

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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February 18, 2000

FID # 267161400
Washington Co.

Mr. Thomas Keenan
Continental Properties Company Inc.
W133 N8569 Executive Parkway
Menomonee Falls, WI 53052

RE: Supplemental Site Investigation Report, Decorah Shopping Center Annex,
1011-1025 South Main Street, West Bend, Wisconsin. Key Project No.
0702007

Dear Mr. Keenan:

This letter is written to acknowledge the receipt and review of the referenced report. Your Consultant, Key Engineering Group Ltd, submitted the report, dated January 18, 2000.

Your Consultant specifically requested the approval of three items which are addressed below.

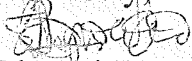
1. Completion of the site investigation: This site investigation appears complete now, *but conditionally* subject to the analytical results meeting ch. NR 140 groundwater standards. In other words, the Remediation and Redevelopment (RR) Section of the Wisconsin Department of Natural Resources (WDNR) reserves future rights to request for any additional investigations if groundwater standards cannot be met within a reasonable period of time. The definition of the degree and extent of contamination in the Randy and Debbie Sternig Residence could have been very useful as MW-5 still appears contaminated.
2. Site-Specific soil standard evaluation: The SSRCL for PCE of 1, 839 ug/kg appears reasonable for the direct contact pathway. However, hot spot removal of soils from zero to at least five and one half foot at the locations of GP- 8, GP-

10, GP-11, GP-12 and GP-4 could have enabled this site to attend groundwater standards in a reasonable time period by reducing long term monitoring. It is always helpful to support the calculation of SSRCL by modeling data, which gives an approximate time to achieve groundwater standards.

3. Strategy to achieve case closure (groundwater monitoring to verify that residual soil impacts do not represent a significant source to groundwater impacts): You need to sample for geochemical parameters which are indicative of the occurrence of natural attenuation. Your Consultant proposed a quarterly groundwater monitoring program for a minimum of one year. Generally, the WDNR recommends two years of natural attenuation for all sites. Notwithstanding, each site's data is evaluated on it's own merit. The WDNR cannot close a site if there are contaminants migration off-site the property boundary (ies). Currently, flexible closure exist of closing sites with deed restrictions and groundwater use restriction, if the groundwater contamination is above enforcement standards by recording groundwater use restriction (s) if the owner (s) opt to or if the owner (s) opt to with adjacent property owners. In any case, the site's data must show that there are conducive conditions for the occurrence of natural attenuation. We are willing to explore flexible closure whenever your Consultant submits a summary of the analytical data for natural attenuation monitoring of this site.

I look forward to working with you to achieve your goals in the dry cleaners program. If you have any questions concerning this letter, please contact me at (414)263-8607

Sincerely,



Binyoti F. Amungwafor
Hydrogeologist

CC: Mr. Curtis M. Hoffart, Key Engineering Group Ltd.
Case File