**Table 1a**
**Soil Sample Analytical Results**
**Tower Standard**
**Lac du Flambeau, Wisconsin**

| | | Date --> | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Sample ID --> | BH-1 | | BH-2 | | BH-3 | | BH-4 | | BH-5 | | BH-6 | | BH-7 | | BH-7 | | BH-8 | |
| | | Sample Depth (Feet) --> | 2-4 | 7-8 | 2-4 | 7-8 | 2-4 | 7-8 | 1-2 | 6-7 | 1-2 | 6-7 | 1-2 | 6-7 | 1.5-2.5 | 6-7 | 1-2 | 5.5-6.5 | 1.5-2.6 | 5.5-6.7 |
| | | PID Detection Result --> | | | | | | | | | | | | | | | | | | |
| | | Percent Moisture --> | 9.0% | 8.2% | 7.4% | 9.9% | 6.8% | 8.3% | 7.7% | 9.2% | 4.2% | 6.0% | 5.7% | 5.0% | 8.0% | 5.7% | 7.7% | 7.3% | 5.7% | 7.4% |
| **Petroleum VOC's (µg/kg)** | Non-Industrial Not-To-Exceed DC RCL | NR 140 Groundwater Pathway Protection (DF=2) | | | | | | | | | | | | | | | | | | |
| Benzene | 1,490 | 5.1 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Ethylbenzene | 7,470 | 1,570 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Toluene | 818,000 | 1,107 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Xylenes (Total) | 258,000 | 3,940 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 |
| Methly tert Butyl Ether | 59,400 | 27 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| 1,2,4-Trimethylbenzene | 89,800 | NS | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| 1,3,5-Trimethylbenzene | 182,000 | NS | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Trimethylbenzenes (Total) | NS | 1,379 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 |
| Naphthalene | 5,150 | 658.7 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| **Number of Individual Exceedances (DC)-->** | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Cumulative Hazard Index (DC)-->** | | | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 |
| **Cumulative Cancer Risk (DC)-->** | | | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 |

| | | Date --> | 9/14/2015 | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | | 9/14/2015 | 9/14/2015 | 9/14/2015 | 9/15/2015 | | 9/15/2015 | | 9/15/2015 | | 9/15/2015 | 9/15/2015 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Sample ID --> | BH-10 | BH-11 | | BH-12 | | BH-13 | | BH-15 | BH-16 | BH-17 | | BH-18 | | BH-19 | | BH-20 | BH-21 | |
| | | Sample Depth (Feet) --> | 9-9.5 | 1-2 | 8.5-9.0 | 0.5-1.5 | 8.5-9.5 | 1-2 | 8-9 | 0.0-1.5 | 5-6 | 1.5-2.5 | 7-8 | 1-2 | 5.5-6.5 | 5-7 | 7-9 | 5.7 | 1-2 | 6.5-7.5 |
| | | PID Detection Result --> | | | | | | | | | | | | | | | | | | |
| | | Percent Moisture --> | 6.7% | 6.7% | 8.5% | 7.8% | 4.0% | 4.6% | 7.8% | 8.1% | 6.9% | 6.7% | 11.3% | 6.5% | 5.6% | 8.2% | 8.4% | 10.3% | 3.8% | 4.9% |
| **Petroleum VOC's (µg/kg)** | Non-Industrial Not-To-Exceed DC RCL | NR 140 Groundwater Pathway Protection (DF=2) | | | | | | | | | | | | | | | | | | |
| Benzene | 1,490 | 5.1 | < 25 | < 25 | < 25 | *45.1*[J] | *< 125* | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Ethylbenzene | 7,470 | 1,570 | < 25 | < 25 | < 25 | 30.9[J] | 1,380 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | 665 |
| Toluene | 818,000 | 1,107 | < 25 | < 25 | < 25 | 132 | 130[J] | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | 165 |
| Xylenes (Total) | 258,000 | 3,940 | < 50 | < 50 | < 50 | 216.3 | *9,670* | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | 80.0[J] | 3,283 |
| Methly tert Butyl Ether | 59,400 | 27 | < 25 | < 25 | < 25 | < 25 | < 125 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| 1,2,4-Trimethylbenzene | 89,800 | NS | < 25 | < 25 | < 25 | 35.9[J] | 26,100 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | 49.8[J] | 2,810 |
| 1,3,5-Trimethylbenzene | 182,000 | NS | < 25 | < 25 | < 25 | 33.9[J] | 8,300 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | 919 |
| Trimethylbenzenes (Total) | NS | 1,379 | < 50 | < 50 | < 50 | < 50 | *34,400* | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | 49.8[J] | *3,729* |
| Naphthalene | 5,150 | 658.7 | < 25 | < 25 | < 25 | < 25 | ***6,760*** | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | 527 |
| **Number of Individual Exceedances (DC)-->** | | | 0 | 0 | 0 | 0 | **1** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Cumulative Hazard Index (DC)-->** | | | 0.0007 | 0.0007 | 0.0007 | 0.0013 | 0.3496 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0010 | 0.0394 |
| **Cumulative Cancer Risk (DC)-->** | | | 2.5E-08 | 2.5E-08 | 2.5E-08 | 4.0E-08 | 1.6E-06 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.1E-07 |

*Notes:*

NR720 Standards Obtained From WDNR Online Excel Database
RCL - NR 720 Proposed Soil Residual Contaminant Level
DC - Direct Contact
Exceeds Non-Industrial Not-To-Exceed DC RCL — **Bold**
Exceeds NR 140 Groundwater Pathway Protection — *Italic*
NS - No Standard
[J] - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
< - Concentration below listed laboratory detection limit
NA - Not Analyzed

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EPA-R5-2017-010506_0000582

**Table 1b**
**Soil Sample Analytical Results**
**Tower Standard**
**Lac du Flambeau, Wisconsin**

| | | Date --> | 9/15/2015 | | 9/15/2015 | 9/15/2015 | 9/15/2015 | | 9/15/2015 | 9/15/2015 | | 9/15/2015 | | 9/15/2015 | | 9/16/2015 | | 9/16/2015 | 9/16/2015 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Sample ID --> | BH-22 | | BH-23A | BH-23C | BH-24 | | BH-25 | BH-26 | | BH-27 | | BH-28 | | BH-29 | | BH-30 | BH-31 | |
| | | Sample Depth (Feet) --> | 1-2 | 6.5-7.5 | 4.5-5.5 | 6-7 | 1.5-2.5 | 6.5-7.5 | 1-2 | 1-2 | 6-7 | 1.5-2.5 | 6.5-7.5 | 1.5-2.5 | 7-8 | 1-2 | 7-8 | 0.5-1.5 | 1-2 | 6.5-7.5 |
| | | PID Detection Result --> | | | | | | | | | | | | | | | | | | |
| | | Percent Moisture --> | 7.1% | 5.3% | 4.6% | 8.3% | 5.1% | 8.4% | 6.7% | 3.0% | 3.5% | 4.0% | 37.6% | 3.4% | 4.9% | 5.5% | 5.8% | 3.9% | 4.7% | 5.0% |
| **Petroleum VOC's (µg/kg)** | Non-Industrial Not-To-Exceed DC RCL | NR 140 Groundwater Pathway Protection (DF=2) | | | | | | | | | | | | | | | | | | |
| Benzene | 1,490 | 5.1 | 594 | ***3,720[J]*** | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Ethylbenzene | 7,470 | 1,570 | 3,290 | ***87,000*** | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Toluene | 818,000 | 1,107 | 3,750 | ***114,000*** | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Xylenes (Total) | 258,000 | 3,940 | 18,720 | ***443,000*** | < 50 | < 50 | < 50 | < 50 | < 50 | 56.6[J] | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 |
| Methly tert Butyl Ether | 59,400 | 27 | < 25 | < 2,000 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| 1,2,4-Trimethylbenzene | 89,800 | NS | 5,030 | ***206,000*** | < 25 | < 25 | < 25 | < 25 | < 25 | 68.3 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| 1,3,5-Trimethylbenzene | 182,000 | NS | 1,340 | 67,600 | < 25 | < 25 | < 25 | < 25 | < 25 | 35.8[J] | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Trimethylbenzenes (Total) | NS | 1,379 | 6,370 | ***273,600*** | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 | < 50 |
| Naphthalene | 5,150 | 658.7 | 538 | ***35,300*** | < 25 | < 25 | < 25 | < 25 | < 25 | 27.3[J] | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| **Number of Individual Exceedances (DC)-->** | | | 0 | **5** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Cumulative Hazard Index (DC)-->** | | | 0.0885 | 3.1417 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0188 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0007 |
| **Cumulative Cancer Risk (DC)-->** | | | 9.4E-07 | 2.1E-05 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 1.6E-07 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 |

| | | Date --> | 9/16/2015 | | 9/16/2015 | 9/16/2015 | | 9/16/2015 | | 9/16/2015 | 9/16/2015 | | 9/16/2015 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Sample ID --> | BH-32B | | BH-33 | BH-34 | | BH-35B | | BH-36B | BH-37B | | Trip Blank |
| | | Sample Depth (Feet) --> | 0.5-1.0 | 6-7 | 8-9 | 1-2 | 8-9 | 1-2 | 8-9 | 0.5-1.0 | 1-2 | 5.5-6.5 | |
| | | PID Detection Result --> | | | | | | | | | | | |
| | | Percent Moisture --> | 5.6% | 7.2% | 9.1% | 2.8% | 3.4% | 7.1% | 17.9% | 7.9% | 5.2% | 8.4% | |
| **Petroleum VOC's (µg/kg)** | Non-Industrial Not-To-Exceed DC RCL | NR 140 Groundwater Pathway Protection (DF=2) | | | | | | | | | | | |
| Benzene | 1,490 | 5.1 | 56.8 | *< 1,000* | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| Ethylbenzene | 7,470 | 1,570 | 877 | **38,500** | < 25 | < 25 | < 25 | < 25 | 45.4J | < 25 | < 25 | < 25 | < 25 |
| Toluene | 818,000 | 1,107 | 142 | *24,900* | < 25 | < 25 | < 25 | < 25 | 49.3J | < 25 | < 25 | < 25 | < 25 |
| Xylenes (Total) | 258,000 | 3,940 | 3,751 | *226,100* | < 50 | < 50 | < 50 | 56.6[J] | 413 | < 50 | < 50 | < 50 | < 50 |
| Methly tert Butyl Ether | 59,400 | 27 | < 25 | < 1,000 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 |
| 1,2,4-Trimethylbenzene | 89,800 | NS | 1,160 | ***147,000*** | < 25 | < 25 | < 25 | 68.3 | 182 | < 25 | < 25 | < 25 | < 25 |
| 1,3,5-Trimethylbenzene | 182,000 | NS | 652 | 44,200 | < 25 | < 25 | < 25 | 35.8[J] | 128 | < 25 | < 25 | < 25 | < 25 |
| Trimethylbenzenes (Total) | NS | 1,379 | 1,812 | *191,200* | < 50 | < 50 | < 50 | < 50 | 310 | < 50 | < 50 | < 50 | < 50 |
| Naphthalene | 5,150 | 658.7 | < 25 | ***31,900*** | < 25 | < 25 | < 25 | 27.3[J] | 177 | < 25 | < 25 | < 25 | < 25 |
| **Number of Individual Exceedances (DC)-->** | | | 0 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Cumulative Hazard Index (DC)-->** | | | 0.0188 | 2.1401 | 0.0007 | 0.0007 | 0.0007 | 0.0013 | 0.0038 | 0.0007 | 0.0007 | 0.0007 | 0.0007 |
| **Cumulative Cancer Risk (DC)-->** | | | 1.6E-07 | 1.2E-05 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.6E-08 | 5.8E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 | 2.5E-08 |

*Notes:*

NR720 Standards Obtained From WDNR Online Excel Database
RCL - NR 720 Proposed Soil Residual Contaminant Level
DC - Direct Contact
Exceeds Non-Industrial Not-To-Exceed DC RCL — **Bold**
Exceeds NR 140 Groundwater Pathway Protection — *Italic*
NS - No Standard
[J] - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
< - Concentration below listed laboratory detection limit
NA - Not Analyzed

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EPA-R5-2017-010506_0000582

**Table 2**
**Summary of Soil Analytical Results**
**Tower Standard**
**Lac du Flambeau, Wisconsin**

| | | | | |
|---|---|---|---|---|
| | | | Date --> | 9/15/2015 |
| | | | Sample ID --> | BH-23A |
| | | | Sample Depth (Inches) --> | 4.0-4.5 |
| | | | PID Detection Result --> | |
| **PAH Compounds (µg/kg)** | Industrial Not-To-Exceed DC RCL | Non-Industrial Not-To-Exceed DC RCL | NR 140 Groundwater Pathway Protection (DF=2) | |
| Acenaphthene | 3,300,000 | 3,440,000 | NS | < 8.7 |
| Acenaphthylene | NS | NS | NS | < 7.8 |
| Anthracene | 10,000,000 | 17,200,000 | 197,744.2 | < 9.1 |
| Benzo(a)Anthracene | 211 | 148 | NS | < 6.1 |
| Benzo(a)Pyrene | 21.1 | 15 | 470 | < 6.2 |
| Benzo(b)Fluoranthene | 211 | 148 | 480 | < 8.7 |
| Benzo(ghi)Perylene | NS | NS | NS | < 6.7 |
| Benzo(k)Fluoranthene | 2,110 | 1,480 | NS | < 9.7 |
| Chrysene | 21,100 | 14,800 | 145.1 | < 8.1 |
| Dibenzo(a,h)anthracene | 21.1 | 15 | NS | < 6.4 |
| Fluoranthene | 2,200,000 | 2,290,000 | 88,817.9 | < 8.7 |
| Fluorene | 2,200,000 | 2,290,000 | 14,814.8 | < 8.7 |
| Indeno(1,2,3-cd)Pyrene | 211 | 148 | NS | < 6.6 |
| 1-Methyl Naphthalene | 5,310 | 15,600 | NS | < 8.7 |
| 2-Methyl Naphthalene | 220,000 | 229,000 | NS | < 8.7 |
| Naphthalene | 2,600 | 5,150 | 658.7 | < 8.7 |
| Phenanthrene | NS | NS | NS | < 8.7 |
| Pyrene | 1,650,000 | 1,720,000 | 54,472.5 | < 8.7 |
| | | | **Number of Individual Exceedances (DC)-->** | 0 |
| | | | **Cumulative Hazard Index (DC)--** | 0.000 |
| | | | **Cumulative Cancer Risk (DC)--** | 5.9E-07 |

DC - Direct Contact
Exceeds Non-Industrial Not-To-Exceed DC RCL — **Bold**
Exceeds NR 140 Groundwater Pathway Protection — *Italic*
NS - No Standard
[J] - Estimated concentration above themethod detection limit and below the reporting limit.
< - Concentration below listed laboratory detection limit
NA - Not Analyzed

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