

W66 N215 Commerce Court  
Cedarburg, Wisconsin 53012  
(262) 375-4750  
(800) 645-7365  
Fax (262) 375-9680

December 18, 2000

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

Reference: *Final Report*  
Former Hein Werner Property  
1005 Perkins Avenue  
Waukesha, Wisconsin  
WDNR FID#: 268091890

KEY ENGINEERING GROUP, LTD.  
File No. 0810009

Dear Mr. Ferguson

Pursuant to the conclusions documented in the *Site Investigation Report* (Key Engineering Group, Ltd., February 10, 2000), the purpose of this final letter report is to request that the Wisconsin Department of Natural Resources (WDNR) provide a *No Further Action* letter to Hein Werner for the above referenced site. This letter was prepared by Key Engineering Group, Ltd. (KEY) on behalf of Hein Werner.

This letter documents the following:

- Management of investigation derived soil and groundwater.
- Final reconnaissance of the site.
- Collection and disposal of remaining surface waste attributable to Hein Werner.
- Rationale refuting the conclusions of Dakota Intertek Corp (Dakota) documented in letters to WDNR dated March 6, 2000 and March 15, 2000. Dakota represents both the current subject site owner (Mallory Improvements, Inc.) and the adjacent salvage yard owner (Waukesha Auto Parts and Salvage Company, a.k.a. Waukesha Iron and Metal).

### **Management of Investigation Derived Soil and Groundwater**

On October 23, 2000, 16 drums of soil generated during the site investigation, were transported from the site by Advanced Waste Carriers, Inc. to the Advanced Waste Services, Inc. ChemWorks Treatment Facility. The Certificate of Disposal and manifest documentation are attached.

Groundwater generated during the site investigation (15 drums) was transported to the Snap-on Tools facility in Kenosha, Wisconsin and discharged to the Kenosha Water Utility. Supporting documentation is attached.

### **Final Reconnaissance/Removal of Remaining Surface Waste**

On November 15, 2000, KEY performed a final reconnaissance of the site to identify any remaining surface waste attributable to Hein Werner. A few additional areas of surface paint waste residue and drum remnants were identified during this final reconnaissance. This remaining surface waste was not previously observed because of the dense vegetative cover that was present during the initial reconnaissance (performed in August 1999).

On November 17, 2000, KEY collected the surface waste materials identified in the final reconnaissance. The materials were disposed of in accordance with the previous waste sample classification data (see Section 5.0 of the *Site Investigation Report*). Disposal documentation is attached.

In completing this surface waste removal action, Hein Werner has eliminated, to the extent practicable, the residual risk at the site due to past Hein Werner operations.

### **Rationale Refuting Dakota Conclusions**

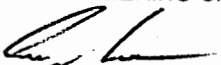
As you are aware, Dakota, *who represents both the current subject site owner (Mallory Improvements, Inc.) and the adjacent salvage yard owner (Waukesha Auto Parts and Salvage Company)*, has documented their review of the *Site Investigation Report* in two letters to the WDNR (dated March 6, 2000 and March 15, 2000). Dakota's opinion is that the site investigation is not complete and the adjacent salvage yard is not the source of the detected petroleum concentrations on the subject site. Hein Werner and KEY strongly believe Dakota's conclusions are not objective or technically sound. The site investigation was completed in accordance with the WDNR approved *Site Investigation Work Plan* and the site investigation data has adequately defined the magnitude and extent of residual contamination and the level of residual risk at the site. As documented in the *Site Investigation Report*, based on (1) due diligence (review of WDNR information and discussions with WDNR) regarding the adjacent salvage yard, (2) the site investigation data and (3) the scope and period of Hein Werner operations at the site, there is high probability that the adjacent salvage yard is the source of the residual petroleum impacts at the site.

### **Conclusion**

Based on the additional information presented herein, Hein Werner and KEY believe that a WDNR finding of *No Further Action* for Hein Werner is warranted. Hein Werner and KEY appreciate your continued cooperation. 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

Enclosures: Disposal Documentation

cc: Mr. Hiram J. Buffington, Snap-On Tools

**Advanced Waste Services, Inc.**

**ChemWorks Treatment Facility**

**Certificate of Disposal**

3801K W. McKinley Ave., Milwaukee, WI 53208 (800) 842-9792

This document serves as the Certificate of Disposal for the material received at ChemWorks Treatment Facility, as indicated below:

Generator: Helm Werner  
1005 Perkins Ave.  
Waukesha WI

Manifest Document Number: 9009

Profile Number: 003440

Date Issued: 25-Oct-00

This certificate hereby certifies that the above described non-hazardous material was handled in accordance with all required and applicable local, state and federal regulations.

By: [Signature]

Date: 10.25.00

Title: OPERATIONS MGR.

**NON-HAZARDOUS WASTE MANIFEST**

Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of

**09009**

3. Generator's Name and Mailing Address

Rein Werner  
1003 Parkins Ave. Waukesha WI

R/U Loc:

2801 80th St.  
Kenosha WI 53141

4. Generator's Phone 262-656-5310 Dennis McDonald

-enter facility on west side  
Drives to the west of ground

5. Transporter 1 Company Name

Advanced Waste Carriers, Inc.

6. US EPA ID Number

WI 0000615361

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

**CHEMWORKS**  
3801K WEST MCKINLEY AVE.  
MILWAUKEE, WI 53208

10. US EPA ID Number

A. Transporter's Phone 800-842-9792

B. Transporter's Phone

C. Facility's Phone 414-342-1852

11. Waste Shipping Name and Description

Waste Non-Hazardous Liquid, Non Regulated Material

12. Containers  
No. Type

13. Total  
Quantity

14. Unit  
Wt./Vol

6/6 DM 50880 G

D. Additional Descriptions for Materials Listed Above

003440 Soil Scrings

E. Handling Codes for Wastes Listed Above

G = Gallons  
P = Pounds

F. Special Handling Instructions and Additional Information

24 hour Emergency Contact #800-842-9792

Emergency Response Guide On Board

18. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting and record-keeping of Hazardous Waste.

Printed Name

Signature

Month Day Year

Dennis McDonald

*Dennis McDonald*

10/23/00

Transporter's Acknowledgment of Receipt of Materials

Printed Name

Signature

Month Day Year

ERIC KONZERT

*Eric Konzert*

10/23/00

Transporter's Acknowledgment of Receipt of Materials

Printed Name

Signature

Month Day Year

19. Recipient's Name and Address

20. Facility Operator's Certification of receipt of waste materials covered by this manifest except as noted in item 19.

Printed Name

Signature

Month Day Year

# Snap-on Tools

**Date:** June 7, 2000

cc: Hiram Buffington  
Dave Cox, Hein Werner

**Location:** Kenosha, Wisconsin

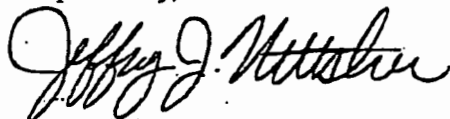
**Attention:** Bruce Rabe, Kenosha Water Utility

**Subject:** Treatment of Hein Werner Groundwater Samples

As discussed during our telephone conversation on Monday, July 31, 2000, please find attached the groundwater sample analytical results collected from a site investigation conducted by Snap-on Tools in Waukesha, Wisconsin. The purge water removed from the ground during the groundwater sampling process was collected in 55-gallon drums. Sixteen drums of water were accumulated during the groundwater sampling process for a total of 880 gallons. Two of the twelve wells sampled yielded contaminant concentrations exceeding Wisconsin's NR 140 Groundwater Quality Enforcement Standard (ES) for drinking water. MTBE was detected above the ES limit in well MW-2 in both samples collected. Benzene was detected in one of three samples and MTBE was detected in three of three samples above the ES limit in well MW-3 (as seen on Table 3 of the attachment).

It is Snap-on's desire to dispose of this water through our wastewater pretreatment system located within the Kenosha Manufacturing Plant which would then discharge to the City of Kenosha sanitary sewer collection system. Please keep in mind that the results of this site investigation are being compared to Wisconsin's Drinking Water Standard. Please review the attached analytical results and let me know if this method of disposal is acceptable to the Kenosha Water Utility.

Respectfully,



Jeffrey J. Nettesheim  
Sr. Project Engineer  
Environment & Industrial Hygiene  
(262) 656-5370

Attachments

*There is no reason this waste cannot be disposed of now by mixing it with plant water. The monitoring data does not show a problem.*

*Bruce*

# INVOICE

Advanced Waste Services  
 1126 S. 70th St.  
 Suite N508B  
 West Allis, WI 53214  
 800-842-9792

Date: 11/30/00  
 Invoice Number: 015725  
 Account Number: SNAP  
 Salesperson ID: MW  
 Fax # 2626565336  
 Phone # 2626564728

MR. DENNIS MCDONALD  
 SNAP ON TOOLS  
 2801 80TH STREET  
 P.O. BOX 1410  
 KENOSHA, WI 53141-1410

Purchase Order Number: HEIN WERNER	Due Date: 12/10/00	Terms: 10 DAYS
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Service Date	Document #	Description	Amount
11/00		SOIL BORINGS PICKUP @ KEY ENV.	
	D008 HAZARDOUS	DISPOSAL 2 DR @\$250/DRUM	500.00
		1 85 GAL DR-OVERPAK & DISPOSAL	135.00
		TRANSPORTATION/STOP CHARGE	95.00
<i>Ok to Pay</i> <i>170037-952</i> <i>Dennis McDonald</i> <i>12/11/00</i>			

We Accept American Express, Elan, Mastercard & Visa

Total Due: 730.00



PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 9-30-2000

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's U.S. EPA ID Number W-I-D-O-C-6-0-7-2-6-9-8		Manifest Document No. 1-2-9-4-1	2. Page 1 of 1	Information in the shaded areas is not required by Federal Law, but Items D, F, H, I and K are required by State Law.	
3. Generator's Name and Mailing Address Former Rein Werner Prop. 105 Perkins Ave. Waukesha WI 53186					A. State Manifest Document Number INA 1472941		
4. Generator's Telephone Number (202) 656-5303 Dennis McDonald					B. State Generator ID		
5. Transporter 1 Company Name Advanced Waste Carriers, Inc.					C. State Transporter ID		
6. U.S. EPA ID Number W-I-C-O-C-0-8-1-3-3-5-1					D. Transporter's Phone		
7. Transporter 2 Company Name					E. State Transporter ID		
8. U.S. EPA ID Number					F. Transporter's Phone		
9. Designated Facility Name and Site Address Pollution Control Industries 4343 Kennedy Ave. East Chicago IN 46312					G. State Facility ID		
10. U.S. EPA ID Number I-R-D-O-C-0-6-4-5-9-4-3					H. Facility's Phone		
11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers	13. Total Quantity	14. Unit Wt/Vol
a. Hazardous Waste Solid, NOS, 9, NA3077, R311 (D008) ERG#171					No.	Type	Waste No.
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above Paint Solids					K. Handling Codes for Weights Listed Above		
15. Special Handling Instructions and Additional Information: PLEASE SEND MANIFEST COPIES TO: SNAP-CR Dennis McDonald 2801 80th St. Kenosha WI 53141-1410 24 Hour Emergency Contact #800-842-9792 Emergency Response Guide On Board.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations: If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name				Signature		Date	
17. Transporter 1 - Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
18. Transporter 2 - Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest (except as noted in Item 19):							
Printed/Typed Name				Signature		Date	

National Response Center at 800 / 424-8802 or 202 / 426-2675.

INA1472941