



Infrastructure, buildings, environment, communications

Gina Keenan
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King Drive
P.O. Box 12436
Milwaukee, Wisconsin 53212-0436

ARCADIS G&M, Inc.
126 North Jefferson Street
Suite 400
Milwaukee
Wisconsin 53202
Tel 414 276 7742
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Subject:

Request for Approval to Dispose of PCE-Impacted Soils, N. Getz Property, West Allis, Wisconsin.
FID #268085840, ERR

ENVIRONMENT

Dear Ms. Keenan:

Date:
22 August 2003

ARCADIS has been retained by Norman Getz to implement the planned remediation of tetrachloroethylene (PCE) contaminated soils and groundwater at the Norman Getz site in West Allis, Wisconsin (the Site). A Remedial Action Plan, dated January 15, 2003 was submitted to the Wisconsin Department of Natural Resources (WDNR). WDNR issued a letter dated February 26, 2003 approving the remedial action plan for this Site.

Contact:
Jim Bannantine

One of the components of the Site remediation is excavation and off-site disposal of impacted soils. In accordance with the "Draft Guidance for Hazardous Waste Remediation" dated November 2002 (the WDNR Guidance Document), Norman Getz is requesting concurrence from the WDNR that the PCE-impacted soil can be managed as a non-hazardous waste.

Phone:
414 277 6230

Email:
jbannantine@arcadis-us.com

According to the WDNR Guidance Document, if the following criteria are met, then soil containing a listed hazardous waste does not need to be managed as a hazardous waste:

Our ref:
WI001027.0001

- Item 1: Soil as a Listed Hazardous Waste: If the soil contains chemical concentrations below site specific Residual Contaminant Levels (RCLs), then a "contained out" determination can be made and the soils can be managed in accordance with the provisions in ch. NR 718 of the Wisconsin Administrative Code.
- Item 2: Soil with a Hazardous Characteristic: If the soil exhibits any characteristics of hazardous waste, then the soil must be treated as a hazardous waste until the hazardous characteristic is removed.

- Item 3: Land Disposal Restrictions: The soil concentration must be below the Land Disposal Restriction (LDR) standards or a hazardous waste variance must be obtained from the WDNR.

The following sections document how the soils at the Norman Getz property meet each of these requirements.

Soil as a Listed Hazardous Waste

Based on our conversations with Mark Gordon of the WDNR, the Wisconsin industrial default parameters for ingestion and inhalation are appropriate for calculating the potential exposure during soil excavation activities. ARCADIS calculated health-based screening levels in accordance with the document entitled "*Determining Residual Contaminant Levels Using the EPA Soil Screening Level Web Site*" prepared by WDNR and using the Wisconsin industrial default parameters. The data inputs were consistent with the Wisconsin defaults in the document and with the requirements of ch. NR 720.19 (5).

Figure 1 shows the soil PCE concentrations from previous investigation activities, along with the estimated extent of soils to be removed. Appendix A shows the results of the Site-specific RCL calculations. The soil PCE concentrations in the planned excavation areas are below the calculated Site-specific RCLs for ingestion and inhalation. Thus, ARCADIS plans to manage the soil in accordance with the requirements of ch. NR 718.

Soil with a Hazardous Characteristic

According to the WDNR Guidance Document, "Contaminated media that exhibits a hazardous characteristic upon generation also requires management as a hazardous waste." ARCADIS collected three samples from the planned excavation areas, and submitted the soil samples for laboratory analysis of volatile organic compounds and toxicity characteristic leaching procedure (TCLP) for PCE. The soil sample locations and analytical results are shown on Figure 1 and a copy of the analytical report and chain of custody form are included in Appendix B. The three samples contained PCE at concentrations ranging from 1,680 to 32,300 micrograms per kilogram, however, the TCLP results were all less than 0.18 micrograms per liter. The TCLP limit for PCE is 0.7 milligrams per liter. The laboratory analytical data indicates that the soil to be excavated does not meet the definition of a hazardous waste based on leaching of PCE into the soil. The Site has been utilized historically as a dry cleaner; thus, there is no reason to suspect that the soils in this area would be reactive, corrosive or ignitable. Based on this information, the soils at this Site do not exhibit any characteristics of hazardous waste.

Land Disposal Restriction Requirements

According to the WDNR Guidance Document, the EPA promulgated the Phase IV LDR rule in 1998, which established treatment standards for contaminated soils where the proposed remedy is land disposal. Soils must either be treated to a 90 percent reduction in contaminant levels or to levels below 10 times the Universal Treatment Standards (UTS). According to ch. NR 675.28 of the Wisconsin Administrative Code, the UTS for PCE is 6 milligrams per kilogram (mg/kg). Thus, 10 times the UTS is equal to 60 mg/kg. None of the soil PCE concentrations from the proposed excavation areas at the Norman Getz property exceed this concentration, thus the LDRs are not applicable for this project.

Closing

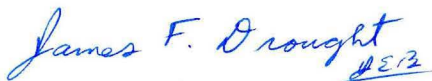
ARCADIS, on behalf of Norman Getz, is requesting WDNR concurrence that the PCE-impacted soils at the Site do not require management as a hazardous waste. ARCADIS and Norman Getz propose to manage the excavated soils in conformance with ch. NR 718 of the Wisconsin Administrative Code. The "*Remediation Site Hazardous Waste Determinations*" form for this site is included in Appendix C. In accordance with our remedial action plan, the soils shall be excavated and disposed in a solid waste landfill. We appreciate your continued assistance with this project. To maintain our project schedule, we look forward to your review of this document at your earliest convenience. Should you have any questions or require any additional information, please contact us at your convenience.

Sincerely,

ARCADIS G&M, Inc.



James Bannantine, PG
Senior Hydrogeologist



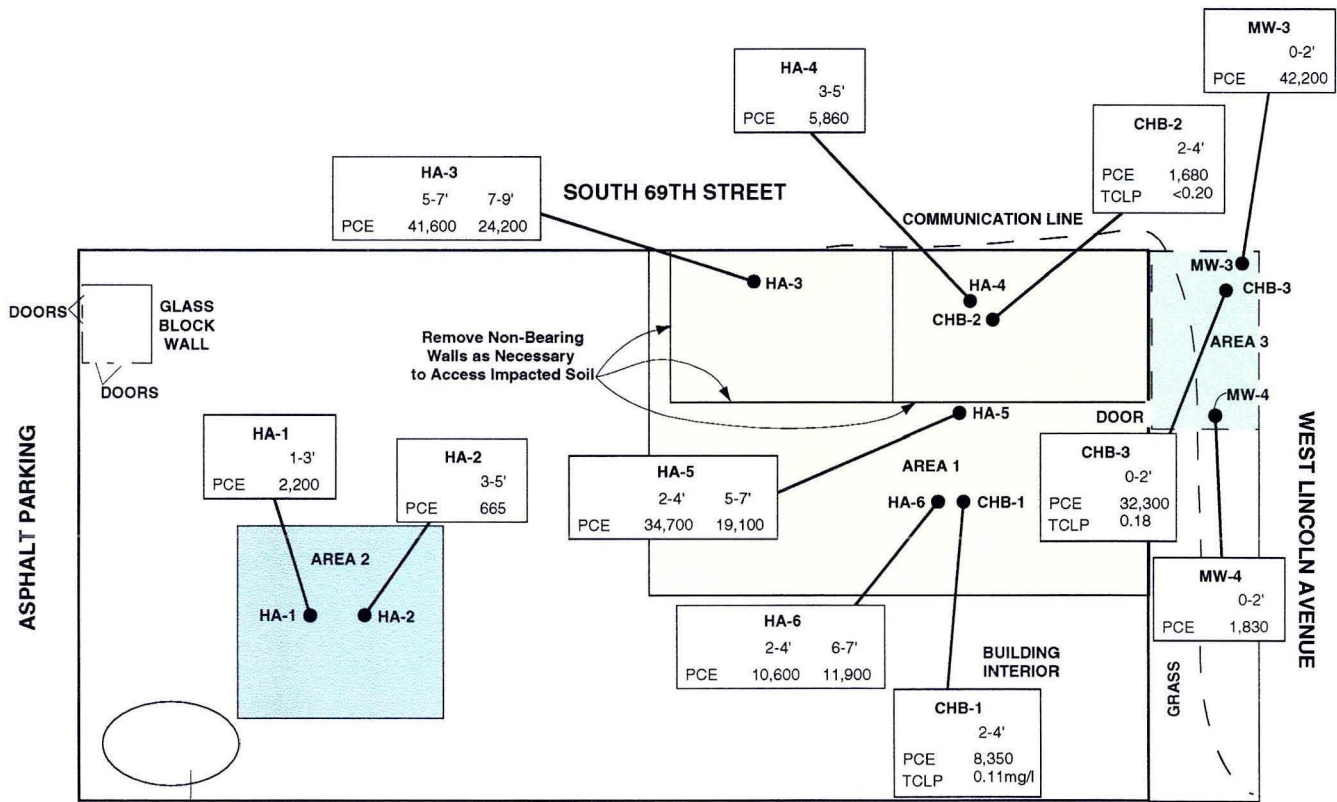
James F. Drought, PH
Principal Hydrogeologist

Copies:

Mr. Donald P. Gallo - Reinhart Boerner Van Dueren, S.C.

Mr. Norman Getz

Mr. Jonathon Ward - City of Wet Allis

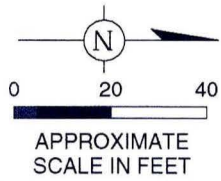


APPROXIMATE LOCATION OF 15 55-GALLON DRUMS OF INVESTIGATION DERIVED WASTE

LEGEND
● SOIL BORING

PCE concentrations are expressed as micrograms per kilogram (µg/kg)

Toxicity Characteristic Leaching Procedure (TCLP) results are expressed as milligrams per liter



SITE LAYOUT AND PCE RESULTS FROM PROPOSED EXCAVATION AREAS

NORMAN GETZ PROPERTY
6854 WEST BELOIT ROAD
WEST ALLIS, WISCONSIN

FIGURE
1



Appendix A

Site Specific RCL
Calculations



U.S. Environmental Protection Agency

Superfund

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Soil Screening Guidance for Chemicals

Equation Values for Ingestion

Noncarcinogenic Parameter	Value	Carcinogenic Age-adjusted Parameter	Value	Carcinogenic Nonadjusted Parameter	Value
Target Hazard Quotient (unitless)	1	Target Risk (unitless)	1.0E-6	Target Risk (unitless)	1.0E-6
Body Weight (kg)	70	Adult Body Weight (kg)	70	Body Weight (kg)	70
		Child Body Weight (kg)	15		
Exposure Duration (yr)	25	Adult Exposure Duration (yr)	24	Exposure Duration (yr)	25
		Child Exposure Duration (yr)	6		
Exposure Frequency (day/yr)	250	Exposure Frequency (day/yr)	350	Exposure Frequency (day/yr)	250
Intake Rate (mg/day)	100	Adult Intake Rate (mg/day)	100	Intake Rate (mg/day)	100
		Child Intake Rate (mg/day)	200		
		Average Lifetime (yr)	70	Average Lifetime (yr)	70
		Age-adjusted Ingestion Factor (mg-yr/kg-day)	114.29		

Soil Screening Levels for Ingestion (mg/kg)

Analyte	Cas Number	Oral RfD	Oral Slope Factor	Noncarcinogenic	Carcinogenic (Age-adjusted)	Carcinogenic (Nonadjusted)
Tetrachloroethylene	127184	1.00E-02 ^a	5.20E-02 ^y	1.02E+04	1.23E+01	5.50E+01

Equation Values for Inhalation of Fugitive Dust

Particulate Emission Factor Parameter	Value	Noncarcinogenic Parameter	Value	Carcinogenic Parameter	Value
Surface Area (acres)	0.5	Target Hazard Quotient (unitless)	1	Target Risk (unitless)	1.0E-6
City (climate zone)	Chicago(VII)	Exposure Duration (yr)	25	Exposure Duration (yr)	25
Q/C (g/m ² -s per kg/m ³)	97.78	Exposure Frequency (day/yr)	250	Exposure Frequency (day/yr)	250
Fraction of vegetative cover (unitless)	0.5			Average Lifetime (yr)	70
Mean annual windspeed (m/s)	4.65				
Equivalent threshold value of windspeed at 7m (m/s)	11.32				
Function dependent on U _m /U _t (unitless)	0.182				

Soil Screening Levels for Inhalation of Fugitive Dust (mg/kg)

Analyte	Cas Number	Inhalation RfC	Inhalation Unit Risk	Particulate Emission Factor	Noncarcinogenic	Carcinogenic
Tetrachloroethylene	127184	6.00E-01 [∇]	5.8E-07 [∇]	1.55E+09	1.36E+09	1.09E+07

Equation Values for Inhalation of Volatiles

Volatilization Factor Parameter	Value	Soil Saturation Concentration Parameter	Value	Noncarcinogenic Parameter	Value	Carcinogenic Parameter	Value
Surface Area (acres)	0.5			Target Hazard Quotient (unitless)	1	Target Risk (unitless)	1.0E-6
City (climate zone)	Chicago (VII)			Exposure Duration (yr)	25	Exposure Duration (yr)	25

Q/C (g/m ² -s per kg/m ³)	97.78			Exposure Frequency (day/yr)	250	Exposure Frequency (day/yr)	250
Fraction organic carbon (unitless)	0.006	Fraction organic carbon (unitless)	0.006			Average Lifetime (yr)	70
Dry soil bulk density (g/cm ³)	1.5	Dry soil bulk density (g/cm ³)	1.5				
Soil particle density (g/cm ³)	2.65	Soil particle density (g/cm ³)	2.65				
Water-filled soil porosity (L _{water} /L _{soil})	0.2	Water-filled soil porosity (L _{water} /L _{soil})	0.2				
Exposure interval (s)	9.5e08						

Soil Screening Levels for Inhalation of Volatiles (mg/kg)

Analyte	Cas Number	Inhalation RfC	Inhalation Unit Risk	Volatilization Factor	Soil Saturation Concentration	Noncarcinogenic	Carcinogenic
Tetrachloroethylene	127184	6.0E-01 \checkmark	5.8E-07 \checkmark	5.0E+03	2.4E+02	4.4E+03	3.5E+01

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Last updated on Monday, February 17th, 2003
 URL: <http://risk.lsd.ornl.gov/cgi-bin/epa/ssl2.cgi>

Appendix B

Analytical Results and
Chain-of-Custody

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003

Job No: 03.06083


Page 1 of 11

The following samples were received by TestAmerica for analysis:

WI001027.0001 Getz Dry Cleaner

Sample Number	Sample Description	Date Taken	Date Received
531379	CHB-1 2-4'	07/02/2003	07/03/2003
531380	CHB-2 2-4'	07/02/2003	07/03/2003
531381	CHB-3 0-2'	07/02/2003	07/03/2003

Soil results reported
on a dry weight basis.


Brian D. DeJong
Organic Operations Manager

ARCADIS
Job No: 03.06083

07/16/2003
Page 2 of 11

KEY TO DATA FLAGS

The attached sample(s) may have a result flag shown on the report. The following are the result flag definitions:

A = Analyzed/extracted past hold time
B = Blank is contaminated
C = Standard outside of control limits
D = Diluted for analysis
E = TCLP extraction outside of method required temperature range
F = Sample filtered in lab
G = Received past hold time
H = Late eluting hydrocarbons present
I = Improperly handled sample
J = Estimated concentration
L = Common lab solvent and contaminant
M = Matrix interference
P = Improperly preserved sample
Q = Result confirmed via re-analysis
S = Sediment present
T = Does not match typical pattern
W = BOD re-set due to missed dilution
X = Unidentified compound(s) present
Z = Internal standard outside limits
* = See Case Narrative

KEY TO ANALYST INITIALS

The attached sample(s) may have been analyzed by another certified laboratory. If a number appears in the Analyst Initials field, the following are the appropriate certifications (if the lab code does not appear below, that means that WDNR certification is not required for the work performed):

Lab Code	Certification Number
008	WDNR - 999766900
009	WDNR - 241293690
020	WDNR - 999447680
030	ILNELAC - 100230; WDNR - 998294430
060	ILNELAC - 100221; WDNR - 999447130
070	IA - 007; ILNELAC - 000668; MDH - 019-999-319; WDNR - 999917270
130	WDNR - 632021390
147	WDNR - 721026460
300	FLNELAC - 87358; IA - 131; MDH - 047-999-345; WDNR - 998020430
400	WDNR - 113133790
510	WDNR - 241249360
520	WDNR - 999518190; ILNELAC - 100439
700	WDNR - 113289110

TestAmerica Watertown WDNR - 128053530; IDNR - 294; MDH - 055-999-366; ND - R-046

For questions regarding this report, please contact Dan Milewsky or Warren Topel.

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531379
Account No: 32050
Page 3 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-1 2-4'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 12:40

Date Received: 07/03/2003

Parameter	Results	Units	Reporting		Date		Prep/Run	
			Limit	Method	Analyzed	Analyst	Batch	
Solids, Total	79.0	%	n/a	SW 5035	07/10/2003	kee		5214
TCLP ZHE VOLATILE PREP	COMPLETE			SW 1311	07/11/2003	jts	535	
TCLP-VOLATILES-8260								
TCLP-Benzene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-Carbon Tetrachloride	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-Chlorobenzene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-Chloroform	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-1,2-Dichloroethane	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-1,1-Dichloroethene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-Methyl Ethyl Ketone	<0.20	mg/L	0.20	SW 8260B	07/14/2003	mae	535	3452
TCLP-Tetrachloroethene	0.11	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-Trichloroethene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
TCLP-Vinyl Chloride	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535	3452
Surr: Dibromofluoromethane	100	%	n/a	SW 8260B	07/14/2003	mae	535	3452
Surr: Toluene-d8	101	%	n/a	SW 8260B	07/14/2003	mae	535	3452
Surr: Bromofluorobenzene	102	%	n/a	SW 8260B	07/14/2003	mae	535	3452
VOC - METHANOL - 8260B								
Benzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Bromobenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Bromochloromethane	<44	ug/kg	35	SW 8260B	07/14/2003	aba		2435
Bromodichloromethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Bromoform	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Bromomethane	<127	ug/kg	100	SW 8260B	07/14/2003	aba		2435
n-Butylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
sec-Butylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
tert-Butylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Carbon Tetrachloride	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Chlorobenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Chlorodibromomethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Chloroethane	<63	ug/kg	50	SW 8260B	07/14/2003	aba		2435
Chloroform	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Chloromethane	<63	ug/kg	50	SW 8260B	07/14/2003	aba		2435
2-Chlorotoluene	<63	ug/kg	50	SW 8260B	07/14/2003	aba		2435
4-Chlorotoluene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
1,2-Dibromo-3-Chloropropane	<63	ug/kg	50	SW 8260B	07/14/2003	aba		2435
1,2-Dibromoethane (EDB)	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
Dibromomethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
1,2-Dichlorobenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435
1,3-Dichlorobenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba		2435

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531379
Account No: 32050
Page 4 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-1 2-4'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 12:40

Date Received: 07/03/2003

Parameter	Results	Units	Reporting		Date		Prep/Run
			Limit	Method	Analyzed	Analyst	Batch
1,4-Dichlorobenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Dichlorodifluoromethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,1-Dichloroethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,2-Dichloroethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,1-Dichloroethene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
cis-1,2-Dichloroethene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
trans-1,2-Dichloroethene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,2-Dichloropropane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,3-Dichloropropane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
2,2-Dichloropropane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,1-Dichloropropene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
cis-1,3-Dichloropropene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
trans-1,3-Dichloropropene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Di-isopropyl ether	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Ethylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Hexachlorobutadiene	<44	ug/kg	35	SW 8260B	07/14/2003	aba	2435
Isopropylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
p-Isopropyltoluene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Methylene Chloride	<63	ug/kg	50	SW 8260B	07/14/2003	aba	2435
Methyl-t-butyl ether	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Naphthalene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
n-Propylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Styrene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,1,1,2-Tetrachloroethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,1,2,2-Tetrachloroethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Tetrachloroethene	8,350	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Toluene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,2,3-Trichlorobenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,2,4-Trichlorobenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,1,1-Trichloroethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,1,2-Trichloroethane	<44	ug/kg	35	SW 8260B	07/14/2003	aba	2435
Trichloroethene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Trichlorofluoromethane	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,2,3-Trichloropropane	<127	ug/kg	100	SW 8260B	07/14/2003	aba	2435
1,2,4-Trimethylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,3,5-Trimethylbenzene	<32	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Vinyl Chloride	<44	ug/kg	35	SW 8260B	07/14/2003	aba	2435
Xylenes, Total	<44	ug/kg	35	SW 8260B	07/14/2003	aba	2435
Surr: Dibromofluoromethane	104	%	88-108	SW 8260B	07/14/2003	aba	2435

ANALYTICAL REPORT

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07/16/2003
Job No: 03.06083
Sample No: 531379
Account No: 32050
Page 5 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-1 2-4'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 12:40 Date Received: 07/03/2003

Parameter	Results	Units	Reporting	Method	Date	Prep/Run	
			Limit		Analyzed	Analyst	Batch
Surr: Toluene-d8	96	%	87-106	SW 8260B	07/14/2003	aba	2435
Surr: Bromofluorobenzene	99	%	93-109	SW 8260B	07/14/2003	aba	2435

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
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Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531380
Account No: 32050
Page 6 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-2 2-4'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 12:55 Date Received: 07/03/2003

Parameter	Results	Units	Reporting		Date Analyzed	Prep/Run	
			Limit	Method		Analyst	Batch
Solids, Total	89.1	%	n/a	SW 5035	07/10/2003	kee	5214
TCLP ZHE VOLATILE PREP	COMPLETE			SW 1311	07/11/2003	jts	535
TCLP-VOLATILES-8260							
TCLP-Benzene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Carbon Tetrachloride	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Chlorobenzene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Chloroform	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-1,2-Dichloroethane	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-1,1-Dichloroethene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Methyl Ethyl Ketone	<0.20	mg/L	0.20	SW 8260B	07/14/2003	mae	535 3452
TCLP-Tetrachloroethene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Trichloroethene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Vinyl Chloride	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
Surr: Dibromofluoromethane	99	%	n/a	SW 8260B	07/14/2003	mae	535 3452
Surr: Toluene-d8	100	%	n/a	SW 8260B	07/14/2003	mae	535 3452
Surr: Bromofluorobenzene	102	%	n/a	SW 8260B	07/14/2003	mae	535 3452
VOC - METHANOL - 8260B							
Benzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Bromobenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Bromochloromethane	<39	ug/kg	35	SW 8260B	07/15/2003	aba	2439
Bromodichloromethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Bromoform	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Bromomethane	<112	ug/kg	100	SW 8260B	07/15/2003	aba	2439
n-Butylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
sec-Butylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
tert-Butylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Carbon Tetrachloride	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Chlorobenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Chlorodibromomethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Chloroethane	<56	ug/kg	50	SW 8260B	07/15/2003	aba	2439
Chloroform	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Chloromethane	<56	ug/kg	50	SW 8260B	07/15/2003	aba	2439
2-Chlorotoluene	<56	ug/kg	50	SW 8260B	07/15/2003	aba	2439
4-Chlorotoluene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
1,2-Dibromo-3-Chloropropane	<56	ug/kg	50	SW 8260B	07/15/2003	aba	2439
1,2-Dibromoethane (EDB)	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
Dibromomethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
1,2-Dichlorobenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439
1,3-Dichlorobenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531380
Account No: 32050
Page 7 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-2 2-4'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 12:55 Date Received: 07/03/2003

Parameter	Results	Units	Reporting		Date		Prep/Run	
			Limit	Method	Analyzed	Analyst	Batch	
1,4-Dichlorobenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Dichlorodifluoromethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,1-Dichloroethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,2-Dichloroethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,1-Dichloroethene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
cis-1,2-Dichloroethene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
trans-1,2-Dichloroethene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,2-Dichloropropane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,3-Dichloropropane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
2,2-Dichloropropane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,1-Dichloropropene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
cis-1,3-Dichloropropene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
trans-1,3-Dichloropropene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Di-isopropyl ether	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Ethylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Hexachlorobutadiene	<39	ug/kg	35	SW 8260B	07/15/2003	aba	2439	
Isopropylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
p-Isopropyltoluene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Methylene Chloride	<56	ug/kg	50	SW 8260B	07/15/2003	aba	2439	
Methyl-t-butyl ether	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Naphthalene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
n-Propylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Styrene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,1,1,2-Tetrachloroethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,1,2,2-Tetrachloroethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Tetrachloroethene	1,680	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Toluene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,2,3-Trichlorobenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,2,4-Trichlorobenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,1,1-Trichloroethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,1,2-Trichloroethane	<39	ug/kg	35	SW 8260B	07/15/2003	aba	2439	
Trichloroethene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Trichlorofluoromethane	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,2,3-Trichloropropane	<112	ug/kg	100	SW 8260B	07/15/2003	aba	2439	
1,2,4-Trimethylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
1,3,5-Trimethylbenzene	<28	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Vinyl Chloride	<39	ug/kg	35	SW 8260B	07/15/2003	aba	2439	
Xylenes, Total	<39	ug/kg	35	SW 8260B	07/15/2003	aba	2439	
Surr: Dibromofluoromethane	97	%	88-108	SW 8260B	07/15/2003	aba	2439	

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531380
Account No: 32050
Page 8 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-2 2-4'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 12:55

Date Received: 07/03/2003

Parameter	Results	Units	Reporting	Method	Date		Prep/Run
			Limit		Analyzed	Analyst	Batch
Surr: Toluene-d8	97	%	87-106	SW 8260B	07/15/2003	aba	2439
Surr: Bromofluorobenzene	100	%	93-109	SW 8260B	07/15/2003	aba	2439

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531381
Account No: 32050
Page 9 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-3 0-2'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 13:40

Date Received: 07/03/2003

Parameter	Results	Units	Reporting	Method	Date	Prep/Run	
			Limit		Analyzed	Analyst	Batch
Solids, Total	83.7	%	n/a	SW 5035	07/10/2003	kee	5214
TCLP ZHE VOLATILE PREP	COMPLETE			SW 1311	07/11/2003	jts	535
TCLP-VOLATILES-8260							
TCLP-Benzene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Carbon Tetrachloride	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Chlorobenzene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Chloroform	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-1,2-Dichloroethane	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-1,1-Dichloroethene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Methyl Ethyl Ketone	<0.20	mg/L	0.20	SW 8260B	07/14/2003	mae	535 3452
TCLP-Tetrachloroethene	0.18	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Trichloroethene	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
TCLP-Vinyl Chloride	<0.020	mg/L	0.020	SW 8260B	07/14/2003	mae	535 3452
Surr: Dibromofluoromethane	99	%	n/a	SW 8260B	07/14/2003	mae	535 3452
Surr: Toluene-d8	100	%	n/a	SW 8260B	07/14/2003	mae	535 3452
Surr: Bromofluorobenzene	102	%	n/a	SW 8260B	07/14/2003	mae	535 3452
VOC - METHANOL - 8260B							
Benzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Bromobenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Bromochloromethane	<42	ug/kg	35	SW 8260B	07/14/2003	aba	2435
Bromodichloromethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Bromoform	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Bromomethane	<119	ug/kg	100	SW 8260B	07/14/2003	aba	2435
n-Butylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
sec-Butylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
tert-Butylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Carbon Tetrachloride	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Chlorobenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Chlorodibromomethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Chloroethane	<60	ug/kg	50	SW 8260B	07/14/2003	aba	2435
Chloroform	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Chloromethane	<60	ug/kg	50	SW 8260B	07/14/2003	aba	2435
2-Chlorotoluene	<60	ug/kg	50	SW 8260B	07/14/2003	aba	2435
4-Chlorotoluene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,2-Dibromo-3-Chloropropane	<60	ug/kg	50	SW 8260B	07/14/2003	aba	2435
1,2-Dibromoethane (EDB)	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
Dibromomethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,2-Dichlorobenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435
1,3-Dichlorobenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531381
Account No: 32050
Page 10 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-3 0-2'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 13:40

Date Received: 07/03/2003

Parameter	Results	Units	Reporting		Date		Prep/Run	
			Limit	Method	Analyzed	Analyst	Batch	
1,4-Dichlorobenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Dichlorodifluoromethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,1-Dichloroethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,2-Dichloroethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,1-Dichloroethene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
cis-1,2-Dichloroethene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
trans-1,2-Dichloroethene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,2-Dichloropropane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,3-Dichloropropane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
2,2-Dichloropropane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,1-Dichloropropene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
cis-1,3-Dichloropropene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
trans-1,3-Dichloropropene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Di-isopropyl ether	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Ethylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Hexachlorobutadiene	<42	ug/kg	35	SW 8260B	07/14/2003	aba	2435	
Isopropylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
p-Isopropyltoluene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Methylene Chloride	<60	ug/kg	50	SW 8260B	07/14/2003	aba	2435	
Methyl-t-butyl ether	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Naphthalene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
n-Propylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Styrene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,1,1,2-Tetrachloroethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,1,2,2-Tetrachloroethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Tetrachloroethene	32,300	ug/kg	25	SW 8260B	07/15/2003	aba	2439	
Toluene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,2,3-Trichlorobenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,2,4-Trichlorobenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,1,1-Trichloroethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,1,2-Trichloroethane	<42	ug/kg	35	SW 8260B	07/14/2003	aba	2435	
Trichloroethene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Trichlorofluoromethane	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,2,3-Trichloropropane	<119	ug/kg	100	SW 8260B	07/14/2003	aba	2435	
1,2,4-Trimethylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
1,3,5-Trimethylbenzene	<30	ug/kg	25	SW 8260B	07/14/2003	aba	2435	
Vinyl Chloride	<42	ug/kg	35	SW 8260B	07/14/2003	aba	2435	
Xylenes, Total	<42	ug/kg	35	SW 8260B	07/14/2003	aba	2435	
Surr: Dibromofluoromethane	106	%	88-108	SW 8260B	07/14/2003	aba	2435	

ANALYTICAL REPORT

Mr. Jim Bannantine
ARCADIS
126 N Jefferson Street
Suite 400
Milwaukee, WI 53202

07/16/2003
Job No: 03.06083
Sample No: 531381
Account No: 32050
Page 11 of 11

JOB DESCRIPTION: WI001027.0001 Getz Dry Cleaner
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: CHB-3 0-2'
Milwaukee, WI
Rec'd on ice

Date/Time Taken: 07/02/2003 13:40

Date Received: 07/03/2003

Parameter	Results	Units	Reporting	Method	Date		Prep/Run
			Limit		Analyzed	Analyst	Batch
Surr: Toluene-d8	95	%	87-106	SW 8260B	07/14/2003	aba	2435
Surr: Bromofluorobenzene	97	%	93-109	SW 8260B	07/14/2003	aba	2435



Laboratory Task Order No./P.O. No. _____

CHAIN-OF-CUSTODY RECORD

Page 1 of 1

Project Number/Name WI001027.0001/Getz Dry Cleaner
 Project Location Milwaukee, WI
 Laboratory Test America
 Project Manager Jim Bannantine
 Sampler(s)/Affiliation PL / ARCADIS

ANALYSIS / METHOD / SIZE

03.06083

onice

VOC's, 2 on glass jar w/ no preserve
 Dry Weigh, 1 on plastic, no preserve
 TC-LP, 1 on jar, no preserve

Sample ID/Location	Matrix	Date/Time Sampled	Time Lab ID	ANALYSIS / METHOD / SIZE					Remarks	Total
CHB-1 (2-4')	S	7/02/03	1240	1	1	1			3	
CHB-2 (2-4')	S	7/02/03	1255	1	1	1			3	
CHB-3 (0-2')	S	7/02/03	1340	1	1	1			3	

Sample Matrix: L = Liquid; S = Solid; A = Air Total No. of Bottles/Containers 9

Relinquished by: <u>Paul Lenaker</u>	Organization: <u>ARCADIS</u>	Date: <u>7/03/03</u>	Time: <u>10:00 AM</u>	Seal Intact?
Received by: <u>Laura Skuman</u>	Organization: <u>TA</u>	Date: <u>7/03/03</u>	Time: <u>1040</u>	Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
Relinquished by: <u>Laura Coleman</u>	Organization: <u>TA</u>	Date: <u>7/03/03</u>	Time: <u>1410</u>	Seal Intact?
Received by: <u>Carol</u>	Organization: <u>TA</u>	Date: <u>7/3/03</u>	Time: <u>14:40</u>	Yes <input type="radio"/> No <input type="radio"/> N/A

Special Instructions/Remarks: Any questions/comments to Jim B. w/ ARCADIS @ (414) 276-7742.

Delivery Method: In Person Common Carrier Lab Courier Other _____

SPECIFY SPECIFY

ARCADIS

Appendix C

Remediation Site Hazardous
Waste Determination Form

Completion of this form is voluntary. There are no penalties for failure to provide information on this form. Personally identifiable information requested on this form is likely to be used for purposes other than that for which it is originally being collected.

REMEDIATION SITE HAZARDOUS WASTE DETERMINATIONS

- DRAFT -

This form is intended as an aid for use by Generators and Responsible Parties in determining whether *contaminated soil or groundwater and wastes* encountered or generated during the remediation of contaminated sites in Wisconsin are or would be listed or characteristic hazardous wastes¹ subject to regulation under ch. 291, Wisconsin Statutes and chs. NR 600 to 690, Wisconsin Administrative Code.

Listing determinations are often particularly difficult in the remedial context because the listings are generally identified by the sources of the hazardous wastes rather than the concentrations of various hazardous constituents; therefore, analytical testing alone, without information on a waste's source, will not generally produce information that will conclusively indicate whether a given waste is a listed hazardous waste. Generators and Responsible Parties should use available site information such as material safety data sheets (MSDS's), manifests, vouchers, bills of lading, sales and inventory records, accident reports, spill reports, inspection reports, and other available information. It may also be necessary to conduct interviews of current or former personnel who would have knowledge of the processes and hazardous materials used including waste handling or past spills in an effort to ascertain the sources of wastes or contaminants, but when this information is not available or inconclusive the Generator may assume that the wastes (or contaminants) are not listed RCRA hazardous wastes.

Where a person makes a good faith effort to determine if a material is a listed hazardous waste but cannot make such a determination because documentation regarding a source of contamination, contaminant, or waste is unavailable or inconclusive, EPA has stated that one may assume the source, contaminant or waste is not listed hazardous waste and, therefore, provided the material in question does not exhibit a characteristic of hazardous waste, RCRA requirements do not apply.

Generator Information	
Generator's Name <i>Norman Getz</i>	Preparer's Name <i>James Bannantine</i>
Address <i>Route 3 Box 206 AA</i>	Address <i>126 North Jefferson Street</i>
City, State and Zip Code <i>Grafton, West Virginia</i>	City, State and Zip Code <i>Milwaukee WI 53202</i>
Telephone Number <i>1-304-265-1165</i>	Telephone Number <i>414-276-7742</i>

Site Information

¹Section NR 615.06, Wisconsin Administrative Code, requires any person who generates a solid waste to use the following procedure to determine if that waste is a hazardous waste:

- (1) First determine if the solid waste is excluded from regulation under s. NR 605.05.
- (2) Then determine if the solid waste is listed as a hazardous waste in s. NR 605.09.
- (3) For purposes of compliance with ch. NR 675 (Land Disposal Restrictions) or if the waste is not listed as a hazardous waste in s. NR 605.09, determine whether the waste is identified in s. NR 605.08 by either:
 - (a) Testing the waste according to the methods in s. NR 605.08; or
 - (b) Applying knowledge of the hazardous characteristic of the solid waste considering the materials or the processes used.

Site Name <i>Former Norge Dry Cleaners</i>	Site known by any other name(s)? <i>Beloit Rd. Valet Cleaners, Inc.</i>
Address <i>6854 West Beloit Road</i>	County <i>Milwaukee</i>
Located in the <u>City</u> Town or Village and Zip Code <i>West Allis</i>	

INFORMATION REVIEWED TO MAKE A HAZARDOUS WASTE DETERMINATION:

Listed Hazardous Waste Determination

Manifests were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
Vouchers were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
Bills of lading were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
Sales and inventory records were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
Material safety data sheets	Yes / <input checked="" type="radio"/> No / None Found or None Available
Accident reports were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
Spill reports were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
Inspection reports were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
DNR's case files were reviewed	Yes / <input checked="" type="radio"/> No / None Found or None Available
Interviewed several current and former employees who are likely to know about the use and/or disposal of the chemical or waste of concern (not just managers).	Yes / <input checked="" type="radio"/> No / None Found or None Available
Other information considered (provide description)	Yes / <input checked="" type="radio"/> No / None Found or None Available

Characteristic Hazardous Waste Determination

Identified location(s) <i>CHB-1 (2-4')</i> <i>CHB-2 (2-4')</i> <i>CHB-3 (0-2')</i>	<i>See Figure for Sampling Locations</i>	Testing results <i>PCE</i> <i>CHB-1 (2-4') TCLP = 0.11 mg/l</i> <i>CHB-2 (2-4') TCLP = <0.020 mg/l</i> <i>CHB-3 (0-2') TCLP = 0.18 mg/l</i>
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Certification	
I certify that the information documented above in the "Information reviewed to make a hazardous waste determination" section was developed and used as part of a good faith effort to make a hazardous waste determination. Reasonable diligence was used in collecting the information, evaluating the information, and using the compiled information. I certify that this document is true and correct to the best of my knowledge, and that I have authority to make this certification.	
Name and Title	
<i>James Bannantine Senior Hydrogeologist</i>	
Signature and Date	
<i>James E Bannantine 8/11/03</i>	

Note: DNR will concur or not concur with the Generator's hazardous waste determination based on the certification and any information submitted with it. DNR may reconsider its concurrence based on new, additional or corrected information. A change in the hazardous waste determination may change waste management options.

For DNR use only:

DNR Review
Based on this certification and the supporting information (if any) that was submitted with it, DNR
<input type="checkbox"/> <u>concur</u>
<input type="checkbox"/> <u>does not concur</u>
with the Generator's hazardous waste determination.
Comments:
Signature and Date

12/03/02