

Engineers • Land Surveyors • Environmental Scientists

December 12, 2007

Ms. Christine Vernor Badger Lease & Auto Sales c/o Mr. Mark Treter Treter Law Office 6951 Industrial Loop Greendale, WI 53129-2444

RE: Project Upda e and Proposal NR 141 Monitoring Well and Vapor Probe Installation Badger Lease and Auto Sales 9601 West Greenfield Avenue West Allis, Wisconsin

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Dear Ms. Vernon:

Pursuant to our Wisconsin Department of Natural Resources (WDNR)-approve work plan (January 8, 2007), RSV Engineering, Inc. (RSV) installed and sampled temporary groundwater monitoring wells at five locations, and collected soil samples from three locations, at the Badger Lease & Auto Sales (Badger) facility, as shown on Figure 1.

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Results of samples collected from temporary monitoring wells installed north and east of the site in September 2007 indicate additional work is necessary to delineate the extent of groundwater impacts at the site. Consequently, RSV is submitting this proposal for additional site investigation, as required by ch. NR 716.09 of the Wisconsin Administrative Code.

September 2007 Investigation Results

RSV initiated additional site investigation activities in September 2007 to further define the extent and magnitude of soil and groundwater impacts beneath the property and to the north, east, and southeast of the property. Two temporary monitoring wells were installed east of 96th Street (SB101 and SB102), one temporary monitoring well was installed in the median of Greenfield Avenue north of the property (SB103), and two temporary monitoring wells were installed on the property; one adjacent to the floor drain in the vicinity of the former dry cleaning units (SB105), and an additional well adjacent to the southeast corner of the current building (SB104). All drilling was logged by an RSV hydrogeologist; boring logs are included in Attachment A. As discussed in the January 2007 Work Plan, the purpose of these temporary monitoring wells was to gather data to aid in selection of locations for permanent monitoring wells.

Selected soil samples were collected for analysis of volatile organic compounds (VOCs), based on screening results from a photoionization detector (PID) and visual and olfactory observations. Results are summarized in Table 1; laboratory reports are provided in Atachment B. Groundwater samples

were collected from each location for analyses of VOCs, and the borings were subsequently abandoned in accordance with NR141 requirements. Results of the groundwater analyses are summarized in Table 2.

Soil:

Analytical results from the borings indicate that soil impacts observed in the B-4 and MW-8 samples extend beneath the building and likely under the sidewalk in the area of SB104 (Figure 1). The northern and western edges of chlorinated VOC (CVOC) soil impacts in this area appear to be defined. However, an additional area of CVOC impacts to soil is present at the northern edge of the property, as evidenced by elevated concentrations of tetrachloroethene (PCE) in a soil sample collected from MW-4. The presence of PCE in this area suggests that the sanitary sewer, which enters the property adjacent to MW-4 may be acting as a preferential pathway for contaminant migration.

Soils impacted with petroleum VOCs (PVOCs) were identified east of 96th Street, at the location of SB102. Petroleum impacts related to the presence of the former underground storage tanks (USTs) had already been identified in the northeastern corner of the subject property, limited to the area surrounding MW-5. The areas may be related; however, the presence of a utility corridor in the center of 96th Street makes it less probable that soil impacts could migrate across this feature. Consequently, the PVOCs detected at SB102 may originate at another source in that area.

Groundwater:

Groundwater analytical results from the September 2007 temporary well sampling, in combination with previous sampling of site monitoring wells, indicate that the extent of groundwater impacts is generally defined to the north, northeast and west. Elevated concentrations of CVOCs detected in SB101 indicate that the southeastern extent of groundwater exceeding NR140 Enforcement Standards (ESs), or the leading edge of the plume, has not been defined. Detection of PCE in excess of the ES at SB103 to the north of the property, is a further indication that the utility corridor in that area may be functioning as a preferential pathway for groundwater and/or soil vapors in that direction.

Additional Work Required

Soil Borings and Soil Vapor Probes:

Pursuant to our January 2007 proposal and direction from the WDNR, soil vapor monitoring will be necessary. Three soil vapor probes are proposed in the approximate locations shown on Figure 2. One sub-slab vapor probe sampling point will be established within the structure on the site, near the location of the former drycleaning units. The probe will be a stainless steel implant manufactured by Swagelok (Figure 3) and will be installed into a 1-inch hole drilled into the concrete floor. Two additional vapor probes will be installed into the grass on the subject property south of the building. Air samples will be collected from each vapor probe and submitted to a WDNR-certified environmental laboratory for analyses by EPA Method TO-15.



Monitoring Wells:

As discussed in the January 2007 Work Plan, additional NR 141 compliant monitoring wells are necessary to further define the extent and magnitude of groundwater impacts beneath the site and vicinity. The three new wells will be drilled on City of West Allis property in the approximate locations on Figure 2. Wells MW101 through MW103 will be installed in the approximate locations of SB101 through SB103, with MW101 adjusted to the south and east closer to the leading edge of the plume.

We anticipate that well drilling will be completed using a truck-mounted hollow stem auger drilling rig. Soil samples will be collected during drilling of MW101 utilizing hydraulic push techniques and lithology will be logged by qualified field staff, observations regarding staining and odor will also be recorded. Samples will not be collected during drilling of MW102 or MW103, due to their proximity to previous borings SB102 and SB103. Analytical samples are not anticipated to be collected during borehole drilling for monitoring well construction.

Wells will be constructed with 2-inch Schedule 40 flush-threaded PVC and will have 10-foot factoryslotted screens set at a depth of 7 to 8 feet below the water table. Flush-mount protective covers with locking caps will be installed at each location. For purposes of cost estimation, we do not anticipate the construction more than three monitoring wells; however, as discussed below, our proposal provides unit rates in the event that more than three monitoring wells are needed.

After wells are installed, their locations and elevations will be surveyed to the nearest 0.01 foot, relative to a local datum. Because the existing wells have been in place for several years, and because the site is active with respect to vehicle traffic, elevations of the existing wells will be re-surveyed at the time of surveying the new wells.

Wells will be developed by surging and purging, and WDNR well construction and development forms will be completed. Wells MW-1 through MW-3 and PZ-1 and PZ-2 will also be re-developed in anticipation of sampling them concurrently with the new wells. After a minimum of 3 days, RSV will return to the site for the first groundwater sampling event. RSV will measure groundwater elevations, purge all wells, and collect groundwater samples. All purge water will be containerized in clean DOT-approved 55 gallon drums pending groundwater analyses, and subsequent selection of an appropriate disposal method. Groundwater samples will be forwarded on ice to a WDNR-certified environmental laboratory for analyses of VOCs. This procedure will be repeated three more times on a quarterly basis for a total of four rounds of groundwater sampling.

Utility Corridor Assessment:

As noted above, utility trenches backfilled with materials more permeable than the native clay in the study area may be acting as preferential pathways for contaminant migration to the north and east of the site. While it is not feasible to drill investigative borings or install monitoring wells along these corridors in the centers of Greenfield Avenue or 96th Street, monitoring wells proposed herein for installation will monitor contaminant migration east of the corridor (MW-101 and MW-102) and along the corridor to the north (MW-103). At this time, no additional sampling along the utility corridors is proposed



Disposal of Investigative Waste:

Currently, numerous drums are present in the location shown on Figure 1, containing the waste from historical site investigation activities. Sigma Environmental Services, Inc. (Sigma) submitted two drum composite samples for Protocol B concurrently with their investigation activities at the site. An application for approval of the waste for disposal at a Subtitle D landfill was filed on October 8, 2002 (Appendix C); however, it is unknown whether that application was approved. Costs for Protocol B waste profiling were included in the January 2007 Work Plan. RSV assumes at this time that the laboratory analytical results for the 2002 samples can be obtained from Sigma and used to complete a waste profile for disposal of Sigma and RSV investigation wastes. Competitive quotes will be obtained from waste disposal contractors following completion of monitoring well installation, and the drums will be disposed of following completion of this phase of site investigation.

Deliverables

After completion of the site investigation and laboratory analyses, RSV will evaluate the results of the field study and prepare a report. The report will summarize the work preformed by Sigma, STS and RSV with updated figures, analytical results tables, soil boring logs and monitoring well construction and development forms, as well as laboratory analytical reports.

Project Management

Robert J. Nauta, P.G. – Project Manager / Vice President

This project will be managed by Robert Nauta, a professional geologist in the State of Wisconsin and NR 712 hydrogeologist. Following completion of a Master's Degree in hydrogeology from the University of Wisconsin-Madison, Mr. Nauta has attained over 20 years of consulting experience ranging from field management to large-scale project management. His project experience has included numerous investigations of sites impacted with chlorinated VOCs, and has a successful history of site closures.

Paula Richardson – Project Hydrogeologist

Field investigation and data analyses will be provided by Paula Richardson, RSV Project Hydrogeologist. Ms. Richardson has over 4 years of environmental consulting experience as a hydrogeologist for site hydrogeologic characterization and evaluation of soil and groundwater contamination for properties impacted with petroleum products, chlorinated organics, coal gasification by-products, metals, polychlorinated biphenyls, and ash.

Schedule

RSV is prepared to begin work immediately upon receiving authorization to proceed. Based upon typical preparation time and subcontractor schedules, we anticipate being in the field within 2 to 3 weeks of authorization to proceed. Monitoring well and soil vapor probe installation and well development will take 1 to 2 days, and groundwater sampling will require an additional day of field



time. Typical laboratory turnaround is 3 weeks, and the draft report preparation will be completed approximately 2 to 3 weeks after laboratory reports are received.

Estimated Costs

Estimated total costs are summarized in Table 3. Please note that Table 3 replaces the costs provided in Table 1 of our previous work plan, and has been modified to include one more monitor well and a third soil vapor probe. Fees will be assessed on a time and materials basis in accordance with the rates summarized in the attached rate schedule. Additionally, prior to selection of subcontractors, a minimum of three competitive bids will be obtained from qualified providers of each service, and selections will be made based on low bids for each service. Updated cost spreadsheets for the DERF program are included in Attachment D.

Terms and Conditions

RSV will complete the Scope of Services described above on a time and material basis in accordance with the estimated costs in Table 3. Within 30 days of the date Consultant's invoice is received by Client, Client shall pay the full amount of such invoice. Client shall pay an additional charge of 1-1.2% of the unpaid invoice amount per month, to the extent legally payable, for any payment made more than 30 days after the date of the invoice; provided, however, that such additional charge shall not apply to any disputed portion of any invoice resolved in favor of Client.

Disclaimer & Insurance

The rules of the PECFA program (WAC Comm 47) require that we disclose the following information:

Although the Petroleum Environmental Cleanup Fund (PECFA) may reimburse a substantial share of the cost of conducting a remediation of a petroleum contamination, the owner will have a program deductible which they must pay. In addition, there may be costs that are not covered by the PECFA fund or are above the maximums that will be reimbursed for by the fund. A remediation may cost you more than the deductible.

As with the PECFA program, some costs incurred may not be reimbursable through the dry cleaning fund.



RSV complies with the professional insurance coverage requirements established by Administrative Code for PECFA and DERF projects.

Please review this update and proposal, and contact us with any questions or concerns. With your approval, this will then be forwarded to the WDNR project manager for review and approval, in accordance with the rules of the DERF program.

Respectfully,

RSV ENGINEERING, INC.

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Paula A. Richardson Hydrogeologist

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Robert J. Nauta, P.G. Vice President

✓cc: Mark Treter, Esq.



TABLE 1

BADGER LEASE & AUTO SALES 9601 Greenfield Ave., West Allis WI SOIL ANALYESE - VOLATILE ORGANIC COMPOUNDS Concentrations in µg/kg

	Wiscon	sin Administra	tive Code		EPA SSLs		SAMPL	E LOCATIO	ON AND DE	PTH (ft)
PARAMETER	NR 720	NR 746	NR 746	Ingestion	Inhalation of	Migration to	SB102	SB104	SB105	SB105
	RCLs	SSLs-Table 1	SSLs-Table 2	Dermal	Volatiles	Groundwater	6-8'	8-10'	2-4'	6-8'
Benzene	5.5	8,500	1,100	58,000	1,000	30	<u>39</u>	<30	<59	<340
n-Butylbenzene	NS	NS	NS	NS	NS	NS	<32	<30	<59	<340
sec-Butylbenzene	NS	NS	NS	NS	NS	NS	<32	<30	<59	<340
cis-1,2-Dichloroethene	NS	NS	NS	11,000,000	NS	400	<32	200	<59	1,300
trans-1,2-Dichloroethene	NS	NS	NS	23,000,000	NS	700	<32	40	<59	<340
Ethylbenzene	2,900	4,600	NS	110,000,000	400,000	13,000	<32	<30	<59	<340
Isopropylbenzene	NS	NS	NS	NS	NS	NS	<32	<30	<59	<340
p-Isopropyltoluene	NS	NS	NS	NS	NS	NS	<32	<30	<59	<340
Methylene chloride	NS	NS	NS	420,000	22,000	20	<63	<60	<120	<670
Methyl-t-butyl ether	NS	NS	NS	NS	NS	NS	<32	<30	<59	<340
Naphthalene	NS	2,700	NS	12,000,000	240,000	84,000	490	<60	<120	<670
n-Propylbenzene	NS	NS	NS	NS	NS	NS	<32	<30	<59	<340
Tetrachloroethene	NS	NS	NS	6,000	2,000	60	<32	6,800	13,000	50,000
Toluene	1,500	38,000	NS	230,000,000	650,000	12,000	<32	<30	<59	<340
Trichloroethene	NS	NS	NS	8,000	100	60	<32	3,500	230	9,100
1,2,4-Trimethylbenzene	NS	83,000	NS	NS	NS	NS	36	<30	<59	<340
1,3,5-Trimethylbenzene	NS	11,000	NS	NS	NS	NS	<32	<30	<59	<340
Vinyl chloride	NS	NS	NS	4,000	1,000	10	<44	<u>61</u>	<83	<470
Xylenes, total	4,100	42,000	NS	1,000,000,000	NS	200	<110	<100	<200	<1,100

<u>39</u> : Exceeds one or more regulatory standards.

NS : Standard not established.

<32 : Analyte not detected above detection limit shown.

Detected analytes and other analytes of interest shown, reference laboratory report for full list of VOCs analyzed.

TABLE 2

BADGER LEASE & AUTO SALES 9601 Greenfield Ave., West Allis WI GROUNDWATER ANALYSES - VOLATILE ORGANIC COMPOUNDS Concentrations in µg/L

PARAMETER	WAC I	NR 140		SAM	IPLE LOCAT	ΓΙΟΝ	
	ES	PAL	SB101	SB102	SB103	SB104	SB105
Benzene	5	0.5	<20	<u>120</u>	0.32	<8.0	<40
n-Butylbenzene	NS	NS	<20	5.3	< 0.20	<8.0	<40
sec-Butylbenzene	NS	NS	<25	3.2	< 0.25	<10	<50
cis-1,2-Dichloroethene	70	7	7,900	<1.0	< 0.50	760	2,700
trans-1,2-Dichloroethene	100	20	<50	<1.0	< 0.50	<u>63 J</u>	<100
Ethylbenzene	700	140	<50	9.7	< 0.50	<20	<100
Isopropylbenzene	NS	NS	<20	13	< 0.20	<8.0	<40
p-Isopropyltoluene	NS	NS	<20	1.7	< 0.20	<8.0	<40
Methylene chloride	5	0.5	<100	<2.0	<1.0	<40	<200
Methyl-t-butyl ether	60	12	<50	<1.0	< 0.50	<20	<100
Naphthalene	100	10	<25	1.1	< 0.25	11 J	<50
n-Propylbenzene	NS	NS	<50	24	< 0.50	<20	<100
Tetrachloroethene	5	0.5	<u>960</u>	<1.0	6.8	3,200	14,000
Toluene	1,000	200	<20	10	0.61	<8.0	<40
Trichloroethene	5	0.5	2,700	< 0.40	0.45	1,700	9,700
1,2,4-Trimethylbenzene	480	96	<20	2.1	< 0.20	<8.0	<40
1,3,5-Trimethylbenzene	480	96	<20	2.1	<0.20	<8.0	<40
Vinyl chloride	0.2	0.02	<u>410</u>	< 0.40	< 0.20	<u>340</u>	<40
Xylenes, total	10,000	1,000	<50	35	<0.50	<20	<100

760 : Exceeds NR 140 Enforcement Standard (ES).

<u>63</u>: Exceeds NR 140 Preventive Action Limit (PAL).

NS : Standard not established.

<20 : Analyte not detected above detection limit shown.

Detected analytes and other analytes of interest shown, reference laboratory report for full list of VOCs analyzed.

TABLE 3 **ESTMATED FEES** SITE INVESTIGATION BADGER LEASING AND AUTO SALES 9601 WEST GREEFIELD AVENUE WEST ALLIS, WISCONSIN

TASK	UNITS	QTY.	RATE	C	OSTS
			NATE	RSV	SUBCONT
Tasks 1 and 2: Additional Soil Sampling a					
Project Manager	Hours	6	\$120	\$720	
Environmental Scientist	Hours	20	\$85	\$1,700	
Geoprobe ^{1,2}	Days	1	\$1,395		\$1,395
City ROW Permit	Each	1	\$60		\$60
Concrete Coring	Each	1	\$300		\$300
Utility clearance	Each	1	\$75		\$75
Expenses - PID rental	Days	2	\$100	\$200	
Expenses - Consumables	Days	1	\$50	\$50	
Laboratory analyses ^{1,3}	Quote	10	\$55		\$550
			Subtotal:	\$2,670	\$2,380
Task 3: Monitor Well Construction and Fe	our Rounds of Sampl	ing			
Project Manager	Hours	6	\$120	\$720	
Environmental Scientist	Hours	78	\$85	\$6,630	
Survey Technician	Hours	8	\$55	\$440	
Drilling Contractor ¹	Quote	1	\$3,214		\$3,214
City ROW Permit	Each	1	\$160	***************************************	\$160
Laboratory analyses 1,3, 4	Quote	63	\$55	******	\$3,465
Expenses - Consumables	Days	4	\$50	\$200	40,100
			Subtotal:	\$7,990	\$6,839
Task 4: Vapor Probe Sampling					
Environmental Scientist	Hours	16	\$85	\$1,360	
Laboratory Analyses ^{1,6}	Ouote	3	\$277		\$831
Probe Assemblies - Sub-slab	Each	1	\$65		\$65
Probe Assemblies - Exterior	Each	2	\$80		\$160
			Subtotal:	\$1,360	\$1,056
Task 5: Disposal of Investigative Waste					1
Environmental Scientist	Hours	8	\$85	\$680	
Laboratory Analyses ^{1,6}	Quote	1	\$825		\$825
Ovepacks of dammaged drums ⁷	Each	4	\$200		\$800
Disposal ^{5, 8}	Quote	48	\$145		\$6,960
			Subtotal:	\$680	\$8,585
Task 6: Report					
Principal Hydrogeologist/Engineer	Hours	6	\$150	\$900	
Project Manager	Hours	24	\$120	\$2,880	
Environmental Scientist	Hours	12	\$85	\$1,020	
CADD Operator	Hours	8	\$70	\$560	
Accounting/Clerical	Hours	8	\$45	\$360	
			Subtotal:	\$5,720	\$0
	ESTIMAT	TED TOTA	L COSTS:	\$18,420	\$18,860
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 1 A 10% subcontractor handling charge will be added if the subcontractor invoice is paid by RSV.

² Geoprobe cost includes three temporary wells (Task 3-A).

³ Unit costs for soil and groundwater analyses are for normal turnaround. Expedited turnaround will increase costs by a factor of 2.

Samples include all existing wells, three new wells, three temporary wells and two duplicates.

⁵ Assumes that Protocol B testing will be required for disposal of waste generated during proposed phase of investigation.

⁶ Assumes the following:

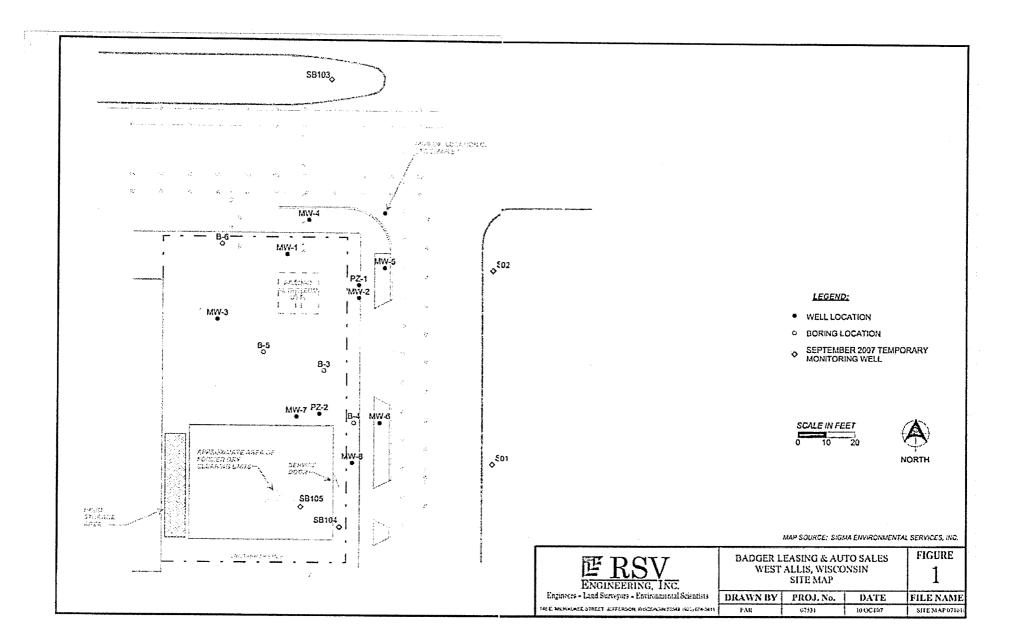
- A total of 30 drums will be disposed, including existing drums.

- Waste will qualify as special or non-hazardous.

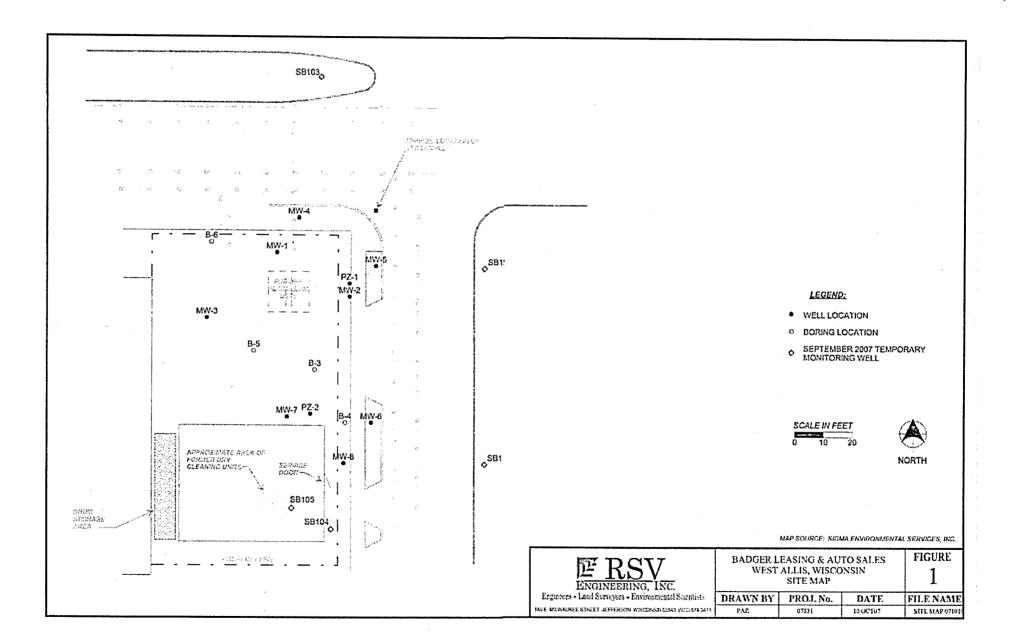
- Actual cost will be based on actual waste generated.

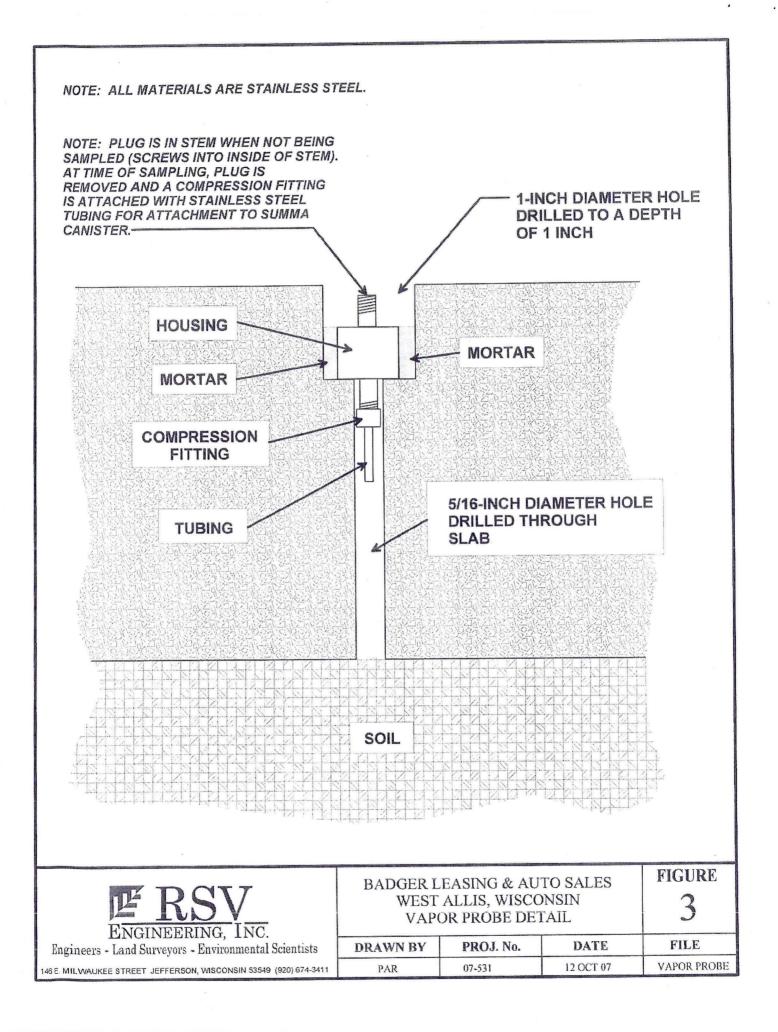
⁷ RSV observed 4 drums that will clearly need overpacking for shipment. It is possible that other drums will be found in need of overpacking as well, based on a determination by the waste handler.

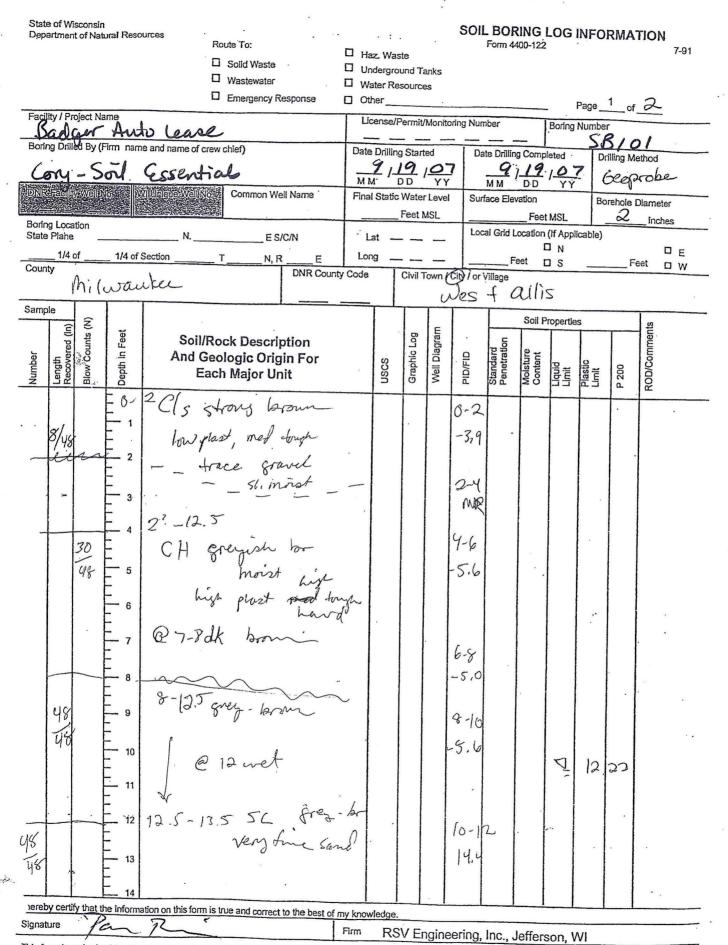
⁸ There are currently 40 drums at the site. This estimate is based on an assumption that the RSV work will generate an additional 8 drums.



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This form is authorized by Chapters 144.147 and 162, Wis. Stats. Completion of this report is mandatory. Penalties: Forfeit not less than \$10 nor more than \$4,000 for separate offense, pursuant to ss 144.99 and 162.06, Wis. Stats

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This form is authorized by Chapters 144.147 and 162, Wis. Stats. Completion of this report is mandatory. Penalties: Forfeit not less than \$10 nor more than \$4,000 for each violation. Fines not less than \$10 or more than \$100 or imprisoned not less than 30 days, or both for each violation. Each day of continued violation is a separate offense, pursuant to ss 144.99 and 162.06, Wis. Stats

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This form is authorized by Chapters 144.147 and 162, Wis. Stats. Completion of this report is mandatory. Penalties: Forfeit not less than \$10 nor more than \$4,000 for each violation. Fines not less than \$10 or more than \$100 or imprisoned not less than 30 days, or both for each violation. Each day of continued violation is a sparate offense, pursuant to ss 144.99 and 162.06, Wis. Stats

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THE LEADER IN ENVIRONMENTAL TESTING

602 Commerce Drive Watertown, WI 53094 * 800-833-7036 * Fax 920-261-8120

September 28, 2007

Client:	RSV ENGINEERING, INC. 146 East Milwaukee Street PO Box 298 Jefferson, WI 53549	Work Order: Project Name: Project Number:	WQI0707 Badger Auto Lease [none] 07-53	
Attn:	Mr. Bob Nauta	Date Received:	09/19/07	

An executed copy of the chain of custody is also included as an addendum to this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-800-833-7036

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
SB102 6-8	WQI0707-01	09/19/07 12:00
SB104 8-10	WQI0707-02	09/19/07 12:15
SB105 2-4	WQI0707-03	09/19/07 13:30
SB105 6-8	WQI0707-04	09/19/07 14:15
SB101	WQI0707-05	09/19/07 12:30
SB102	WQI0707-06	09/19/07 13:00
SB103	WQI0707-07	09/19/07 14:00
Trip Blank	WQI0707-08	09/19/07
MeOH Blank	WQI0707-09	09/19/07

Samples were received into laboratory on ice.

Wisconsin Certification Number: 128053530

The Chain of Custody, 1 page, is included and is an integral part of this report.

Unless subcontracted, volatiles analyses (including VOC, PVOC, GRO, BTEX, and TPH gasoline) performed by TestAmerica Watertown at 1101 Industrial Drive, Units 9&10. All other analyses performed at the address shown in the heading of this report.

Lab data avail. not recopied. See 9/20/12 letter/report. fr 1ab reports.

Approved By:

Brian Je Jong

TestAmerica - Watertown, WI Brian DeJong For Dan F. Milewsky Draiant Manager

10-4-07