

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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January 14, 2005

In Reply, Refer to: FID# 241039920
BRRTS# 02-41-184461
BRR/ERP

MPL Realty
Mr. William Puchner
W302 N6015 Spence Road
Hartland, WI 53029

Subject: Review of ERP Site Assessment Report for the Former Wire and Metal Specialties Site,
4021 S Kinnickinnic Ave, St. Francis, WI

Dear Mr. Puchner:

Your consultant, Midwest Engineering Services, Inc. (Midwest) has submitted an "ERP Site Assessment" report (dated October 19, 2004) for the above referenced property, to the Wisconsin Department of Natural Resources (WDNR). In addition, I have discussed the site with your consultant by telephone. You have also submitted the required fee to have the WDNR review the report.

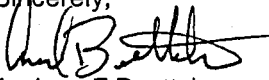
Based on a review of the report, the extent of soil and groundwater contamination has not yet been defined. The following areas need to be addressed in order to complete the investigative phase of the project:

- 1) The vertical extent of soil contamination has not yet been defined in the area of PZ-1/MW-9. High concentrations of a number of volatile organic compounds (VOCs) are present in samples collected from 27 feet below the ground surface (bgs), which is the deepest sample collected in this area. Additional soil samples are required to determine the extent of soil contamination at depth.
- 2) Groundwater contamination is also present in PZ-1 at concentrations above the NR 140 Enforcement Standard (ES) for several VOCs. The vertical extent of groundwater contamination needs to be determined.
- 3) The presence of non-aqueous phase liquid (NAPL) in MW-9 should continue to be monitored, with ongoing removal of any recoverable NAPL. The source of the NAPL is unknown, therefore a request for an "Off-Site Exemption" is unlikely to be granted, based on the information available at this time.
- 4) The horizontal extent of groundwater contamination is not defined. The installation of additional monitoring wells will likely be necessary to determine the down gradient extent of groundwater contamination. Due to the various complicating factors associated with well placement (required cooperation of adjacent property owner(s), presence of utilities, physical impediments, etc), further discussion of specific potential locations would be useful. If you would like me to come out to the site to assist in choosing additional well locations, please contact me at the telephone number listed below.
- 5) MW-12 may need to be replaced due to the lack of sufficient water for sample collection, the well may need to be replaced. In the mean time, the well should continue to be checked to see if enough groundwater becomes present to collect a sample. If your consultant believes that more aggressive development techniques (such as "surge and purge") could be helpful, they should submit a request for approval of the alternative development technique to me, as required in S. NR 141.31, Wis. Admin. Code.

- 6) A temporary monitoring well, located northeast of the intersection of E Norwich Ave and S Kinnickinnic Ave, was installed for WE Energy by their consultant. WE Energy is currently requesting WDNR approval to abandon this well. Because of the proximity of the well (referred to as TW-127 for the WE Energy – Howard Ave Property) to your site, the well may be of some value for refining the groundwater flow direction near your site. If you are interested in using this well, please contact Mark Collins at WE Energy (414-221-2162) to discuss transferal of the well. Also, note that the well was sampled for VOCs on 7/24/2001 and no ES exceedances were detected, therefore the primary value of this well would be for hydrological information only and ongoing sampling of the well would not likely be necessary.
- 7) An assessment of the potential impacts of subsurface utilities and the presence of the railroad tracks/drainage ditch located to the west of the site, on groundwater flow and contaminant migration, should be conducted.
- 8) Addition of geophysical (as well as geochemical) parameters to the ongoing monitoring of the monitoring wells and piezometers is appropriate to evaluate the potential for natural attenuation of the contaminants present at the site.
- 9) Continued VOC sample analysis from MW-11 and MW-103 does not appear to be necessary at this time, however water level collection and geophysical/geochemical parameter assessment should continue.

We appreciate your efforts to restore the environment at this site. If you have any questions or concerns regarding this letter, please contact me at (414) 263- 8541.

Sincerely,



Andrew F Boettcher
Hydrogeologist – RR/SER

CC: Mike Rehfeldt – Midwest Engineering Services, 205 Wilmont Drive, Waukesha, WI 53189-7959