

① Sewers  
② Vapor



RJV Environmental Services, LLC  
Surface Water Studies  
Groundwater Studies  
Site Investigations

February 10, 2015

Nancy D. Ryan, Hydrogeologist  
Linda Michalets, Hydrogeologist  
Bureau for Remediation and Redevelopment  
Wisconsin Department of Natural Resources  
2300 N. Dr. Martin Luther King, Jr. Dr.  
Milwaukee, Wisconsin 53212

RE: Badger Lease & Auto Sales, Inc. 3  
BRRTS Numbers 02-41-305222 and 02-41-005185  
West Allis, Wisconsin

Dear Ms. Ryan and Ms. Michalets:

Pursuant to requests from the Wisconsin Department of Natural Resources ("WDNR"), RJN Environmental Services, LLC ("RJN") has prepared this proposal for additional investigative activities at the Badger Lease & Auto Sales, Inc. ("Badger") site in West Allis, Wisconsin.

**Groundwater Conditions**

Figure 1 shows the groundwater flow conditions, as measured on July 24, 2002. As the figure shows, groundwater flow was in an easterly-southeasterly direction. However, as a summary of groundwater quality conditions shows on Figure 2, exceedances of chlorinated VOCs have been detected to the northeast of the Badger site. Consequently, there is indication of variable groundwater flow conditions.

**Recommended Additional Study**

The conditions presented on Figure 2 indicate that additional groundwater quality monitoring is justified to the east of the Badger site, and the WDNR has requested a well on the south side of the site. Consequently, RJN is proposing the construction of three additional groundwater monitoring wells in the locations shown on Figure 3. The wells will be constructed using a hollow stem auger rig, in accordance with the conditions of Wisconsin Administrative Code NR 141.

Drilling will be supervised and logged by a Wisconsin-registered professional geologist. Because these areas are not in source areas for petroleum or chlorinated contamination, no soil screening or sampling will be performed. *Soil & sample locat. S of Blage*

After well construction, wells will be properly developed. Documentation, including WDNR forms 4400-113A and 4400-113B, will be completed. *— need Screening &*

A minimum of 72 hours after well construction and development, the wells will be sampled. Prior to sampling, water levels will be measured in all wells, and the wells will be purged by bailing three casing

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Phone: 608.576.3001

*Soil vapor?*

volumes (if well can be purged dry, they will be purged once, and allowed to recover to 75 percent of the original volume). After purging, samples will be collected in laboratory-supplied containers.

Because wells MW-3, PZ-1 and PZ-2 have historically yielded no detections of contaminants, RJN recommends that these wells not be sampled; however, their water levels will be measured.

Sampled will be placed in an iced cooler, and shipped by overnight delivery to the TestAmerica laboratory in College Park, Illinois, for analyses of VOCs. TestAmerica is a WDNR-certified environmental laboratory.

After the analyses are completed, RJN will prepare a brief letter report, summarizing the results, and making recommendations, as appropriate. Boring logs and well construction and development forms will be included.

### ***Division of Fees and Costs Between PECFA and DERF Claims***

#### **Work Completed but not Claimed:**

A claim for work that has been completed, but not yet submitted for reimbursement is the desired immediate step for Badger. It is essential that funds be replenished so that work can proceed on the work plan summarized above. Significant work has been completed since the last PECFA claim was submitted. This has included work by Sigma, RSV and RJN, and has included soil sampling, groundwater sampling and the disposal of investigative waste (soil).

With respect to historical soil quality, petroleum compounds have been detected in approximately 30 percent of soil borings, and chlorinated compounds in 70 percent. RJN therefore recommends that of the laboratory and labor costs that can be attributed to soil sampling be divided on a 30/70 basis with respect to PECFA and DERF claims.

A similar assessment of groundwater quality shows the split to be 25 percent petroleum compounds and 75 percent chlorinated compounds. RJN therefore recommends that costs for work that has been completed for which no claim has yet been filed, and that can be attributed to the groundwater study be split on a 25/75 basis with respect to PECFA and DERF claims.

It is unlikely that all costs to be claimed can be attributed to either the soil or groundwater investigation. Therefore, based on the summary above, RJN recommends that of the remaining fees and costs, 27.5 percent be applied to a PECFA claim and 72.5 percent to a DERF claim.

#### **Proposed Work Plan:**

The proposed work plan includes the construction of three monitoring wells, and the sampling of the three new wells and seven of the existing wells. The three proposed wells are at locations where temporary wells have produced contaminants. Chlorinated compounds were detected at the locations of proposed wells MW-10 and MW-11, and petroleum compounds have been detected at the location of proposed well MW-9. Therefore, RJN recommends that one-third of the cost of well construction be attributed to PECFA, and the remaining two-thirds applied to DERF.

Based on the percentage of historical detections in groundwater, RJN recommends that 30 percent of sampling costs be applied to PECFA and the remainder to DERF. Because a PECFA investigation would



*2, 27.5*

only require the analyses of petroleum volatile organic compounds (PVOCs), RJN will obtain a quote for both PVOCs and VOCs from the laboratory, and the difference will be applied to the DERF program, which requires the analyses of the full VOC scan.

### ***Estimated Costs***

Table 1 summarizes the estimated costs for monitoring well construction and one round of samples. Table 1 also contains columns indicating the amount to be applied to a PECFA claim and a DERF claim.

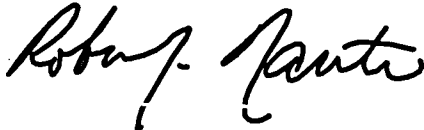
### ***Closing***

RJN believes that the scope presented above provides a meaningful approach to advancing the knowledge of the extent of impacts from the contamination associated with the Badger site.

As we have expressed numerous times in the past, funding is essential to any additional work, including the scope proposed in this letter. We have made every possible effort to produce documentation for past work that has not yet been submitted for reimbursement. Although it is clear that the services have been performed, including drilling and laboratory contracted work, we are at an impasse due to a lack of the documentation that the WDNR is requiring. We urgently request assistance in overcoming those obstacles so that work can progress.

If you have any questions or additional requests, please contact us.

Sincerely,  
RJN ENVIRONMENTAL SERVICES, LLC



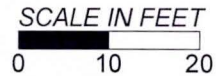
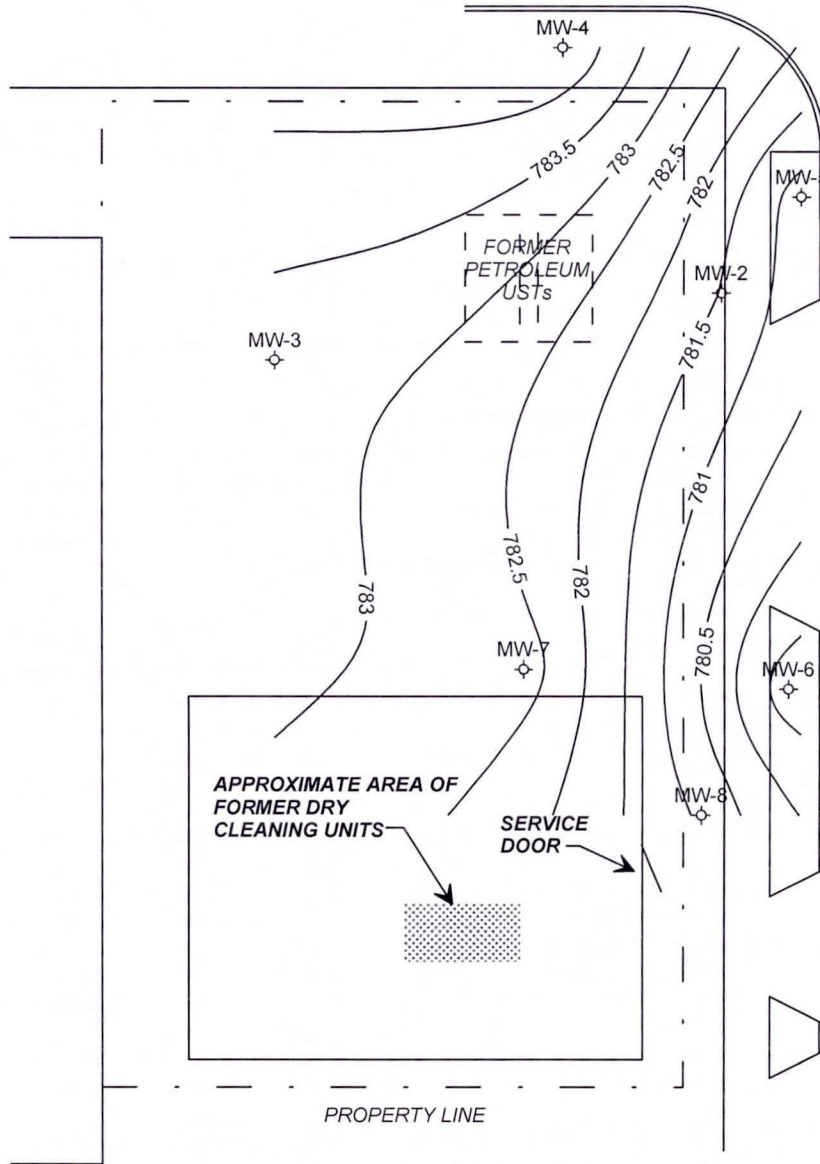
Robert J. Nauta  
Hydrogeologist

Cc: Badger Lease and Auto Sales, Inc.  
Mark C. Treter, Esq. – Treter Law Office



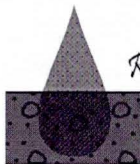
⊕ MONITORING WELL

— 783 — GROUNDWATER ELEVATION (FEET, MSL)



NORTH

WATER LEVEL AT MW-1 WAS NOT LEGIBLE ON SIGMA DOCUMENT.  
MAP SOURCE: SIGMA ENVIRONMENTAL SERVICES, INC.



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BADGER AUTO LEASING  
WEST ALLIS, WISCONSIN  
WATER TABLE - 07/24/02

DRAWN BY	PROJ. No.	DATE	FILE
RN	12-103	12 JAN 15	WTR 072402

FIGURE  
1

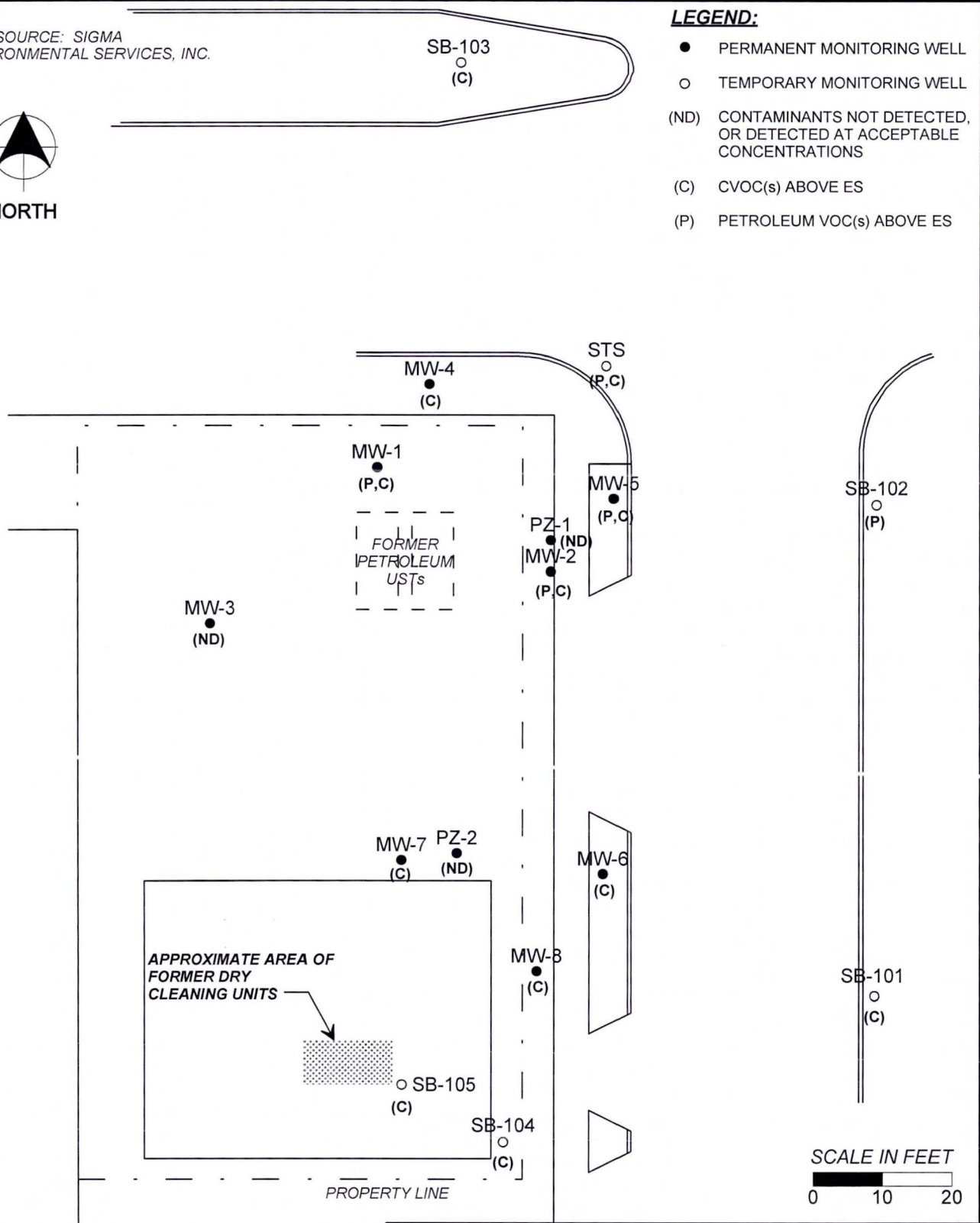
MAP SOURCE: SIGMA ENVIRONMENTAL SERVICES, INC.



NORTH

**LEGEND:**

- PERMANENT MONITORING WELL
- TEMPORARY MONITORING WELL
- (ND) CONTAMINANTS NOT DETECTED, OR DETECTED AT ACCEPTABLE CONCENTRATIONS
- (C) CVOC(s) ABOVE ES
- (P) PETROLEUM VOC(s) ABOVE ES



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BADGER LEASE WEST ALLIS, WISCONSIN HISTORICAL GROUNDWATER CONDITIONS			<b>FIGURE</b> <span style="font-size: 2em;">2</span>
<b>DRAWN BY</b>	<b>PROJ. No.</b>	<b>DATE</b>	<b>FILE</b>
RN	12-103	12 JAN 15	GW QUAL

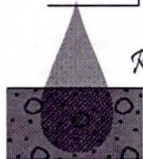
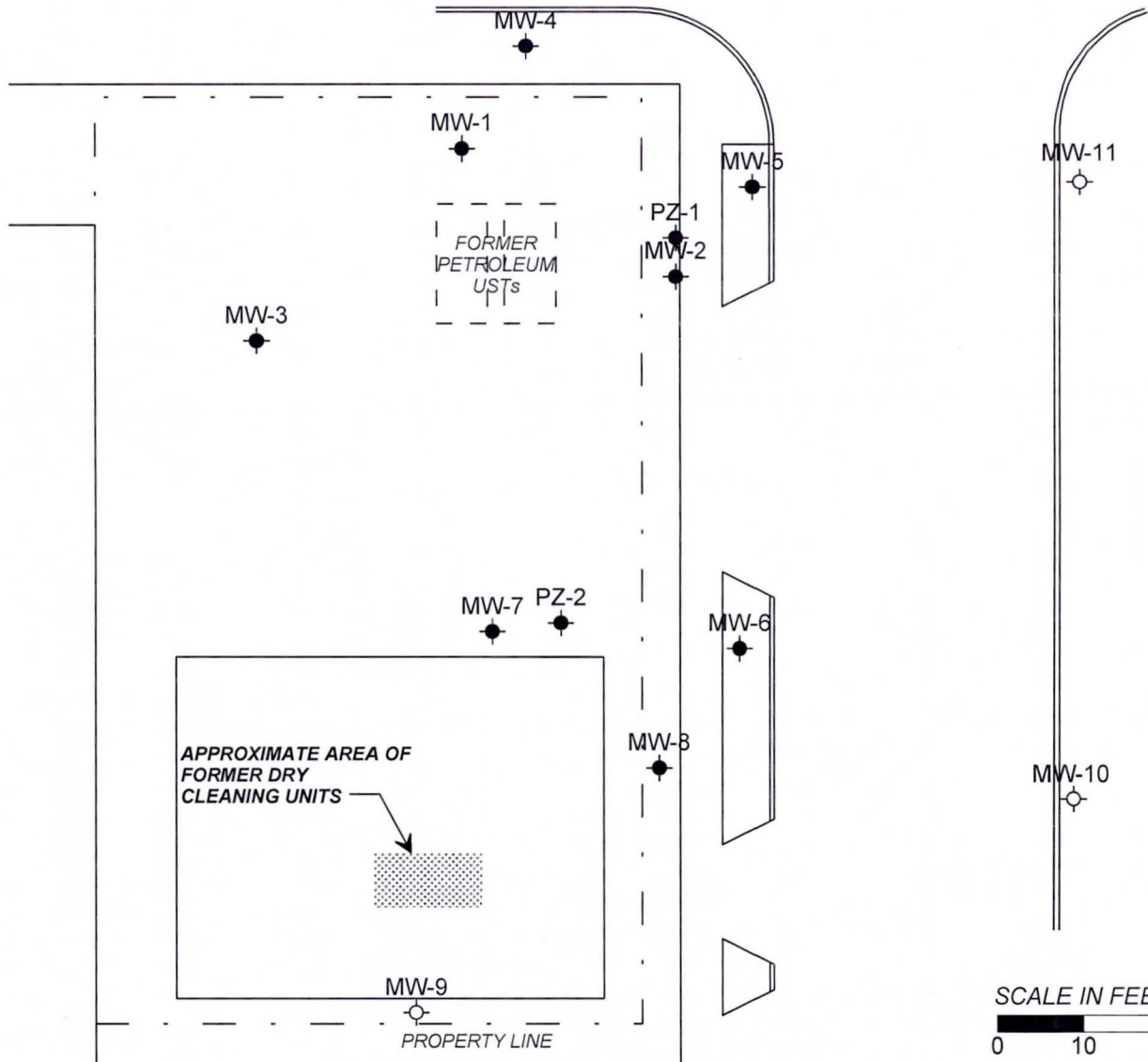
MAP SOURCE: SIGMA  
ENVIRONMENTAL SERVICES, INC.



NORTH

**LEGEND:**

- EXISTING MONITORING WELL
- PROPOSED MONITORING WELL



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<b>BADGER LEASE WEST ALLIS, WISCONSIN PROPOSED SITE INVESTIGATION</b>			<b>FIGURE 3</b>
<b>DRAWN BY</b>	<b>PROJ. No.</b>	<b>DATE</b>	<b>FILE</b>
RN	12-103	12 JAN 15	INVESTIGATION

TABLE 1  
BADGER LEASE & AUTO SALES  
ESTIMATED COSTS

TASK	UNITS	QTY	RATE	COST	PECFA	DERF
<b>Task: Project management</b>						
Hydrogeologist	Hours	16	\$125	\$2,000	\$600	\$1,400
Permitting	Estimate	1	\$250	\$250	\$75	\$175
<b>Subtotal:</b>				\$2,250	\$675	\$1,575
<b>Task: Well Construction &amp; Development</b>						
Hydrogeologist	Hours	16	\$85	\$1,360	\$449	\$911
Driller	Quote	1	\$1,395	\$1,395	\$460	\$935
Expenses	Estimate	1	\$250	\$250	\$83	\$167
<b>Subtotal:</b>				\$3,005	\$992	\$2,013
<b>Task: Sampling</b>						
Hydrogeologist	Hours	16	\$85	\$1,360	\$408	\$952
Lab	Each	10	\$100	\$1,000	\$300	\$700
Expenses	Estimate	1	\$250	\$250	\$75	\$175
<b>Subtotal:</b>				\$2,610	\$783	\$1,827
<b>ESTIMATED TOTAL COSTS</b>				\$7,865	\$2,450	\$5,415