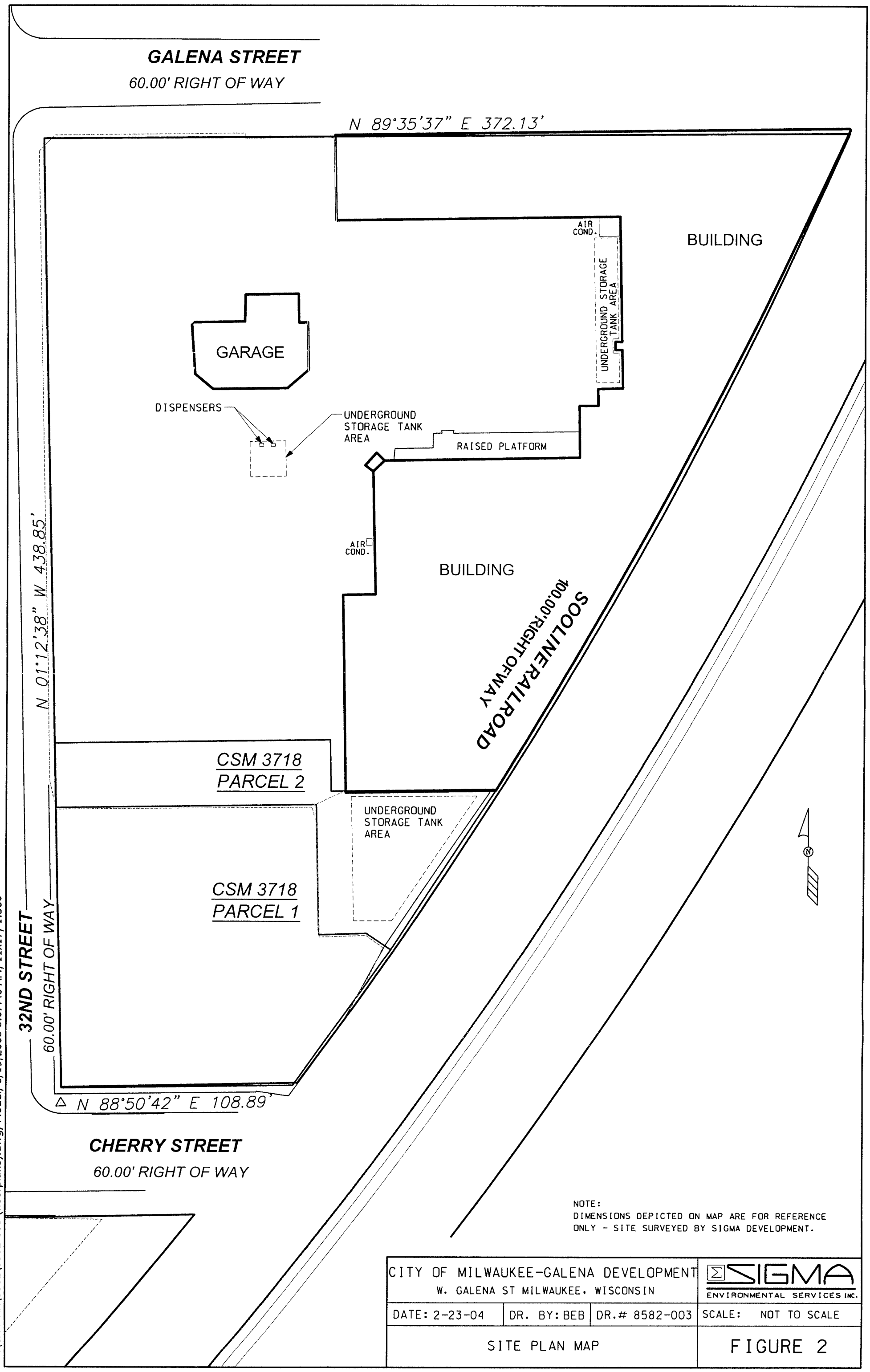
Scale 1 : 24,000
1" = 2000 ft

TN
MN
2.7W



NOTE:
DIMENSIONS DEPICTED ON MAP ARE FOR REFERENCE ONLY - SITE SURVEYED BY SIGMA DEVELOPMENT.

CITY OF MILWAUKEE-GALENA DEVELOPMENT W. GALENA ST MILWAUKEE, WISCONSIN			SIGMA ENVIRONMENTAL SERVICES INC.
DATE: 2-23-04	DR. BY: BEB	DR.# 8582-003	SCALE: NOT TO SCALE
SITE PLAN MAP			FIGURE 2

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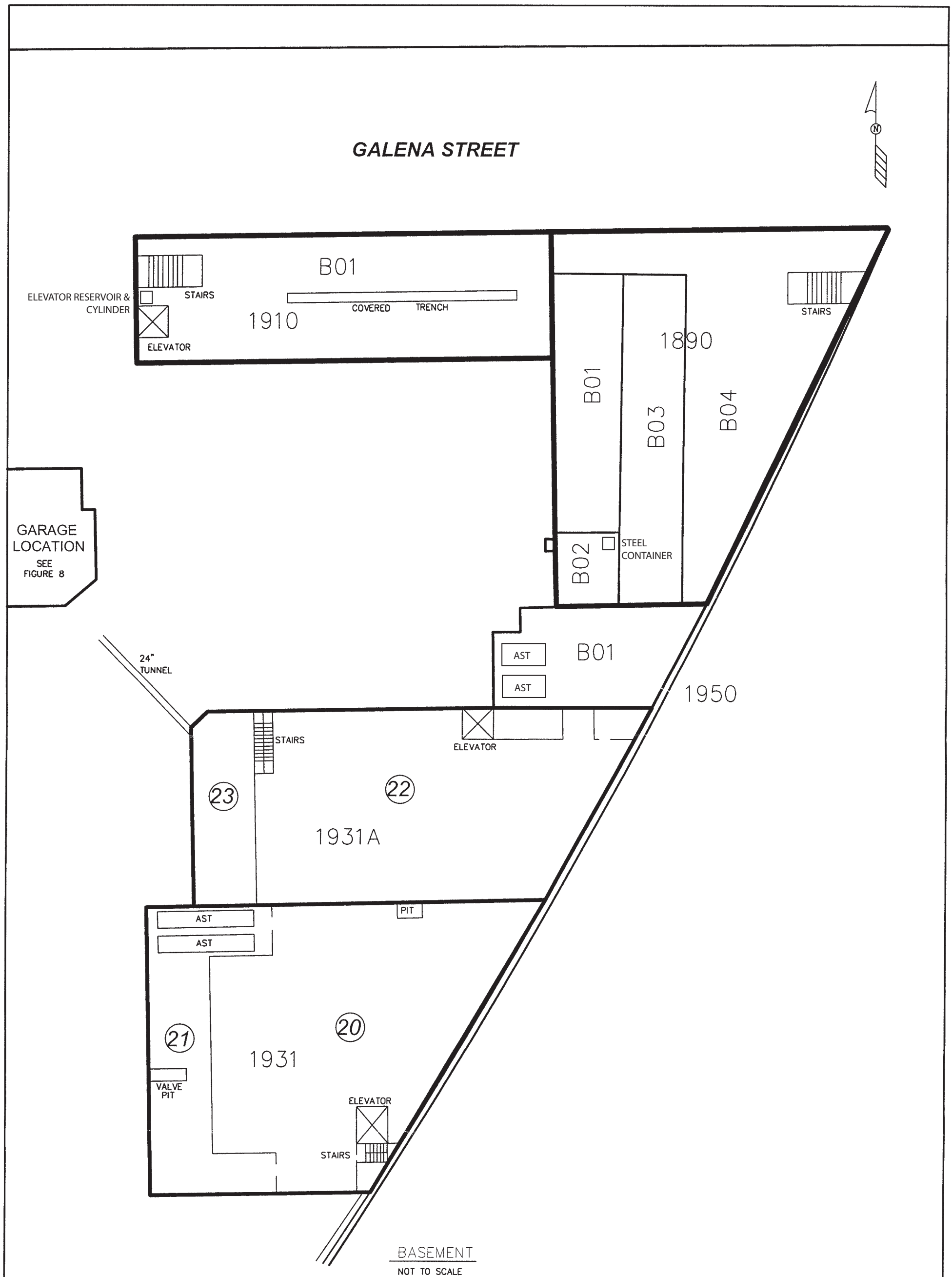
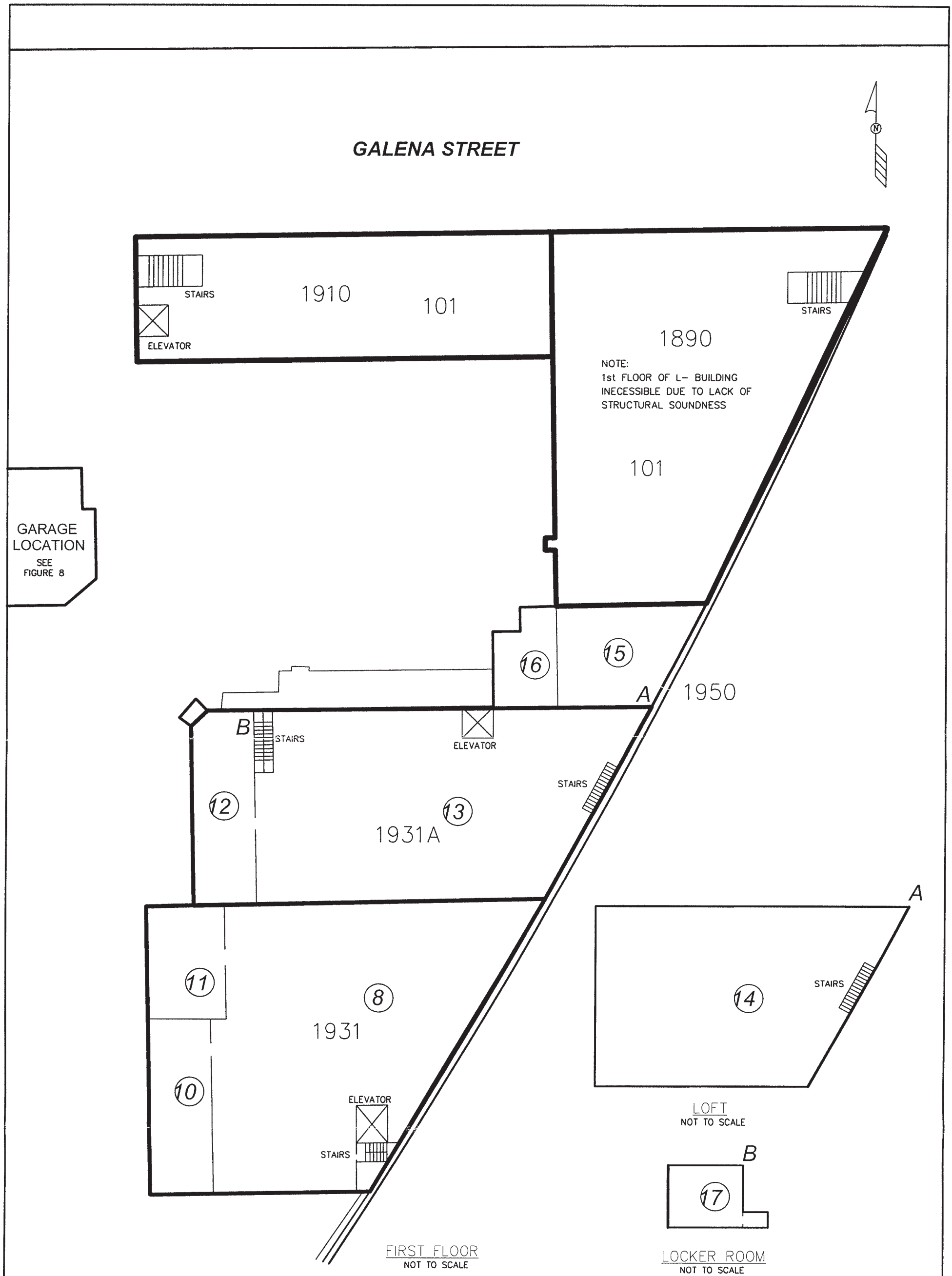


LEGEND

(10) = ROOM NUMBER

NOTE:
DIMENSIONS DEPICTED ON MAP ARE FOR REFERENCE ONLY – SITE SURVEYED BY SIGMA DEVELOPMENT.

CITY OF MILWAUKEE–GALENA DEVELOPMENT W. GALENA ST. MILWAUKEE, WISCONSIN			SIGMA ENVIRONMENTAL SERVICES INC.
DATE: 2-23-04	DR. BY: BEB	DR.# 8582-003	SCALE: NOT TO SCALE
BASEMENT SAMPLE LOCATION MAP			FIGURE 3

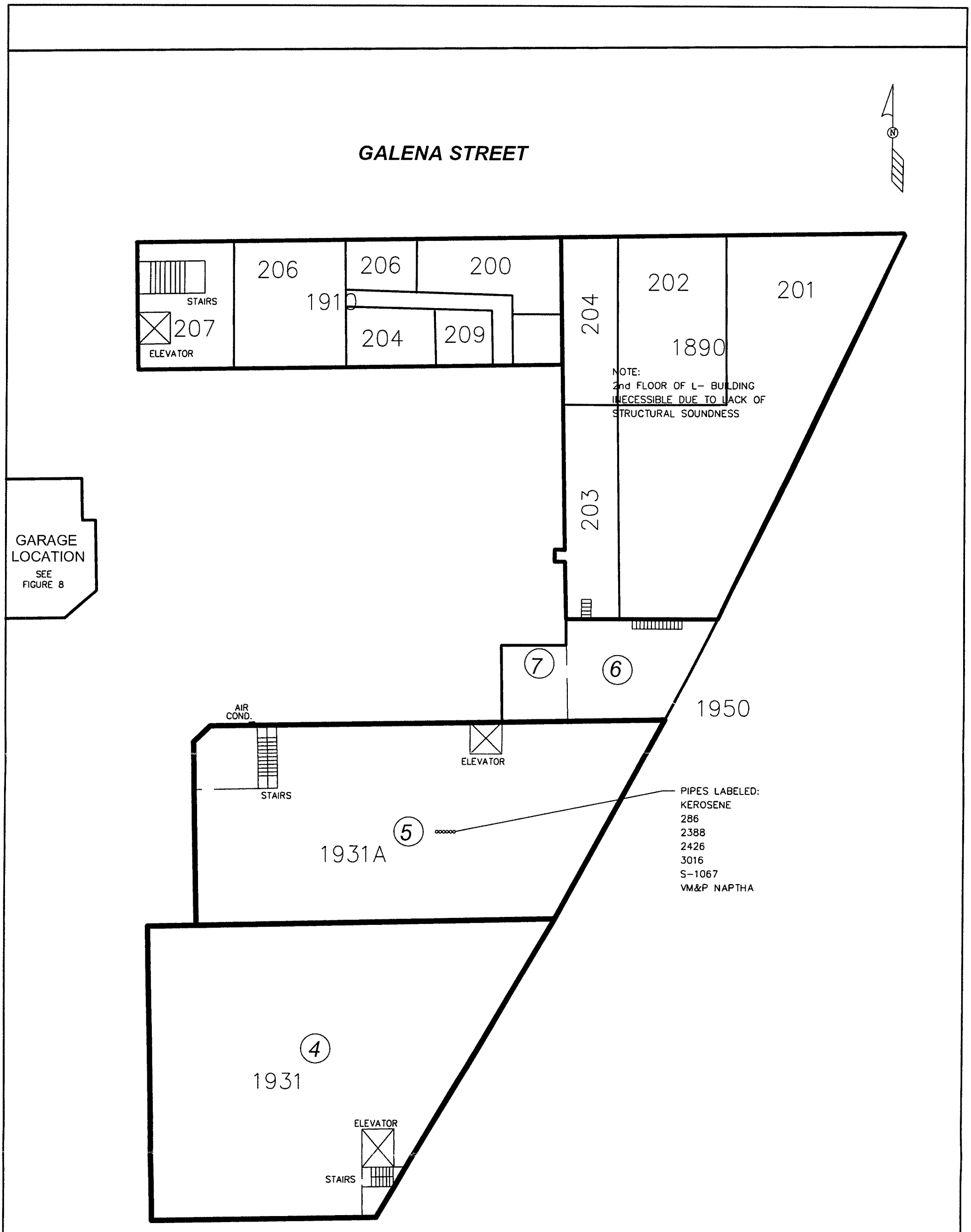


LEGEND

(10) = ROOM NUMBER

NOTE:
DIMENSIONS DEPICTED ON MAP ARE FOR REFERENCE ONLY - SITE SURVEYED BY SIGMA DEVELOPMENT.

CITY OF MILWAUKEE-GALENA DEVELOPMENT W. GALENA ST. MILWAUKEE, WISCONSIN			SIGMA ENVIRONMENTAL SERVICES INC.
DATE: 2-23-04	DR. BY: BEB	DR.# 8582-003	SCALE: NOT TO SCALE
FIRST FLOOR SAMPLE LOCATION MAP			FIGURE 4



SECOND FLOOR
NOT TO SCALE

LEGEND

(10) = ROOM NUMBER

NOTE:
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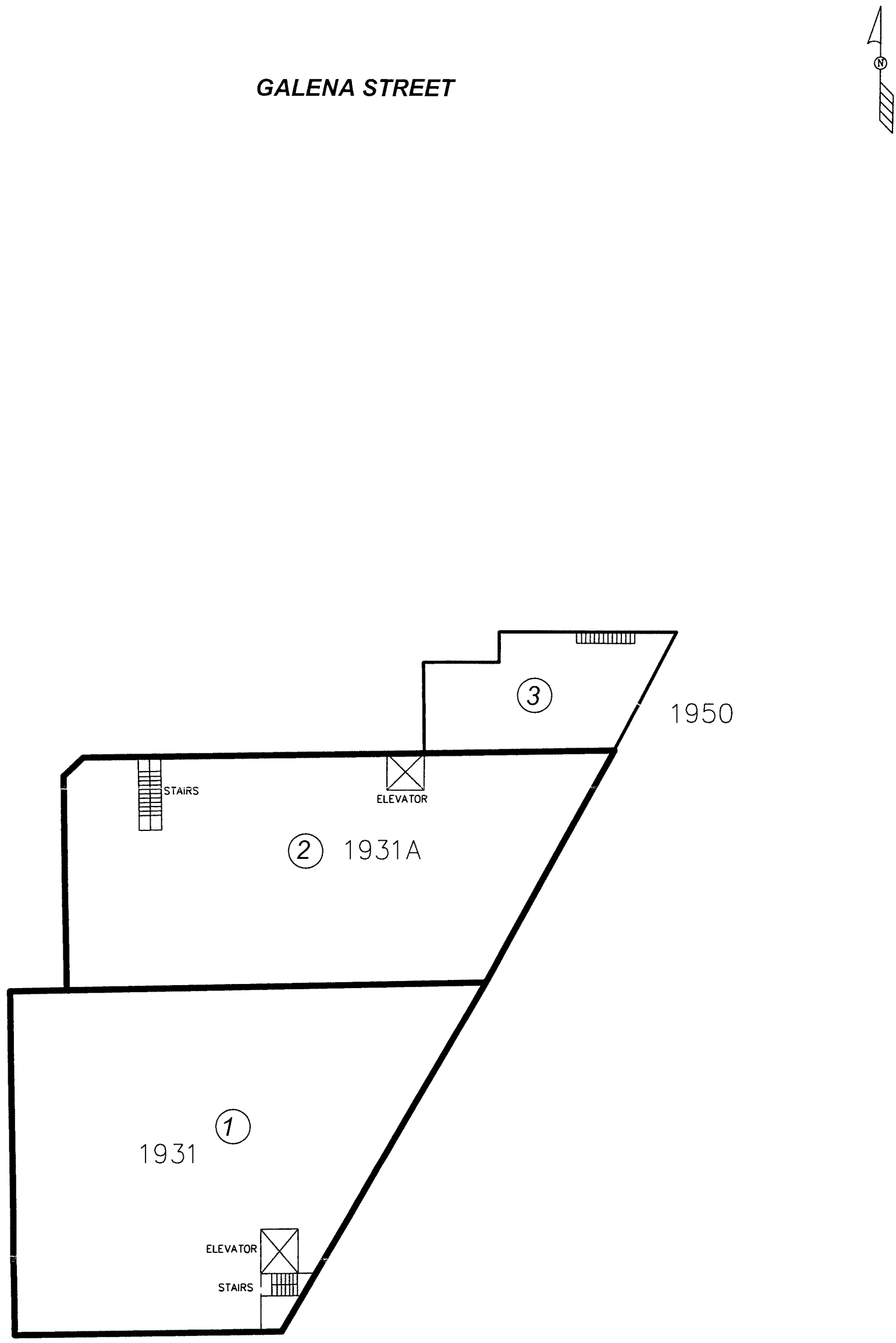
CITY OF MILWAUKEE-GALENA DEVELOPMENT W. GALENA ST. MILWAUKEE, WISCONSIN			SIGMA ENVIRONMENTAL SERVICES INC.
DATE: 2-23-04	DR. BY: BEB	DR.# 8582-003	SCALE: NOT TO SCALE
SECOND FLOOR SAMPLE LOCATION MAP			FIGURE 5



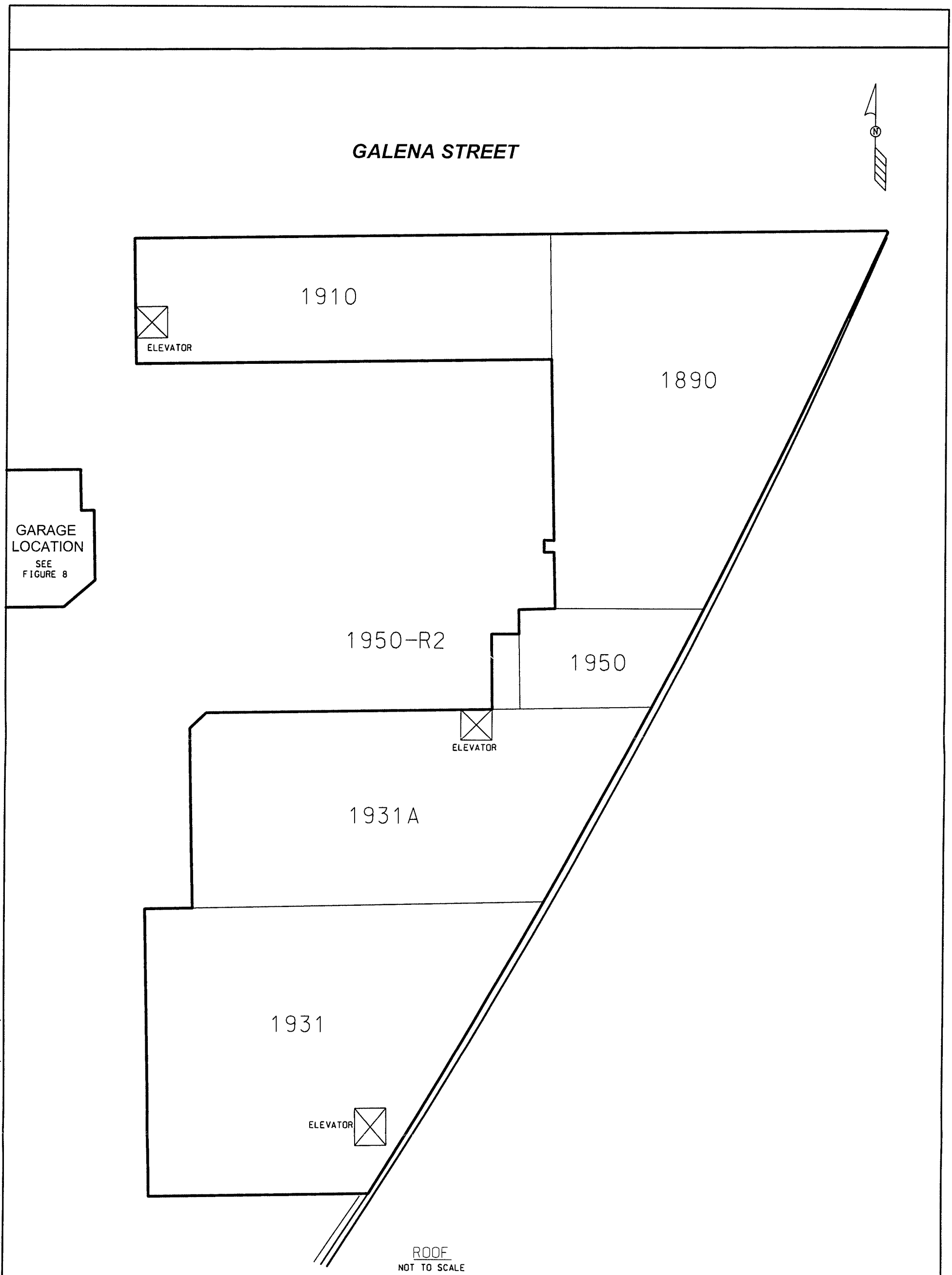
THIRD FLOOR
NOT TO SCALE

LEGEND

(10) = ROOM NUMBER

NOTE:
DIMENSIONS DEPICTED ON MAP ARE FOR REFERENCE ONLY – SITE SURVEYED BY SIGMA DEVELOPMENT.

CITY OF MILWAUKEE–GALENA DEVELOPMENT W. GALENA ST. MILWAUKEE, WISCONSIN			SIGMA ENVIRONMENTAL SERVICES INC.
DATE: 2-23-04	DR. BY: BEB	DR.# 8582-003	SCALE: NOT TO SCALE
THIRD FLOOR SAMPLE LOCATION MAP			FIGURE 6



LEGEND

00-● = ASBESTOS SAMPLE LOCATION

00-▲ = LEAD PAINT SAMPLE LOCATION

(10) = ROOM NUMBER

NOTE:
DIMENSIONS DEPICTED ON MAP ARE FOR REFERENCE ONLY - SITE SURVEYED BY SIGMA DEVELOPMENT.

CITY OF MILWAUKEE-GALENA DEVELOPMENT W. GALENA ST. MILWAUKEE, WISCONSIN			SIGMA ENVIRONMENTAL SERVICES INC.
DATE: 2-23-04	DR. BY: BEB	DR.# 8582-003	SCALE: NOT TO SCALE
ROOF SAMPLE LOCATION MAP			FIGURE 7

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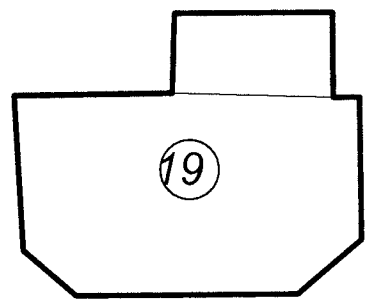
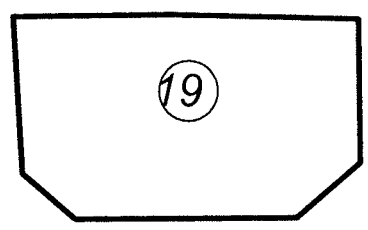


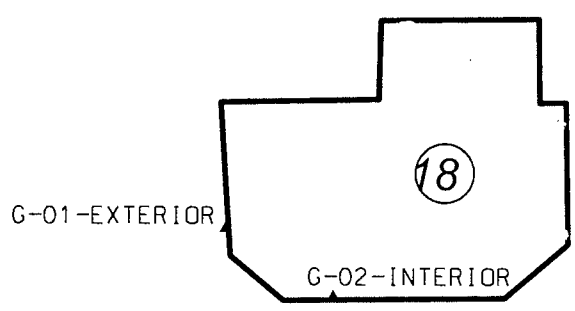
GARAGE - ROOF
NOT TO SCALE

NOTE:
ROOF OF GARAGE INECESSIBLE



GARAGE - SECOND FLOOR
NOT TO SCALE

NOTE:
2nd FLOOR OF GARAGE INECESSIBLE



GARAGE - FIRST FLOOR
NOT TO SCALE

NOTE:
SEE "SITE PLAN" - FIGURE 2 FOR LOCATION OF GARAGE

LEGEND

00-● = ASBESTOS SAMPLE LOCATION

00-▲ = LEAD PAINT SAMPLE LOCATION

(10) = ROOM NUMBER

NOTE:
DIMENSIONS DEPICTED ON MAP ARE FOR REFERENCE ONLY - SITE SURVEYED BY SIGMA DEVELOPMENT.

CITY OF MILWAUKEE-GALENA DEVELOPMENT W. GALENA ST. MILWAUKEE, WISCONSIN			SIGMA ENVIRONMENTAL SERVICES INC.
DATE: 2-23-04	DR. BY: BEB	DR.# 8582-003	SCALE: NOT TO SCALE
GARAGE SAMPLE LOCATION MAP			FIGURE 8

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APPENDIX A

LABORATORY ANALYTICAL REPORT
(PROTOCOL B PARAMETERS – WOODEN BLOCKS)

TABLE A
PROTOCOL B RESULTS - WOODEN BLOCK FLOOR
Former T.C. Esser Paint Prpoerty - 1931 Building
1542-46 N. 32nd Street
Milwaukee, WI 53208
Project Reference #11314

Source Area / Location			Wood Bricks	Acceptance Limits
Analyte/Protocol	Units	Procedure	Collection Date	---
			09/24/09	---
Wet Chemistry				
Reactive Cyanide	mg/kg	9012B	0.63	200 ppm
Free Liquids	%	9095A	none	0% free liquids
Reactive Sulfide	mg/kg	9034	<8.3	200 ppm
pH	ph units	9045D	5.0	2.0 - 12.5
Total Chlorides	mg/kg	9056	130 (equiv. to 0.013%)	< 1.0% *
Specific Gravity	g/cm^3	2710F	0.3	no limit
Total solids	%	2540G	88.4	no limit
Flash Point	° F	D93	>170	> 140 F
TCLP Metals				
Arsenic	mg/l	6010B	<0.05	< 5.0
Barium	mg/l	6010B	0.40	< 100.0
Cadmium	mg/l	6010B	<0.05	< 1.0
Chromium	mg/l	6010B	<0.05	< 5.0
Copper	mg/l	6010B	<0.05	< 100.0
Lead	mg/l	6010B	0.054	< 5.0
Mercury	mg/l	7470A	<0.001	< 0.2
Nickel	mg/l	6010B	<0.05	< 35.0
Selenium	mg/l	6010B	<0.05	< 1.0
Silver	mg/l	6010B	<0.05	< 5.0
Zinc	mg/l	6010B	0.66	< 200.0
Total PCBs				
PCB-1016	mg/kg	8082A	<0.035	< 50 ppm
PCB-1221	mg/kg	8082A	<0.061	< 50 ppm
PCB-1232	mg/kg	8082A	<0.051	< 50 ppm
PCB-1242	mg/kg	8082A	<0.061	< 50 ppm
PCB-1248	mg/kg	8082A	0.68	< 50 ppm
PCB-1254	mg/kg	8082A	0.57	< 50 ppm
PCB-1260	mg/kg	8082A	<0.047	< 50 ppm
TCLP SVOCs				
o-Cresol	mg/l	8270C	1.1	< 200.0 (2)
m-Cresol	mg/l	8270C	2.8 (for m & p)	< 200.0 (2)
p-Cresol	mg/l	8270C	see above	< 200.0 (2)
1,4-Dichlorobenzene	mg/l	8270C	<0.5	< 7.5
2,4-Dinitrotoluene	mg/l	8270C	<0.5	< 0.13 (1)
Hexachlorobenzene	mg/l	8270C	<0.5	< 0.13 (1)
Hexachloro-1,3-butadiene	mg/l	8270C	<5	< 0.5
Hexachloroethane	mg/l	8270C	<0.5	< 3.0
Nitrobenzene	mg/l	8270C	<5	< 2.0
Pentachlorophenol	mg/l	8270C	<0.5	< 100.0
Phenol	mg/l	8270C	0.92	< 2,000
Pyridine	mg/l	8270C	<0.5	< 5.0 (1)
2,4,6-Trichlorophenol	mg/l	8270C	<0.5	< 2.0
2,4,5-Trichlorophenol	mg/l	8270C	<0.5	< 400.0
TCLP VOCs				
Benzene	mg/l	8260B	<0.05	< 0.5
Carbon Tetrachloride	mg/l	8260B	<0.05	< 0.5
Chlorobenzene	mg/l	8260B	<0.05	< 100.0
Chloroform	mg/l	8260B	<0.25	< 6.0
1,2-Dichloroethane	mg/l	8260B	<0.05	< 0.5
1,1-Dichloroethylene	mg/l	8260B	<0.05	< 0.7
Methyl Ethyl Ketone	mg/l	8260B	<0.5	< 200.0
Tetrachloroethylene	mg/l	8260B	<0.05	< 0.7
Trichloroethylene	mg/l	8260B	<0.05	< 0.5
Vinyl chloride	mg/l	8260B	<0.05	< 0.2

Notes:

mg/kg = milligrams per kilogram (equivalent to parts per million, ppm)
mg/l = milligrams per liter (equivalent to parts per million, ppm)
g/cm^3 = grams per cubic centimeter
% = percent
° F = degrees Farhenheit
* = If chlorine is < or = 1%, the following compounds must be analyzed: PCE, TCE, methylene chloride, 1,1,1-TCA, carbon tetrachloride, chloroform, ortho-dichlorobenzene, dichlorodifluoromethane, 1,1,2-trichloro-1,2,2-trifluoroethane, trichlorofouoromethane, 1,1-DCA, and 1,2-DCE. Sum must be less than total weight.

(1) = Quantitation limit is greater than the calculated regulatory level. The quantitation limit, therefore becomes the regulatory level.

(2) = If o, m-, and p-Cresol concentrations cannot be differentiated, the total Cresol (D026) concentration is used. The regulatory level for total Cresol is 200 mg/l

Synergy Environmental Lab, INC.

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

ROSS CREIGHTON
SIGMA ENVIRONMMENTAL
1300 W. CANAL STREET
MILWAUKEE, WI 53233

Report Date *28-Sep-09*

Project Name ESSER PAINT
Project # 11314

Invoice # E19589

Lab Code 5019589A
Sample ID WOOD BRICKS
Sample Matrix soil
Sample Date 9/15/2009

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Inorganic										
Metals										
TCLP Arsenic	< 0.05	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Barium	0.40	mg/l	0.15		1	6010B		9/21/2009	ESC	1
TCLP Cadmium	< 0.05	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Chromium	< 0.05	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Copper	< 0.05	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Lead	0.054	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Mercury	< 0.001	mg/l	0.001		1	7470A		9/21/2009	ESC	1
TCLP Nickel	< 0.05	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Selenium	< 0.05	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Silver	< 0.05	mg/l	0.05		1	6010B		9/21/2009	ESC	1
TCLP Zinc	0.66	mg/l	0.05		1	6010B		9/21/2009	ESC	1
Organic										
PCB'S										
PCB-1016	< 0.035	mg/kg	0.035	0.17	10	EPA 8082A		9/21/2009	ESC	1
PCB-1221	< 0.061	mg/kg	0.061	0.17	10	EPA 8082A		9/21/2009	ESC	1
PCB-1232	< 0.051	mg/kg	0.051	0.17	10	EPA 8082A		9/21/2009	ESC	1
PCB-1242	< 0.061	mg/kg	0.061	0.17	10	EPA 8082A		9/21/2009	ESC	1
PCB-1248	0.68	mg/kg	0.053	0.17	10	EPA 8082A		9/21/2009	ESC	1
PCB-1254	0.57	mg/kg	0.038	0.17	10	EPA 8082A		9/21/2009	ESC	1
PCB-1260	< 0.047	mg/kg	0.047	0.17	10	EPA 8082A		9/21/2009	ESC	1
TCLP SVOC's										
TCLP o-Cresol	1.1	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP m & p-Cresol	2.8	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP 1,4-Dichlorobenzene	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP 2,4-Dinitrotoluene	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1

Project Name ESSER PAINT
Project # 11314

Invoice # E19589

Lab Code 5019589A
Sample ID WOOD BRICKS
Sample Matrix soil
Sample Date 9/15/2009

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
TCLP Hexachlorobenzene	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP Hexachlorobutadiene	< 5	mg/l	5		50	8270C		9/22/2009	ESC	1 49
TCLP Hexachloroethane	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP Nitrobenzene	< 5	mg/l	5		50	8270C		9/22/2009	ESC	1 49
TCLP Pentachlorophenol	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP Phenol	0.92	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP Pyridine	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP 2,4,6-Trichlorophenol	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP 2,4,5-Trichlorophenol	< 0.5	mg/l	0.5		5	8270C		9/22/2009	ESC	1
TCLP VOC's										
TCLP Benzene	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
TCLP Carbon Tetrachloride	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
TCLP Chlorobenzene	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
TCLP Chloroform	< 0.25	mg/l	0.25		1	8260B		9/21/2009	ESC	1
TCLP 1,2-Dichloroethane	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
TCLP 1,1-Dichloroethene	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
TCLP Methyl Ethyl Ketone	< 0.5	mg/l	0.5		1	8260B		9/21/2009	ESC	1
TCLP Tetrachloroethene	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
TCLP Trichloroethene	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
TCLP Vinyl Chloride	< 0.05	mg/l	0.05		1	8260B		9/21/2009	ESC	1
Wet Chemistry										
General										
Specific Gravity	0.30	g/cm3			1	2710F		9/25/2009	ESC	1
Reactive Sulfide	< 8.3	mg/kg	8.3	25	1	EPA 9034		9/22/2009	ESC	1
Free Liquid	none				1	9095A		9/22/2009	ESC	1
Reactive Cyanide	0.63	mg/kg	0.063	0.25	1	9012B		9/25/2009	ESC	1
Solids, Total %	88.4	%			1	2540G		9/23/2009	ESC	1
pH	5.0	su			1	EPA 9045D		9/19/2009	ESC	1
Total Chlorides	130	mg/kg	1.3	10	1	9056		9/22/2009	ESC	1
Flash Point	> 170	Deg. F			1	D93		9/25/2009	ESC	1

"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

Code	*Comment*
1	Laboratory QC within limits.
49	Sample diluted to compensate for matrix interference.
	ESC denotes sub contract lab - Certification #998093910

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight.

Authorized Signature

CHAIN OF CUSTODY RECORD

Synergy Environmental Lab, Inc.

1990 Prospect Ct. • Appleton, WI 54914
920-830-2455 • FAX 920-733-0631

Chain # № .273
Page 1 of 1

Sample Handling Request
___ Rush Analysis Date Required ___
(Rushes accepted only with prior authorization)
___ Normal Turn Around

Lab I.D. #	
Account No. :	Quote No.:
Project #: 11314	
Sampler: (signature) [signature]	
Project (Name / Location): ESSER PAINT - MILW WI	
Reports To: ROSS CREIGHTON	Invoice To: SAME
Company SIGMA ENVIRONMENTAL	Company
Address 1300 W. CANAL ST.	Address
City State Zip MILWAUKEE WI 53233	City State Zip
Phone 414-643-4200	Phone
FAX 4210	FAX

Analysis Requested / Other Analysis

Lab I.D.	Sample I.D.	Collection Date	Collection Time	Comp	Grab	Filtered Y/N	No. of Containers	Sample Type (Matrix)*	Preservation	DRO (Mod DRO Sep 95)	GRO (Mod GRO Sep 95)	IRON	LEAD	NITRATE / NITRITE	PAH (EPA 8270)	PVOC (EPA 8021)	PVOC + NAPHTHALENE	SULFATE	VOC DW (EPA 524.2)	VOC (EPA 8260)	8-RCRA METALS	Protocol B									PID/ FID
5019589A	Wood Bricks	9-15	12:00	—	—	—	1	Wood Shavings	—													X									

Comments/Special Instructions (*Specify groundwater "GW", Drinking Water "DW", Waste Water "WW", Soil "S", Air "A", Oil, Sludge etc.)

Sample Integrity - To be completed by receiving lab.
Method of Shipment: Client
Temp. of Temp. Blank ___ °C On Ice: X
Cooler seal intact upon receipt: X Yes ___ No

Relinquished By: (sign)	Time	Date	Received By: (sign)	Time	Date
[signature]	12:30	9-15			

Received in Laboratory By: [signature] Time: 8:40 Date: 9/16/09

APPENDIX B

ELEVATOR HYDRAULIC OIL
(PCB-CONTAINING)

LABORATORY ANALYTICAL REPORT

AND

DISPOSAL DOCUMENTATION

Synergy Environmental Lab, INC.

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

ROSS CREIGHTON
SIGMA ENVIRONMMENTAL
1300 W. CANAL STREET
MILWAUKEE, WI 53233

Report Date *25-Nov-09*

Project Name FMR ESSER PAINT **Invoice #** E19918
Project # 11525

Lab Code 5019918A
Sample ID 1910 ELEVATOR
Sample Matrix oil
Sample Date 11/6/2009

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
PCB'S										
PCB-1016	< 1.0	mg/kg	1	5.1	300	EPA 8082A		11/21/2009	ESC	1
PCB-1221	< 1.8	mg/kg	1.8	5.1	300	EPA 8082A		11/21/2009	ESC	1
PCB-1232	< 1.5	mg/kg	1.5	5.1	300	EPA 8082A		11/21/2009	ESC	1
PCB-1242	< 1.6	mg/kg	1.6	5.1	300	EPA 8082A		11/21/2009	ESC	1
PCB-1248	18	mg/kg	1.6	5.1	300	EPA 8082A		11/21/2009	ESC	1
PCB-1254	< 1.1	mg/kg	1.1	5.1	300	EPA 8082A		11/21/2009	ESC	1
PCB-1260	< 1.4	mg/kg	1.4	5.1	300	EPA 8082A		11/21/2009	ESC	1

"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

Code	*Comment*
1	Laboratory QC within limits.

ESC denotes sub contract lab - Certification #998093910

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature Michael J. Ricker

CHAIN OF CUSTODY RECORD

Synergy Environmental Lab, Inc.

1990 Prospect Ct. • Appleton, WI 54914
920-830-2455 • FAX 920-733-0631

Chain # № 0968

Page 1 of 1

Sample Handling Request
___ Rush Analysis Date Required ___
(Rushes accepted only with prior authorization)
X Normal Turn Around

Lab I.D. #
Account No. :
Quote No.:
Project #: 11525
Sampler: (signature) [signature]

Project (Name / Location): FORMER ESSER PAINT MILWAUKEE, WI

Reports To: ROSS CREIGHTON
Company SIGMA ENVIRONMENTAL
Address 1300 WEST CANAL STREET
City State Zip MILWAUKEE, WI 53233
Phone 414-643-4120
FAX 414-643-4210

Invoice To:
Company
Address
City State Zip
Phone
FAX

Lab I.D.	Sample I.D.	Collection Date	Collection Time	Comp	Grab	Filtered Y/N	No. of Containers	Sample Type (Matrix)*	Preservation	DRO (Mod DRO Sep 95)	GRO (Mod GRO Sep 95)	IRON	LEAD	NITRATE / NITRITE	PAH (EPA 8270)	PVOC (EPA 8021)	PVOC + NAPHTHALENE	SULFATE	VOC DW (EPA 524.2)	VOC (EPA 8260)	8-RCRA METALS	PCB's									PID/ FID
S019918A	1910 Elevator	11/6/09	13:10			N	1	OIL	None													X									

Analysis Requested | Other Analysis

Comments/Special Instructions (*Specify groundwater "GW", Drinking Water "DW", Waste Water "WW", Soil "S", Air "A", Oil, Sludge etc.)

HOLD EXTRA SAMPLE VOLUME FOR FUTURE ANALYSIS

Sample Integrity - To be completed by receiving lab.
Method of Shipment : Dunham
Temp. of Temp. Blank. ____ °C On Ice: X
Cooler seal intact upon receipt: Y Yes ____ No

Relinquished By: (sign)	Time	Date	Received By: (sign)	Time	Date
[signature]	6:40	11/11/09			

Received in Laboratory By: [signature] Time: 9:20 Date: 11/12/09

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

	Veolia ES Location	MENOMONEE FALLS FACILITY	MENOMONEE FALLS	WI	|552	476
|__|	Invoice Address	OFFICE	CITY	ST	

Veolia ES TSDF requested _____ Technology requested _____ Generator No. 561742 Generator EPA ID No. WID006078331

1. Generator Name ESSER TC COMPANY Generator State No. _____

Address REDEV. AUTH. CITY OF MILWAUKEE3107 W. GALENA STREET State Wastestream No. _____

City MILWAUKEE State WI Country US ZIP 53208 ____

NAICS(SIC) Code 9999 _____ _____ _____ Source G16 Origin 1 Form W206 System Type _____

---

2. Waste Name HYDRAULIC OIL Lab or Waste Area _____

3. Process Generating Waste

REMOVAL OF OIL FROM ELEVATOR SHAFT

4. Shipping Name USED OIL _____

Hazard Class NONE UN/NA No. NONE PG ___ RQ amt 0 lb Waste: N PIH: N IH: N DWW: N P: N

RQ Des: 1._____ 2._____

DOT Des: 1._____ 2._____

5. Waste Codes NONE _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids	
a ___ < 2	a ___ <.8	a ___ < 80	0 - 0% suspended	0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	0 - 0% settleable	0 - 0 % water solubility
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	0 - 0% dissolved	8000 -15000 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200		
e ___ > 12.5	e ___ > 1.2	e X > 200		Free Liquid 100 -100 %
5.0- 10.0 exact	.7- 1.0 exact	f ___ no flash - exact		VOC 0 - 0 %

Physical State	Hazardous Characteristics		Odor
s ___ solid	a ___ air reactive	r ___ radioactive or NRC regulated	a none X
m ___ semi-solid	w ___ water reactive	s ___ shock sensitive	b mild ___
l X liquid	c ___ cyanide reactive	t ___ temp sensitive	c strong ___
p ___ pumpable semi-solid	f ___ sulfide reactive	m ___ polymerization/monomer	describe _____
f ___ flowable powder	e ___ explosive	n ___ OSHA carcinogen	
g ___ gas	o ___ oxidizing acid	i ___ infectious	**Halogens**
a ___ aerosol	p ___ peroxide former	h ___ inhalation hazard	Br .0 - .0 % Bromine
r ___ pressurized liquid		Zone: _	Cl .0 - .0 % Chlorine
d ___ debris per 40 CFR 268.45			F .0 - .0 % Fluorine
h ___ sharps			I .0 - .0 % Iodine
q ___ pumpable liquid			

Layers: | a ____ multilayered: b ____ bi-layered: c X single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity	___ high(syrup)	___ high(syrup)	___ high(syrup)	BLK
by	X medium(oil)	___ medium(oil)	___ medium(oil)	BRN
Layer:	___ low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 105098

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n Y **HOC < 1000 ppm** X **HOC > 1000 ppm** ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges	Units
HYDRAULIC OIL FROM ELEVATOR	100.00	100.00 %

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration 18.00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
    If yes:
    Is the wastestream subject to Notification/Control Requirements? Yes __ No X
    Benzene Concentration .00 ppm
    Does it contain >= 10% water? Yes __ No X
    What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
    Volatile Organic Concentration .00 ppmw
    CC Approved Analytical Method? Yes __ No X
    Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

---

14. **Container Information** :

Packaging: 551A2 Type/Size: DM 55 GAL OPEN HEAD (17H) DM
551A1 Type/Size: DM 55 GAL CLOSED HEAD (17E) DM

Shipping Frequency: Units 2.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

---

15. **Additional Information** :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

Tory Kress for RACM — Name (Print or Type)
4142868268 — Phone
5/13/10 — Date
Tory Kress for RACM — Signature
Sr. Envtl. Proj. Engr. — Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 105098

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road
Menomonee Falls, WI 53051

12/08/09

Esser – TC/Redevelopment Authority - City of Milwaukee/WID006078331

Dear Redevelopment Authority – City of Milwaukee:

According to your records, on 11/21/2009, 100 gallons of profile/WIP 105098 from your facility were analyzed for PCBs. Unfortunately, 18 ppm of polychlorinated biphenyls (PCBs) were detected in the waste upon testing.

Your signature below certifies that, to the best of your knowledge, your waste did not contain PCB's at regulated levels and that any PCB's detected at less than 50 ppm are not from a PCB source containing greater than 50 ppm concentration nor the result of impermissible dilution. Further your signature certifies that your waste had been under your control the entire time prior to removal and was generated by your business only, and did not contain waste from other persons, businesses, locations, etc.

Sincerely,

Allan G. Kountz
Veolia ES Technical Solutions, L.L.C.

Signature: Tony Kress

Printed Name: Tony Kress

Title: Sr. Envir. Proj. Mgr.

Date: 5/13/2010

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

__ Veolia ES Location MENOMONEE FALLS FACILITY (OFFICE) MENOMONEE FALLS (CITY) WI (ST) |552 | 476 |

|__| Invoice Address

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 561742 Generator EPA ID No. WID006078331

1. Generator Name ESSER TC COMPANY Generator State No. _____

Address REDEV. AUTH. CITY OF MILWAUKEE3107 W. GALENA STREET State Wastestream No. _____

City MILWAUKEE State WI Country US ZIP 53208 ____

NAICS(SIC) Code 9999 _____ _____ _____ Source G39 Origin 1 Form W319 System Type _____

---

2. Waste Name PPE/DEBRIS Lab or Waste Area _____

3. Process Generating Waste

PPE/DEBRIS FOR PUMPING OF OIL DRUM

4. Shipping Name NON-REGULATED MATERIAL, NON-RCRA, NON-DOT.

Hazard Class NONE UN/NA No. NONE PG ___ RQ amt 0 lb Waste: N PIH: N IH: N DWW: N P: N

RQ Des: 1._____ 2._____

DOT Des: 1.NON-HAZARDOUS PPE/DEBRIS 2._____

5. Waste Codes NONE _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids	
a ___ < 2	a ___ <.8	a ___ < 80	100 - 100% suspended	0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	100 - 100% settleable	0 - 0 % water solubility
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	100 - 100% dissolved	0 - 0 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200		
e ___ > 12.5	e ___ > 1.2	e ___ > 200		Free Liquid 0 - 0 %
5.0- 10.0 exact	.5- 1.5 exact	f X no flash - exact		VOC 0 - 0 %

Physical State	Hazardous Characteristics		Odor
s X solid	a ___ air reactive	r ___ radioactive or NRC regulated	a none X
m ___ semi-solid	w ___ water reactive	s ___ shock sensitive	b mild ___
l ___ liquid	c ___ cyanide reactive	t ___ temp sensitive	c strong ___
p ___ pumpable semi-solid	f ___ sulfide reactive	m ___ polymerization/monomer	describe _____
f ___ flowable powder	e ___ explosive	n ___ OSHA carcinogen	
g ___ gas	o ___ oxidizing acid	i ___ infectious	**Halogens**
a ___ aerosol	p ___ peroxide former	h ___ inhalation hazard	Br .0 - .0 % Bromine
r ___ pressurized liquid		Zone: _	Cl .0 - .0 % Chlorine
d ___ debris per 40 CFR 268.45			F .0 - .0 % Fluorine
h ___ sharps			I .0 - .0 % Iodine
q ___ pumpable liquid			

Layers: | a ____ multilayered: b ____ bi-layered: c X single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	___ low(water)	___ low(water)	___ low(water)	_____
	X solid	___ solid	___ solid	

WIP NO. 131360

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n N **HOC < 1000 ppm** ___ **HOC > 1000 ppm** ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges	Units
PPE, RUBBER TUBING, PAPER, PLASTIC, WOOD	100.00	100.00 %

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
    If yes:
    Is the wastestream subject to Notification/Control Requirements? Yes __ No X
    Benzene Concentration .00 ppm
    Does it contain >= 10% water? Yes __ No X
    What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
    Volatile Organic Concentration .00 ppmw
    CC Approved Analytical Method? Yes __ No X
    Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. **Container Information** :

Packaging: 551A2 Type/Size: DM 55 GAL OPEN HEAD (17H) DM
_____ Type/Size: __ _____

Shipping Frequency: Units 1.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. **Additional Information** :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

Tory Kress — Name(Print or Type)
414-286-8268 — Phone
5/13/10 — Date
Tory Kress — Signature
Sr. Envm. Proj. Engr. — Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 131360