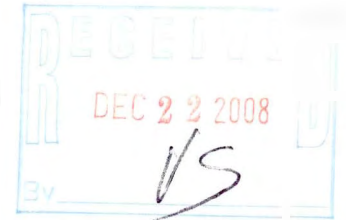




Ms. Victoria Stovall  
Wisconsin Department of Natural Resources  
South East Region Headquarters  
PO Box 12436  
Milwaukee, WI 53212

December 17, 2008  
(1105)

RE: Praefke Brake and Supply, 133 Oak Street, West Bend, Wisconsin 53095  
**FID #267004430 BRRTS#02-67-152445**



Dear Ms. Stovall:

Natural Resource Technology (NRT) is submitting the following letter to summarize current site conditions and a work plan for additional groundwater sampling for the former Praefke Brake and Supply located in West Bend, Wisconsin. In addition, this letter will address the Wisconsin Department of Natural Resources (WDNR) letter dated August 13, 2008 regarding the status of this site and environmental activities that have taken place at the facility. Mr. Gordon Praefke, owner of the subject property, retained NRT as the environmental consultant for the site in March of 2005. NRT is located at 23713 West Paul Road, Pewaukee, Wisconsin 53072. We can be reached at (262) 523-9000.

The results of historic groundwater monitoring suggest that overall, semi-volatile organic compounds of concern (PCP and naphthalene) appear to be stable or decreasing. Volatile organic compound constituents (in wells with detections) also appear to remain stable and/or are declining. No groundwater sampling has been conducted at the site since the February 2007 sampling event; therefore, we are recommending that samples be collected from on and off-site wells to assess current groundwater conditions. NRT will sample select wells including RW-1A, RW-1B, RW-1C, RW-2A, MW-A, MW-2, MW-3, MW-4, MW-D1, MW-D2, MW-H, and MW-3 (Figure 5/Table 1). Monitoring wells MW-6A and MW-G were damaged by snowplows; therefore, groundwater samples cannot be obtained from these wells. Due to the cyclical nature of the known constituents within the groundwater wells, NRT has elected to sample these wells during a seasonal period (February 2009) in which the constituents are typically at their highest concentrations (Appendix A).

The results of the groundwater monitoring suggest that overall, compounds of concern appear to be stable or decreasing; therefore, it is anticipated that following the February 2009 sampling event, sufficient data will have been collected for the purposes of preparing a closure request and a Geographic Information System (GIS) registration package for submittal to the WDNR for the 133 Oak Street facility.

Future site activities will also include the sale of several small residential lots that are located across West Oak Street, directly north of the 133 Oak Street property (Figure 1). These lands are currently developed with a single-family residential structure and an asphalt-paved parking lot that was formerly used by Praefke Brake employees. NRT reviewed historical Sanborn Fire Insurance Maps to discern if these properties were utilized for purposes other than residential use. The Sanborn Maps depict the former Praefke Brake facility structures located south of Oak Street, while the lands north of Oak Street are not depicted on any map reviewed, indicating that these lands were historically platted for residential use and remained undeveloped with industrial or commercial structures.

NRT also reviewed historic groundwater data for the recovery wells (RW-1B and RW-1C) located on these properties. NRT's review of groundwater data indicates that although very low level volatile organic compounds were detected in RW-1B in the past, these compounds have not been detected in a groundwater

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sampling event since November of 2000. We believe that the February 2009 sampling event will support the historic results at these locations.

To facilitate the sale of these properties, Mr. Praefke requested that that the City of West Bend revert the current industrial zoning to its original residential zoning. The West Bend Planning Commission readily approved this action, and Habitat for Humanity is scheduled to finalize the purchase of the existing house and lots for residential development. In summary, future site closure actions, GIS registration, and related obligations (i.e. cap maintenance plans) will apply only to the Praefke Brake site. The residential redevelopment will proceed without any environmental encumbrance related to the Praefke Brake site.

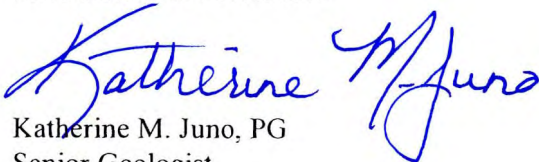
At the current time, Mr. Praefke is leasing the facility to offset the costs of environmental management of the site and has elected not to participate in the Voluntary Party Liability Exemption program; however, a prospective buyer and/or Mr. Praefke may wish to participate in the program in the future. NRT will continue to assist Mr. Praefke with the environmental monitoring and management of this project with the goal of site closure for the former Praefke Brake facility. Please contact us if you have any questions or comments regarding your review of this letter.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.



Sarah A. Ganswindt  
Environmental Technician



Katherine M. Juno, PG  
Senior Geologist

Attachments: WDNr Letter to Gordon Praefke dated August 13, 2008  
Table 1: February 2009 Sampling Plan  
Figure 1: RR Site Map of Former Praefke Brake Property (EIS Brake Parts)  
Figure 5: Site Plan  
Appendix A: Tables 1 and 2

C: Mr. Gordon Praefke (w/att.)

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