Proposal
number of issues called out
further investigation
soil + ground water ??

Phase I Environmental Site Assessment

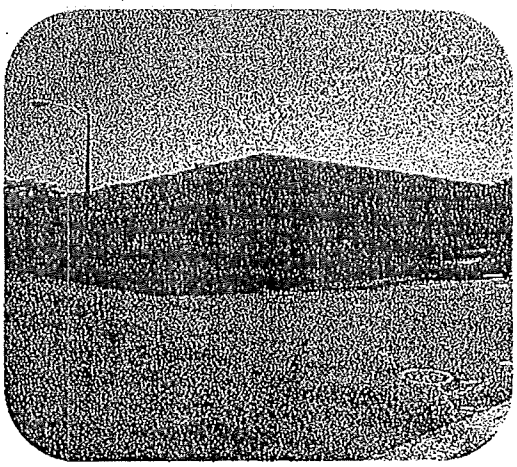
Training Center
1313 and 1329-1331 West National Avenue
Milwaukee, Milwaukee County, Wisconsin

October 27, 2011
Terracon Project No. 58117902

Blaine J Schroyer
414-423 0258

brschroyer @

terracon.com



Prepared for:
BMO Harris Bank N.A.
Milwaukee, Wisconsin

Prepared by:
Terracon Consultants, Inc.
Franklin, Wisconsin

Offices Nationwide Established in 1965
Employee-Owned terracon.com

Terracon

Geotechnical ❁ Environmental ❁ Construction Materials ❁ Facilities

October 27, 2011

Terracon

Mr. William Zeidler
BMO Harris Bank N.A.
770 North Water Street, 9th Floor
Milwaukee, Wisconsin 53202

c/o Ms. Diane Marchik
Godfrey & Kahn, S.C.
780 North Water Street
Milwaukee, Wisconsin 53202

Re: Phase I Environmental Site Assessment
Training Center
1313 and 1329-1331 West National Avenue
Milwaukee, Milwaukee County, Wisconsin
Project No. 58117902

Dear Mr. Zeidler:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Phase I Environmental Site Assessment report for the above-referenced site. This assessment was performed in accordance with our proposal dated September 21, 2011.

If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,
Terracon Consultants, Inc.

Andrew G. Cawrse
Staff Scientist

David G. Jackson, CHMM
Environmental Department Manager

Attachments

TABLE OF CONTENTS

EXECUTIVE SUMMARY i

1.0 INTRODUCTION 1
- 1.1 Site Description 1
- 1.2 Scope of Services 1
- 1.3 Standard of Care 1
- 1.4 Additional Scope Limitations, ASTM Deviations and Significant Data Gaps 2
- 1.5 Reliance 3
- 1.6 Client Provided Information 3

2.0 PHYSICAL SETTING 4

3.0 HISTORICAL USE INFORMATION 5
- 3.1 Historical Topographic Maps 5
- 3.2 Historical Aerial Photographs 6
- 3.3 Historical City Directories 7
- 3.4 Historical Fire Insurance Maps 9
- 3.5 Property Tax File Information 11
- 3.6 Title Search 12
- 3.7 Environmental Liens 12
- 3.8 Building Department Records 12
- 3.9 Zoning/Land Use Records 13
- 3.10 Historical Interviews 13
- 3.11 Prior Report Review 14
- 3.12 Historical Use Information Summary 14

4.0 RECORDS REVIEW 14
- 4.1 Federal and State/Tribal Databases 15
- 4.2 Local Agency Inquiries 27
- 4.3 Records Review Summary 28

5.0 SITE RECONNAISSANCE 29
- 5.1 General Site Information 29
- 5.2 General Description of Site, Occupants, and Operations 30
- 5.3 Site Observations 30
- 5.4 Interviews Conducted During Visual Reconnaissance 34
- 5.5 Site Reconnaissance Summary 34

6.0 ADJOINING PROPERTY RECONNAISSANCE 34

7.0 ADDITIONAL SERVICES 35
- 7.1 Limited Visual Observations for Asbestos 35
- 7.2 Limited Visual Observations for Mold 35
- 7.3 Limited Radon Records Review 36
- 7.4 Limited Lead-Based Paint Survey 36
- 7.5 Limited Wetland Review 37

TABLE OF CONTENTS (cont.)

8.0 FINDINGS AND CONCLUSIONS 37
8.1 Findings 37
8.2 Conclusions 40
9.0 DECLARATION 40

APPENDICES

APPENDIX A Figure 1 - Topographic Map, Figure 2 - Site Diagram
APPENDIX B Description of Terms and Acronyms
APPENDIX C Historical Documentation
APPENDIX D Environmental Database Information
APPENDIX E Site Photographs
APPENDIX F Credentials

Common Acronyms[1]

ACM.....Asbestos containing material
AST.....Aboveground storage tank
ASTM.....ASTM International
AUL.....Activity and use limitation
BGS.....Below ground surface
BTEX.....Benzene, toluene, ethylbenzene, and xylenes
CERCLA.....Comprehensive Environmental Response, Compensation, and Liability Act
CFR.....Code of Federal Regulations
DOT.....United States Department of Transportation
EPA.....United States Environmental Protection Agency
HREC.....Historical recognized environmental condition
LUST.....Leaking underground storage tank
MCL.....Maximum contaminant level
MSDS.....Material safety data sheet
NGVD.....National Geodetic Vertical Datum
NOV.....Notice of violation
NPL.....National Priority List
NRCS.....USDA Natural Resources Conservation Service
OSHA.....Occupational Safety and Health Administration
PCB.....Poly-chlorinated biphenyl
RCRA.....Resource Conservation and Recovery Act
REC.....Recognized environmental condition
SPCC.....Spill Prevention, Control and Countermeasure
SWPPP.....Stormwater pollution prevention plan
TEPH.....Total extractable petroleum hydrocarbons
TPH.....Total petroleum hydrocarbons
TVPH.....Total volatile petroleum hydrocarbons
TRI.....Toxic release inventory
TSCA.....Toxic Substances Control Act
USGS.....United States Geological Survey
UST.....Underground storage tank
VCP.....Voluntary cleanup program
VOC.....Volatile organic compound

Units of measure

sq ft or ft^2.....square feet
mg/kg.....milligrams per kilogram
mg/l.....milligrams per liter
ug/l.....micrograms per liter
ppb.....parts per billion
ppm.....parts per million

[1] An additional list of acronyms and definitions is included in Appendix B.

PHASE I ENVIRONMENTAL SITE ASSESSMENT
TRAINING CENTER
1313 AND 1329-1331 WEST NATIONAL AVENUE
MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN

Project No. 58117902
October 27, 2011

EXECUTIVE SUMMARY

This Phase I ESA was performed in accordance with our proposal dated September 21, 2011, and was conducted consistent with the procedures included in ASTM International (ASTM) E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* The ESA was conducted under the supervision or responsible charge of David G. Jackson, CHMM, environmental professional. Andrew G. Cawrse performed the site reconnaissance on October 6, 2011.

A cursory summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

- The site is located at 1313 and 1329-1331 West National Avenue in Milwaukee, Milwaukee County, Wisconsin. The site consists of approximately 1.6 acres of land improved with one approximately 30,000 square-foot one-story building that was constructed in approximately 1928 with multiple additions over time. In general, the building was observed to be in fair to poor condition. A section of the metal roof located in the training/storage area was damaged (fist-sized hole) and water intrusion in this area was observed. Drop ceiling tiles were missing and/or damaged in the office area. Reportedly, the basement areas beneath the training/storage area and office area are prone to flooding after significant rainfall events. Office space and training areas/class rooms are located in the western portion of the building. According to Mr. John Anderson, Associate Director, a printing operation also was located in the western portion of the building, but the operation was recently shut down. Automobile repair training areas, automobile repair areas, welding training areas, and storage areas are located in the remaining portions of the building. Basement areas located under the eastern and western portions of the building are used for storage. A mezzanine (used for storage) is located in the automobile repair portion of the building. In addition, an approximately 4,200 square-foot one-story garage (slab-on-grade) that was constructed in approximately 1996 is located in the southern portion of the site. The garage has a paint booth and is currently used to repair and fabricate dumpsters. Parking areas are located in the northeastern and southwestern portions of the site.
- During the site reconnaissance, air compressors, above ground hydraulic lifts, HVAC related equipment, a paint spray booth, two ASTs containing petroleum product, 55-gallon drums of petroleum product, one tray containing petroleum product, small paint containers, a waste oil UST fill port and vent pipe, a sump, multiple floor drains

and a trench floor drains, two pole-mounted transformers, *de minimis* staining, and larger areas of staining around the UST fill port and floor drain located in the garage were observed. Reportedly, a 6,000-gallon #2 fuel oil UST was abandoned in-place at the site. No evidence of the UST was observed during the reconnaissance; however, records review indicates that the tank was located in approximately the same location as the waste oil UST. Leaks from the floor drains and/or a spill/release of petroleum products and/or hazardous substances from the waste oil and fuel oil USTs could impact the site; therefore, the floor drains and USTs are considered RECs to the site.

- Based on review of the historical information, the site consisted of dwellings until the current on-site building was constructed in approximately 1928 with multiple additions over time. Review of the historical information indicates that the site was occupied by an automobile sales and service facility in approximately 1930. In addition, a filling station was located at the site from approximately 1930 through 1940. Building permit records note that a gasoline pump and a tank that was removed and replaced with a 6,000 gallon #2 fuel oil UST were historically located at the site. It appears that the fuel oil UST may have been abandoned in place outside of the northeast corner of the building in 1987. However, based on historical records, the fuel oil UST appears to be located in approximately the same location as a current waste oil UST (see Section 5.3). No additional records indicating if the fuel oil UST was abandoned in-place, removed, or converted for waste oil storage were available. Based on the historical use of the site as an automobile repair/service facility and filling station, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exist; therefore, the historical use of the site is considered a REC.

The areas adjoining the site appear to have included residences, a school, and commercial and manufacturing companies. A used car dealership and an automobile repair facility adjoined the site to the north from approximately 1940 though present times. In addition, a manufacturing facility and electrical contractor have adjoined the site to the northwest from approximately 1921 through present times. A glove manufacturing company, a fertilizer company, machining companies, and a printing company adjoined the site to the west from approximately 1921 through 1996. A steam laundry was located at the property to the east, approximately 130 feet from the site, from approximately 1921 through 1945. This property was also identified as a printing company from approximately 1980 through 1996. These facilities are further discussed in Section 4.1.

- The adjoining properties consist of an automobile repair facility, an office, a smokehouse, a manufacturing facility, school, an apartment, and residences. Fred's Auto Repair (1306-1310 West National Avenue), the Farm Country Smokehouse property (1334 West National Avenue), and Astronautics Corporation of America (1400-1426 West National Avenue) to the north are further discussed in Section 4.1.

- The subject site is listed in the database report as a Conditionally Exempt Small Quantity Generator (CESQG), meaning it generates 100 kg or less of hazardous waste per calendar month. The site is also listed in the database report as an EDR Historical Auto Repair and Service Center. Based on the historical use of the site as an automobile repair and service facility, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exists; therefore, the historical use of the site is considered a REC.

  The facility adjoining the site to the northwest across the West National Avenue was a manufacturing facility from approximately 1921 though present times. The facility adjoining the site to the north across the West National Avenue was a used car dealership and an automobile repair facility from approximately 1940 though present times. Based on the proximity to the site and length of time these facilities have been in operation, a spill/release of petroleum products and/or hazardous substances at these properties could impact the site; therefore, these facilities are considered RECs to the site. However, as generally interpreted by the WDNR, if a release from an off-site source impacts the site, the site owner would not be responsible for investigation or remediation of the release, provided the conditions outlined in Wisconsin Statute s. 292.13 are met.

  Other adjoining properties and area properties were identified within the ASTM-specified search radii within the database report. However, based upon their regulatory status, location of residual contamination, apparent topographic gradient, and/or relative distance from the site, activities at these properties are not considered RECs to the site.

- Previous environmental reports, permits and registrations, or geotechnical reports for the site were not provided by the client to Terracon for review.
- At the client's request Terracon performed additional services at the site, as discussed in Section 7.0 of this report.

Conclusions

Based on the scope of services, limitations, and findings of this assessment, Terracon identified the following RECs related to the site:

An automobile sales and service facility has occupied the site since approximately 1930. In addition, a filling station was located at the site from approximately 1930 through 1940. A waste oil UST is currently located outside near the northeast corner of the service building at the site. It also appears that a 6,000-gallon #2 fuel oil UST was abandoned in-place at the site in approximately the same location as the waste oil UST. Large areas of staining were observed around the waste oil UST fill port and some floor drains in the service area. Based on the historical use of the site as an automobile repair and service facility and filling station,

the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exists. In addition, leaks from the floor drains and/or a spill/release of petroleum products and/or hazardous substances from the waste oil and fuel oil USTs could impact the site; therefore, the floor drains and USTs are considered RECs to the site.

Facilities to the north and northwest were historically used for manufacturing and automobile repair. Based on their proximity to the site and length of time these facilities have been in operation, a spill/release of petroleum products and/or hazardous substances at these properties could impact the site. However, as generally interpreted by the WDNR, if a release from an off-site source impacts the site, the site owner would not be responsible for investigation or remediation of the release, provided the conditions outlined in Wisconsin Statute s. 292.13 are met.

PHASE I ENVIRONMENTAL SITE ASSESSMENT
TRAINING CENTER
1313 AND 1329-1331 WEST NATIONAL AVENUE
MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN

Project No. 58117902
October 27, 2011

1.0 INTRODUCTION

1.1 Site Description

Site Description

Site Name	Training Center
Site Location/Address	1313 and 1329-1331 West National Avenue, Milwaukee, Milwaukee County, Wisconsin
Land Area	Approximately 1.6 acres
Site Improvements	One approximately 30,000 square-foot building (with a basement) and one approximately 4,200 square-foot building (slab-on-grade). Other improvements include a parking area and utilities.

The site location is depicted on Figure 1 of Appendix A, which was reproduced from a portion of the USGS 7.5-minute series topographic map. A diagram of the site and adjoining properties is included as Figure 2 of Appendix A. Acronyms and terms used in this report are described in Appendix B.

1.2 Scope of Services

This Phase I ESA was performed in accordance with our proposal dated September 21, 2011, and was conducted consistent with the procedures included in ASTM International (ASTM) E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The purpose of this ESA was to assist the client in developing information to identify RECs in connection with the site as reflected by the scope of this report. This purpose was undertaken through user-provided information, a regulatory database review, historical and physical records review, interviews, including local government inquiries, as applicable, and a visual noninvasive reconnaissance of the site and adjoining properties. Limitations, ASTM deviations, and significant gaps (if identified) are evident from reviewing the applicable scope of services and the report text.

1.3 Standard of Care

This ESA was performed in accordance with generally accepted practices of this profession, undertaken in similar studies at the same time and in the same geographical area. We have endeavored to meet this standard of care, but may be limited by conditions encountered during performance, a client-driven scope of work, or inability to review information not received by the report date. When appropriate, these limitations are discussed in the text of

the report, and an evaluation of their significance with respect to our findings has been conducted.

Phase I ESAs, such as the one performed at this site, are of limited scope, are noninvasive and cannot eliminate the potential that hazardous, toxic, or petroleum substances are present or have been released at the site beyond what is identified by the limited scope of this ESA. In conducting the limited scope of services described herein, certain sources of information and public records were not reviewed. It should be recognized that environmental concerns may be documented in public records that were not reviewed. No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs. No warranties, express or implied, are intended or made. The limitations herein must be considered when the user of this report formulates opinions as to risks associated with the site or otherwise uses the report for any other purpose. These risks may be further evaluated - but not eliminated - through additional research or assessment. We will, upon request, advise you of additional research or assessment options that may be available and associated costs.

1.4 Additional Scope Limitations, ASTM Deviations and Significant Data Gaps

Based upon the agreed-on scope of services, this ESA did not include subsurface or other invasive assessments, business environmental risk evaluations, or other services not particularly identified and discussed herein. Reasonable attempts were made to obtain information within the scope and time constraints set forth by the client; however, in some instances, information requested is not, or was not, received by the issuance date of the report. Consideration of such information is beyond the scope of this assessment. Information obtained for this ESA was received from several sources that we believe to be reliable; nonetheless, the authenticity or reliability of these sources cannot and is not warranted hereunder. This ESA was further limited by the following:

- *Credentials of the company (Statement of Qualifications) have not been included in this report but are available upon request.*
- *Pertinent documents are referred to in the text of this report, and a separate reference section has not been included.*
- *Terracon could not evaluate the history of the site back to its first developed use. However, it appears that the site has been developed since at least 1894.*

In Terracon's professional opinion, it is unlikely that these limitations, either individually or collectively, prevented Terracon from identifying a REC or REC(s). An evaluation of the significance of these limitations and missing information with respect to our findings has been conducted, and where appropriate, significant data gaps are identified and discussed in the text of the report. However, it should be recognized that an evaluation of significant

data gaps is based on the information available at the time of report issuance, and an evaluation of information received after the report issuance date may result in an alteration of our conclusions, recommendations, or opinions. We have no obligation to provide information obtained or discovered by us after the issuance date of the report, or to perform any additional services, regardless of whether the information would affect any conclusions, recommendations, or opinions in the report. This disclaimer specifically applies to any information that has not been provided by the client.

This report represents our service to you as of the report date and constitutes our final document; its text may not be altered after final issuance. Findings in this report are based upon the site's current utilization, information derived from the most recent reconnaissance and from other activities described herein; such information is subject to change. Certain indicators of the presence of hazardous substances or petroleum products may have been latent, inaccessible, unobservable, or not present during the most recent reconnaissance and may subsequently become observable (such as after site renovation or development). Further, these services are not to be construed as legal interpretation or advice.

1.5 Reliance

This ESA report is prepared for the exclusive use and reliance of BMO Harris Bank N.A. and its assigns and affiliates, including but not limited to M&I Regional Properties, LLC and Louisville Realty Corporation. Use or reliance by any other party is prohibited without the written authorization of BMO Harris Bank N.A., its assigns and affiliates, and Terracon Consultants, Inc. (Terracon).

Reliance on the ESA by the client and all authorized parties will be subject to the terms, conditions and limitations stated in the proposal, ESA report, and Terracon's Agreement for Services. The limitation of liability defined in the Agreement for Services is the aggregate limit of Terracon's liability to the client and all relying parties.

Continued viability of this report is subject to ASTM E 1527-05 Sections 4.6 and 4.8. If the ESA will be used by a different user (third party) than the user for whom the ESA was originally prepared, the third party must also satisfy the user's responsibilities in Section 6 of ASTM E 1527-05.

1.6 Client Provided Information

Prior to the site visit, Ms. Lori Adams, client's representative, provided the following information by completing a User Questionnaire (see Appendix C). In addition, Ms. Adams referenced "title work" that was previously supplied. A copy of the title document is also included in Appendix C.

1.6.1 Specialized Knowledge or Experience

Ms. Adams responded not applicable (n/a) to the question regarding her having specialized knowledge or experience that is material to RECs in connection with the site.

1.6.2 Actual Knowledge of Environmental Liens or AULs

Ms. Adams responded not applicable (n/a) to the question regarding her having actual knowledge of environmental liens or AULs encumbering the site or in connection with the site.

1.6.3 Reason for Significantly Lower Purchase Price

Ms. Adams responded not applicable (n/a) to the question regarding a significantly lower purchase price for the site because of the presence of hazardous substances or petroleum products.

1.6.4 Commonly Known or Reasonably Ascertainable Information

Ms. Adams responded not applicable (n/a) to the question regarding commonly known or reasonably ascertainable information within the local community about the site that is material to RECs in connection with the site.

1.6.5 Obvious Indicators of Contamination at the Site

Ms. Adams responded not applicable (n/a) to the question regarding her being aware of obvious indicators that point to the presence or likely presence of contamination at the site.

2.0 PHYSICAL SETTING

Physical Setting

PHYSICAL SETTING INFORMATION FOR SITE AND SURROUNDING AREA		SOURCE
Topography (Refer to Appendix A for an excerpt of the Topographic Map)		
Site Elevation	Approximately 630-640 feet above the national geodetic vertical datum (NGVD).	USGS 7.5-Minute Series Topographic Map, Milwaukee Quadrangle, Dated 1958 Photorevised 1971
Surface Runoff/ Topographic Gradient	The topographic gradient generally slopes to the north.	
Closest Surface Water	Menomonee River canals, located approximately 1,100 feet to the north of the site.	
Soil Characteristics		
Soil Type	Unmapped area (UA)	Milwaukee County, Wisconsin United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) Web Soil Survey located at http://websoilsurvey.nrcs.
Description	The site is located in an unmapped area.	

PHYSICAL SETTING INFORMATION FOR SITE AND SURROUNDING AREA		SOURCE
		usda.gov/app/
Geology/Hydrogeology		
Formation	**Unconsolidated:** Ground moraine **Bedrock:** Dolomites, undifferentiated	USGS Water Resources of Wisconsin- Lake Michigan Basin, Hydrologic Investigations Atlas HA-432, and Depth to Bedrock in Wisconsin, Skinner and Borman, 1973
Description	**Unconsolidated:** Till; stratified clay, silt, sand, gravel, and boulders **Bedrock:** Silurian-aged sedimentary rocks - mostly dolomite	
Estimated Depth to First Occurrence of Groundwater	Approximately 7-14 feet below ground surface (bgs).	LUST case file (BRRTS No. 03-41-255160) related to Ott Property (807 S. 14th St)
Primary Aquifer	Niagara aquifer	USGS Water Resources of Wisconsin- Lake Michigan Basin, Hydrologic Investigations Atlas HA-432, and Depth to Bedrock in Wisconsin, Skinner and Borman, 1973
**Hydrogeologic Gradient:*	The groundwater flow direction is towards the east.	LUST case file (BRRTS No. 03-41-255160) related to Ott Property (807 S. 14th St)

* The groundwater flow direction and the depth to shallow, unconfined groundwater, if present, would likely vary depending upon seasonal variations in rainfall and other hydrogeological features. Without the benefit of on-site groundwater monitoring wells surveyed to a datum, groundwater depth and flow direction beneath the site cannot be directly ascertained.

3.0 HISTORICAL USE INFORMATION

Terracon reviewed the following historical sources for indications of RECs. A summary of the historical review is included at the end of this section. Copies of selected historical documents are included in Appendix C.

3.1 Historical Topographic Maps

Readily available historical USGS topographic maps were reviewed to identify RECs in connection with the site. Reviewed historical topographic maps are summarized below.

- Milwaukee, Wisconsin Quadrangle, 1906 (1:62,500)
- Milwaukee Special, Wisconsin Quadrangle, 1906 (1:62,500)
- Milwaukee, Wisconsin Quadrangle, 1958 (1:24,000)

- Milwaukee, Wisconsin Quadrangle, 1958 (1: 62,500)
- Milwaukee, Wisconsin Quadrangle, 1971 (1:24,000)

Historical Topographic Maps

Direction	Description
Site	The site is located within the incorporated area of the City of Milwaukee with no structures depicted (1906, 1958, and 1971)
North	A road is depicted to the north; however, the property to the north is within the City of Milwaukee and no structures are depicted (1906, 1958, and 1971)
East	The property to the east is located within the incorporated area of the City of Milwaukee with no structures depicted (1906, 1958, and 1971)
South	A road is depicted to the south; however, the property to the south is within the City of Milwaukee and no structures are depicted (1906, 1958, and 1971)
West	A road is depicted to the west; however, the property to the west is within the City of Milwaukee and no structures are depicted (1906, 1958, and 1971)

3.2 Historical Aerial Photographs

Terracon reviewed historical aerial photographs for information concerning the history of development at and near the site. The photographs were obtained from Environmental Data Resources (EDR). Evaluation of these aerials may be limited by a photo's quality and scale. The following photographs were reviewed and select copies are provided in Appendix C:

- Year: 1937, Scale: 1"=556'
- Year: 1950, Scale: 1"=500'
- Year: 1956, Scale: 1"=500'
- Year: 1963, Scale: 1"=500'
- Year: 1969, Scale: 1"=500'
- Year: 1979, Scale: 1"=833'
- Year: 1981, Scale: 1"=1,000'
- Year: 1985, Scale: 1"=500'
- Year: 1992, Scale: 1"=833'
- Year: 2000, Scale: 1"=604'
- Year: 2005, Scale: 1"=604'
- Year: 2008, Scale: 1"=604'
- Year: 2010, Scale: 1"=130' (from Milwaukee County GIS records)

Historical Aerial Photographs

Direction	Description
Site	Multiple small structure are visible on the site (1937); The small structures are still visible, but a large structure is now visible in the northern portion of the site (1950 and 1956); The large structure is still visible, but the small structures are no longer visible (1963-1992); The large structure is still visible, but a second structure is now visible in the southern portion of the site (2000-2010)
North	A road followed by structures to the north (1937); A road followed by multiple structures to the north and one large structure to the northwest (1950-2010)
East	Multiple small structures are visible to the east (1937-2010)
South	A road followed by multiple small structures (1937-1956); The small structures to the south are no longer visible and this area is now vacant (1963-2010)
West	A road followed by multiple small structures (1937); A road followed by multiple small structures and one large structure (1950-2010)

3.3 Historical City Directories

The city directories used in this study were made available through the City of Milwaukee Public Library and were reviewed at approximate five year intervals for the years from 1921-2010. Since these references are copyright protected, reproductions are not provided in this report. The current street address for the site was identified as 1313 and 1329-1331 West National Avenue.

Historical City Directories

Direction	Description
Site	**1303-1333 W National Ave (formerly 633-655 W National Ave):** Residences (1921 and 1925); Residences, Natl Motor Car Co, and Natl Gas & Battery Co fill sta (1930); Residence and Jaegar Motor Co and filling sta (1935 and 1940); Residence and Jaegar Motor Co autos (1945); Jaegar Oldsmobile Inc autos (1950-1980); Vacant (1985); Esperanza Unida Auto Repair Center Inc (1990); Amprotect Environmental svc and Esperanza Unida Auto Repair (1996); International Building job trnng rltd svc (2000); Esperanza Unida social serv and welfare org (2005-2010) **800-824 S 14th St (formerly 332-348 S 9th Ave):** Residences (1921-1960); Not listed (1965-2010) **1312-1332 W Walker St (formerly 642-652 W Walker St):** Residences (1921-1965); Not listed (1970-2010)
North	**1228-1230 W National Ave (formerly 624 W National Ave):** Harris & Smith, tools (1921); Carpet cleaner (1925); Residence and carpet weaver (1930 and 1935); Residence and Rug Cleaning Co (1940-1960); Residence and antiques (1965 and 1970); Residence (1975); Dons Silk Screening uniform lettering (1980); Residence and Dons Silk Screening uniform lettering (1985 and 1990); Dons Silk Screening (1996); Not listed (2000-2010) **1306-1310 W National Ave (formerly 628 W National Ave):** Residence (1921); Not listed (1925-1935); Jaeger Motor Co used cars (1940 and 1945); Jaegar Oldsmobile Inc used car dept (1950-1975); O'Brien Oldsmobile Inc used car sls (1980); Freds Auto Body and Fred the Muffler Man (1985 and 1990); Freds Auto Body Repair (1996-2010) **1314-1316 W National Ave:** Not listed (1921-1930); Tavern (1935-1990); Residence (1996

Direction	Description
	and 2000); No current listing (2005 and 2010) **1334 W National Ave (formerly 652-654 W National Ave):** Milwaukee Sausage Co (1921-1996); Not listed (2000); Burbachs Hampton Market (2005); Not listed (2010) **1400-1426 W National Ave (formerly 656-678 W National Ave):** Slocum Straw Works hat mfrs (1921-1955); Vacant (1960); Magaw Elec Co contr (1965); Brite Lighting Co Div and Magaw Elec Co contrs (1970); Vacant (1975); Astronautics Corp of America aircraft components mfrs (1980-1996); Not listed (2000); Astronautics Corp of America aircraft components mfrs (2005 and 2010)
East	**1235-1241 W National Ave (formerly 629-631 W National Ave):** Apartments (1921-2010) **1227-1233 W National Ave (formerly 621-625 W National Ave):** Residence (1921-2005); Not listed (2010) **1223 W National Ave (formerly 617-619 W National Ave):** Reliance Laundry & Cleaning Co (1921-1940); Reliance Laundry & Cleaning Co and Mil Linen Supply Co (1945); Mil Linen Supply Co (1950-1970); Vacant (1975); Hetrick Printing Inc (1980-1996); Not listed (2000); One Source Staffing (2005); Junk Jenie liquidators and One Source Staffing (2010) **1308 W Walker St (formerly 638 W Walker St):** Residence (1921-1990); Not listed (1996); Residence (2000); No current listing (2005 and 2010) **1306 W Walker St (formerly 636 W Walker St):** Residence (1921-1945); No return (1950); Residence (1955-1990); Not listed (1996); Residence (2000-2010) **1300-1302 W Walker St (formerly 634 W Walker St):** Residence (1921-1990); Not listed (1996); Residence (2000-2010) **1240 W Walker St (formerly 632 W Walker St):** Residence (1921-1990); Not listed (1996); Residence (2000-2010)
South	**1309 W Walker St (formerly 637 W Walker St):** Residence (1921-1955); Not listed (1960-2010) **1315 W Walker St (formerly 641 W Walker St):** Residence (1921-1955); Not listed (1960-2010) **1319 W Walker St (formerly 643 W Walker St):** Not listed (1921-1930); Residence (1935-1955); Not listed (1960-2010) **1321 W Walker St (formerly 645 W Walker St):** Vacant (1921); Residence (1925-1955); Not listed (1960-2010) **1325 W Walker St (formerly 649 W Walker St):** Residence (1921-1955); Not listed (1960-2010) **1329-1331 W Walker St (formerly 651 W Walker St):** Residence (1921-1955); Not listed (1960-2010) **1335 W Walker St (formerly 653 W Walker St):** Residence (1921-1945); Not listed (1950); Residence (1955); Not listed (1960-2010) **1210 W Mineral St (formerly 606 W Mineral St):** School (1921-2010)
West	**807 S 14th St (formerly 1419 and 655-667 W National Ave):** Milwaukee Glove Co (1921); Milwaukee Glove Co and Nitragin Co Inc fertilizers (1925 and 1930); Meier Ice Cream Co (plant), Milwaukee Glove Co, and Dolco Glove Co (1935 and 1940); Meier Ice Cream Co (plant) and Milwaukee Glove Co (1945 and 1950); Milwaukee Glove Co (1955); State Wine Sales Corp whol laminated plastics, Wisconsin Wholesale tile non cermic, Milwaukee Glove Co, and Danly Mach Specialties Inc mfrs (1960 and 1965); Blueprints Inc, Ekay Knitting Mills, and Danly Machine Corp (1970 and 1975); Alloy Sling Chain mfr & distr, Ekay Knitting Mills, and Danly Machine Corp (1980); Great Lakes Printing of Wisc canvas prods, Ekay Knitting Mills, and Dienamics Inc die makers (1985-1996); Not listed (2000); Latino Community Ctr and Victory Christian Academy (2005); Latino Community Ctr (2010) **815 S 14th St (formerly 341 S 9th Ave):** Residence (1921-1950); Apartments (1955-2010) **819 S 14th St (formerly 345 S 9th Ave):** Residence (1921-2010)

Direction	Description
	825-827 S 14th St (formerly 349-351 S 9th Ave): Residences (1921-1955); Apartments (1960-2000); No current listing (2005-2010) **1404 W Walker St:** Not listed (1921-1945); Vacant (1950); Residence (1955-1985); No return (1990); Residence (1996 and 2000); No current listing (2005); Residence (2010) **1403 W Walker St (formerly 659 W Walker St):** Residence (1921-1935); Vacant (1940); Residence (1945); No return (1950); Residence (1955); No return (1960); Residence (1965-2010)

Facilities of more obvious potential environmental concern are underlined in the above table. Based on the review of historical city directories, an automobile sales and service facility has been located at the site since approximately 1930. In addition, a filling station was located at the site from approximately 1930 through 1940. Based on the historical use of the site as an automobile repair and service facility and filling station, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exist; therefore, the historical use of the site is considered a REC.

Review of the historical directories indicates that a used car dealership and an automobile repair facility adjoined the site to the north (1306-1310 West National Avenue) from approximately 1940 though present times. In addition, a manufacturing facility and electrical contractor has adjoined the site to the northwest (1400-1426 West National Avenue) from approximately 1921 through present times. A glove manufacturing company, a fertilizer company, machining companies, and a printing company adjoined the site to the west (807 South 14th Street - formerly 1419 West National Avenue) from approximately 1921 through 1996. These facilities are further discussed in Section 4.1.

Review of the directories also indicates that a laundry and cleaning company was located at 1223 West National Avenue (approximately 130 feet from the site) from approximately 1921 through 1945. However, review of the historical fire insurance maps indicates that this facility was a steam laundry. This property was also identified as a printing company from approximately 1980 through 1996. This facility is further discussed in Section 4.1.

3.4 Historical Fire Insurance Maps

Historical fire insurance maps produced by the Sanborn Map Company were requested from Environmental Data Resources Inc. (EDR) to evaluate past uses and relevant characteristics of the site and surrounding properties. EDR provided Sanborn maps as summarized below.

- EDR, 1894, Certification # F3ED-4947-9423
- EDR, 1910, Certification # F3ED-4947-9423
- EDR, 1951, Certification # F3ED-4947-9423

- EDR, 1969, Certification # F3ED-4947-9423

Historical Fire Insurance Maps

Direction	Description
Site	**1303-1333 W National Ave (formerly 633-655 W National Ave):** Four dwellings, a stable, and a structure identified as a carriage factory are depicted (1894); Five dwellings and two stables are depicted, but the carriage factory is no longer depicted (1910); The dwellings are no longer depicted, but a large structure identified as auto sales and service is now depicted (1951 and 1969) **800-824 S 14th St (formerly 332-348 S 9th Ave):** Two dwellings are depicted (1894); Three dwellings are depicted (1910 and 1951); The dwellings are no longer depicted and this area is now labeled parking (1969) **1312-1332 W Walker St (formerly 642-652 W Walker St):** Four dwellings are depicted (1894, 1910, and 1951); The dwellings are no longer depicted and this area is now labeled parking (1969)
North	**1228-1230 W National Ave (formerly 624 W National Ave):** One dwelling is depicted (1894); One store labeled rug weaving and one structure labeled carpet cleaning are depicted (1910); The rug weaving store is still depicted, but the structure used for carpet cleaning is no longer depicted (1951 and 1969) **1306-1310 W National Ave (formerly 628 W National Ave):** One dwelling is depicted (1894 and 1910); One structure labeled office and an area labeled auto sales is depicted (1951 and 1969) **1314-1316 W National Ave:** Vacant (1894 and 1910); One structure identified as a store (1951 and 1969) **1334 W National Ave (formerly 652-654 W National Ave):** Vacant (1894 and 1910); One large structure labeled Milwaukee Sausage Co sausage mfg (1951 and 1969) **1400-1426 W National Ave (formerly 656-678 W National Ave):** Vacant (1894); One large structure labeled Slocum Straw Works mfrs ladies straw & felt hats is now depicted (1910 and 1951); The large structure is now labeled whol elec supplies (1969)
East	**1235-1241 W National Ave (formerly 629-631 W National Ave):** Two dwellings are depicted (1894); Two structures identified as flats and two structures identified as dwellings are depicted (1910, 1951, and 1969) **1227-1233 W National Ave (formerly 621-625 W National Ave):** Two dwellings are depicted (1894, 1910, 1951, and 1969) **1223 W National Ave (formerly 617-619 W National Ave):** Three dwellings are depicted (1894); One structure labeled steam laundry and one dwelling are depicted (1910, 1951, and 1969) **1308 W Walker St (formerly 638 W Walker St):** One dwelling is depicted (1894, 1910, 1951, and 1969) **1306 W Walker St (formerly 636 W Walker St):** One dwelling is depicted (1894, 1910, 1951, and 1969) **1300-1302 W Walker St (formerly 634 W Walker St):** One dwelling is depicted (1894, 1910, 1951, and 1969) **1240 W Walker St (formerly 632 W Walker St):** Two dwellings are depicted (1894, 1910, and 1951); Only one dwelling is now depicted (1969)
South	**1309 W Walker St (formerly 637 W Walker St):** One dwelling is depicted (1894, 1910, and 1951); The dwelling is no longer depicted and the area is now vacant (1969) **1315 W Walker St (formerly 641 W Walker St):** One dwelling is depicted (1894, 1910, and 1951); The dwelling is no longer depicted and the area is now vacant (1969) **1319 W Walker St (formerly 643 W Walker St):** Vacant (1894 and 1910); One dwelling is

Direction	Description
	depicted (1951); The dwelling is no longer depicted and the area is now vacant (1969) **1321 W Walker St (formerly 645 W Walker St):** One dwelling is depicted (1894, 1910, and 1951); The dwelling is no longer depicted and the area is now vacant (1969) **1325 W Walker St (formerly 649 W Walker St):** One dwelling is depicted (1894, 1910, and 1951); The dwelling is no longer depicted and the area is now vacant (1969) **1329-1331 W Walker St (formerly 651 W Walker St):** One dwelling is depicted (1894, 1910, and 1951); The dwelling is no longer depicted and the area is now vacant (1969) **1335 W Walker St (formerly 653 W Walker St):** One dwelling is depicted (1894, 1910, and 1951); The dwelling is no longer depicted and the area is now vacant (1969)
West	**807 S 14th St (formerly 1419 and 655-667 W National Ave):** Vacant (1894 and 1910); One large structure identified as Milwaukee Glove Co is depicted. The southern portion of the building is labeled ice cream mfg (1951); The structure is still depicted, but is now labeled glove mfg and mach supplies (1969) **815 S 14th St (formerly 341 S 9th Ave):** Vacant (1894); One dwelling is depicted (1910, 1951, and 1969) **819 S 14th St (formerly 345 S 9th Ave):** One dwelling is depicted (1894, 1910, 1951, and 1969) **825-827 S 14th St (formerly 349-351 S 9th Ave):** One dwelling is depicted (1894, 1910, 1951, and 1969) **1404 W Walker St:** Vacant (1894 and 1910); One structure identified as a flat is depicted (1951); The structure is now labeled apartments (1969) **1403 W Walker St (formerly 659 W Walker St):** One dwelling is depicted (1894, 1910, 1951, and 1969)

Facilities of more obvious potential environmental concern are underlined in the above table. Based on review of the historical fire insurance maps, an automobile sales and service facility was located at the site in 1951 and 1969. This facility was further discussed in Section 3.3.

An automobile sales facility adjoined the site to the north (1306-1310 West National Avenue) in 1951 and 1969. In addition, a manufacturing facility adjoined the site to the northwest (1400-1426 West National Avenue) in 1910 and 1951. A glove manufacturing company and machine company adjoined the site to the west (807 South 14th Street - formerly 1419 West National Avenue) in approximately 1951 and 1969. These facilities were further discussed above in Section 3.3. A steam laundry was located at 1223 W. National Avenue (formerly 617-619 W. National Avenue, approximately 130 feet to the east of the site, from at least 1910 through 1969. Based on the topographic cross-gradient and the Menomonee River valley, and its distance from the site, the historical steam laundry operation is not anticipated to impact the site.

3.5 Property Tax File Information

Based on a review of information obtained from the City of Milwaukee Assessors Department, the current site owner is Esperanza Unida, Inc. The tax key numbers for the site are 4332251000 and 4332252000. A copy of the assessment record is included in Appendix C.

3.6 Title Search

At the direction of the client, a title search was included as part of the scope of services. County Deed Records were reviewed by Texas Environmental Research (Texas) of Rockwall, Texas to obtain a chain-of-title for the site.

Ownership records for parcel number 4332251000 and 4332252000 were reviewed back to 1929 and 1930, respectively. Based on their review of title records in Milwaukee County, Texas determined that the current site owner is Esperanza Unida, Inc. Previous site owners included individuals. Easements for utilities were also noted in the chain of title. The title information is included in Appendix C.

3.7 Environmental Liens

At the direction of the client, an environmental lien search was included as part of the scope of services. Environmental lien records pertaining to the site were reviewed by Texas Environmental Research of Rockwall, Texas. Based on the review, environmental lien records for the site were not identified in the public records.

Terracon reviewed the Wisconsin Department of Natural Resources (WDNR) GIS Registry of Closed Remediation Sites website, which identifies:

- Sites closed with residual contamination above groundwater standards after cleanup;
- Sites closed after November 2002, with residual contamination above soil standards;
- Sites closed prior to June 3, 2006, with deed restrictions due to residual contamination; and,
- Sites closed after June 3, 2006, with land use controls due to residual contamination.

The subject site was not listed in the GIS registry of closed remediation sites or the AUL database records (see Section 4.1).

3.8 Building Department Records

Terracon reviewed building department records at the City of Milwaukee Department of City Development for information indicating potential RECs (e.g. tanks) on the site. The records included a 1928 building permit to build a one-story garage, a 1929 permit to install a coal-fired boiler, plumbing permits, sign permits, HVAC permits, electrical permits, occupancy permits, addition permits, and a 1949 permit for an oil-fired boiler. The occupancy permits included a 1950, 1977, and 1986 permit for automobile sales, a 1978 permit for automobile sales and service, and a 1985 permit for automobile service training. Additional permits included a 1949 permit to construct a sales and service area, a 1950 permit for a paint shop and auto body repair area, a 1977 permit for a flammable liquid storage area, and a 1995

permit for a repair, paint storage, and paint spray booth addition. The records also included a 1941 permit to raze a one story 20X20 filling station. In addition, the records included a 1965 fire department memo indicating that a no smoking sign was to be located by the gasoline pump outside the east wall, 1967 permit to install a pump, a 1977 permit to remove an existing tank and install a new 6,000-gallon #2 fuel oil storage UST, a map indicating the location of the UST, and a 1987 permit to backfill with gravel a fuel oil tank and abandon the tank in place. The records are included in Appendix C. Terracon requested tank records for the fuel oil tank from the Department of Safety and Professional Services (DSPS). However, Ms. Laura Pleasants, Paralegal, indicated that there are no records for the site. No records indicating if the fuel oil tank was abandoned in-place, removed, or converted to be used for waste oil storage (see Section 5.3) were available.

3.9 Zoning/Land Use Records

Based on the review of the City of Milwaukee Assessor Department online records, the site is currently zoned as LB2; Local Business.

3.10 Historical Interviews

The following individuals were interviewed regarding historical use of the site.

Interviewee

Interviewer	Interviewee/Phone #	Title	Date/Time
Andrew G. Cawrse	John Anderson	Associate Director for Esperanza Unida	October 6, 2011 / 11:00 a.m.
Andrew G. Cawrse	Robert Miranda / 414.671.0251	Executive Director for Esperanza Unida	October 6, 2011 / 4:00 p.m.

Mr. John Anderson provided Terracon with access to the on-site building. Mr. Anderson then referred Terracon to Mr. Robert Miranda, the Executive Director of Eperanza Unida, for additional information regarding the historical use of the site.

Mr. Robert Miranda indicated that the non-profit Esperanza Unida has owned the site for approximately 25 years. He said that the current on-site building was constructed in the 1940s and 1950s and that it was historically occupied by an automobile dealership. Mr. Miranda stated that the owners have used the building for automobile repair training and sales. He indicated that there is a UST at the site that is used to store waste oil. Mr. Miranda stated that he was unaware of the capacity of the UST. He said that the UST is periodically pumped out once it is full. Mr. Miranda stated that he is unaware of spills or leaks related to the UST, or potential environmental contamination issues on the site.

3.11 Prior Report Review

Previous environmental reports, permits and registrations, or geotechnical reports for the site were not provided by the client to Terracon for review.

3.12 Historical Use Information Summary

Based on review of the historical information, the site consisted of dwellings until the current on-site building was constructed in approximately 1928 with multiple additions over time. Review of the historical information indicates that the site was occupied by an automobile sales and service facility in approximately 1930. In addition, a filling station was located at the site from approximately 1930 through 1940. Building permit records note that a gasoline pump and a tank that was removed and replaced with a 6,000 gallon #2 fuel oil UST were historically located at the site. It appears that the fuel oil UST may have been abandoned in place outside of the northeast corner of the building in 1987. However, based on historical records, the fuel oil UST appears to be located in approximately the same location as a current waste oil UST (see Section 5.3). No additional records indicating if the fuel oil UST was abandoned in-place, removed, or converted for waste oil storage were available. Based on the historical use of the site as an automobile repair/service facility and filling station, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exist; therefore, the historical use of the site is considered a REC.

The areas adjoining the site appear to have included residences, a school, and commercial and manufacturing companies. A used car dealership and an automobile repair facility adjoined the site to the north from approximately 1940 though present times. In addition, a manufacturing facility and electrical contractor have adjoined the site to the northwest from approximately 1921 through present times. A glove manufacturing company, a fertilizer company, machining companies, and a printing company adjoined the site to the west from approximately 1921 through 1996. A steam laundry was located at the property to the east, approximately 130 feet from the site, from approximately 1921 through 1945. This property was also identified as a printing company from approximately 1980 through 1996. These facilities are further discussed in Section 4.1.

4.0 RECORDS REVIEW

Regulatory database information was provided by EDR, a contract information services company. The purpose of the records review was to identify RECs in connection with the site. Evaluating identified regulatory facilities for potential vapor intrusion conditions was outside the scope of this assessment. Information in this section is subject to the accuracy of the data provided by the information services company and the date at which the information is updated, and the scope herein did not include confirmation of facilities listed as "unmappable" by regulatory databases.

In some of the following subsections, the words up-gradient, cross-gradient and down-gradient refer to the topographic gradient in relation to the site. As stated previously, the groundwater flow direction and the depth to shallow groundwater, if present, would likely vary depending upon seasonal variations in rainfall and the depth to the soil/bedrock interface. Without the benefit of on-site groundwater monitoring wells surveyed to a datum, groundwater depth and flow direction beneath the site cannot be directly ascertained.

4.1 Federal and State/Tribal Databases

Listed below are the facility listings identified on federal and state/tribal databases within the ASTM-required search distances from the approximate site boundaries. Database definition, descriptions, and the database search report are included in Appendix D.

Federal Databases

Database	Description	Radius (miles)	Facilities
NPL	The NPL is the USEPA's database of uncontrolled or abandoned hazardous waste facilities that have been listed for priority remedial actions under the Superfund Program.	1.0	0
NPL (Proposed)	Proposed National Priority List Sites	1.0	0
NPL (Delisted)	The NPL Delisted refers to facilities that have been removed from the NPL.	1.0	0
NPL LIENS	Federal Superfund Liens	Site	0
CERCLIS / NFRAP	The CERCLIS database is a compilation of facilities which the USEPA has investigated or is currently investigating for a release or threatened release of hazardous substances pursuant to the CERCLA of 1980. NFRAP refers to facilities that have been removed and archived from its inventory of CERCLA sites.	0.5	3
RCRA CORRACTS/ TSD	The USEPA maintains a database of RCRA facilities associated with treatment, storage, and disposal (TSD) of hazardous waste that are undergoing "corrective action." A "corrective action" order is issued when there has been a release of hazardous waste or constituents into the environment from a RCRA facility.	1.0	3
RCRA Non-CORRACTS/ TSD	The RCRA Non-CORRACTS/TSD Database is a compilation by the USEPA of facilities which report storage, transportation, treatment, or disposal of hazardous waste. Unlike the RCRA CORRACTS/TSD database, the RCRA Non-CORRACTS/TSD database does not include RCRA facilities where corrective action is required.	0.5	1
RCRA Generators	The RCRA Generators database, maintained by the USEPA, lists facilities that generate hazardous waste as part of their normal business practices. Generators are listed as either large, small, or conditionally exempt. LQG produce at least 1000 kg/month of non-acutely hazardous waste or 1 kg/month of acutely hazardous waste. SQG produce 100-1000 kg/month of non-acutely hazardous waste. CESQG are those that generate less than 100 kg/month of non-acutely hazardous waste.	Site and adjoining	3

Database	Description	Radius (miles)	Facilities
ERNS	The ERNS is a listing compiled by the USEPA on reported releases of petroleum and hazardous substances to the air, soil and/or water.	Site	0
HMIRS	Hazardous Materials Information Reporting System	Site	0
IC / EC	A listing of sites with engineering and/or institutional controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.	0.5	0
DOD	Department of Defense Sites	1.0	0
FUDS	Formerly Used Defense Sites	1.0	0
US BROWNFIELDS	A listing of Brownfield Sites	0.5	3
CONSENT	Superfund (CERCLA) Consent Decrees	1.0	0
ROD	Records of Decision	1.0	0
UMTRA	Uranium Mill Tailings Sites	0.5	0
ODI	Open Dump Inventory	0.5	0
TRIS	Toxic Chemical Release Inventory System	Site	0
TSCA	Toxic Substances Control Act	Site	0
FTTS	FIFRA/TSCA Tracking System	Site	0
SSTS	Section 7 Tracking Systems	Site	0
ICIS	Integrated Compliance Information System	Site	0
LUCIS	Land Use Control Information System	0.5	0
RADINFO	Radiation Information Database	Site	0
CDL	Clandestine Drug Labs	Site	0
PAD	PCB Activity Database System	Site	0
MLTS	Material Licensing Tracking System	Site	0
MINES	Mines Master Index File	0.25	0
FINDS	Facility Index System/Facility Registry System	Site	0
RAATS	RCRA Administrative Action Tracking System	Site	0

State Databases

Database	Description	Radius (miles)	Facilities
State Hazardous Waste	The Wisconsin Department of Natural Resources maintains a database of state equivalent CERCLIS (SCL) facilities in the State of Wisconsin.	1.0	0
BRRTS	Bureau of Remediation & Redevelopment Tracking System	Site	0
WI ERP	Wisconsin Environmental Repair Program Database	0.5	17
State Landfill	List of Licensed Landfills	0.5	0

Database	Description	Radius (miles)	Facilities
WI WDS	The Registry was created by the WDNR to serve as a comprehensive listing of all sites where solid or hazardous wastes have been or may have been deposited. Inclusion of a site on the Registry is not intended to suggest that environmental problems have occurred, are occurring, or will occur in the future.	0.5	0
LUST	Leaking Underground Storage Tank Database	0.5	40
UST	The Wisconsin Department of Commerce (WDOC) has compiled a database of registered Underground Storage Tanks in the State of Wisconsin.	Site and adjoining	1
LAST	Leaking Aboveground Storage Tank Listing	0.5	0
AST	Aboveground Storage Tanks	Site and adjoining	0
MANIFEST	Manifest Information	Site and adjoining	0
WI Spills	Wisconsin Spills Database	Site	0
AGSPILLS	Agricultural Spill Cases	Site	0
CRS	Closed Remediation Sites	Site	0
AUL	Sites with deed notices and deed restrictions.	0.5	21
VCP	The WDNR Voluntary Party Liability Exemption (VCP) is an elective environmental cleanup program.	0.5	0
DRYCLEANERS	A listing of drycleaning facilities enrolled in the Five Star Recognition Program, which encourages a reduction in the use and emissions of perchloroethylene (perc), a common but potentially hazardous drycleaning solvent .	0.25	0
WI WRRSER	Wisconsin Remedial Response Site Evaluation Report	Site	0
BEAP	"Brownfields" are abandoned or under-utilized commercial and industrial properties where expansion or redevelopment is hindered by real or perceived contamination. Through BEAP, WDNR staff assess selected brownfields to determine if the properties are contaminated.	0.5	2
BROWNFIELDS	Brownfields Site Location Listing	0.5	4
AIRS	Air Permit Program Listing	Site	0
TIER 2	Tier 2 Facility Index	Site	0
LEAD	Lead Inspection Data	Site	0
SHWIMS	Solid & Hazardous Waste Information Management System	Site	0

Tribal Databases

INDIAN RESERVE	Indian Reservations	1.0	0
INDIAN LUST	Leaking Underground Storage Tanks on Indian land	0.5	0
INDIAN UST	The Wisconsin Department of Commerce (WDOC) has compiled a database of registered Underground Storage Tanks on Indian land in the State of Wisconsin.	Site and adjoining	0

EDR Proprietary Records

Manufactured Gas Plants	EDR Proprietary Manufactured Gas Plants	1.0	0
EDR Historical Auto Stations	EDR Proprietary Historical Auto Stations	0.25	1

In addition to the above ASTM-required listings, Terracon reviewed other federal, state, local and proprietary databases provided by the database firm. A list of the additional reviewed databases is included in the regulatory database report included in Appendix D.

The following table summarizes the site-specific information provided by the database and/or gathered by this office for identified facilities. Facilities are listed in order of proximity to the site. Additional discussion for selected facilities may follow the summary table.

Listed Facilities

Facility Name and Location	Estimated Distance/Direction/Gradient	Database Listings
Esperanza Unida 1329 W National Ave	Subject site	RCRA-CESQG, FINDS, MANIFEST, SHWIMS, EDR Historical Auto Station
Great Lakes Printing Of Wi 1419 W National Ave	Adjoining to the west / cross-gradient	RCRA-CESQG, FINDS, SHWIMS
Ott Property (Former) 807 S 14th St	Adjoining to the west / cross-gradient	UST, LUST, AUL
Astronautics Corp 1426 W National Ave	Adjoining to the northwest / down-gradient	RCRA-SQG, FINDS, MANIFEST, SHWIMS, FTTS, HIST FTTS
Siladi Inc 1334 W National Ave	Adjoining to the north / down-gradient	RCRA-NonGen, FINDS
Milwaukee Sausage Co 1334 W National Ave	Adjoining to the north / down-gradient	UST, LUST, SHWIMS, WI WRRSER
Fred's Auto And Body Repair 1310 W National Ave	Adjoining to the north / down-gradient	RCRA-NonGen, FINDS
Retrick Painting 1223 W National Ave	Approximately 130 feet / east / cross-gradient	RCRA-NonGen, FINDS, UST
South Community Organization 915 S 14th St	Approximately 190 feet / southwest / up-gradient	UST
(No Facility Given) 1239-1241 W Pierce St	Approximately 300 feet / north-northeast / down-gradient	UST
Cochrane Compressor Co Inc 1500 W National Ave	Approximately 320 feet / northwest / down-gradient	FINDS, SHWIMS, LUST, CRS, AUL, RCRA-CESQG
Try Chem Corp 1333 West Pierce Street	Approximately 430 feet / north / down-gradient	US BROWNFIELDS, CERC-NFRAP, FINDS, BEAP, RCRA-NonGen

Facility Name and Location	Estimated Distance/Direction/Gradient	Database Listings
Mmsd Canal St Wet Weather Manhole #11 1333 W Pierce St	Approximately 430 feet / north / down-gradient	SHWIMS, BEAP, SPILLS, BRRTS, BROWNFIELDS, WI ERP
Milwaukee Scrap Metal Co 1239 W Pierce St	Approximately 460 feet / north-northeast / down-gradient	LUST, BRRTS, CRS, AUL, WI ERP
Milwaukee Scrap Metal Co 1238 W Pierce St	Approximately 460 feet / north-northeast / down-gradient	FINDS, RCRA-NonGen
Milwaukee Scrap Metal Co 1236 W Pierce St	Approximately 470 feet / north-northeast / down-gradient	SHWIMS, UST, LUST, BRRTS, CRS, AUL, WI ERP
Vulcan Global Manufacturing Systems Inc 1400 W Pierce St	Approximately 480 feet / north-northwest / down-gradient	RCRA-SQG, FINDS, SPILLS, SHWIMS, MANIFEST
Residence/Vacant Property 1411 W Pierce St	Approximately 490 feet / north-northwest / down-gradient	BRRTS, WI ERP
Refrigerant Recovery Inc 1125 W National Ave	Approximately 650 feet / east-northeast / cross-gradient	FINDS, SHWIMS, MANIFEST, RCRA-NonGen
Racm Vacant Lot 1110-1134 W Pierce St	Approximately 670 feet / east-northeast / cross-gradient	WI ERP
Vacant Lot 1101-1117 W Pierce St	Approximately 680 feet / east-northeast / cross-gradient	LUST, CRS, AUL
Commerical Properties 1544-1578 W Nation 1544-78 National Ave	Approximately 720 feet / west / cross-gradient	LUST
1506 W Pierce St 1506 W Pierce St	Approximately 760 feet / northwest / down-gradient	UST, LUST, CRS, AUL
Vulcan Global Manufacturing Solutions In 1517 W Pierce St	Approximately 780 feet / northwest / down-gradient	UST, SPILLS, LUST, MANIFEST, RCRA-NonGen
1107-1117 W. Pierce Street 1107-1117 W. Pierce Street	Approximately 830 feet / east-northeast / cross-gradient	US BROWNFIELDS
Astra Plating 1535 W Pierce St	Approximately 840 feet / west-northwest / cross-gradient	FINDS, RCRA-CESQG
Able Metals 704 S 11th St	Approximately 850 feet / east-northeast / cross-gradient	FINDS, SHWIMS, RCRA-NonGen
(No Facility Given) 701 S 11th St	Approximately 850 feet / east-northeast / cross-gradient	UST
Gebhardt Vogel Tanning Co 1228 W Bruce St	Approximately 870 feet / north-northeast / down-gradient	UST, SHWIMS, LUST, FINDS, RCRA-NonGen
1200-04 W Washington 1200-04 W Washington	Approximately 880 feet / south-southeast / up-gradient	BRRTS, WI ERP, US BROWNFIELDS
(No Facility Given) 1200 - 1204 W Washington Street	Approximately 880 feet / south-southeast / up-gradient	UST
Economy Bushing Co (Former) 1560 W Pierce St	Approximately 940 feet / west-northwest / cross-gradient	FINDS, SHWIMS, RCRA-NonGen

Facility Name and Location	Estimated Distance/Direction/Gradient	Database Listings
Thermo Electron Corp Metal Treating Inc 1575 W Pierce St	Approximately 980 feet / west-northwest / down-gradient	UST, AST, FINDS, SHWIMS, MANIFEST, RCRA-CESQG, WI ERP
Mid City Foundry Co 1521 Bruce St	Approximately 1010 feet / northwest	FINDS, SHWIMS, BRRTS, MANIFEST, RCRA-CESQG
Muchl Roy Universal Joint Svc 1015 W National Ave	Approximately 1060 feet / east	FINDS, RCRA-NonGen
(No Facility Given) 1500 W Bruce	Approximately 1080 feet / northwest	UST
(No Facility Given) 701-711 S Cesar E Chavez Dr	Approximately 1080 feet / west-northwest	UST
(No Facility Given) 1003 W National Ave	Approximately 1100 feet / east	UST
Debelak Plumbing Property 1102 W Bruce St	Approximately 1110 feet / northeast	BRRTS, BROWNFIELDS
Milwaukee Radiator Repair Inc 701 S 16th	Approximately 1110 feet / west-northwest	FINDS, SHWIMS, LUST, RCRA-CESQG
National Drycleaning 1000 W National Ave	Approximately 1110 feet / east	FINDS, SHWIMS, RCRA-CESQG
Debelak Bros Inc (Former) 1100 W Bruce St	Approximately 1120 feet / northeast	UST, FINDS, SHWIMS, RCRA-NonGen
Lakeview Industries Llc Dba Nat L Platin 1565 W Bruce St	Approximately 1160 feet / northwest	UST, RCRA-SQG, FINDS, SPILLS, SHWIMS, MANIFEST
Ricardo & Pepes Auto Repairs (Former) 1614 W National Ave	Approximately 1170 feet / west	UST, LUST, CRS, AUL, WI WRRSER
(No Facility Given) 713 S 10th St	Approximately 1180 feet / east-northeast	UST
Law Tanning Co Ltd 1616 W Pierce St	Approximately 1250 feet / west-northwest	FINDS, AIRS, SHWIMS, MANIFEST, RCRA-CESQG
Blackhawk Leather Llc 1000 W Bruce St	Approximately 1270 feet / northeast	FINDS, RCRA-NonGen
1000 W Bruce St 1000 W Bruce St	Approximately 1270 feet / northeast	SPILLS, BRRTS, CRS, AUL, WI ERP
(No Facility Given) 550 S Muskego Ave	Approximately 1290 feet / northwest	UST
(No Facility Given) 1035 W Bruce St	Approximately 1290 feet / northeast	UST
Square D Co 1033 W Bruce St	Approximately 1290 feet / northeast	UST, SHWIMS, RCRA-NonGen
Square D Co - W Bruce - Milwaukee 1033 W Bruce St	Approximately 1290 feet / northeast	FINDS, RCRA-NonGen
(No Facility Given) 1109 S 16th St	Approximately 1300 feet / southwest	UST

Facility Name and Location	Estimated Distance/Direction/Gradient	Database Listings
Van Collision And Alteration Inc 938 W National Ave	Approximately 1360 feet / east	FINDS, SHWIMS, BRRTS, MANIFEST, RCRA-CESQG, BROWNFIELDS
Dental Assoc Of Milwaukee 1135 S 16th St	Approximately 1370 feet / southwest	LUST, WI WRRSER
Bp Station Walkers Point 902 W National Ave	Approximately 1480 feet / east	LUST
Eagle Metal Finishing Llc 919 W Pierce St	Approximately 1490 feet / east-northeast	SHWIMS, CRS, AUL, WI ERP
Pemper Engineering 1715 W Pierce	Approximately 1530 feet / west-northwest	UST, FINDS, SHWIMS, LUST, CRS, AUL, RCRA-CESQG
Ndc Megamart/Wenninger 1717 W Pierce St	Approximately 1530 feet / west-northwest	LUST, CRS, AUL, WI WRRSER
Wenningers 1728 W National Ave	Approximately 1550 feet / west	FINDS, SHWIMS, LUST, RCRA-NonGen
Ndc Inc/Mega Marts 1738 W National Ave	Approximately 1570 feet / west	LUST
Pabst Brewery Block 6 North 1245 N 11th St	Approximately 1570 feet / south-southeast	LUST, AUL
Gilberts Property 1740 W Pierce St	Approximately 1600 feet / west-northwest	BRRTS, CRS, AUL, WI ERP
Mandella Box Co 929 W Bruce St	Approximately 1620 feet / east-northeast	LUST
Centrede La Comunidad Unida 1028 S 9th St	Approximately 1660 feet / east-southeast	WI ERP
Prop Shop 902 W Bruce St	Approximately 1660 feet / east-northeast	LUST, WI WRRSER
Value Village 1828 W National Ave	Approximately 1810 feet / west	LUST, WI WRRSER
International Harvestor Cyanide Pits 1714 Bruce St	Approximately 1810 feet / west-northwest	CERC-NFRAP, BRRTS
M & T Self Serv 1831 National Ave	Approximately 1810 feet / west	UST, SPILLS, SHWIMS, LUST, CRS, AUL
City Oil Co 840 W Virginia	Approximately 1830 feet / east-northeast	UST, FINDS, SPILLS, SHWIMS, LUST, RCRA-NonGen
Pabst Brewery Block 4 South 1233 N 9th St	Approximately 2040 feet / southeast	LUST, AUL, WI ERP
Block Property 925 S 19th St	Approximately 2050 feet / west	LUST
Open Pantry Gas Station - Former 1110 W Greenfield Ave	Approximately 2060 feet / south-southeast	LUST, CRS, AUL
J & M Carpet Cleaning 1111 W Greenfield Ave	Approximately 2070 feet / south-southeast	SHWIMS, LUST
Wi Dot Garza Site 743 W Bruce St	Approximately 2070 feet / east-northeast	WI ERP

Facility Name and Location	Estimated Distance/Direction/Gradient	Database Listings
Best Properties 1924 W National Ave	Approximately 2130 feet / west	FINDS, SHWIMS, LUST, CRS, AUL, RCRA-NonGen
Didion Grains 335 S Emmber Ln	Approximately 2170 feet / north-northwest	WI ERP
Interstate Brands Corp 1823 W Pierce St	Approximately 2170 feet / west-northwest	FINDS, SHWIMS, LUST, CRS, AUL, RCRA-CESQG
N D C Inc Mega Marts 1835 W Pierce St	Approximately 2190 feet / west-northwest	SPILLS, LUST
Apartment Bldg 718 S 7th St	Approximately 2280 feet / east-northeast	LUST
Wi Dot Klein Property 754 W Virginia St	Approximately 2290 feet / east-northeast	WI ERP
Clark Oil Station 29 1418 S Muskego Ave	Approximately 2310 feet / south-southwest	FINDS, SHWIMS, LUST, RCRA-CESQG, FINANCIAL ASSUR, WI WRRSER
Speedway 4027 907 W Greenfield Ave	Approximately 2470 feet / southeast	FINDS, SPILLS, LUST, MANIFEST, RCRA-CESQG, FINANCIAL ASSUR
Milwaukee Cty Fire Dept Engine #12 1400 S 9th St	Approximately 2490 feet / southeast	SPILLS, SHWIMS, LUST, FINANCIAL ASSUR
Burnham Canal - Miller Compressing Compa 1640 W Bruce Street	Approximately 2510 feet / west-northwest	CERCLIS
Miller Compressing Co 1640 W Bruce St	Approximately 2510 feet / west-northwest	RCRA-SQG, FINDS, SPILLS, SHWIMS, LUST, MANIFEST, CRS, AUL, PADS, WI ERP, SWRCY
West Grand Corpmer - Former 630 -640 W National Ave	Approximately 2520 feet / east	LUST, AUL
P&V Atlas Corp 647 W Virginia St	Approximately 2550 feet / east-northeast	SHWIMS, LUST
R&M Petroleum 1801 W Greenfield Ave	Approximately 2550 feet / southwest	SHWIMS, LUST, CRS, AUL, FINANCIAL ASSUR
Wi Dot Esperanza 611 W National Ave	Approximately 2590 feet / east	SHWIMS, LUST, WI WRRSER
Aldrich Chemical Co Inc 230 S Emmber Ln	Approximately 2610 feet / north-northwest	CORRACTS, RCRA-LQG, FINDS, SPILLS, MANIFEST, RCRA-TSDF
612 W Pierce St 612 W Pierce St	Approximately 2620 feet / east-northeast	BRRTS, BROWNFIELDS, WI ERP
Wi Dot-Aldrich Chemical Co Inc (Former) 940 W St Paul Avenue	Approximately 4670 feet / north-northeast	CERC-NFRAP, CORRACTS, FINDS, SHWIMS, MANIFEST, RCRA-TSDF, TSCA, RCRA-NonGen

Facility Name and Location	Estimated Distance/Direction/Gradient	Database Listings
Hydrite Chemical Co 229 East National Avenue	Approximately 5100 feet / east	CORRACTS, FINDS, RCRA-NonGen

Esperanza Unida (1329 W National Ave)
(RCRA-CESQG, FINDS, MANIFEST, SHWIMS, EDR Historical Auto Station) The subject site is listed in the database report as a Conditionally Exempt Small Quantity Generator (CESQG), meaning it generates 100 kg or less of hazardous waste per calendar month. Based on the database report, the facility has not received notices of violations related to RCRA activity. The FINDS, MANIFEST, and SHWIMS listings appear to be related to the RCRA activity at the facility. The site is also listed in the database report as an EDR Historical Auto Repair and Service Center. Based on the database report, automobile repair and service operations were conducted at the site in 1935, 1941, 1947, 1970, 1988, and 1993. As noted in Section 3.12, based on the historical use of the site as an automobile repair and service facility, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exists; therefore, the historical use of the site is considered a REC.

Great Lakes Printing Of Wi (1419 W National Ave)
(RCRA-CESQG, FINDS, SHWIMS) This facility adjoins the site to the west across the South 14th Street right-of-way and is topographically cross-gradient from the site. The facility is classified as a Conditionally Exempt Small Quantity Generator (CESQG), meaning it generates 100 kg or less of hazardous waste per calendar month. Based on the database report, the facility has not received notices of violations related to RCRA activity. The FINDS and SHWIMS listings appear to be related to the RCRA-CESQG facility listing. This property is related to the former Ott Property (discussed below) in that this property's current address is 807 South 14th Street.

Ott Property (Former) (807 S 14th St)
(UST, LUST, AUL) This facility adjoins the site to the west across the South 14th Street right-of-way and is topographically cross-gradient from the site. A review of the database report indicated that one single-walled 3,000-gallon fuel oil UST is registered as "Closed/Removed" as of October 25, 1999 at this property.

A LUST case file (BRRTS activity number 03-41-255160) for the facility was opened on May 24, 2000 due to reported soil contamination and free product in the groundwater. On September 29, 2011, Terracon reviewed the LUST case file for this property at the WDNR Southeast Region office in Milwaukee, Wisconsin.

Terracon reviewed a May 11, 2007 "Closure Request," that was prepared by GZA GeoEnvironmental, Inc. (GZA). Based on review of the GZA report, an initial investigation was completed in April 1999 to determine if a leaking UST was located at the property. The

initial investigation included collecting soil and groundwater samples in the vicinity of the former fuel oil UST for laboratory analysis. Based on laboratory analysis, soil and groundwater contamination was confirmed. Additional investigation in June 1999 included sampling four additional Geoprobe® borings on the property and two borings at the property to the south to define the extent of the contamination. Based on the investigation, 1,1,1-trichloroethane (TCA) was detected in one of the soil samples from GP-8 (approximately 155 feet to the west of the site) at 120 micrograms per kilogram. This boring was located on the adjoining property to the south of the Ott property. However, GZA stated that "Although a significant concentration, the 1,1,1-TCA is not associated with any impacts on the subject property and is therefore not a significant concern." GZA reported that 1,1,1-TCA was detected in a groundwater sample from GP-8 at 37 micrograms per liter (below the Chapter NR 140 PAL). In October 1999, approximately 400 cubic yards of soil was excavated from the former Ott property, the fuel oil UST was removed, and a 350-gallon UST believed to contain gasoline was removed. Review of the figures for the report indicates that the former USTs were located approximately 150 feet west of the site (across the South 14th Street right-of-way) and the excavation boundary was located approximately 140 feet from the site.

In July 2005 four groundwater monitoring wells were installed in the vicinity of the tanks. Groundwater samples were collected between August 2005 and June 2006. The depth to groundwater appeared to range from approximately 7 to 14 feet below grade and the groundwater flow direction was determined to be to the east (towards the site). GZA then concluded that decreasing trends for the groundwater contaminants (which included petroleum related VOCs primarily) were observed and that no constituents analyzed exceeded the applicable Chapter NR 140 enforcement standard (ES) for the June 22, 2006 monitoring event. Therefore, GZA requested case closure.

On August 28, 2007, the LUST case file was closed by the WDNR. Based on the property's location across the South 14th Street right-of-way, location of the former USTs, the soil excavation area, limited groundwater contamination, and case closure status, the release at this property is not considered a REC. However, a TCA impact identified at the property to the south of the facility was determined not to be from the Ott property. The source and extent of the TCA impact was not defined during the LUST investigation. However, given its distance from the site, the TCA is not anticipated to impact the site.

Astronautics Corp (1426 W National Ave)
(RCRA-SQG, FINDS, MANIFEST, SHWIMS, FTTS, HIST FTTS) This facility adjoins the site to the northwest across the West National Avenue right-of-way and is topographically down-gradient from the site. The facility is classified as a Small Quantity Generator (SQG), meaning it generates more than 100 kg but less than 1,000 kg of hazardous waste per calendar month. Based on the database report, the facility has not received notices of violations related to RCRA activity. The FINDS, MANIFEST, SHWIMS, FTTS, and HIST FTTS listings appear to be related to the RCRA activity at this facility. Review of the historical city directories (see Section 3.3) indicates that a manufacturing facility and

electrical contractor were located at this property from approximately 1921 though present times. Based on its proximity to the site and length of time the manufacturing facility has been in operation, a spill/release of petroleum products and/or hazardous substances at this property could impact the site; therefore, this facility is considered a REC to the site.

Siladi Inc (1334 W National Ave)
(RCRA-NonGen, FINDS) This facility adjoins the site to the north across the West National Avenue right-of-way and is topographically down-gradient from the site. The facility is classified as a NonGen, meaning it does not presently generate hazardous waste. Based on the database report, the facility has not received notices of violations related to RCRA activity. The FINDS listing appears to be related to the RCRA- NonGen facility listing. This facility is further discussed below (Milwaukee Sausage Co).

Milwaukee Sausage Co (1334 W National Ave)
(UST, LUST, SHWIMS, WI WRRSER) This facility adjoins the site to the north across the West National Avenue right-of-way and is topographically down-gradient from the site. A review of the database report indicated that two single-walled 4,000-gallon fuel oil USTs are registered as "Closed/Removed" as of March 30, 1995 at this property.

A LUST case file (BRRTS activity number 03-41-003774) for the facility was opened on November 12, 1993 due to reported soil and free product groundwater contamination. On September 29, 2011, Terracon reviewed the LUST case file at the WDNR Southeast Region office in Milwaukee, Wisconsin. Review of the case file indicated that a 5,000-gallon fuel oil tank and a 4,000-gallon fuel oil tank were removed from the property.

Terracon reviewed a 1994 "Request for Closure," that was prepared by Environmental Audits, Inc. (Environmental Audits). Based on review of the Environmental Audits report, soil and groundwater contamination was discovered at the property during a March 1993 investigation. Two fuel oil USTs were removed in March 1994 and contaminated soil was noted. Closure assessment soil sampling/analysis was conducted after the fuel oil USTs were removed. Based on the laboratory analysis, a fuel oil release was confirmed. Environmental Audits then concluded that since the tanks were located in a narrow area, access to the contaminated soil was limited; therefore due to this and "economical issues" they requested that the case file be closed.

The case file also contained a February 3, 1998 letter report for the property that was prepared by Environmental Audits. Based on review of the report, three groundwater monitoring wells were installed at the property in 1996. Free product was detected in MW-3 in 1996. Therefore, MW-3 was converted into a four-inch diameter product recovery well and a passive skimmer was installed in the well. This well was located on the north end of this property and approximately 235 feet north of the site. Environmental Audits collected groundwater samples from MW-1 and MW-2 for laboratory analysis. Environmental Audits reported that "The results indicate that all parameters are below detection or Preventative

(sic) Action Levels (PAL) established under NR 140. Consequently, we can conclude that the contaminant plume has not migrated within the site and should not be a threat to migrate offsite." Groundwater elevation and flow direction was not provided in the letter report. Environmental Audits then recommended that free product recovery should continue until a 0.125" sheen level is reached. Environmental Audits recommended that once the level was reached, additional investigation to determine the residual soil contamination levels should be conducted.

Terracon reviewed a January 29, 2002 report titled, "An Underground Storage Tank Removal Assessment," that was prepared by Dakota Intertek Corp. (Dakota). Based on review of the report, in August 2001 Dakota excavated and removed the remaining contaminated soil from the property and collect confirmation soil samples from the tank pit. The size of the excavation or the amount of soil removed was not provided. Review of the figures for the report indicates that the former USTs were located approximately 160 feet from the site and the excavation boundary was located approximately 150 feet from the site. Dakota then concluded, "Based on field observations and soil chemical analysis results, no release has occurred since the fuel oil tanks were initially removed. Based on our visual inspection, we believe that the fuel oil release was associated with the former USTs previously located on the subject property." Dakota then recommended closure.

Terracon finally reviewed a March 7, 2002 letter report titled, "Milwaukee Sausage Co," that was prepared by Dakota. In the letter report, Dakota provided the laboratory results for a March 2002 groundwater sampling event. Review of the results indicates that contaminants were not detected in the monitoring well located closest to the site (Well #3). As noted earlier, this well was located approximately 100 feet from the site. Select parts from the reports are included in Appendix C.

On June 4, 2002, the LUST case file was closed by the WDNR. Based on the property's location across the West National Avenue right-of-way, location of the former USTs, the soil excavation area, and case closure status, the fuel oil release at this property is not considered a REC.

Fred's Auto And Body Repair (1310 W National Ave)
(RCRA-NonGen, FINDS) This facility adjoins the site to the north across the West National Avenue right-of-way and is topographically down-gradient from the site. The facility is classified as a NonGen, meaning it does not presently generate hazardous waste. A review of the database report indicated that RCRA violations related to general hazardous waste requirements were reported in 2004 for this facility. The violations were corrected and compliance was achieved in 2007. Review of the historical city directories (see Section 3.3) indicates that a used car dealership and an automobile repair facility were located at this property from approximately 1940 though present times. Based on the proximity to the site and length of time the facility has been in operation, a spill/release of petroleum products

and/or hazardous substances at this property could impact the site; therefore, this facility is considered a REC to the site.

Hetrick Painting (1223 W National Ave)
(RCRA-NonGen, FINDS, UST) This facility is located approximately 130 feet to the east of the site and is topographically cross-gradient from the site. The facility is classified as a NonGen, meaning it does not presently generate hazardous waste. Based on the database report, the facility has not received notices of violations related to RCRA activity. The FINDS listing appears to be related to the RCRA- NonGen facility listing. A review of the database report indicated that one single-walled 2,000-gallon fuel oil UST is registered as "Closed/Removed" as of September 21, 1999 at this property. This facility is not listed in the records used to track reported spills/releases of petroleum products and/or hazardous substances. Based on the topographically cross-gradient position relative to the site, distance from the site, and since there are no reported RCRA violations or spills/releases, this facility is not considered a REC.

Remaining Facilities
The remaining facilities listed do not appear to represent RECs to the site at this time based upon their regulatory status, apparent topographic gradient, and/or relative distance from the site. In addition, as generally interpreted by the WDNR, if a release from an off-site source impacts the site, the site owner would not be responsible for investigation or remediation of the release, provided the conditions outlined in Wisconsin Statute s. 292.13 are met.

Unmapped facilities
Unmapped facilities are those that do not contain sufficient address or location information to evaluate the facility listing locations relative to the site. The database report contained multiple listings in the unmapped section. Determining the location of unmapped facilities is beyond the scope of this assessment; however, none of these facilities were identified as the site. These facilities are listed in the database report in Appendix D.

4.2 Local Agency Inquiries

4.2.1 Health Department/Environmental Division

The City of Milwaukee Health Department was contacted regarding environmental records or information indicating environmental concerns for the site. Ms. Raquel Filmanowicz, Health Operations Administrator & Public Records Custodian, indicated that there are no records related to the site.

4.2.2 Fire Department

Terracon contacted the City of Milwaukee Fire Department for records of any responses to spills, dumping incidents, or potential environmental concerns at the site. Ms. Amanda Lanaghan, of the fire department, indicated that there are no records related to the site.

4.2.3 Building Permit/Inspection Department

Terracon reviewed records for the site at the City of Milwaukee Department of City Development. See Section 3.8 for information regarding building permits.

4.2.4 Local/Regional Pollution Control Agency

The WDNR, DSPS, and EPA are the primary agencies that regulate the use, storage, and disposal of petroleum products and/or hazardous substances in Wisconsin. The environmental database report provided by EDR (discussed in Section 4.1) was generated through their research of databases maintained by the WDNR, DSPS (formerly Dept. of Commerce), and EPA for facilities that are subject to pollution control. The site was listed in the environmental database report and is further discussed in Section 4.1.

4.3 Records Review Summary

The subject site is listed in the database report as a Conditionally Exempt Small Quantity Generator (CESQG), meaning it generates 100 kg or less of hazardous waste per calendar month. The site is also listed in the database report as an EDR Historical Auto Repair and Service Center. Based on the historical use of the site as an automobile repair and service facility, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exists; therefore, the historical use of the site is considered a REC.

The facility adjoining the site to the northwest across the West National Avenue was a manufacturing facility from approximately 1921 though present times. The facility adjoining the site to the north across the West National Avenue was a used car dealership and an automobile repair facility from approximately 1940 though present times. Based on the proximity to the site and length of time these facilities have been in operation, a spill/release of petroleum products and/or hazardous substances at these properties could impact the site; therefore, these facilities are considered RECs to the site. However, as generally interpreted by the WDNR, if a release from an off-site source impacts the site, the site owner would not be responsible for investigation or remediation of the release, provided the conditions outlined in Wisconsin Statute s. 292.13 are met.

Other adjoining properties and area properties were identified within the ASTM-specified search radii within the database report. However, based upon their regulatory status, location of residual contamination, apparent topographic gradient, and/or relative distance from the site, activities at these properties are not considered RECs to the site.

5.0 SITE RECONNAISSANCE

5.1 General Site Information

Information contained in this section is based on a visual reconnaissance conducted while walking through the site and the accessible interior areas of structures, if any, located on the site. Figure 2 in Appendix A is a diagram of the site. Photo documentation of the site at the time of the visual reconnaissance is provided in Appendix E. Credentials of the individuals planning and conducting the site visit are included in Appendix F.

General Site Information

Site Reconnaissance	
Field Personnel	Andrew G. Cawrse
Reconnaissance Date	October 6, 2011
Weather Conditions	Sunny, 75 degrees Fahrenheit
Site Contact/Title	Mr. Robert Miranda / Executive Director for Esperanza Unida
Site Description	
Site Name	Training Center
Site Location/Address	1313 and 1329-1331 West National Avenue, Milwaukee, Milwaukee County, Wisconsin
Land Area	Approximately 1.6 acres
Site Improvements	One approximately 30,000 square-foot building (with a basement) and one approximately 4,200 square-foot building (slab-on-grade). Other improvements include a parking area and utilities.
Zoning	LB2; Local Business
Site Topographic Relief	The topographic gradient generally slopes to the north.

Building Description

Building Identification	*Building Use*	*Approx. Construction Date*	*Number of Stories*	*Approx. Size (ft²)*
Training Center	Office, automobile repair	1928 (with multiple additions)	1	30,000
Garage	Dumpster repair and fabrication	1996	1	4,200

Site Utilities	
Electricity	We Energies
Drinking Water	City of Milwaukee
Wastewater	Milwaukee Metropolitan Sewerage District
Natural Gas	We Energies

5.2 General Description of Site, Occupants, and Operations

The site consists of approximately 1.6 acres of land improved with one approximately 30,000 square-foot one-story building that was constructed in approximately 1928 with multiple additions over time. In general, the building was observed to be in fair to poor condition. A section of the metal roof located in the training/storage area was damaged (fist-sized hole) and water intrusion in this area was observed. Drop ceiling tiles were missing and/or damaged in the office area. Reportedly, the basement areas beneath the training/storage area and office area are prone to flooding after significant rainfall events. Office space and training areas/class rooms are located in the western portion of the building. According to Mr. John Anderson, Associate Director, a printing operation also was located in the western portion of the building, but the operation was recently shut down. Automobile repair training areas, automobile repair areas, welding training areas, and storage areas are located in the remaining portions of the building. Basement areas located under the eastern and western portions of the building are used for storage. A mezzanine (used for storage) is located in the automobile repair portion of the building. In addition, an approximately 4,200 square-foot one-story garage (slab-on-grade) that was constructed in approximately 1996 is located in the southern portion of the site. The garage has a paint booth and is currently used to repair and fabricate dumpsters. Parking areas are located in the northeastern and southwestern portions of the site.

5.3 Site Observations

The following table summarizes site observations and interviews. Affirmative responses (designated by an "X") are discussed in more detail following the table.

Site Characteristics

Category	Item or Feature	Observed
Site Operations, Processes, and Equipment	Emergency generators	
	Elevators	X
	Air compressors	X
	Hydraulic lifts	
	Dry cleaning	
	Photo processing	
	Laboratory hoods and/or incinerators	
	Waste treatment systems and/or water treatment systems	
	Heating and/or cooling systems	X
	Other processes or equipment	X
Aboveground Chemical or Waste Storage	Aboveground storage tanks	X
	Drums, barrels and/or containers ≥ 5 gallons	
	MSDS	
Underground Chemical or Waste	Underground storage tanks or ancillary UST equipment	X
	Sumps, cisterns, catch basins and/or dry wells	X

Category	Item or Feature	Observed
Storage, Drainage or Collection Systems	Grease traps	
	Septic tanks and/or leach fields	
	Oil/water separators	
	Pipeline markers	
	Interior floor drains	X
Electrical Transformers/ PCBs	Pad or pole mounted transformers and/or capacitors	X
	Other equipment	
Releases or Potential Releases	Stressed vegetation	
	Stained soil	
	Stained pavement or similar surface	X
	Leachate and/or waste seeps	
	Trash, debris and/or other waste materials	
	Dumping or disposal areas	
	Construction/demolition debris and/or dumped fill dirt	
	Surface water discoloration, odor, sheen, and/or free floating product	
	Strong, pungent or noxious odors	
	Exterior pipe discharges and/or other effluent discharges	
Other Notable Site Features	Surface water bodies	
	Quarries or pits	
	Wells	

Site Operations, Processes, and Equipment

Air compressors

Terracon observed two air compressors in the basement located in the eastern portion of the building. There appeared to be staining on the concrete floor and block wall around one of the compressors located in the basement. No floor drains were observed near this compressor and the concrete floor was in generally good condition. No obvious staining was observed on the concrete floor beneath the other compressor (also located in the basement).

Hydraulic lifts

Terracon observed aboveground hydraulic lifts in the service/training area of the building. Mr. John Anderson, the Associate Director, indicated that there are no in-ground hydraulic components for the lifts. No indication of staining, odors, or leaks were observed around the lifts. In addition, a tire rim clamp was observed in the training area. Staining was observed on the concrete floor around the rim clamp.

Heating and/or cooling systems

HVAC related equipment including a forced air natural gas fueled furnace was observed on the site. No leaks or spills were observed around the heating system. In addition, a large boiler was observed in the basement located in the eastern portion of the site. Mr. John

Anderson, the Associate Director, indicated that the boiler was coal-fired and that it is no longer in use.

Other processes or equipment

A paint spray booth was observed in the garage located in the southern portion of site. The floor of the booth was in good condition and no drains were observed in the spray booth area. Mr. Anderson stated that the used paint booth filters are not stored at the site and are periodically disposed off-site when necessary. No staining was observed on the exterior building wall or ground near the paint booth vent located on the northern portion of the building.

Aboveground Chemical or Waste Storage

Aboveground storage tanks

Two approximately 100-gallon ASTs containing petroleum product were observed in the service area located in the eastern portion of the building. Staining was observed on the concrete floor around the ASTs located in the service area. The staining appeared to be of *de minimis* status with no significant stains near floor drains or cracks.

Drums, barrels and/or containers ≥ 5 gallons

Terracon observed four 55-gallon drums of petroleum product stored on the concrete floor in the service/training area. In addition, one full tray of oil was observed in the training area. *De minimis* staining was observed around the drums and tray. No floor drains or cracks were observed near the drums and tray. In addition, multiple small containers of paint were observed in the basement in the western portion of the building. No spills or stains were observed around the containers.

Underground Chemical or Waste Storage, Drainage or Collection Systems

Underground storage tanks or ancillary UST equipment

Terracon observed a fill port and vent pipe for a UST located outside of the northeast corner of the building. The asphalt pavement around the fill port was heavily stained. Mr. Robert Miranda, the site contact, stated that he does not know the size of the UST. Terracon reviewed the storage tank database, maintained by the DSPS, for potential information related to the UST. Based on the review, no information for the site was listed in the records. Mr. Miranda stated that the UST is used to store waste oil and that it is periodically pumped out once it is full. He indicated that he is unaware of spills or releases related to the UST.

Terracon did not observe evidence of the 6,000-gallon #2 fuel oil UST that was reportedly abandoned in-place at the site. However, review of the available records indicates that the fuel oil tank was located in approximately the same location as the waste oil UST. In addition, Mr. John Anderson, the Associate Director, and Mr. Miranda were not aware of additional tanks at the site. There is no other information available regarding the fuel oil UST. A spill/release of petroleum products and/or hazardous substances from the waste oil

and fuel oil USTs could impact the site; therefore, the USTs are considered a REC to the site.

Sumps, cisterns, catch basins and/or dry wells
Terracon observed a sump in the basement in the eastern portion of the site. Terracon did not observe staining or detect odors near the sump. No petroleum products and/or hazardous substances were stored near the sump.

Interior floor drains
Terracon observed multiple floor drains in the office and service/training area of the main on-site building. A trench drain was also observed in the service area. In addition, one drain was observed in the garage used to repair and fabricate dumpsters located in the southern portion of the site. Terracon did observe small amount of staining around the trench drain as well as larger stains around the drain located in the garage. Reportedly, the drains are connected to the sanitary sewer system.

Electrical Transformers/ PCBs

Pad or pole mounted transformers and/or capacitors
Two pole-mounted transformers were observed in the central portion of the site. However, no information with regard to PCB content of the transformer fluids was observed. Transformers contain mineral oil which may contain minor amounts of PCB and could be considered "PCB contaminated" (PCB content of 50-499 ppm).

We Energies maintains responsibility for the transformers, and if the transformers were "PCB contaminated," the utility company is not required to replace the transformers fluids until a release is identified. No evidence of an existing or prior release was observed on or near the transformers or ground surfaces during the site reconnaissance.

Releases or Potential Releases

Stained pavement or similar surfaces
Staining was observed on the concrete floors in the service area and training areas of the building as well as on the floor of the garage located in the southern portion of the site. Staining was also observed in the parking lot and around the fill pipe for the UST (discussed above). The majority of the staining appeared to be of *de minimis* status; however, there were areas of larger staining around some drains. Based on the age of the service building, leaks from the drains could impact the subsurface. Therefore, the floor drain systems are considered a REC.

5.4 Interviews Conducted During Visual Reconnaissance

Terracon was accompanied by Mr. John Anderson, the Associate Director, during the site reconnaissance. See Section 3.10 for information regarding the interview with Mr. Anderson.

5.5 Site Reconnaissance Summary

During the site reconnaissance, air compressors, above ground hydraulic lifts, HVAC related equipment, a paint spray booth, two ASTs containing petroleum product, 55-gallon drums of petroleum product, one tray containing petroleum product, small paint containers, a waste oil UST fill port and vent pipe, a sump, multiple floor drains and a trench floor drains, two pole-mounted transformers, *de minimis* staining, and larger areas of staining around the UST fill port and floor drain located in the garage were observed. Reportedly, a 6,000-gallon #2 fuel oil UST was abandoned in-place at the site. No evidence of the UST was observed during the reconnaissance; however, records review indicates that the tank was located in approximately the same location as the waste oil UST. Leaks from the floor drains and/or a spill/release of petroleum products and/or hazardous substances from the waste oil and fuel oil USTs could impact the site; therefore, the floor drains and USTs are considered RECs to the site.

6.0 ADJOINING PROPERTY RECONNAISSANCE

Visual observations of adjoining properties (from site boundaries) are summarized below.

Adjoining Properties

Direction	Description
North	Fred's Auto Repair, Recovery Network, Farm Country Smokehouse, an Astronautics Corporation of America
East	Apartments and residences
South	A school
West	Latino Community Center and residences

The adjoining properties consist of an automobile repair facility, an office, a smokehouse, a manufacturing facility, school, an apartment, and residences. Fred's Auto Repair (1306-1310 West National Avenue), the Farm Country Smokehouse property (1334 West National Avenue), and Astronautics Corporation of America (1400-1426 West National Avenue) to the north are further discussed in Section 4.1.

7.0 ADDITIONAL SERVICES

Per the agreed scope of services specified in the proposal, the following additional services (e.g., asbestos sampling, lead-based paint sampling, wetlands evaluation, lead in drinking water testing, radon testing, etc.) were conducted.

7.1 Limited Visual Observations for Asbestos

Pursuant to the client's request and in conjunction with the site reconnaissance, Terracon visually assessed the exterior and the accessible interior areas of the on-site buildings for suspect ACM. The limited visual observations were performed by Andrew G. Cawrse, an AHERA-accredited asbestos inspector (Certification No. AII-126079). No samples of suspect ACM were collected or analyzed as part of the observations. The visual observations for suspect ACM were restricted to readily visible and accessible building materials. Since the main building was initially constructed in approximately 1928, ACM may be present. The following suspect ACM was observed: dry wall systems, caulking, ceiling tiles, cove base, pipe wrap, and floor tiles and mastic. These materials were in moderate to poor condition with some damaged materials observed in the following areas: the office area had multiple various size areas with missing or damaged ceiling tiles reportedly due to water intrusion. In addition approximately two square feet of damaged floor tile and approximately four square feet of damaged dry wall were observed in a bathroom located in the training/storage area.

Limited visual observations for asbestos is not intended to serve as a comprehensive building asbestos survey, comprehensive inspection or comprehensive assessment for the presence of ACM in all or most of the building systems, nor will it serve to adequately assess the presence of ACM in a building or portions thereof for pre-demolition or pre-renovation purposes. Terracon recommends conducting a thorough asbestos survey prior to disturbance of suspect ACM during planned renovations or building demolition.

7.2 Limited Visual Observations for Mold

Pursuant to the client's request and in conjunction with the site reconnaissance, Terracon observed the exterior and the accessible interior areas of the on-site buildings for visual evidence of water infiltration and suspect mold growth. The observations included visibly accessible surfaces in the building areas visited, and did not include observations of hidden conditions such as inaccessible areas, interior of wall cavities, interior of heating, ventilation and air conditioning (HVAC) systems, or behind intact wall coverings.

The source of excess moisture is typically related to leaky plumbing or roofing, but can also involve the building's HVAC system. When excess moisture accumulates in buildings, mold growth will often occur. In the presence of sufficient moisture, different molds can grow on wood, paper, carpet, or insulating materials. Molds reproduce through spores that cannot be seen with the naked eye. When they settle on damp indoor surfaces, active mold growth can begin. Moisture control is the key to controlling mold growth in indoor environments.

Mold growth was observed in one of the rooms in the office area at the time of the site reconnaissance. The mold was observed on the wall and covered an area of approximately six square feet.

Terracon observed indications of water infiltration including water stains in the office areas and basements at the time of the site reconnaissance. In addition, a hole in the ceiling in the training/storage area was also observed and is a potential source for water infiltration. While not observed during the site reconnaissance, according to Mr. John Anderson, the Associate Director, the basement areas beneath the training/storage area are prone to flooding after significant rainfall events. Indication of water intrusion was also observed in the basement beneath the office area.

7.3 Limited Radon Records Review

Radon is a naturally occurring radioactive gas produced through the natural decay of uranium to stable lead. It is odorless, tasteless, and invisible. Elevated concentrations of radon can be found in soils and rocks containing uranium, granite, shale, phosphate, and pitchblende. Locations of these materials are highly unpredictable. Elevated levels of radon may also be found in soils containing certain types of industrial wastes, such as the by-products from uranium or phosphate mining. Radon can accumulate inside structures at concentrations that may pose risks to human health. Indoor radon levels are influenced by building construction and the concentration of radon in the underlying soil.

Pursuant to the client's request, Terracon reviewed Radon Zone Map for Wisconsin prepared by U.S. EPA and the U.S. Geological Survey to identify the site location in terms of potential for average indoor radon concentrations. The study indicated the site is located in EPA Zone 2, which has a predicted average indoor screening level between 2 and 4 pCi/L. The EPA recommends a guideline action level of 4.0 pCi/L for annual average indoor radon concentrations in residential properties. The action level is based on an exposure of 18 hours per day for 40 years. According to a U.S. Department of Energy environmental assessment, radon is much less of a concern in commercial buildings than in residential buildings as these buildings usually have mechanical ventilation and occupants are typically not in the buildings as often as they are in their homes. No action level has been established for commercial buildings or occupational exposure.

Based on this information, the site is considered to have a moderate potential for elevated indoor concentrations of radon gas. Testing would be required to evaluate site-specific concentrations of radon gas.

7.4 Limited Lead-Based Paint Survey

Pursuant to the client's request and in conjunction with the site reconnaissance, Terracon visually assessed the accessible interior areas and exterior of the on-site building for potential lead-based paint (LBP). The painted surfaces appeared to be in fair condition; with

some peeling or flaking paint observed. However, no peeling/flaking paint appeared to be accumulating on floor/ground surfaces. Since the main building was constructed in approximately 1928, lead-based paint may be present.

7.5 Limited Wetland Review

Pursuant to the client's request, Terracon reviewed the Milwaukee Quadrangle USGS Topographic Map, Milwaukee County Soil Survey, and WDNR Surface Water Data Viewer (http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=SurfaceWaterViewer.wetlands) to evaluate the documented presence of apparent Waters of the U.S. and jurisdictional wetlands, as defined and regulated by federal authority under 33 CFR Parts 320-330.

The documented presence of apparent Waters of the U.S. or jurisdictional wetlands, as defined and regulated by federal authority under 33 CFR Parts 320-330, were not identified on the site through review of the topographic map, soil survey map, and WDNR Surface Water data viewer. A copy of the WDNR wetlands map is included in Appendix C.

8.0 FINDINGS AND CONCLUSIONS

8.1 Findings

This Phase I ESA was performed in accordance with our proposal dated September 21, 2011, and was conducted consistent with the procedures included in ASTM International (ASTM) E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* The ESA was conducted under the supervision or responsible charge of David G. Jackson, CHMM, environmental professional. Andrew G. Cawrse performed the site reconnaissance on October 6, 2011.

A cursory summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

- The site is located at 1313 and 1329-1331 West National Avenue in Milwaukee, Milwaukee County, Wisconsin. The site consists of approximately 1.6 acres of land improved with one approximately 30,000 square-foot one-story building that was constructed in approximately 1928 with multiple additions over time. In general, the building was observed to be in fair to poor condition. A section of the metal roof located in the training/storage area was damaged (fist-sized hole) and water intrusion in this area was observed. Drop ceiling tiles were missing and/or damaged in the office area. Reportedly, the basement areas beneath the training/storage area and office area are prone to flooding after significant rainfall events. Office space and training areas/class rooms are located in the western portion of the building.

According to Mr. John Anderson, Associate Director, a printing operation also was located in the western portion of the building, but the operation was recently shut down. Automobile repair training areas, automobile repair areas, welding training areas, and storage areas are located in the remaining portions of the building. Basement areas located under the eastern and western portions of the building are used for storage. A mezzanine (used for storage) is located in the automobile repair portion of the building. In addition, an approximately 4,200 square-foot one-story garage (slab-on-grade) that was constructed in approximately 1996 is located in the southern portion of the site. The garage has a paint booth and is currently used to repair and fabricate dumpsters. Parking areas are located in the northeastern and southwestern portions of the site.

- During the site reconnaissance, air compressors, above ground hydraulic lifts, HVAC related equipment, a paint spray booth, two ASTs containing petroleum product, 55-gallon drums of petroleum product, one tray containing petroleum product, small paint containers, a waste oil UST fill port and vent pipe, a sump, multiple floor drains and a trench floor drains, two pole-mounted transformers, *de minimis* staining, and larger areas of staining around the UST fill port and floor drain located in the garage were observed. Reportedly, a 6,000-gallon #2 fuel oil UST was abandoned in-place at the site. No evidence of the UST was observed during the reconnaissance; however, records review indicates that the tank was located in approximately the same location as the waste oil UST. Leaks from the floor drains and/or a spill/release of petroleum products and/or hazardous substances from the waste oil and fuel oil USTs could impact the site; therefore, the floor drains and USTs are considered RECs to the site.

- Based on review of the historical information, the site consisted of dwellings until the current on-site building was constructed in approximately 1928 with multiple additions over time. Review of the historical information indicates that the site was occupied by an automobile sales and service facility in approximately 1930. In addition, a filling station was located at the site from approximately 1930 through 1940. Building permit records note that a gasoline pump and a tank that was removed and replaced with a 6,000 gallon #2 fuel oil UST were historically located at the site. It appears that the fuel oil UST may have been abandoned in place outside of the northeast corner of the building in 1987. However, based on historical records, the fuel oil UST appears to be located in approximately the same location as a current waste oil UST (see Section 5.3). No additional records indicating if the fuel oil UST was abandoned in-place, removed, or converted for waste oil storage were available. Based on the historical use of the site as an automobile repair/service facility and filling station, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exist; therefore, the historical use of the site is considered a REC.

The areas adjoining the site appear to have included residences, a school, and commercial and manufacturing companies. A used car dealership and an

automobile repair facility adjoined the site to the north from approximately 1940 though present times. In addition, a manufacturing facility and electrical contractor have adjoined the site to the northwest from approximately 1921 through present times. A glove manufacturing company, a fertilizer company, machining companies, and a printing company adjoined the site to the west from approximately 1921 through 1996. A steam laundry was located at the property to the east, approximately 130 feet from the site, from approximately 1921 through 1945. This property was also identified as a printing company from approximately 1980 through 1996. These facilities are further discussed in Section 4.1.

- The adjoining properties consist of an automobile repair facility, an office, a smokehouse, a manufacturing facility, school, an apartment, and residences. Fred's Auto Repair (1306-1310 West National Avenue), the Farm Country Smokehouse property (1334 West National Avenue), and Astronautics Corporation of America (1400-1426 West National Avenue) to the north are further discussed in Section 4.1.

- The subject site is listed in the database report as a Conditionally Exempt Small Quantity Generator (CESQG), meaning it generates 100 kg or less of hazardous waste per calendar month. The site is also listed in the database report as an EDR Historical Auto Repair and Service Center. Based on the historical use of the site as an automobile repair and service facility, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exists; therefore, the historical use of the site is considered a REC.

  The facility adjoining the site to the northwest across the West National Avenue was a manufacturing facility from approximately 1921 though present times. The facility adjoining the site to the north across the West National Avenue was a used car dealership and an automobile repair facility from approximately 1940 though present times. Based on the proximity to the site and length of time these facilities have been in operation, a spill/release of petroleum products and/or hazardous substances at these properties could impact the site; therefore, these facilities are considered RECs to the site. However, as generally interpreted by the WDNR, if a release from an off-site source impacts the site, the site owner would not be responsible for investigation or remediation of the release, provided the conditions outlined in Wisconsin Statute s. 292.13 are met.

  Other adjoining properties and area properties were identified within the ASTM-specified search radii within the database report. However, based upon their regulatory status, location of residual contamination, apparent topographic gradient, and/or relative distance from the site, activities at these properties are not considered RECs to the site.

- Previous environmental reports, permits and registrations, or geotechnical reports for the site were not provided by the client to Terracon for review.

- At the client's request Terracon performed additional services at the site, as discussed in Section 7.0 of this report.

8.2 Conclusions

Based on the scope of services, limitations, and findings of this assessment, Terracon identified the following RECs related to the site:

An automobile sales and service facility has occupied the site since approximately 1930. In addition, a filling station was located at the site from approximately 1930 through 1940. A waste oil UST is currently located outside near the northeast corner of the service building at the site. It also appears that a 6,000-gallon #2 fuel oil UST was abandoned in-place at the site in approximately the same location as the waste oil UST. Large areas of staining were observed around the waste oil UST fill port and some floor drains in the service area. Based on the historical use of the site as an automobile repair and service facility and filling station, the potential for spills/releases of petroleum products and/or hazardous substances related to these operations exists. In addition, leaks from the floor drains and/or a spill/release of petroleum products and/or hazardous substances from the waste oil and fuel oil USTs could impact the site; therefore, the floor drains and USTs are considered RECs to the site.

Facilities to the north and northwest were historically used for manufacturing and automobile repair. Based on their proximity to the site and length of time these facilities have been in operation, a spill/release of petroleum products and/or hazardous substances at these properties could impact the site. However, as generally interpreted by the WDNR, if a release from an off-site source impacts the site, the site owner would not be responsible for investigation or remediation of the release, provided the conditions outlined in Wisconsin Statute s. 292.13 are met.

9.0 DECLARATION

I, David G. Jackson, CHMM, declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312; and I have the specific qualifications based on education, training, and experience to assess a site of the nature, history, and setting of the subject site. I have developed and performed the All Appropriate Inquiries in conformance with the standards and practice set forth in 40 CFR Part 312.