

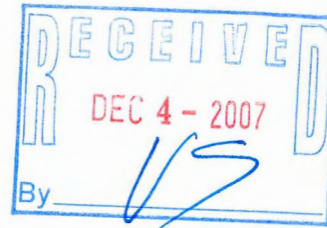


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02-41-184802

Engineering & Science

December 3, 2007

Andrew Boettcher
Wisconsin Dept. of Natural Resources
2300 N Dr Martin Luther King Jr Dr
Milwaukee WI 53212-3128



**SUBJECT: Request to Approve Soils for Disposal at Novak Site (Lime Pit)
Former St. Ann's Property Redevelopment
6027-6123 West Greenfield Avenue, West Allis, WI
BT² Project #2931**

Dear Mr. Boettcher:

We are writing to request the approval of the Wisconsin Department of Natural Resources (WDNR) to dispose excess cut soils from the subject redevelopment project at the Lime Pit Property in West Allis. The soils have been identified with concentrations of polynuclear aromatic hydrocarbons (PAHs) at levels greater than the PAH residual contaminant levels (RCLs) as published in the April 1997 interim guidance. Other pockets of contamination at the site are primarily based on former underground storage tanks (USTs) that have been removed and remediated. Low concentrations of metals, including arsenic and lead, were also detected in the site soils, some above the appropriate RCL.

The origin of the PAH and metals impacts is likely the presence of historical urban fill, as no onsite source for widespread PAH or metals contamination was found during Phase 1 and Phase 2 Environmental Site Assessments. Fill containing PAHs and metals are common in urban use areas. We have attached a map with sampling locations and summary tables showing the detected concentrations of volatile organics, detected metals, and PAHs. We have included the maximum observed concentrations from the Lime Pit sampling for comparison, as provided by the City's consultant, TEMCO. We can provide laboratory analytical reports as needed. Generally the concentrations observed at the subject site are significantly less than the concentrations observed at the Lime Pit.

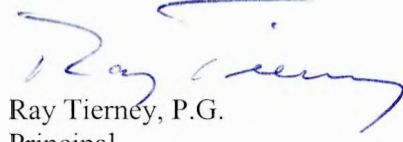
As we understand it, the Novak Property (Lime Pit) is a redevelopment site in itself and is looking for fill soils, and that soils with low-level impacts are allowed based on the proposed reuse and management of the property. In a discussion with a representative for the City of West Allis, the Lime Pit was identified as a potential outlet for cut soils from the St. Ann's Redevelopment site. Based on the projected cut and fill analysis, the redevelopment project will have no more than 3,500 cubic yards of contaminated fill that would require offsite disposal. The filling operations are apparently ongoing in the southeastern portion of the lime pit.

A previous request to WDNR (Eric Amadi, Project Manager) is related to a desire to reuse a portion of the cut soils from the project onsite, filling former basements and competing grades. WDNR has not made a final determination related to that request.

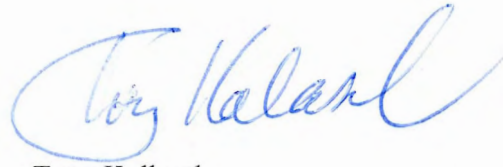
We request WDNR's approval for hauling approximately 3,500 cubic yards of cut soils to the Lime Pit Property for disposal. We have attached a \$500 check for the WDNR review fee. Please do not hesitate to contact us with any questions or concerns.

Mr. Andrew Boettcher
December 3, 2007
Page 2

Sincerely,
BT², Inc.



Ray Tierney, P.G.
Principal

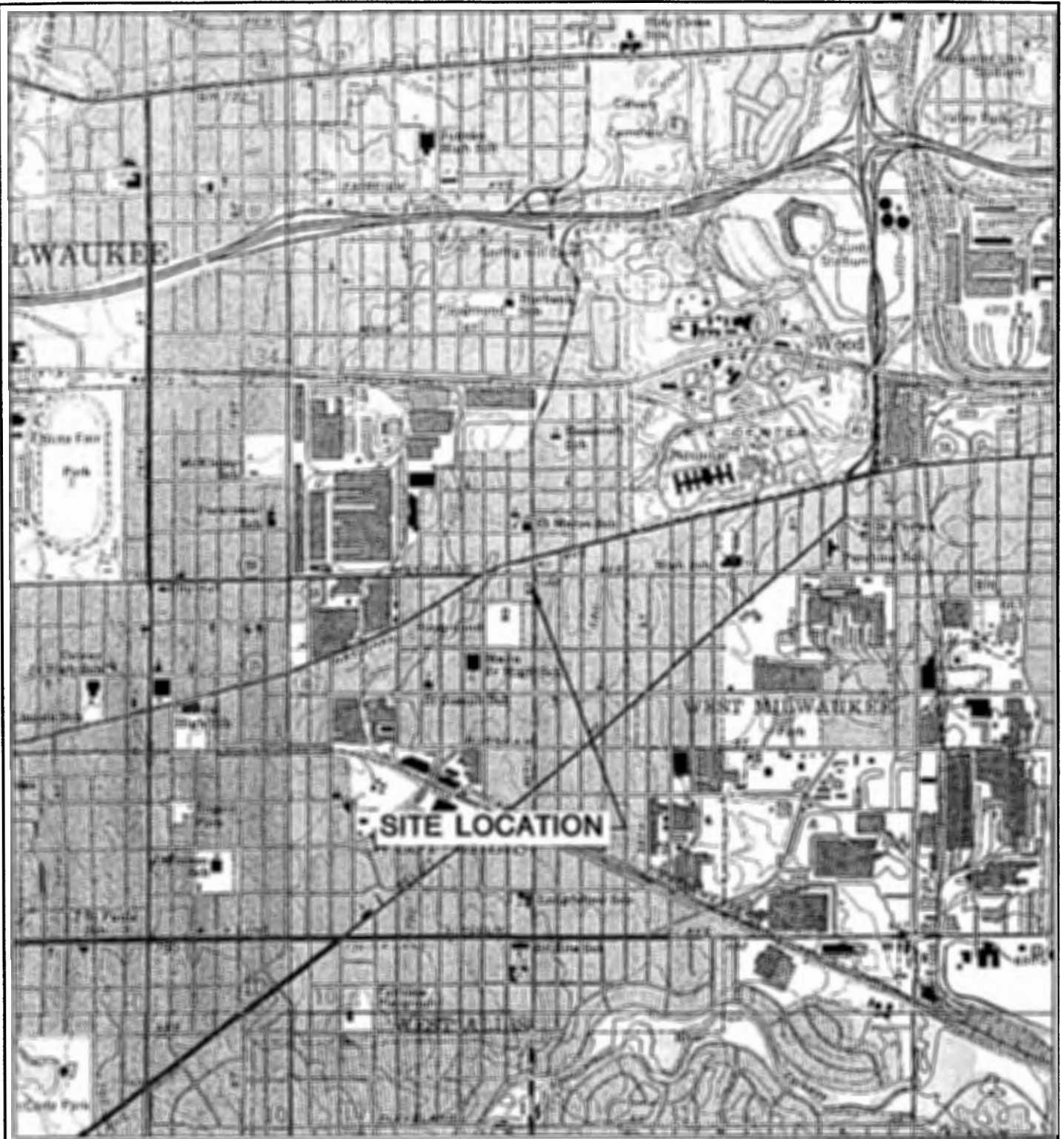


Tony Kollasch
Project Hydrogeologist

Enclosures: Figure 1 – Site Location Map
Figure 2 – Site Plan with Soil Sample Locations
Table 1 – Soil Analytical Results Summary – VOCs
Table 2 – Soil Analytical Results Summary – Metals
Table 3 – Soil Analytical Results Summary – PAHs
Check made out to Wisconsin DNR - \$500

cc: Eric Amadi, WDNR
Jeffrey Hosler – Temco
Dale Dobroth, LG River Tower Associates LLC

TJK
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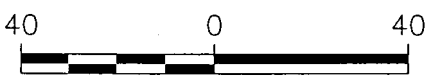
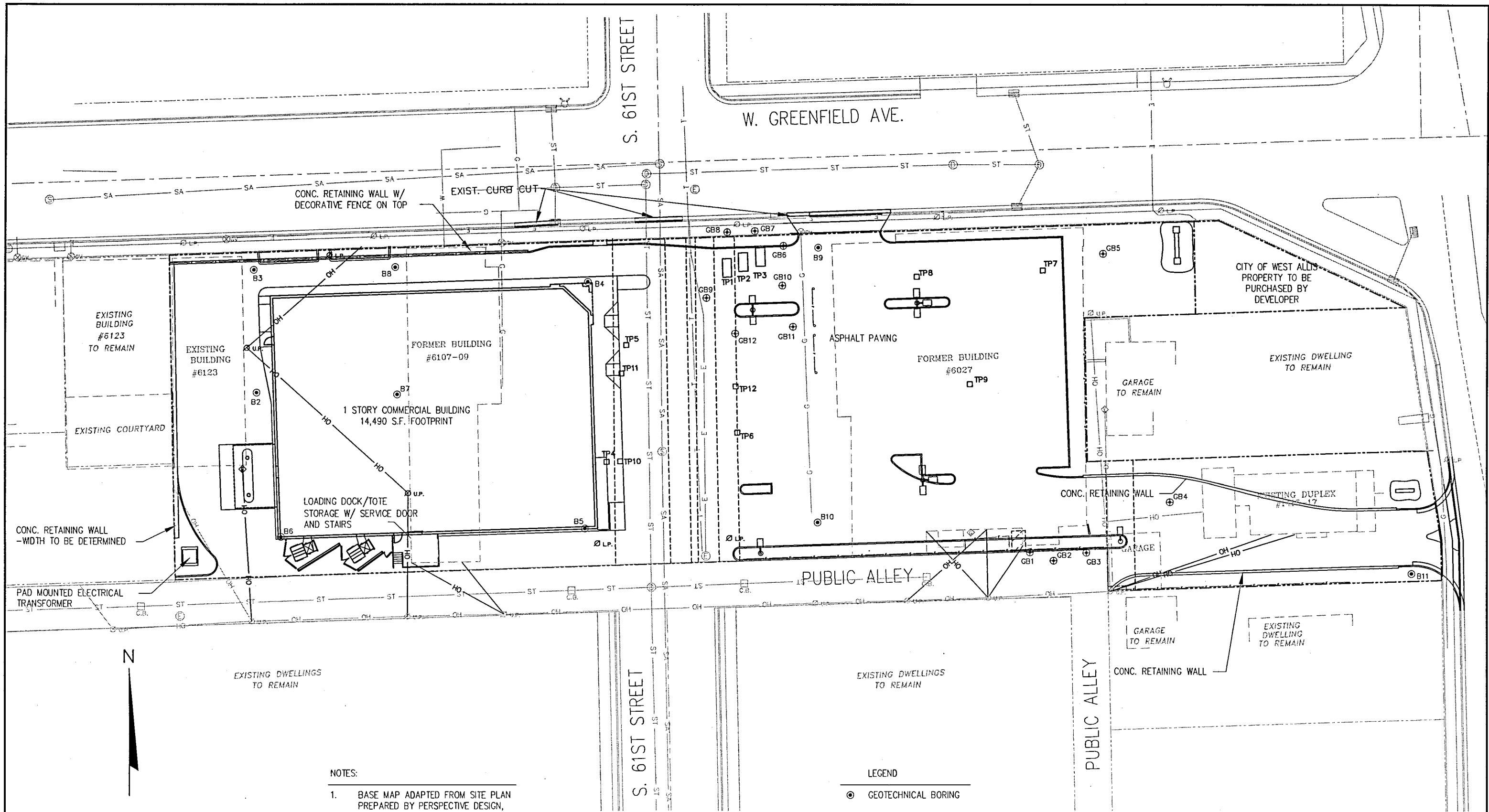
MILWAUKEE QUADRANGLE
 WISCONSIN—MILWAUKEE CO.
 7.5 MINUTE SERIES (TOPOGRAPHIC)
 SW/4 MILWAUKEE 15' QUADRANGLE
 1971
 SCALE: 1" = 2,000'



PROJECT NO. 2931
DRAWN BY: KP
CHECKED BY: AW
APPROVED BY:
DRAWN: 08/04/05
REVISED: 08/04/05

FIGURE 1
 SITE LOCATION MAP
 PROPOSED WALGREEN'S STORE
 60TH STREET AND GREENFIELD AVENUE
 WEST ALLIS, WISCONSIN





SCALE: 1" = 40'

NOTES:

1. BASE MAP ADAPTED FROM SITE PLAN PREPARED BY PERSPECTIVE DESIGN, INC., APRIL 25, 2007.
2. UTILITY LOCATIONS ARE APPROXIMATE. FIELD VERIFY UTILITY LOCATIONS BEFORE PERFORMING SITE WORK.

LEGEND

- ⊙ GEOTECHNICAL BORING
- ⊕ GEOPROBE SOIL BORING
- TEST PIT

PROJECT NO. 2931	DRAWN BY: KP		2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830 FAX: (608) 224-2839	CLIENT SIDCOR REAL ESTATE 950 N. WESTERN AVENUE LAKE FOREST, IL 60045-1734 PHONE: (847) 283-9200	SITE 6027-6123 WEST GREENFIELD AVENUE WEST ALLIS, WISCONSIN	FIGURE SITE PLAN	FIGURE 2
DRAWN: 05/03/07	CHECKED BY: TK						
REVISED: 11/30/07	APPROVED BY:						

Table 3
Soil Analytical Results Summary - PAHs
SIDCOR - 60th & Greenfield / BT² Project #2931
(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	Lab Notes	Acenaph-thene	Acenaph-thylene	Anthracene	Benzo(a) anthracene	Benzo(b) fluoranthene	Benzo(k) fluoranthene	Benzo(a) pyrene	Benzo(ghi) perylene	Chrysene	Dibenzo(a,h) anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd) pyrene	1-Methyl-naphthalene	2-Methyl-naphthalene	Naphthalene	Phenanthrene	Pyrene
B3	4/30/2007	3.5-5	--	<290	<490	43	<u>210</u>	<u>180</u>	91	<u>190</u>	110	150	<43	370	<57	<u>130</u>	<170	140	<170	130	290
B3	4/30/2007	8.5-10	--	<370	<620	57	<u>280</u>	<u>200</u>	110	<u>200</u>	100	200	<55	560	<73	<u>120</u>	<220	<180	<220	210	420
B7	4/30/2007	6-7.5	--	<61	<100	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<9.1	24	<12	<6.1	<36	<30	<36	<6.1	<6.1
	4/30/2007	11-12.5	--	<73	<120	23	27	14	9.8	<u>18</u>	9.6	20	<11	75	<15	10	<44	<37	<44	58	59
B8	4/30/2007	3.5-5	--	<730	<1,200	1,800	<u>5,400</u>	<u>3,800</u>	<u>2,600</u>	<u>4,300</u>	<u>2,600</u>	4,800	<u>730</u>	17,000	1,000	<u>2,800</u>	<440	<370	<u>810</u>	<u>7,900</u>	9,800
B8	4/30/2007	18.5-20	--	<74	<120	<7.4	<7.4	<7.4	<7.4	<7.4	<7.4	<7.4	<11	23	<15	<7.4	<44	<37	<44	<7.4	<7.4
GB2	4/26/2007	6-8	--	<54	<92	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<8.1	<11	<11	<5.4	<33	<27	<33	15	<5.4
GB10	4/26/2007	10-12	--	<60	<100	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<9.1	<12	<12	<6.0	<36	<30	<36	<6.0	<6.0
TP7	11/7/2007	3-4	--	<51	<87	25	79	68	32	<u>71</u>	66	71	<u>9.9</u>	150	<10	50	<31	<26	<31	110	87
TP8	11/7/2007	2-2.5	(1)	<540	<920	63	<u>1,900</u>	<u>7,000</u>	<u>2,700</u>	<u>4,700</u>	<u>6,500</u>	2,300	<u>1,400</u>	1,300	<110	<u>6,000</u>	370	1,500	<320	300	1,200
	11/7/2007	6-6.5	--	<63	<110	<6.3	<6.3	<6.3	<6.3	<6.3	<6.3	<6.3	<9.5	<13	<13	<6.3	<38	<32	<38	<6.3	<6.3
TP9	11/7/2007	2-2.5	(1)	<320	<550	350	<u>1,000</u>	<u>1,000</u>	560	<u>1,100</u>	830	930	<u>210</u>	1,900	100	<u>870</u>	<190	920	<190	1,100	1,900
	11/7/2007	7-8	--	<64	<110	<6.4	<6.4	<6.4	<6.4	<6.4	<6.4	<6.4	<9.6	<13	<13	<6.4	<38	<32	<38	<6.4	<6.4
TP10	11/7/2007	0.5-0.5	--	350	<550	370	<u>1,200</u>	<u>1,000</u>	600	<u>1,200</u>	750	1,200	<u>160</u>	3,800	170	<u>840</u>	<200	1,500	<200	<u>2,300</u>	2,300
TP11	11/7/2007	0.2-0.8	--	<130	<220	27	<u>120</u>	<u>110</u>	66	<u>110</u>	82	110	<20	310	<26	<u>86</u>	<79	<66	<79	120	270
TP12	11/7/2007	0.2-1.2	(1)	<9,500	<16,000	1,200	<u>3,700</u>	<u>3,500</u>	<u>2,100</u>	<u>3,700</u>	<u>2,700</u>	2,600	<1,400	6,400	<1,900	<u>3,600</u>	<5,700	<4,800	<5,700	<u>3,700</u>	5,300
Novak Site (Lime Pit) Maximum Concentration *				20,000	36,000	66,000	99,000	94,000	41,000	80,000	43,000	90,000	13,000	180,000	29,000	40,000	4,800	9,500	37,000	140,000	170,000
WDNR PAH Soil Generic Residual Contaminant Levels (RCLs) (Interim Guidance - April 1997)																					
Groundwater Pathway				38,000	700	3,000,000	17,000	360,000	870,000	48,000	6,800,000	37,000	38,000	500,000	100,000	680,000	23,000	20,000	400	1,800	8,700,000
Non-Industrial Direct Contact				900,000	18,000	5,000,000	88	88	880	8.8	1,800	8,800	8.8	600,000	600,000	88	1,100,000	600,000	20,000	18,000	500,000
Industrial Direct Contact				60,000,000	360,000	300,000,000	3,900	3,900	39,000	390	39,000	390,000	390	40,000,000	40,000,000	3,900	70,000,000	40,000,000	110,000	390,000	30,000,000

ABBREVIATIONS:

µg/kg = micrograms per kilogram or parts per billion (ppb)

WDNR = Wisconsin Department of Natural Resources

PAHs = Polynuclear Aromatic Hydrocarbons

NOTES:

Bold+underlined values exceed PAH RCLs.

* = From TEMCO Table. Novak Property is nearby property proposed for soil disposal.

LABORATORY NOTES/QUALIFIERS:

(1) Surrogate analysis - The sample required a dilution due to the nature of the sample matrix. Because of this dilution, the surrogate spike concentration in the sample was reduced to a level where the recovery calculation does not provide useful information.

Created by: TLR Date: 5/9/2007
Last revision by: TJK Date: 12/3/2007
Checked by: TJK Date: 12/3/2007

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Table 1
Soil Analytical Results Summary
SIDCOR - 60th & Greenfield / BT² Project #2931
 (Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	Lab Notes	DRO (mg/kg)	GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	MTBE	Lead (mg/kg)	Other VOCs
B3	4/30/2007	3.5-5	(1)	NA	NA	<29	<29	<29	<100	<29	<29	<29	8.7	ND
	4/30/2007	8.5-10	(1)	NA	NA	<29	<29	<29	<100	<29	<29	<29	17	ND
B4	4/27/2007	11-12.5	--	5.5	NA	<29	<29	<29	<100	<29	<29	<29	9.5	ND
B6	4/27/2007	6-7.5	(1)	32	NA	<29	<29	<29	<99	<29	<29	<29	27	ND
B7	4/30/2007	6-7.5	(1)	NA	NA	<30	<30	<30	<100	<30	<30	<30	10	ND
	4/30/2007	11-12.5	(1)	NA	NA	<29	<29	<29	<100	<29	<29	<29	9.2	ND
B8	4/30/2007	3.5-5	(1)	NA	NA	<29	<29	<29	<100	<29	<29	<29	21	ND
	4/30/2007	18.5-20	(1)	NA	NA	<29	<29	<29	<99	<29	<29	<29	7.6	ND
GB1	4/26/2007	6-8	--	<4.4	NA	<30	<30	<30	<100	<30	<30	<30	12	ND
GB2	4/26/2007	6-8	--	280	NA	<30	<30	<30	<100	<30	<30	<30	11	sec-Butylbenzene 41
GB3	4/26/2007	2-4	--	<5.1	NA	<32	<32	<32	<110	<32	<32	<32	19	ND
GB4	4/26/2007	8-10	--	<4.5	NA	<30	<30	<30	<100	<30	<30	<30	12	ND
GB5	4/26/2007	6-8	--	<4.5	NA	<29	<29	<29	<99	<29	<29	<29	11	ND
GB6	4/26/2007	8-10	--	<4.5	NA	<30	<30	<30	<100	<30	<30	<30	13	ND
GB7	4/26/2007	8-10	--	<4.5	NA	<30	<30	<30	<100	<30	<30	<30	12	ND
GB8	4/26/2007	8-10	--	<4.2	NA	<29	<29	<29	<97	<29	<29	<29	12	ND
GB9	4/26/2007	10-12	--	<4.4	NA	<29	<29	<29	<98	<29	<29	<29	12	ND
GB10	4/26/2007	10-12	--	<4.5	17	<31	<31	<31	<110	<31	<31	<31	14	tert-Butylbenzene 32
	4/26/2007	14-16	--	<4.6	NA	<31	<31	<31	<100	<31	<31	<31	11	ND
GB11	4/26/2007	10-12	--	<4.6	NA	<31	<31	<31	<100	<31	<31	<31	13	ND
GB12	4/26/2007	10-12	--	<4.2	NA	<28	<28	<28	<96	<28	<28	<28	11	ND
TP1-2	4/19/2007	--	--	<5.7	<6.0	<30	<30	58	110	<30	<30	<30	--	NA
TP2-6	4/19/2007	--	--	<5.9	<5.9	<29	<29	<29	<88	<29	<29	<29	--	NA
TP3-4	4/19/2007	--	(2)	250	9.1	<30	36	39	160	100	42	<30	63	1,2-Dichlorobenzene 31 Naphthalene 98

Table 1
Soil Analytical Results Summary
SIDCOR - 60th & Greenfield / BT² Project #2931
(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	Lab Notes	DRO (mg/kg)	GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	MTBE	Lead (mg/kg)	Other VOCs
Blank	4/19/2007	--	(2)	NA	NA	<25	<25	<25	<85	<25	<25	<25	NA	ND
MeOH Blank	4/26/2007	--	(1)	NA	NA	<25	<25	<25	<85	<25	<25	<25	NA	ND
NR 720 Residual Contaminant Level (RCL)				100	100	5.5	2,900	1,500	4,100	NE	NE	NE	50	
NR 746 Table 1				NE	NE	8,500	4,600	38,000	42,000	83,000	11,000	NE	NE	1,2-Dichloroethane 600 Naphthalene 2,700
NR 746 Table 2				NE	NE	1,100	NE	NE	NE	NE	NE	NE	NE	1,2-Dichloroethane 540

ABBREVIATIONS:

µg/kg = micrograms per kilogram or parts per billion (ppb)

DRO = Diesel Range Organics

MTBE = Methyl-tert-butyl ether

NA = Not Analyzed

mg/kg - milligrams per kilogram or parts per million (ppm)

GRO = Gasoline Range Organics

VOCs = Volatile Organic Compounds

ND = Not Detected

PID = Photo-Ionization Detector

TMB = Trimethylbenzene

NE = Not Established

-- = Not Applicable

NOTES:

Bold+underlined values exceed NR 720 RCLs.

NR 720 RCL - Wisconsin Administrative Code (WAC), Chapter NR 720 Residual Contaminant Level.

NR 746 Table 1 - WAC, Chapter NR 746.06(2)(b) Table 1 - Indicators of Residual Petroleum Product in Soil Pores.

NR 746 Table 2 - WAC, Chapter NR 746.06(2)(b) Table 2 - Protection of Human Health from Direct Contact with Contaminated Soil.

LABORATORY NOTES/QUALIFIERS:

(1) Chloroethane - The RPD exceeded the acceptance limit.

(2) Dichlorodifluoromethane - Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was above acceptance limits.

1,2,4-Trichlorobenzene - Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was below acceptance limits.

Created by: TLR Date: 5/9/2007

Last revision by: TLR Date: 5/9/2007

Checked by: JSN Date: #####

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Table 2
Soil Analytical Results Summary - Metals
SIDCOR - 60th & Greenfield / BT² Project #2931
(Results are in mg/kg)

Sample	Date	Depth (feet)	Arsenic	Cadmium	Chromium	Lead
B3	4/30/2007	3.5-5	<u>7.4</u>	0.74	20	8.7
	4/30/2007	8.5-10	<u>12</u>	0.16	9.3	17
B4	4/27/2007	11-12.5	NA	NA	NA	9.5
B6	4/27/2007	6-7.5	NA	NA	NA	27
B7	4/30/2007	6-7.5	<u>6.1</u>	0.32	17	10
	4/30/2007	11-12.5	<u>8.4</u>	0.18	14	9.2
B8	4/30/2007	3.5-5	<u>7.7</u>	0.77	21	21
	4/30/2007	18.5-20	<u>8.4</u>	<0.12	12	7.6
GB1	4/26/2007	6-8	NA	NA	NA	12
GB2	4/26/2007	6-8	NA	NA	NA	11
GB3	4/26/2007	2-4	NA	NA	NA	19
GB4	4/26/2007	8-10	NA	NA	NA	12
GB5	4/26/2007	6-8	NA	NA	NA	11
GB6	4/26/2007	8-10	NA	NA	NA	13
GB7	4/26/2007	8-10	NA	NA	NA	12
GB8	4/26/2007	8-10	NA	NA	NA	12
GB9	4/26/2007	10-12	NA	NA	NA	12
GB10	4/26/2007	10-12	NA	NA	NA	14
	4/26/2007	14-16	NA	NA	NA	11
GB11	4/26/2007	10-12	NA	NA	NA	13
GB12	4/26/2007	10-12	NA	NA	NA	11
TP3-4	4/19/2007	5-6	NA	NA	NA	<u>63</u>
TP8	11/7/2007	2-2.5	NA	NA	NA	45
Novak Property (Lime Pit) High Concentration *			7.1	0.95	19.6	65.4
NR 720 RCLs Non-Industrial			0.039	8	(a)	50
NR 720 RCLs Industrial			1.6	510	(a)	500

Table 2
Soil Analytical Results Summary - Metals
SIDCOR - 60th & Greenfield / BT² Project #2931

ABBREVIATIONS:

mg/kg - milligrams per kilogram or parts per million (ppm)

NE = No Standard Established

NA = Not Analyzed

NOTES:

(a) Chromium, hexavalent non-industrial = 14 mg/kg; industrial = 200 mg/kg.

Chromium, trivalent non-industrial = 16,000 mg/kg; industrial = not applicable.

Bold+underlined values exceed NR 720 RCLs.

NR 720 RCLs Non-Industrial = NR 720 Table 2 Residual Contaminant Levels (RCLs)

Based On Human Health Risk From Direct Contact Related To Land Use for Non-Industrial.

NR 720 RCLs Industrial = NR 720 RCLs Table 2 Based On Human Health Risk From Direct

Contact Related To Land Use for Industrial.

* = From TEMCO Table. Novak Property is nearby property proposed for soil disposal.

Created by: TLR
Last revision by: TJK
Checked by: TJK

Date: 5/9/2007
Date: 12/3/2007
Date: 12/3/2007

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