

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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January 6, 2009

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 the ERP Site Vapor Assessment Report and Groundwater Monitoring 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 the "ERP Site Vapor Assessment Report" dated June 17, 2008 and the "Groundwater Monitoring Report" (GW Report) dated October 7, 2008 for the above referenced property, to the Wisconsin Department of Natural Resources (WDNR). The GW Report contained a request for the WDNR to review the case for closure.

On October 17, 2007, the WDNR issued a letter which outlined the additional issues that needed to be addressed before the WDNR could consider closing the case. Based on a review of the reports, it appears that some, but not all of the issues have been addressed. The issues are listed below. Following each item is the current status of the issue.

- 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.

Only one additional round of groundwater samples has been collected. This issue has not been sufficiently addressed.

- 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.

This issue has not been sufficiently addressed.

- 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.

This issue has been addressed as documented in the "ERP Site Vapor Assessment Report". No additional vapor sampling is required at this time.

- 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.

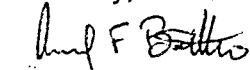
This issue still applies to the final closure of the site.

- 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.

This issue still applies to the final closure of the site.

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