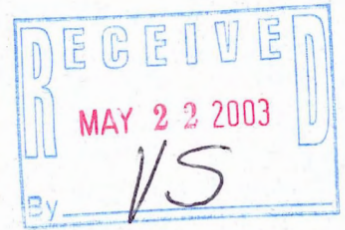


W66 N215 Commerce Court
Cedarburg, Wisconsin 53012
(262) 375-4750
(800) 645-7365
Fax (262) 375-9680



May 15, 2003

Ms. Brenda H. Boyce
Wisconsin Department of Natural Resources
141 Northwest Barstow Street, Room 180
Waukesha, Wisconsin 53188

Reference: *Additional Information*
Former Hein Werner Property
1005 Perkins Avenue
Waukesha, Wisconsin
WDNR FID #: 268091890
WDNR BRRTS #: 02-68-000916

- 268003120

KEY ENGINEERING GROUP, LTD.
File No. 0810009

Dear Ms. Boyce:

The letter was prepared on behalf of Hein Werner to document additional data collection pursuant to a Wisconsin Department of Natural Resources (WDNR) November 14, 2002 letter request (provided as Attachment 1).

This letter has been formatted according to the chronology of requests in the November 14, 2002, WDNR letter.

"Additional shallow soil sampling is needed to the northeast of Area 2 and Area D to delineate the lateral extent of lead contamination over the Wisconsin Administrative Code NR 720.11 industrial direct contact level of 500 milligrams per kilogram (mg/kg)"

Eight additional near surface soil samples (composite of the top 18 inches) were collected on April 1, 2003 (SS-2-1 through 4 and SS-D-1 through 4) in a vector orientation from Area 2 and Area D and three additional soil samples were collected on April 14, 2003 (SS-D-5 and 6, and Area F) and analyzed for total lead. In addition, the toxicity characteristic leaching procedure (TCLP) for lead was performed on soil samples with total lead concentrations exceeding 100 mg/kg (3 samples). Soil samples were collected in the following areas:

- Area 2, where a total lead concentration was 554 mg/kg;
- Area D, where a total lead concentration was 712 mg/kg;
- Area D, where a total lead concentration was 235 mg/kg (collected upon receipt of the April 1, 2003 soil data to further delineate the extent beyond SS-D-2);
- Area F, where some larger paint residue was removed.

The soil sample laboratory analytical reports are presented as Attachment 2. The additional total lead results ranged from 29 mg/kg to 655 mg/kg as depicted on Figure 1. The TCLP lead results ranged from <0.10 (below the laboratory's method detection limit)

to 0.064 milligrams per liter to which is significantly below the NR 605 level of 5 micrograms per liter.

To assess the direct contact exposure pathway at the site, consistent with United States Environmental Protection Agency and WDNR guidance documents and which is an acceptable standard statistical analysis, a relevant direct contact exposure concentration was determined for lead. This relevant lead direct contact exposure concentration was calculated at the upper 95% confidence limit (on the arithmetic mean) of all the near surface (0 to 4 feet) total lead data (as documented on Figure 1) as well as total lead data located in the northeastern portion of the property.

The overall site results of this analysis indicated an upper 95% confidence limit concentration of 221 mg/kg assuming the data is normally distributed (or 240 mg/kg assuming the data is log normally distributed) considering the data only within the northeastern corner of the property indicated an upper 95% confidence limit concentration of 280 mg/kg assuming the data is normally distributed (or 329 mg/kg assuming the data is log normally distributed). Supporting documentation is provided as Attachment 3. These statistical exposure concentrations are less than the NR 720.11 Table 2 industrial direct contact residual contaminant level (500 mg/kg); therefore, lead does not represent an excess overall direct contact risk at the site.

"As I stated in point #3 of my July 11, 2002 letter, the Department cannot close out this case until the MTBE issues are resolved. According to our internal tracking database (BRRTS), the department has not received any reports recently for the Waukesha Iron and Metal Company site that would address these concerns."

Hein Werner and KEY feel that the data and rationale presented in the *Site Investigation Report* (KEY, February 10, 2000) and *Addendum to Final Report* (KEY, February 15, 2001) clearly point to the adjacent Waukesha Iron & Metal Company (WIMC) salvage yard as the source of the on-site MTBE impacts to groundwater. **Please refer to the *Site Investigation Report* (KEY, February 10, 2000) and to the *Addendum to Final Report* (KEY, February 15, 2001), which provide details on Hein Werner's firm position on this issue.**

Upon review of the WIMC case file (BRRTS on the web #: 02-68-275715), it appears that the WDNR issued a Notice of Noncompliance (NON) letter on June 6, 2002, to WIMC. Upon discussions with the WDNR, Environmental and Engineering Management, LLC has been retained, and soil/groundwater sampling has been performed on the WIMC property. It is KEY's and Hein Werner's understanding that the WDNR is waiting for a report from Environmental and Engineering Management, LLC at this time. Documentation of the BRRTS on the web as well as file documentation for this site are presented in Attachment 4.

"The Department will request . . . an on-site inspection to ensure that there are no more waste containers exposed at the surface"

On April 2, 2003, an on-site inspection with you, Mr. Scott Ferguson (WDNR), Mr. Daniel Pelczar (KEY) and Mr. Jeffrey Nettesheim (Snap-on Tools) was performed. Some surficial solidified paint waste was observed during the site visit, and upon discussions following the site reconnaissance, additional removal activities, confirmation sampling and a second on-site inspection was requested (verbally).

On April 14, 2003, representatives from KEY and Snap-on Tools performed an aggressive sweep of the property to remove any additional surficial paint waste. The additional paint waste locations were primarily located in the vicinity of previous locations is depicted on Figure 1. Documentation of the additional paint waste disposal is provided in Attachment 5. One confirmation soil sample was collected in the same

Ms. Brenda H. Boyce, P.G.
May 15, 2003
Page 3

manor as described above where larger paint waste (designated as Area F) were removed.

On May 1, 2003, we discussed the progress for the site and activities and you indicated that a secondary on-site inspection would not be necessary (as long as everything is documented in a letter).

CLOSING

It is the opinion of KEY and Hein Werner that the additional data documented herein provide further supporting rationale for a WDNR finding of *No Further Action* for Hein Werner. A closure review fee was previously submitted to the WDNR.

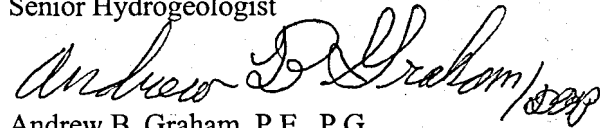
Please contact Hein Werner or KEY with any questions.

Sincerely,

KEY ENGINEERING GROUP, LTD.



Daniel K. Pelczar, CPG, P.G.
Senior Hydrogeologist



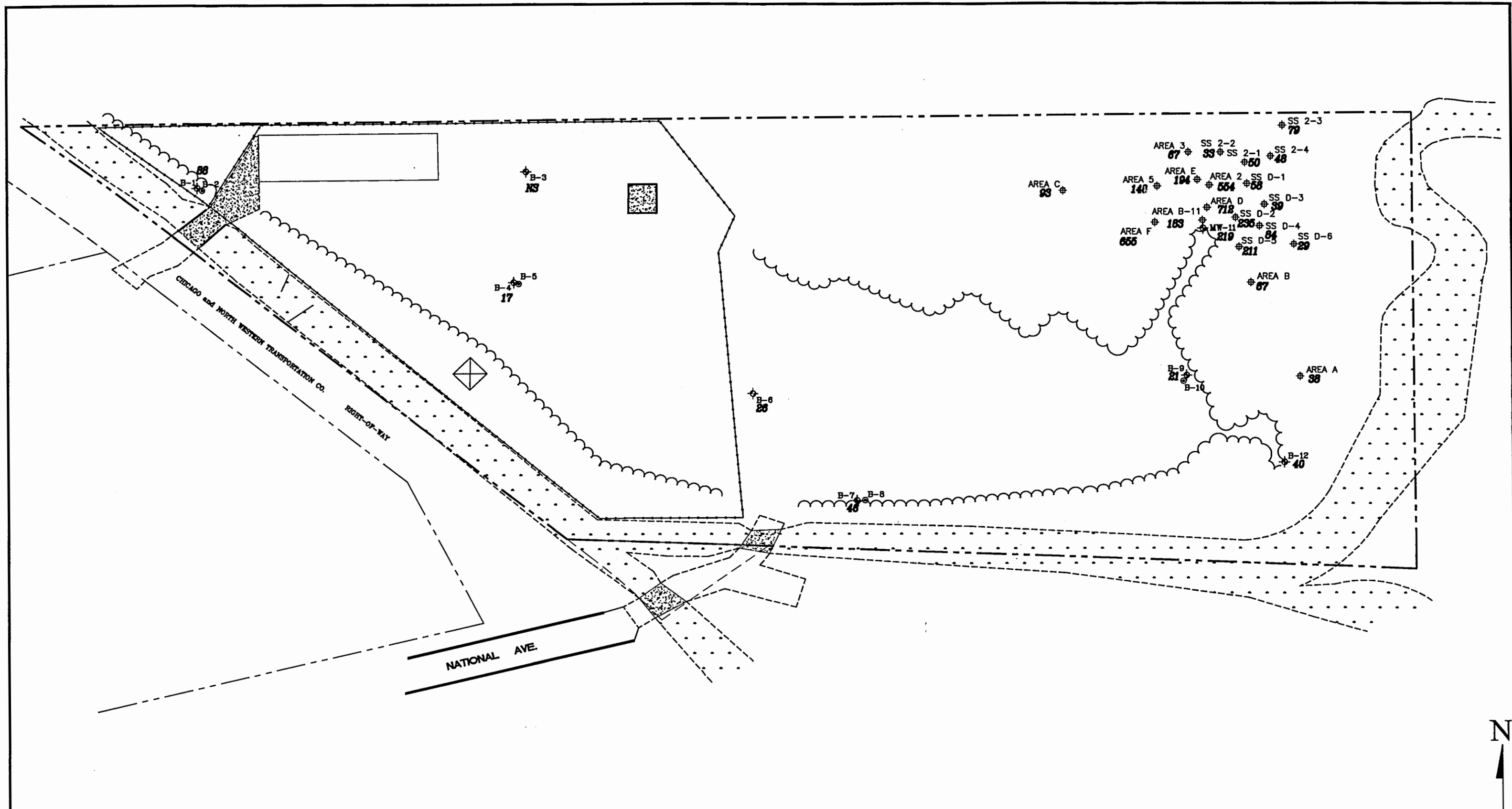
Andrew B. Graham, P.E., P.G.
Senior Engineer

DKP/aef

Attachments:	Figure 1	Summary of Shallow Total Lead Soil Sample Analytical Results
	Attachment 1	November 14, 2002 WDNR Letter
	Attachment 2	Soil Sample Analytical Report
	Attachment 3	Exposure Concentration Documentation
	Attachment 4	BRRTS on the Web information for Waukesha Iron & Metal Company
	Attachment 5	Waste Disposal Documentation

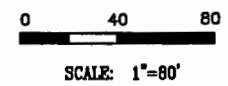
cc: Mr. Hiram J. Buffington, Snap-On Tools

H:\PROJECTS\1998\0810009\LETTERS\051503.dkp.rtf

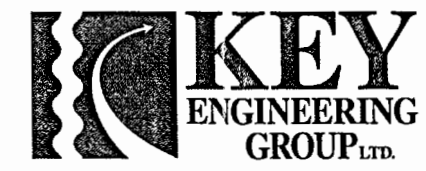


- LEGEND**
- ⊙ PIEZOMETER/BORING LOCATION
 - ⊕ MONITORING WELL/BORING LOCATION
 - ⊕ SURFACE SAMPLE LOCATION (0-18")
 - 88 TOTAL LEAD, mg/kg

NOTES
 mg/kg: MILLIGRAMS PER KILOGRAM
 NS: NO SAMPLE COLLECTED WITHIN 0'-4'



DRN. BY:	C.T.M.	DATE:	05/06/03
DSN. BY:	D.K.P.	FILE NO.:	0810009
CHK. BY:	D.K.P.	DWG. NO.:	8192D
REV. BY:	D.J.G.	SHEET NO.:	1



© 2003 Key Engineering Group Ltd.

FIGURE 1
 LOCATION OF ADDITIONAL
 SHALLOW TOTAL LEAD SOIL
 SAMPLES

FORMER HEIN WERNER PROPERTY
 1005 PERKINS AVENUE
 WAUKESHA, WISCONSIN





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
FAX 262-574-2117

November 14, 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 and reviewed the *Additional Information* report dated October 3, 2002 from your consultant. The case was again presented to the Department's Southeast Region closure committee on November 5, 2002. After careful review of your no further action request, the closure committee has decided that additional information and work is necessary at the site.

Additional shallow soil sampling is needed to the northeast of Area 2 and Area D to delineate the lateral extent of lead contamination over the Wisconsin Administrative Code NR 720.11 industrial direct contact level of 500 mg/kg. Once this has been completed, a remedial action will be required to address the direct contact threat that this soil presents. The committee determined that the method proposed by your consultant to calculate a site-specific cleanup level (SSCL) for the lead is inappropriate based on the type of sampling. If samples had been collected on a grid pattern instead of "hot spot" sampling, then this type of calculation would be appropriate.

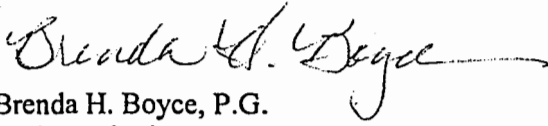
As I stated in point #3 of my July 11, 2002 letter, the Department cannot close out this case until the MTBE issues are resolved. According to our internal tracking database (BRRTS), the Department has not received any reports recently for the Waukesha Iron and Metal Company site that would address these concerns.

When the additional work outlined above has been completed and issues relating to the MTBE have been resolved, a brief submittal should be sent to the Department, and the case will again be reviewed for closure. The Department will request at that point an on-site inspection to ensure that there are no more waste containers exposed at the surface.

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. 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.

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, reading "Brenda H. Boyce". The signature is written in black ink and includes a long horizontal flourish extending to the right.

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

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

ANALYTICAL REPORT

Mr. Dan Pelczar
KEY ENGINEERING GROUP LTD
W66 N215 Commerce Court
Cedarburg, WI 53012

04/18/2003

Job No: 03.02750

Page 1 of 4

The following samples were received by TestAmerica for analysis:

0810009 Former Hein Werner Property

Sample Number	Sample Description	Date Taken	Date Received
519153	SS2-1	04/01/2003	04/02/2003
519154	SS2-2	04/01/2003	04/02/2003
519155	SS2-3	04/01/2003	04/02/2003
519156	SS2-4	04/01/2003	04/02/2003
519157	SSD-1	04/01/2003	04/02/2003
519158	SSD-2	04/01/2003	04/02/2003
519159	SSD-3	04/01/2003	04/02/2003
519160	SSD-4	04/01/2003	04/02/2003

Soil results reported
on a dry weight basis.


Karen R. Wenta
Inorganic Operations Manager

KEY TO DATA FLAGS

The attached sample(s) may have a result flag shown on the report. The following are the result flag definitions:

A = Analyzed/extracted past hold time
B = Blank is contaminated
C = Standard outside of control limits
D = Diluted for analysis
E = TCLP extraction outside of method required temperature range
F = Sample filtered in lab
G = Received past hold time
H = Late eluting hydrocarbons present
I = Improperly handled sample
J = Estimated concentration
L = Common lab solvent and contaminant
M = Matrix interference
P = Improperly preserved sample
Q = Result confirmed via re-analysis
S = Sediment present
T = Does not match typical pattern
W = BOD re-set due to missed dilution
X = Unidentified compound(s) present
Z = Internal standard outside limits
* = See Case Narrative

KEY TO ANALYST INITIALS

The attached sample(s) may have been analyzed by another certified laboratory. If a number appears in the Analyst Initials field, the following are the appropriate certifications (if the lab code does not appear below, that means that WDNR certification is not required for the work performed):

Lab Code	Certification Number
008	WDNR - 999766900
009	WDNR - 241293690
020	WDNR - 999447680
030	ILNELAC - 100230; WDNR - 998294430
060	ILNELAC - 100221; WDNR - 999447130
070	IA - 007; ILNELAC - 000668; MDH - 019-999-319; WDNR - 999917270
130	WDNR - 632021390
147	WDNR - 721026460
300	FLNELAC - 87358; IA - 131; MDH - 047-999-345; WDNR - 998020430
400	WDNR - 113133790
510	WDNR - 241249360
520	WDNR - 999518190; ILNELAC - 100439
700	WDNR - 113289110

TestAmerica Watertown WDNR - 128053530; IDNR - 294; MDH - 055-999-366; ND - R-046

For questions regarding this report, please contact Dan Milewsky or Warren Topel.

ANALYTICAL REPORT

Mr. Dan Pelczar
 KEY ENGINEERING GROUP LTD
 W66 N215 Commerce Court
 Cedarburg, WI 53012

04/18/2003
 Job No: 03.02750
 Account No: 45150
 Purchase Order:
 Page 3 of 4

Job Description: 0810009 Former Hein Werner Property
 Waukesha, WI
 Rec'd at 4 degrees C

Date/Time Taken: SEE BELOW SEE BELOW Date Received: 04/02/2003

Parameter	Results	Units	Reporting	Method	Date	Prep/Run	
			Limit		Analyzed	Analyst	Batch
519153 SS2-1			04/01/2003 10:05				
Solids, Total	88.4	%	n/a	SW 5035	04/04/2003	pam	4820
Lead, AA	50	mg/kg	4.0	SW 7420	04/10/2003	gaf	2489 1361
519154 SS2-2			04/01/2003 10:15				
Solids, Total	84.3	%	n/a	SW 5035	04/08/2003	klb	4824
Lead, AA	33	mg/kg	4.0	SW 7420	04/10/2003	gaf	2489 1361
519155 SS2-3			04/01/2003 10:00				
Solids, Total	87.5	%	n/a	SW 5035	04/08/2003	klb	4824
Lead, AA	79	mg/kg	4.0	SW 7420	04/10/2003	gaf	2489 1361
519156 SS2-4			04/01/2003 09:50				
Solids, Total	86.3	%	n/a	SW 5035	04/08/2003	klb	4824
Lead, AA	48	mg/kg	4.0	SW 7420	04/10/2003	gaf	2491 1361
519157 SSD-1			04/01/2003 09:35				
Solids, Total	85.0	%	n/a	SW 5035	04/08/2003	klb	4824
Lead, AA	58	mg/kg	4.0	SW 7420	04/10/2003	gaf	2491 1361

ANALYTICAL REPORT

Mr. Dan Pelczar
 KEY ENGINEERING GROUP LTD
 W66 N215 Commerce Court
 Cedarburg, WI 53012

04/18/2003
 Job No: 03.02750
 Account No: 45150
 Purchase Order:
 Page 4 of 4

Job Description: 0810009 Former Hein Werner Property
 Waukesha, WI
 Rec'd at 4 degrees C

Date/Time Taken: SEE BELOW SEE BELOW Date Received: 04/02/2003

Parameter	Results	Units	Reporting	Method	Date	Prep/Run	
			Limit		Analyzed	Analyst	Batch
519158 SSD-2			04/01/2003 09:30				
Solids, Total	89.3	%	n/a	SW 5035	04/08/2003	kls	4824
Lead, AA	235	mg/kg	4.0	SW 7420	04/11/2003	gaf	2492 1362
TCLP-Lead, AA	0.064	mg/L	0.10	SW 7420	04/18/2003	gaf	1600 480
Prep, TCLP - 1311	E 18-21			SW 1311	04/17/2003	lak	1600
519159 SSD-3			04/01/2003 09:40				
Solids, Total	86.4	%	n/a	SW 5035	04/08/2003	kls	4824
Lead, AA	39	mg/kg	4.0	SW 7420	04/11/2003	gaf	2492 1362
519160 SSD-4			04/01/2003 09:15				
Solids, Total	80.5	%	n/a	SW 5035	04/08/2003	kls	4824
Lead, AA	84	mg/kg	4.0	SW 7420	04/11/2003	gaf	2492 1362

03.02750



Watertown Division
602 Commerce Drive
Watertown, WI 53094

Phone 920-261-1660 or 800-833-7036
Fax 920-261-8120

To assist us in using the proper analytical methods,
is this work being conducted for regulatory purposes?
Compliance Monitoring

Client Name: KEY ENGINEERING Client #: WT 45150

Address: W66 N215 COMMERCE CT.

City/State/Zip Code: CEDARBURG WI 53012

Project Manager: DAN PELCZAR

Telephone Number: (262) 375-4750 Fax: 375-9680

Sampler Name: (Print Name) MIKE MANTZ

Sampler Signature: *[Signature]*

Project Name: FORMER HEIN WERNER PROPERTY

Project #: 0810009

Site/Location ID: WAUKESHA State: WI

Report To: DAN PELCZAR

Invoice To: KEY

Quote #: 03050 PO#: _____

SAMPLE ID	Date Sampled	Time Sampled	G = Grab, C = Composite	Field Filtered	Matrix								Preservation & # of Containers								Analyze For								QC Deliverables None Level 2 (Batch QC) Level 3 Level 4 Other: _____	REMARKS				
					SL - Sludge	DW - Drinking Water	GW - Groundwater	S - Soil/Solid	WW - Wastewater	Specify Other	HNO ₃	HCl	NaOH	H ₂ SO ₄	Methanol	None	Other (Specify)																	
SS 2-1	4/1/03	10:05	C		SOIL													X																
SS 2-2		10:15																X																
SS 2-3		10:00																X																
SS 2-4		9:50																X																
SS D-1		9:35																X																
SS D-2		9:30																X																Add TCC per Dan Pelczar 4/1
SS D-3		9:40																X																
SS D-4	✓	9:15	✓		✓																													
Special Instructions:												LABORATORY COMMENTS: Init Lab Temp: <u>4</u> Rec Lab Temp: _____ Custody Seals: Y N <u>N/A</u> Bottles Supplied by Test America: Y N Method of Shipment: <u>AT</u>																						
Relinquished By: <u><i>[Signature]</i></u>			Date:	Time:	Received By: <u><i>[Signature]</i></u>			Date:	Time:																									
Relinquished By: <u><i>[Signature]</i></u>			Date:	Time:	Received By: _____			Date:	Time:																									
Relinquished By: _____			Date:	Time:	Received By: <u><i>[Signature]</i></u>			Date:	Time:																									

m 41

ANALYTICAL REPORT

Mr. Dan Pelczar
KEY ENGINEERING GROUP LTD
W66 N215 Commerce Court
Cedarburg, WI 53012

05/06/2003

Job No: 03.03144


Page 1 of 5

The following samples were received by TestAmerica for analysis:

0810009 Former Hein Werner Property

Sample Number	Sample Description	Date Taken	Date Received
520503	SS D-5	04/14/2003	04/15/2003
520504	SS D-6	04/14/2003	04/15/2003
520505	Area F	04/14/2003	04/15/2003

Soil results reported
on a dry weight basis.


Brian D. DeJong
Organic Operations Manager

KEY TO DATA FLAGS

The attached sample(s) may have a result flag shown on the report. The following are the result flag definitions:

A = Analyzed/extracted past hold time
B = Blank is contaminated
C = Standard outside of control limits
D = Diluted for analysis
E = TCLP extraction outside of method required temperature range
F = Sample filtered in lab
G = Received past hold time
H = Late eluting hydrocarbons present
I = Improperly handled sample
J = Estimated concentration
L = Common lab solvent and contaminant
M = Matrix interference
P = Improperly preserved sample
Q = Result confirmed via re-analysis
S = Sediment present
T = Does not match typical pattern
W = BOD re-set due to missed dilution
X = Unidentified compound(s) present
Z = Internal standard outside limits
* = See Case Narrative

KEY TO ANALYST INITIALS

The attached sample(s) may have been analyzed by another certified laboratory. If a number appears in the Analyst Initials field, the following are the appropriate certifications (if the lab code does not appear below, that means that WDNR certification is not required for the work performed):

Lab Code	Certification Number
008	WDNR - 999766900
009	WDNR - 241293690
020	WDNR - 999447680
030	ILNELAC - 100230; WDNR - 998294430
060	ILNELAC - 100221; WDNR - 999447130
070	IA - 007; ILNELAC - 000668; MDH - 019-999-319; WDNR - 999917270
130	WDNR - 632021390
147	WDNR - 721026460
300	FLNELAC - 87358; IA - 131; MDH - 047-999-345; WDNR - 998020430
400	WDNR - 113133790
510	WDNR - 241249360
520	WDNR - 999518190; ILNELAC - 100439
700	WDNR - 113289110

TestAmerica Watertown WDNR - 128053530; IDNR - 294; MDH - 055-999-366; ND - R-046

For questions regarding this report, please contact Dan Milewsky or Warren Topel.

ANALYTICAL REPORT

Mr. Dan Pelczar
 KEY ENGINEERING GROUP LTD
 W66 N215 Commerce Court
 Cedarburg, WI 53012

05/06/2003
 Job No: 03.03144
 Sample No: 520503
 Account No: 45150
 Page 3 of 5

JOB DESCRIPTION: 0810009 Former Hein Werner Property
 PROJECT DESCRIPTION: Soil Analysis
 SAMPLE DESCRIPTION: SS D-5
 Waukesha, WI
 Rec'd at 3 degrees C

Date/Time Taken: 04/14/2003 09:00 Date Received: 04/15/2003

Parameter	Results	Units	Reporting	Method	Date		Prep/Run
			Limit		Analyzed	Analyst	Batch
Solids, Total	85.2	%	n/a	SW 5035	04/16/2003	klb	4845
Lead, AA	211	mg/kg	4.0	SW 7420	04/24/2003	gaf	2498 1364
TCLP-Lead, AA	<0.10	mg/L	0.10	SW 7420	05/06/2003	gaf	1605 482
Prep, TCLP - 1311	E 19-23			SW 1311	04/30/2003	lak	1605

ANALYTICAL REPORT

Mr. Dan Pelczar
KEY ENGINEERING GROUP LTD
W66 N215 Commerce Court
Cedarburg, WI 53012

05/06/2003
Job No: 03.03144
Sample No: 520504
Account No: 45150
Page 4 of 5

JOB DESCRIPTION: 0810009 Former Hein Werner Property
PROJECT DESCRIPTION: Soil Analysis
SAMPLE DESCRIPTION: SS D-6
Waukesha, WI
Rec'd at 3 degrees C

Date/Time Taken: 04/14/2003 09:25

Date Received: 04/15/2003

Parameter	Results	Units	Reporting	Method	Date	Prep/Run	
			Limit		Analyzed	Analyst	Batch
Solids, Total	83.1	%	n/a	SW 5035	04/16/2003	klb	4845
Lead, AA	29	mg/kg	4.0	SW 7420	04/24/2003	gaf	2498 1364

ANALYTICAL REPORT

Mr. Dan Pelczar
 KEY ENGINEERING GROUP LTD
 W66 N215 Commerce Court
 Cedarburg, WI 53012

05/06/2003
 Job No: 03.03144
 Sample No: 520505
 Account No: 45150
 Page 5 of 5

JOB DESCRIPTION: 0810009 Former Hein Werner Property
 PROJECT DESCRIPTION: Soil Analysis
 SAMPLE DESCRIPTION: Area F
 Waukesha, WI
 Rec'd at 3 degrees C

Date/Time Taken: 04/14/2003 09:45

Date Received: 04/15/2003

Parameter	Results	Units	Reporting	Method	Date		Prep/Run
			Limit		Analyzed	Analyst	Batch
Solids, Total	84.0	%	n/a	SW 5035	04/16/2003	kls	4845
Lead, AA	655	mg/kg	4.0	SW 7420	04/24/2003	gaf	2498 1364
TCLP-Lead, AA	<0.10	mg/L	0.10	SW 7420	05/06/2003	gaf	1605 482
Prep, TCLP - 1311	E 19-23			SW 1311	04/30/2003	lak	1605

Test America

INCORPORATED

Watertown Division
602 Commerce Drive
Watertown, WI 53094

Phone 920-261-1660 or 800-833-7036
Fax 920-261-8120

02.03/44

To assist us in using the proper analytical methods,
is this work being conducted for regulatory purposes?
Compliance Monitoring _____

Client Name: Key Engineering Group, Ltd Client #: WT45150
Address: 466 N 215 Commerce Ct.
City/State/Zip Code: Madison, WI 53013
Project Manager: Dan Pelczar
Telephone Number: (262) 375-4700 Fax: (262) 375-9680
Sampler Name: (Print Name) Dan Pelczar
Sampler Signature: [Signature]

Project Name: Foimer Heint/Wesner Property
Project #: 0810009
Site/Location ID: Waukegan State: WI
Report To: Dan Pelczar
Invoice To: Key Engineering Group, Ltd
Quote #: 03050 PC#: _____

SAMPLE ID	Date Sampled	Time Sampled	G = Grab, C = Composite	Field Filtered	Matrix SL - Sludge DW - Drinking Water GW - Groundwater S - Soil/Solid WW - Wastewater Specify Other	Preservation & # of Containers								Analyze For:	REMARKS						
						HNO ₃	HCl	NaOH	H ₂ SO ₄	Methanol	None	Other (Specify)									
SS, D-5	4/14/03	1:00L			Soil																
SS, D-6	↓	1:25L			Soil																
Area F	↓	1:45L			Soil																

QC Deliverables
 None
 Level 2
 (Batch QC)
 Level 3
 Level 4
 Other: _____

Special Instructions: Perform TAPP-Lead if totals are greater than 100

Relinquished By: [Signature] Date: 4/14/03 Time: _____
 Received By: [Signature] Date: 4/15 Time: 11:00

Relinquished By: [Signature] Date: 4/15 Time: 15:10
 Received By: _____ Date: _____ Time: _____

Relinquished By: _____ Date: _____ Time: _____
 Received By: [Signature] Date: 4/15 Time: 15:11

LABORATORY COMMENTS:
 Init Lab Temp: 30
 Rec Lab Temp: 30
 Custody Seals: Y N N/A
 Bottles Supplied by Test America: Y N
 Method of Shipment: TA

RV 4/15/03

Attachment 3



W66 N215 Commerce Court
Cedarburg, Wisconsin 53012

Daniel K. Pelczar, CPG, P.G.
Senior Hydrogeologist

(262) 375-4750 • (800) 645-7365
Fax (262) 375-9680
Pager (414) 718-2299
dpelczar@keyengineering.com

CEDARBURG • GREEN BAY
www.keyengineering.com



EXPOSURE CONCENTRATION ANALYSIS DIRECT CONTACT EXPOSURE PATHWAY

SURFICIAL (0' TO 4') TOTAL LEAD

Upper 95% Confidence Limit Concentration (mg/kg)

Former Hein Werner Property

Confirmation Soil Sample	Soil Sample Depth (feet)	Total Pb Concentration (mg/kg)	LN Transformed Data
B-1	3.5 to 5.5	88	4.48
B-4	1 to 3	17	2.83
B-6	3.5 to 5.5	26	3.26
B-7	1 to 3	46	3.83
B-9	3.5 to 5.5	21	3.04
B-11	1 to 3	219	5.39
B-12	3.5 to 5.5	40	3.69
Area B-11	0 to 1.5	183	5.21
Area 2	0 to 1.5	554	6.32
Area 3	0 to 1.5	67	4.20
Area 5	0 to 1.5	148	5.00
Area A	0 to 1.5	38	3.64
Area B	0 to 1.5	67	4.20
Area C	0 to 1.5	93	4.53
Area D	0 to 1.5	712	6.57
Area E	0 to 1.5	194	5.27
SS-2-1	0 to 1.5	50	3.91
SS-2-2	0 to 1.5	33	3.50
SS-2-3	0 to 1.5	79	4.37
SS-2-4	0 to 1.5	48	3.87
SS-D-1	0 to 1.5	58	4.06
SS-D-2	0 to 1.5	235	5.46
SS-D-3	0 to 1.5	39	3.66
SS-D-4	0 to 1.5	84	4.43
SS-D-5	0 to 1.5	211	5.35
SS-D-6	0 to 1.5	29	3.37
Area F	0 to 1.5	655	6.48

Upper 95% Confidence Limit Concentration(mg/kg) Assuming Data is Normally Distributed	
Number of Samples	27
Mean Concentration (mg/kg)	[AVERAGE] 149
Standard Deviation	[STDEV] 190
	[CONFIDENCE(0.05,190,27)] 72
Upper 95% Confidence Limit Concentration(mg/kg)	221

Upper 95% Confidence Limit Concentration(mg/kg) Assuming Data is Log Normally Distributed	
Number of Samples	27
Mean of LN Transformed Data	[AVERAGE] 4.44
Standard Deviation of LN Transformed Data	[STDEV] 1.03
	H-STATISTIC [Gilbert, 1987] 2.520
Upper 95% Confidence Limit Concentration(mg/kg)	240

References:

Gilbert, R.O. (1987). *Statistical Methods for Environmental Pollution Monitoring*.

USEPA (1997). *The Lognormal Distribution in Environmental Applications*, EPA/600/R-97/006, December 1997.

USEPA (1992). *Supplemental Guidance to RAGS: Calculating the Concentration Term*, OSWER Publ 9285.7-081, May 1992.

USEPA (1989). *Methods for Evaluating the Attainment of Cleanup Standards, Vol. 1: Soils and Solid Media*, EPA 230/02-89-042, February 1989.

WDNR (1997). *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance*, PUBL RR-519-97, April 1997 (corrected).



**EXPOSURE CONCENTRATION ANALYSIS
DIRECT CONTACT EXPOSURE PATHWAY**

SURFICIAL (0' TO 4') TOTAL LEAD

Upper 95% Confidence Limit Concentration (mg/kg)

Former Hein Werner Property

Confirmation Soil Sample	Soil Sample Depth (feet)	Total Pb Concentration (mg/kg)	LN Transformed Data
B-11	1 to 3	219	5.39
Area B-11	0 to 1.5	183	5.21
Area 2	0 to 1.5	554	6.32
Area 3	0 to 1.5	67	4.20
Area 5	0 to 1.5	148	5.00
Area B	0 to 1.5	67	4.20
Area C	0 to 1.5	93	4.53
Area D	0 to 1.5	712	6.57
Area E	0 to 1.5	194	5.27
SS-2-1	0 to 1.5	50	3.91
SS-2-2	0 to 1.5	33	3.50
SS-2-3	0 to 1.5	79	4.37
SS-2-4	0 to 1.5	48	3.87
SS-D-1	0 to 1.5	58	4.06
SS-D-2	0 to 1.5	235	5.46
SS-D-3	0 to 1.5	39	3.66
SS-D-4	0 to 1.5	84	4.43
SS-D-5	0 to 1.5	211	5.35
SS-D-6	0 to 1.5	29	3.37
Area F	0 to 1.5	655	6.48

Upper 95% Confidence Limit Concentration(mg/kg) Assuming Data is Normally Distributed	
Number of Samples	20
Mean Concentration (mg/kg)	[AVERAGE] 186
Standard Deviation	[STDEV] 213
	[CONFIDENCE(0.05,16,29)] 93
Upper 95% Confidence Limit Concentration(mg/kg)	280

Upper 95% Confidence Limit Concentration(mg/kg) Assuming Data is Log Normally Distributed	
Number of Samples	20
Mean of LN Transformed Data	[AVERAGE] 4.72
Standard Deviation of LN Transformed Data	[STDEV] 0.99
	H-STATISTIC [Gilbert, 1987] 2.561
Upper 95% Confidence Limit Concentration(mg/kg)	329

References:

Gilbert, R.O. (1987). *Statistical Methods for Environmental Pollution Monitoring*.

USEPA (1997). *The Lognormal Distribution in Environmental Applications*, EPA/600/R-97/006, December 1997.

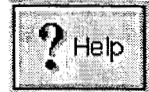
USEPA (1992). *Supplemental Guidance to RAGS: Calculating the Concentration Term*, OSWER Publ 9285.7-081, May 1992.

USEPA (1989). *Methods for Evaluating the Attainment of Cleanup Standards, Vol. 1: Soils and Solid Media*, EPA 230/02-89-042, February 1989.

WDNR (1997). *Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance*, PUBL RR-519-97, April 1997 (corrected).



WI DNR Activities at Discharge Sites



BRRIS data comes from many sources inside and outside of DNR. There may be gaps and errors in the data, or delays in updating new information. Please see our [disclaimers page](#) for more information.

DNR Activity Number: 02-68-275715
Activity Type: ERP
Activity Name: WAUKESHA IRON & METAL INC
Start Date: 03/06/2000
End Date:
Site Name: WAUKESHA IRON & METAL INC
Address: 1351 E MAIN ST
Municipality: WAUKESHA
Zip: 53186
County: Waukesha
DNR Region: Southeast Region
FID Number: 268508680
Jurisdiction: DNR
Risk: Unknown

Persons or Companies associated with this DNR Activity

Person or Company	Role	Address	Address 2	PO Box	Municipality	State	Zip
VOLKERT, DAVE	Project Manager	4041 NORTH RICHARDS ST			MILWAUKEE	WI	53212
WAUKESHA IRON & METAL CO	Responsible Party	1351 E. MAIN ST	LARRY ERLICH		WAUKESHA	WI	53186

Records 1 to 2 of 2

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Actions performed during this DNR Activity

			Date Action

Action Name	Action Description	Comment	Occurred
Miscellaneous	Miscellaneous action. Please see action comments.	NOV SUMMARY LETTER	03/06/2000
Notification	Date the DNR is notified of the discovery of the contamination.		03/06/2000
RP Letter Sent	Date of letter to RP notifying of legal responsibilities associated with the discovery of contamination.		07/25/2001
Notice of Noncompliance (NON)	Date RP is sent a Notice of Noncompliance (NON) as a result of their failure or refusal to comply. Identifies the specific violation and requires a response within a given time period.	BB. NO RESPONSE TO RP LETTER	06/06/2002
Status Report Received	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		06/12/2002

Records 1 to 5 of 5

[Download](#)

Impacts

Impact Description	Comment
Groundwater Contamination	

Record 1 of 1

Substance

Substance Description	Substance Name	Amount Released	Units
Other			

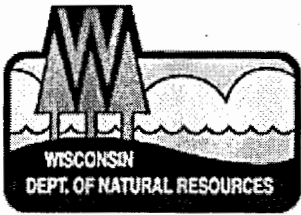
Record 1 of 1

Spiller Action

No Records returned

- [Person or Company](#)

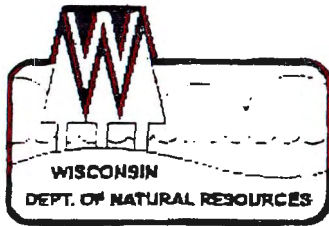
Send DNR Feedback About This DNR Activity
[BRRTS on the Web Feedback Form](#)



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Last Revised: 04/28/2003



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
 George E. Meyer, Secretary
 Gloria L. McCutcheon, Regional Director

Southeast Region
 Sturtevant Service Center
 9531 Rayne Road
 Sturtevant, Wisconsin 53177
 Telephone 414-884-2300
 FAX 414-884-2307
 TDD 414-884-2304

March 6, 2000

Mr. Larry Erlich
 Waukesha Iron & Metal, Inc.
 1351 East Main Street
 Waukesha, WI 53186

Briff # 0248-275715
FID # 248508680

CERTIFIED MAIL

Dear Mr. Erlich:

Thank you for meeting with us to discuss the Notice of Violation that was issued to Waukesha Iron & Metal, Inc. (Waukesha Iron), on February 16, 2000. If you are not in agreement with the summary of this meeting please contact the Department.

Meeting Date: March 2, 2000
 Location: DNR Southeast Region Annex Office.
 Attendance: Larry Erlich, Tim Kennedy, Scott Ferguson and David Dahms.

Summary of Discussion

Mr. Erlich stated that the barrels of old gas that were being stored at Waukesha Iron had been on site for approximately 5-6 years. Tim Kennedy summarized previous discussions with Mr. Erlich which requested Mr. Erlich to limit the accumulation of gasoline on-site. Kennedy stated that Waukesha Iron should limit accumulation to 3-4 drums and less than one year. Mr. Erlich stated that Waukesha Iron has implemented a policy where once one drum of gas is accumulated, Mr. Erlich will call OSI and have the drum removed.

Kennedy recommended that Waukesha Iron remove gas tanks on a concrete pad to reduce the chance of spillage into the environment. Kennedy also recommended that absorbent materials be stored nearby to assist clean up of spills. Scott Ferguson recommended using curbing in these areas. Mr. Erlich stated that a stormwater inspection was done at the facility 2 1/2 months ago under the CCCR program.

Kennedy discussed solid waste requirements at Waukesha Iron. Kennedy requested that Waukesha Iron cannot accumulate piles of solid waste debris and requested that the facility have regular service for solid waste materials. Mr. Erlich stated that two 40 yard roll-off boxes are now on site and that Waukesha Iron will take the boxes in to a licensed solid waste facility once boxes are filled with solid waste.

Kennedy also addressed the storage of lighting ballasts. Kennedy stated that Waukesha Iron needs DNR approval to store lighting ballasts. Kennedy recommended that the facility not accept any PCB or non-PCB lighting ballasts. Mr. Erlich provided documentation that the ballasts previously noted on-site by Kennedy were removed by RTI. Mr. Erlich also explained that there is a large sign at the facility that states no lighting ballasts are accepted.

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Mr. Erlich stated that sometimes lighting ballasts are mixed in with waste lighting fixtures. Mr. Erlich stated that when lighting ballasts are found mixed with other scrap, the ballasts will either be rejected or containerized immediately and shipped to RTI.

Scott Ferguson discussed his role as a Hydrogeologist to Mr. Erlich. Ferguson explained that he is working on a site investigation of the old Akerman property located adjacent to Waukesha Iron. Ferguson explained that old barrels of paint waste, which is classified as hazardous waste, were buried on the Akerman property. Ferguson stated that the property has been required by DNR to complete a site investigation. As part of the investigation, the consultant working on the project collected soil and groundwater samples from the property. Ferguson explained that groundwater samples collected near the boundary of the old Akerman property and Waukesha Iron indicated elevated levels of MTBE, which is a gasoline constituent.

Ferguson noted that MTBE has only be used in gasoline since the 1980s and that Akerman operated at the property in the 1970s. In addition, Ferguson noted that the consultant has determined that groundwater flows from the Waukesha Iron property to the old Akerman property. Ferguson stated that based on the consultant's findings, there may be a possibility that Waukesha Iron may be the source of contamination of MTBE contamination.

Ferguson stated that Waukesha Iron would be getting a responsible party letter. Ferguson stated that under the Spill Law, Waukesha Iron would be required to hire an environmental consultant and perform a site investigation to define the degree and extent of contamination if contamination is found. Ferguson stated that it was very important to follow the milestones in the letter. Ferguson provided an executive summary of the consultant's findings and offered to meet with Mr. Erlich and his consultant.

You can call me at (414) 263-8670 or Tim Kennedy at (414) 229-0858 if you have any questions.

Sincerely,



David Dahms
Enforcement Specialist

c: Bureau of Waste Management - WA/3
Tim Kennedy - Annex
Scott Ferguson - Annex



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
FAX 262-574-2117

June 6, 2002

Mr. Larry Erlich
Waukesha Iron & Metal Co.
1351 E. Main Street
Waukesha, WI 53186

FID#: 268508680
BRRTS#: 02-68-275715

Subject: Notice of Non-Compliance
Waukesha Iron & Metal Co., 1351 E. Main Street, Waukesha

Dear Mr. Erlich:

On July 25, 2001, you were sent a letter from the Department of Natural Resources informing you of your legal responsibilities to address the reported MTBE contamination at the above-referenced site. You were required to submit within 30 days of the date of the letter, written verification that you have hired an environmental consultant. Within 60 days, the Department was to have received a workplan and schedule for the investigation. To date, the Department has received no information regarding this site. As ample time has passed to comply with the Department's request, you are being issued this notice of non-compliance.

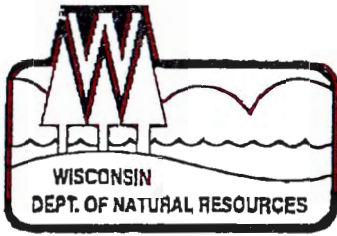
Within 30 days of the date of this letter, you are required to submit the above-required information. This information should be submitted to the Department in writing at the following address: Ms. Victoria Stovall, Wisconsin Department of Natural Resources, 2300 North Dr. MLK Jr. Drive, Milwaukee, WI 53212. All correspondence should reference the FID and BRRTS numbers at the top right of this letter.

If you do not reply to this letter as required, the Department will view that as a negative response and will recommend that further enforcement action be initiated. If you have any questions, you may contact me at (262)574-2140.

Sincerely,

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

C: file



State of Wisconsin | DEPARTMENT OF NATURAL RESOURCES

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

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12438
Milwaukee, Wisconsin 53212-0438
Telephone 414-263-8500
FAX 414-263-8608
TTY 414-263-8713

July 25, 2001

BRRTS# 02-68-275715
FID#: 268508680

Waukesha Iron & Metal Co.
Larry Erlich
1351 E. Main St.
Waukesha, WI 53186

SUBJECT: Reported Petroleum Contamination at Waukesha Iron & Metal Co., 1351 E. Main St., Waukesha

Dear Mr. Erlich:

During a March 6, 2000, enforcement conference, Waukesha Iron & Metal was notified that the department has reason to believe that a groundwater plume of MTBE contamination originates on your property and has migrated off-site onto downgradient property(ies). Based on the information submitted to the WDNR, we believe you are responsible for restoring the environment at the referenced site under Section 292, Wisconsin Stats., known as the hazardous substances spills law. Utilizing information submitted to the Department, this case has been assigned an unknown ranking due to the lack of information concerning soil and groundwater contamination. Your responsibility to restore this site is as follows:

WDNR Southeast Region Prioritization and Scoring Policy

Due to the WDNR workload, it is necessary to rank all contamination cases for review priority. Lower priority cases do not have assigned project managers, however, responsible parties are required to proceed with investigation and clean-up efforts. Until a priority has been assigned to this site, you should proceed with the required response work, submitting all plans and reports, along with status reports, to this office. The WDNR will notify you if your site will receive active oversight.

Your responsibilities include investigating the extent of the contamination and then selecting and implementing the most appropriate remedial action. Enclosed is information to help you understand what you need to do to ensure your compliance with the spills law.

The purpose of this letter is threefold: 1) to describe your legal responsibilities, 2) to explain what you need to do to investigate and clean up the contamination, and 3) to provide you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with the Department of Natural Resources.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Statutes, and states:

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* **RESPONSIBILITY.** A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Codes chapters NR 700 through NR 728 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

Steps to Take:

The longer contamination is left in the environment the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. These are the first four steps to take:

1. Within 30 days of receipt of this correspondence, please submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. You will need to work quickly to meet this timeline.
2. Within 60 days of receipt of this correspondence, your consultant must submit a workplan and schedule for the investigation. The consultant must follow the DNR administrative codes and technical guidance documents. Please include with your workplan a copy of any previous information that has been completed (such as an underground tank removal report or a preliminary excavation report).
3. Please inform DNR of what is being done at your site. Submittal requirement timelines depend on the contaminants at the site. As described in s. NR 700.11, if the site meets criteria for a "simple site", progress reports must be submitted semi-annually, beginning 6 months from the initial notification date. If the site meets criteria for a "complex site", the site investigation report and a draft remedial options report must be submitted to DNR within 30 days of completion of both reports. Your consultant must clearly document the extent and degree of soil and groundwater contamination and submit a proposal for cleaning it up.
4. For complex sites, per s. NR 724.13(3), you or your consultant must provide a brief report at least every 90 days, starting after the remediation system begins operation. The reports should summarize the work completed since the last report. Quarterly reports need only include one or two pages of text, plus any relevant maps and tables. However, should conditions at your site warrant, we may require more frequent contacts with the Department.

Due to the number of contaminated sites and our staffing levels in DNR's Southeast Region, we will be unable to provide workplan approvals for investigations or remedial actions. To maintain your compliance with the spills law and chs. NR 700 through NR 728, do not delay the investigation and cleanup of your site by waiting for DNR response. We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative codes and should be able to answer your questions on meeting cleanup requirements.

Your correspondence and reports regarding this site should be sent to:

Victoria Stovall, Program Assistant
Remediation & Redevelopment Program
Wisconsin Department of Natural Resources
Box 12436
Milwaukee WI 53212

Unless otherwise requested, please send only one copy of plans and reports. To speed processing, correspondence should reference the BRRTS and EID numbers shown at the top of this letter.

Information for Site Owners:

Enclosed is a list of environmental consultants and some tips on selecting one. If you are eligible for reimbursement of costs under Wisconsin's PECFA program (see last paragraph) you will need to compare at least three consultants' proposals before hiring a consultant. Consultants and laboratories working in the PECFA program are required to carry errors and omissions insurance to help protect you against unsuitable work. Also enclosed are materials on controlling costs, understanding the cleanup process, and choosing a site cleanup method. Please read this information carefully.

If you are interested in obtaining the protection of limited liability under s. 292, Stats., please call Margaret Brunette at 414-263-8577 for more information. The liability exemption under s. 292 Stats., is available to persons who meet the definition of "voluntary party" in s. 292.15 and receive DNR approval for the response actions taken at the property undergoing cleanup. The Department will determine eligibility for this program on a case-by-case basis, prior to the "voluntary party" developing a scope of work for conducting a ch. NR 716 site investigation at the property.

Financial Information:

Reimbursement from the Petroleum Environmental Cleanup Fund (PECFA) is available for the costs of cleaning up contamination from eligible petroleum storage tanks. The fund is administered by the Department of Commerce. Please contact Commerce at (608) 266-2424 for more information on eligibility and regulations for this program.

Thank you for your cooperation.

Sincerely,



Victoria Stovall
Program Assistant
Remediation and Redevelopment Program
414-263-8688

7 c: SER File



Environmental and Engineering Management LLC

W223 N7343 Carole Court, Sussex, Wisconsin 53089
Phone/Fax: 262.820.3719

June 10, 2002

Ms. Brenda H. Boyce, P.G.
Wisconsin Department of Natural Resources
407 Pilot Court, Suite 100
Waukesha, Wisconsin 53188

FID#: 268508680
BRRTS#: 02-68-275715

RE: Waukesha Iron & Metal Co., 1351 E. Main Street, Waukesha, WI

Dear Ms. Boyce:

On behalf of Waukesha Iron & Metal Co. (WIM), E2M Environmental and Engineering Management LLC (E2M) has prepared this response to the Notice of Non-Compliance dated June 6, 2002. E2M was been contracted by WIM as the environmental consultant in August 2001.

WIM and E2M conducted a strategy meeting on August 29, 2001. A workplan/proposal was prepared and submitted to WIM on September 10, 2001. The workplan/proposal involved the sampling of two monitoring wells on the former Hein Werner property (to the south) to establish present day baseline MTBE levels. Access agreements to the property and the monitoring wells were required prior to conducting the sampling. A copy of the accepted workplan/proposal is included with this submittal.

Requests for access agreements to the monitoring wells and the property were made on October 23 and 31, 2001, respectively. Copies of the requests are also included with this submittal. Access to the monitoring wells was granted on December 12, 2001. However, access to the property has not been granted. E2M has been in contact with the property owner, Mallory Investments, on biweekly basis or more since December 2001. Upon receipt of the property access agreement, E2M will sample the two monitoring wells. After the reviewing the analytical data, E2M and WIM will develop a Site Investigation workplan and schedule.

With this submittal please rescind the Notice of Non-Compliance for the Waukesha Iron & Metal, Co. If additional information is required I can be reached at 262.820.3719.

Sincerely,
E2M Environmental and Engineering Management LLC

Christian A. Mielke, P.E.
Member/Project Manager

CAM
Enclosures

cc: Mr. Larry Erlich, Waukesha Iron & Metal, Co. (Letter)



STATE OF WISCONSIN

Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

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

Form Approved, OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. WID006072698	Manifest Document No. 93167	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Former Hein Werner Property 105 Perkins Ave. Waukesha, WI 53186 4. Generator's Phone (262) 656-5370 Jeff Nettelsheim			Site Location If Different Snap-On 2801 80th St. Kenosha, WI 53141-1410		A. State Manifest Document Number WI K293167	
5. Transporter 1 Company Name Advanced Waste Carriers, Inc.		6. US EPA ID Number WIO000815381		C. State Transporter's ID EPA506337NY		
7. Transporter 2 Company Name Pollution Control Industries		8. US EPA ID Number IND000646943		D. Transporter's Phone 800-842-9792		
9. Designated Facility Name and Site Address Pollution Control Industries 4343 Kennedy Ave. East Chicago IN 46312		10. US EPA ID Number IND000646943		E. State Transporter's ID WIO000646943		
				F. Transporter's Phone 317-397-3951		
				G. State Facility's ID		
				H. Facility's Phone 219-397-3951		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit wt/vol	Waste No.
a. RC Hazardous Waste Solid, NOS, 9, NA3077, PGIII (DCGS)		001	PM	001.75	P	9 0 0 8
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above n. 249482M Paint Solids				K. Handling Codes for Wastes Listed Above G = Gallons P = Pounds		
15. Special Handling Instructions and Additional Information 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 governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also 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 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 & Position Title Jeffrey J. Nettelsheim SER Mgr		Signature <i>Jeffrey J. Nettelsheim</i>		Date 04/18/2003		
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title Jeffrey Nettelsheim		Signature <i>Jeffrey Nettelsheim</i>		Date 04/18/2003		
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title William L. Smith		Signature <i>William L. Smith</i>		Date 04/23/2003		
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 & Position Title N. Condero		Signature <i>N. Condero</i>		Date 04/25/2003		

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR
2 - Generator retain
3 - Facility send to Wis. DNR
Copies 1 & 3 mail to Wis. DNR at above address.

4 - Facility retain
5 - Facility send to Generator
6 - Transporter retain

Emergency 24 Hour Assistance
and Spill Reporting
Telephone Number: (800) 943-0003

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