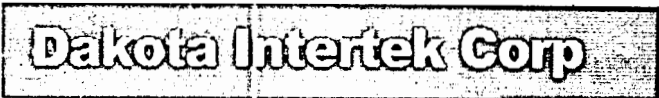


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Don Callen's Mobile Phone: (262) 406-8317



Fax

To: Mr. Scott Fergusson	From: Don Callen
Fax: 44-229-0810	Pages: 5 (including cover)
Phone: 44-229-0840	Date: 3/15/00
Re: Former Akerman Site FID #26809130	cc: Mr. Larry Erlich

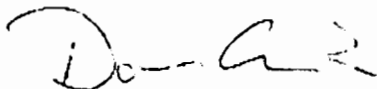
Urgent X For Review Please Comment Please Reply Please Recycle

• Comments:

Mr. Fergusson:

Attached please find correspondence expressing Waukesha Iron & Metal's reservations concerning confirmation as an offsite contributor to the above referenced property. Please review and call me with any points you might want elaborated or clarified. Thank you for your time and attention.

Hard Copy to follow.


Don Callen



**DAKOTA
INTERTEK
CORP.**

d/b/a Dakota
Environmental

Environmental
Technology

Environmental
Contracting

March 15, 2000

Mr. Scott Ferguson
Hydrogeologist
Waste Management Section
Wisconsin Department of Natural Resources
4041 North Richards Street
Milwaukee, Wisconsin 53212

Re: Potential Off-site Contaminant Contribution from Waukesha Iron & Metal Property to Existing Contamination at the Former Akerman Property (FID #268091850).

Dear Mr. Ferguson:

Dakota Intertek Corp. (Dakota) has reviewed the Key Engineering Group, LTD. (Key) Site Investigation Report completed for the Former Akerman Property (hereafter referenced as "site"), prepared for Hein-Werner and dated February 10, 2000. Dakota also completed site investigation activities, including file closure for Waukesha Iron & Metal property. WDNR correspondence addressed to Mr. Larry Erlich dated March 6, 2000 suggests that Waukesha Iron & Metal would be receiving a responsible party letter for Former Akerman Property contamination. Waukesha Iron & Metal is to be named responsible party on the basis of assertions promulgated in the Key Site Investigation Report. While methyl tert butyl ether (MTBE) in groundwater is a concern, Dakota questions whether sufficient information has been obtained to name Waukesha Iron & Metal a responsible party. Please consider:

- 1) **Key suggests Akerman operated the site in the 1970's, and did not store or dispense gasoline.**

Page 3 of the Site Investigation Report suggests that Akerman owned and operated the site jointly with Hein Werner until 1992, and that heavy equipment manufacturing, painting operations, and equipment/vehicle storage were conducted until at least 1981, and equipment/vehicle storage up to 1992. MTBE additives were introduced during the late 1970's.

Only a portion of recyclable metals stored at Waukesha Iron & Metal are vehicles. Waukesha Iron & Metal has never used a gasoline underground storage tank, and has never dispensed gasoline. Gasoline drained from vehicles is stored in 55-gallon drums.

- 2) **Groundwater from Key's MW-2 and MW-3 contain MTBE concentrations exceeding NR 140.10 enforcement standards.**

The WDNR required Waukesha Iron & Metal to address arsenic and mercury groundwater contamination. Before Case Closure was obtained, metals and volatile organic compounds (VOCs) were monitored in

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Waukesha Iron & Metal groundwater. During eight years of groundwater monitoring, no volatile organic compounds, including MTBE, were identified above WDNR regulatory limits in Waukesha Iron & Metal groundwater. A MTBE concentration of 3.3 milligrams per liter ($\mu\text{g/L}$) existed in Waukesha Iron & Metal monitoring well MW5 groundwater in 1995. MTBE in a concentration of 2.8 $\mu\text{g/L}$ also existed in MW5 groundwater in 1998. MTBE was not identified in MW5 at any other time. No other Waukesha Iron & Metal monitoring well contained MTBE in concentrations above laboratory analytical method detection limits (including Waukesha Iron & Metal's MW7, between MW5 and Key's MW-2 and MW-3).

Maximum MTBE concentrations in Key's MW-2 groundwater were confirmed at 364 $\mu\text{g/L}$ in December 1999. By contrast, Waukesha Iron & Metal's MW-5 had an historical high MTBE concentration of 3.3 $\mu\text{g/L}$, less than 10% of existing Former Akerman Property contamination. The following tabulation summarizes vicinity dissolved MTBE contamination since 1990.

Identified Area MTBE Contamination

Date	MW-5	Key MW-2	Key MW-3	Key MW-1	Key MW-5
1990	BDL	--	--	--	--
1993	BDL	--	--	--	--
1995	3.3	--	--	--	--
1997	BDL	--	--	--	--
1998	2.8	--	--	--	--
12-1999	--	364	353	17	85
12-1999	--	329	275	16	BDL
IA	12	12	12	12	12
IS	60	60	60	60	60

BDL: Below [Laboratory Method] Detection Limit

Results expressed in $\mu\text{g/L}$

No other Waukesha Iron & Metal Monitoring Wells contained MTBE.

- 3) MTBE, together with other gasoline-associated PVOC's exists in Former Akerman Property MW-5 groundwater.

Key's MW-5 is the southernmost monitoring well on Former Akerman Property approximately 500 feet downgradient of Waukesha Iron & Metal property. Key's MW-5 is isolated from Waukesha Iron & Metal by east-central Former Akerman Property [upgradient] monitoring wells MW-6 and MW-7. Neither MW-6 nor MW-7 groundwater contains MTBE.

- 4) Shallow petroleum volatile organic compound (PVOC) and volatile organic compound (VOC) vadose zone contamination exists throughout the Former Akerman Property site area.

Laboratory analyses of soils collected from the vadose zone confirm compounds more commonly associated with gasoline, such as benzene, toluene, ethylbenzene, xylenes (BTEX), and trimethylbenzenes. BEX, with naphthalene, exists in concentrations exceeding NR 720.09 residual contaminant levels (RCLs) in soils collected from the 3.5 to 5.5 foot below grade interval of Key's B-9. A number of other VOCs, including toluene and trimethylbenzenes also exist in that sample. Key's B-9 is approximately 600 feet sidegradient of established MTBE-impacted groundwater. Some vadose contamination was confirmed at intervals beginning at 1 foot below grade. It is believed that identified vadose zone contamination is above seasonal high static water levels (December static water levels were recorded at approximately 5 to approximately 9 feet below grade). Compounds commonly associated with gasoline detected in surficial Former Akerman Property soils cannot have originated in Waukesha Iron & Metal groundwater.

5) Stormwater runoff as a vadose zone contaminant transport mechanism is not plausible.

The Site Investigation Report suggests stormwater runoff as a mechanism for gasoline related and other surficial contaminants. However, vadose zone contamination is located in all areas of the site, whereas stormwater runoff originating at Waukesha Iron & Metal appears to be limited to the northwest site area.

To affect Former Akerman Property soils in the southeast portion of the site (Key borings B9 and B12); contaminated runoff would have to travel a minimum of 400 feet through a wooded area with large areas of broken ground and mounds. Ground surface on the adjacent property immediately north of these borings and on Waukesha Iron & Metal property in that area drops dramatically toward the unnamed creek/drainage ditch.

Runoff from Waukesha Iron & Metal upgradient of site MTBE-impacted groundwater is well documented from a September 9, 1999 fire. Approximately 1,000,000 gallons of water were used to combat the fire. Runoff was documented to flow in a southwest direction directly toward the creek following both grade and groundwater gradient.

Laboratory analysis of runoff water used during the fire incident did not document volatile organic compounds above WDNR NR 140.10 enforcement standards. Trace concentrations of acetone, 4-methyl-2-pentanone (MIBK), naphthalene, toluene, and 1,2,4-trimethylbenzene were the only compounds detected above laboratory analytical method detection limits. The character of trace runoff compounds differs from confirmed contamination in Former Akerman Property groundwater.

Key Engineering Site Investigation Report Review
March 14, 2000

Page 4

- 6) Contaminants that historically *did* exist in Waukesha Iron & Metal groundwater do not exist in Former Akerman Property groundwater.

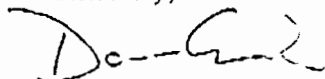
Mercury and arsenic were historically the contaminants of concern in Waukesha Iron & Metal groundwater. These contaminants have not been identified in Former Akerman Property groundwater.


- 7) Other contaminants of concern, such as trichloroethene in groundwater, diesel range organics and polychlorinated biphenyls exist above regulatory standards in the central and southern site.

The site is considered an unregulated landfill, and contains an unknown quantity of foundry sand. Dozens if not hundreds of barrels containing paint solids were stored and buried at the site. Historic releases of a variety of contaminants have been established. Precedent for a release without an immediately obvious source exists at the site.

Waukesha Iron & Metal has a long record of voluntary compliance with regulatory directives. However, both Waukesha Iron & Metal and Dakota believe that sufficient evidence to confirm an offsite source for Former Akerman Property contamination does not currently exist. Thank you for your time and attention in this matter.

Sincerely,


Donald O. Callen Jr.
Project Manager


Wenbin Yuan, P.G.
General Manager