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May 8, 2000

Mr. Scott J. Ferguson, Hydrogeologist Wisconsin Department of Natural Resources Southeast Region Annex 4041 North Richards Street Milwaukee, Wisconsin 53212-0436

Reference:

Request for Approval for Investigation Derived

Soil and Groundwater Management Former Hein Werner Property

1005 Perkins Avenue Waukesha, Wisconsin WDNR FID#: 268091890

> KEY ENGINEERING GROUP, LTD. File No. 0810009

Dear Mr. Ferguson

The purpose of this letter is to request Wisconsin Department of Natural Resources (WDNR) approval for the following investigation derived soil and groundwater management plan for the above referenced site. This letter was prepared by Key Engineering Group, Ltd. (KEY) on behalf of Hein Werner.

Sixteen drums of soil and 15 drums of groundwater were generated during the site investigation documented in the February 10, 2000 *Site Investigation Report*.

Based on the soil sample analytical data, Hein Werner and KEY request approval to empty and spread the 16 drums of investigation derived soil at the approximate soil boring locations. As documented in Table 1 of the *Site Investigation Report*, none of the detected volatile organic compounds, polychlorinated biphenyls or metals concentrations were greater than applicable soil direct contact standards (NR 720/NR 746 generic industrial direct contact residual contaminant levels or United States Environmental Protection Agency industrial direct contact preliminary remediation goals).

In addition, although groundwater concentrations exceeded the NR 140 preventive action limit (PALs) in all groundwater monitoring wells and piezometers, the detected concentrations above the NR 140 PAL at MW-4, MW-6, MW-7, MW-8 and P-2 were qualified by the laboratory as being between the limit of detection and limit of quantification. Groundwater sample analytical data is summarized in Table 3 of the *Site Investigation Report*. Hein Werner and KEY request approval to empty the water drums generated during the development and sampling of MW-4, MW-6, MW-7, MW-8 and P-2 in the vicinity of the monitoring well/piezometer locations. Water generated from the development and sampling of the other monitoring wells and piezometers will be disposed of at an off-site licensed facility.

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It is the opinion of Hein Werner and KEY that this investigation derived soil and groundwater management plan would not cause an incremental risk to human health or the environment. Documentation of the implementation of this investigation derived soil and groundwater management plan would be submitted to the WDNR following completion.

It is Hein Werner's objective to implement the investigation derived soil and groundwater management plan as soon as possible; therefore, an expedited review of this request would be appreciated.

Please call with any questions.

Sincerely,

KEY ENGINEERING GROUP, LTD.

Curtis M. Hoffart, CHMM

Project Scientist

Gregory L. Johnson, CHMM, P.H., P.G., P.E.

Senior Engineer/Scientist

GLJ/kar

CC:

Mr. Hiram J. Buffington, Snap-On Tools

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