

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

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October 30, 2007

Ms. Mary Trotta
Sigma Environmental Services, Inc.
1300 W. Canal St.
Milwaukee, WI 53233

FID# 241398630
BRRTS# 02-41-545142

Subject: Request for Letter of Concurrence for Hazardous Waste Determination for Master Dry Cleaning, 6325 W. Bluemound Rd., Wauwatosa

Dear Ms. Trotta:

The Wisconsin Department of Natural Resources (Department) received your request for a letter of concurrence for the above-referenced property on October 17, 2007. You have requested Department concurrence with the hazardous waste determination, specifically for the "contained-out" soil concentrations calculated using the USEPA Soil Screening Guidance and applying Wisconsin industrial site default values. You propose that soil containing spilled tetrachloroethylene (PCE), trichloroethylene (TCE) and/or vinyl chloride (VC), which would otherwise be considered a "listed" hazardous waste under Wisconsin and USEPA regulations, be considered a non-hazardous waste for disposal and management purposes during site investigative work, when the soil concentration of PCE is less than 33 mg/kg, TCE is less than 14 mg/kg and VC is less than 0.87 mg/kg. Based on the soil analytical data, the investigative soil waste generated to date from soil borings does not exceed these values, except for the soil at SMW-9. The soil from SMW-9 has been segregated and will be disposed of as hazardous waste.

Except for the soil from SMW-9, Sigma will determine if the soil contains PCE or TCE at levels that would be considered a characteristic hazardous waste based on the Toxicity Characteristic Leaching Procedure (TCLP) analysis. These values are 0.7 mg/L for PCE and 0.5 mg/L for TCE by TCLP.

The Department may consider environmental media to not contain a hazardous waste and not be regulated as a hazardous waste when concentrations of the hazardous waste constituents do not exceed site-specific health-based levels and when the soils are managed appropriately following drilling activities. The Department has established that use of the industrial site direct contact protection concentrations, as calculated through the USEPA's Soil Screening Guidance equations using the Department's established default input values, would be acceptable for determining when investigative waste could be considered to no longer contain hazardous waste.

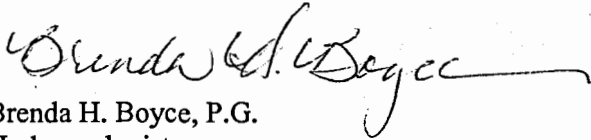
Based on the information received, the Department concurs that you have used the appropriate method and default values for the hazardous waste constituents PCE, TCE and VC to determine the proposed "contained-out" concentration. If soils are removed from the site for investigation purposes under Department approval and are disposed in accordance with state solid waste regulations in a licensed landfill, the soils containing PCE at concentrations less than 33 mg/kg PCE (by VOC analysis) and less than 0.7 mg/L (by TCLP analysis) would not be considered a hazardous waste, and soil containing TCE at concentrations less than 14 mg/kg (by VOC analysis) and less than 0.5 mg/L (by TCLP analysis) would

not be considered a hazardous waste. If vinyl chloride is detected, the Department's default value of 0.87 mg/kg should be applied.

Furthermore, the Department concurs that the methodology presented for determining whether the groundwater generated from development and purging of monitoring wells/piezometers from site investigation activities meets hazardous waste criteria is appropriate. In essence, if the analytical data from sampling the well reports an NR 140 Enforcement Standard (ES) exceedance for PCE, TCE or VC, then the waste from that well is determined to be hazardous.

If you have any questions, please contact me at (414) 263-8366.

Sincerely,

A handwritten signature in cursive script that reads "Brenda H. Boyce". The signature is written in black ink and is positioned above the typed name.

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

C: Michelle Williams – Reinhart Boerner Van Deuren