

CERTIFIED RETURN RECEIPT REQUESTED

February 21, 2000

Mr. Earl Vander Weilen III
Mallory Improvements
445 West Oklahoma Avenue
Milwaukee, WI 53207

REVISED LETTER

Mr. Scott Ferguson
WDNR – Waste Management Section
4041 North Richards Street
Milwaukee, WI 53212

Mr. David Dahms
WDNR Enforcement Section
4041 N. Richards Street
Milwaukee, WI 53212

Gentlemen:

Re: WDNR Administrative Order No. 98-SEEE-056, Regarding the Former
Hein-Werner Property Located at 1005 Perkins Avenue, Waukesha, Wisconsin

Please disregard the previous letter that was sent with the Key Engineering Group Site Investigation Report. Due to an error in the previous letter, this one is being sent in its place.

With regard to the referenced Administrative Order, please find attached Key Engineering Group Site Investigation Report WDNR FID No. 26809189 dated February 10, 2000.

Hein-Werner has completed the Remedial Investigation to answer the allegation that paint-related activities by Hein-Werner may have contaminated the soil and groundwater as a result of the discharge of paint and solvents at the site. The findings of the Key Report are essentially that the site has not been impaired by VOC's attributed to paint-related activities on-site, but that the site has been impacted from an off-site source, the neighboring salvage yard. Hein-Werner's position is based upon the following facts:

- WDNR information regarding environmental releases at the site.
- The groundwater flow direction toward the subject site from the salvage yard.
- The highest levels of petroleum VOC contamination are located adjacent to and downgradient from the largest concentration of salvage yard waste.
- The presence of MTBE, an octane enhancer in gasoline, was not used until the late 1970s, early 1980s. Hein-Werner's activities on the east parcel occurred from 1955 to 1981.
- Hein-Werner never conducted any fuel storage or fueling operation on the east parcel.

The investigation further documents that other than the gasoline fuel contamination previously described, no residual contamination, i.e., metals or PCB's, exist above state enforceable standards. Residual contamination at the site cannot be attributed to the paint-related activities conducted at the site by Hein-Werner, the basis upon which the Department issued the referenced order.

Accordingly, Hein-Werner is requesting that the Department issue to Hein-Werner a letter stating that "no further action is required" at the site located at 1005 Perkins Avenue, Waukesha, Wisconsin.

Respectfully submitted,



H. J. Buffington
Environmental Representative
For Hein-Werner

HB/kh

Enclosure

cc: F. Hay
G. Henning
S. Marrinan
D. Cox