

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Gloria L. McCutcheon, Regional Director

Waukesha Service Center
407 Pilot Court, Suite 100
Waukesha, Wisconsin 53188
Telephone 262-574-2100
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July 11, 2002

Mr. Hiram J. Buffington
Snap-on Tools
2801 80th St.
Kenosha, WI 53141

FID# 268091890
FID# 268003120
BRRTS# 02-68-000916

Subject: Former Hein Werner Property, 1005 Perkins Avenue, Waukesha

Dear Mr. Buffington:

The Department of Natural Resources (Department) has received your closure request with the associated fee and reviewed the file information for compliance with state requirements regarding case closure. The case was presented to the Southeast Region closure committee on July 2, 2002. After careful review of your closure request, the closure committee has decided that additional information and work is necessary at the site in order to meet the requirements for closure. Please address the following concerns:

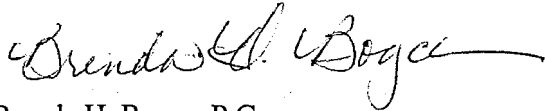
1. Key Engineering Group, Ltd.'s (Key) *Final Report* dated December 18, 2000, indicates that two drums of hazardous waste were removed from the site in a final sweep of surface waste. Please provide a site map showing the locations of where the hazardous waste was removed.
2. Soil confirmation sampling following the removal of paint residue drums appears to be lacking. Appendix 4 of the *Site Investigation Report* (2/10/00) identifies two areas (#3 and #5) on the northeast portion of the site where orange paint was removed on August 30, 1999. (Analytical testing of this paint indicated that the residue is a characteristic hazardous waste for lead.) However, there is no documentation of soil sampling underneath these areas where paint drums were removed to determine the residual lead levels in the soil at either the August 1999 or November 2000 events. In addition, the highest lead level in the soil from soil borings was reported at the northeastern-most boring, B-11 from 1-3 feet below grade. Therefore, additional shallow soil sampling is required in this area, as well as any other areas where orange paint residue was previously removed, to determine if lead concentrations exceed the Wisconsin Administrative Code NR 720.11 Table 2 industrial direct contact level.
3. The source of the MTBE found at MW-2 and MW-3 above the NR 140 Enforcement Standard (ES) has not been identified, nor has the extent of this plume been delineated. No party has clearly demonstrated that this release is from an off-site source (Waukesha Iron and Metal Co.). Until these issues are resolved, this aspect of the case cannot be closed.

When the additional work outlined above has been completed, a brief submittal should be sent to the Department, and the case will again be reviewed for closure. Please direct correspondence with the site FID and BRRTS numbers noted above to: Ms. Victoria Stovall, Wisconsin Department of Natural Resources, 2300 N. Dr. ML King Jr. Dr., P.O. Box 12436, Milwaukee, WI 53212-0436.

If there is additional relevant information that was not previously provided to the Department, which you believe might change the Department's closure decision, you may submit that information for our re-evaluation of your closure request.

The Department appreciates the actions you have taken to restore the environment at this site. A copy of this letter has been forwarded to your environmental consultant. If you have any questions, you may contact me at (262) 574-2140.

Sincerely,

A handwritten signature in cursive script that reads "Brenda H. Boyce". The signature is written in black ink and includes a long horizontal flourish at the end.

Brenda H. Boyce, P.G.
Hydrogeologist
Remediation and Redevelopment Program

C: Greg Johnson – Key Engineering Group, Ltd.
File