



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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October 17, 2007

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

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

Subject: Review of Supplemental ERP Site Assessment and Case Closure Review 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 a request for case closure in the "Supplemental ERP Site Assessment and Case Closure Review Report" (Report), dated May 10, 2007 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.

Based on a review of the report, the extent of soil contamination has not yet been defined. In lieu of completely defining the extent of soil contamination, it would be acceptable to assume that the concentrations that are present under the southern portion of the building continue to be present under the remainder of the building.

There are several issues that need to be addressed before the WDNR can consider closing the case. The remaining issues that need to be addressed are listed below:

- 1) A minimum of four quarters of groundwater samples should be collected and analyzed for volatile organic compounds (VOCs). This sampling activity should include the following wells (MW-7, MW-9, MW-10, MW-12, MW-102, PZ-1 and PZ-2). VOC samples are not required from MW-11 and MW-103, however water level measurements should be collected at all nine wells.
- 2) In order to close a site with remaining groundwater contamination above the standards listed in NR140, the requirements listed under NR726.05(2)(b) must be met. This includes demonstrating that natural attenuation will bring the groundwater into compliance with NR140 groundwater quality standards within a reasonable period of time, considering the criteria in NR722.07. Also, it must be demonstrated that the contaminant concentrations are stable or decreasing.
- 3) Due to the presence of VOCs in the soil and/or groundwater beneath the building, an assessment of the vapor intrusion pathway is necessary. Based on input from the Department of Health and Family Services, you are required to collect a minimum of two indoor (8 hour) vapor samples, 1 outdoor (8 hour) background vapor sample

(from upwind of the site) and 3 sub-slab (15 minute) vapor samples. The indoor and outdoor samples should be collected concurrently.

It is recommended that the sub-slab samples be collected from flush-mounted, threaded brass sample ports cemented into the concrete floor. The sub-slab sample port installation procedure is to drill a hole through the concrete floor to the gravel base layer beneath the concrete and then install the sample port with standard cement (not containing any special compounds to increase flexibility, etc.). You should then wait for the concrete to harden (24-48 hours) before sampling.

All vapor samples should be collected using Summa canisters and should be analyzed using either method TO14 or TO15.

- 4) Due to the presence of several compounds at elevated levels, it is likely that a requirement of closure will be a restriction that limits future land-use to industrial-use only.
- 5) To address the direct contact pathway, your consultant has proposed using the existing building and pavement as an exposure barrier (cap). One of the requirements for allowing the use of a cap to eliminate the direct contact pathway is a cap maintenance plan; therefore a draft cap maintenance plan should be submitted to the WDNR along with the other required documentation listed above.

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, 821 Corporate Ct, Suite 102, Waukesha, WI 53189