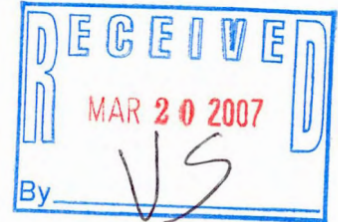


**SITE INVESTIGATION WORKPLAN
CHLORINATED VOLATILE ORGANIC COMPOUND RELEASE**

**EXPRESS CLEANERS, INC.
3941 NORTH MAIN STREET
RACINE, WISCONSIN**

WDNR BRRTS #02-52-547631

March 14, 2007



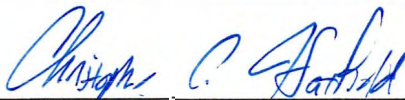
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Stuart J. Gross, PG
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CCH/lmh

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY 1

2.0 BACKGROUND INFORMATION 2

3.0 SITE INVESTIGATION WORKPLAN 2

4.0 REFERENCES 6

FIGURES

Figure 1: Site Layout with Proposed Soil Borehole and Monitoring Well Locations

1.0 EXECUTIVE SUMMARY

This workplan outlines Northern Environmental Technologies, Incorporated's (Northern Environmental's) technical approach to evaluate the extent of a chlorinated volatile organic compound (CVOC) release identified at Express Cleaners, Inc., 3941 North Main Street, Racine, Wisconsin (the Site). A Phase II environmental site assessment completed during April 2006 identified CVOC contamination at the Site. The discovery of the release was reported to the Wisconsin Department of Natural Resources (WDNR) and eligibility for the WDNR Dry Cleaner Environmental Response Program (DERP) was established. During January 2007, Northern Environmental completed site investigation scoping to guide the scope and detail of future site investigation activities.

The WDNR is requiring an investigation to define the extent of the release and possible corrective action to restore the environment. Northern Environmental prepared this workplan to meet WDNR requirements for a site investigation. This workplan involves drilling a minimum of fourteen soil boreholes using a GeoProbe[®] and a truck-mounted drill rig, and installing and sampling a minimum of six groundwater monitoring wells and one piezometer. Soil and groundwater samples will be laboratory analyzed for VOCs. In addition, select groundwater samples will also be analyzed for geochemical indicators of natural attenuation. After the investigation is complete, data will be interpreted to estimate the extent, fate, and human and environmental health impacts of identified contaminants. A site investigation report will be prepared summarizing the investigation results. If warranted, the site investigation report will request the WDNR review the site for closure.

2.0 BACKGROUND INFORMATION

A small shopping center comprised of three building units is located at the Site. The northern-most building unit (3941 North Main Street) historically operated as a dry cleaning facility, and the current tenant is Express Dry Cleaners, Inc. (Express Cleaners). The currently vacant middle unit (3931 North Main Street) was formerly used as a liquor store. A tanning salon is a long-term occupant of the southern unit (3921 North Main Street).

Phase I and II environmental site assessments (ESAs) were completed by Gabriel Environmental Services (Gabriel) during March and April 2006 as part of due diligence associated with the potential sale of the property (Gabriel, 2006a and 2006b). The Phase II ESA included the completion of three soil boreholes near the dry cleaning establishment. Two of the boreholes were completed east of the Site building in the area behind Express Cleaners. The remaining borehole was completed inside Express Cleaners. Concentrations of chlorinated volatile organic compounds (CVOCs), primarily tetrachloroethene (PCE) and its breakdown products trichloroethene (TCE) and cis 1,2-dichloroethene (cis 1,2-DCE), were detected in each of the boreholes. Gabriel concluded that used PCE and filters stored in 55-gallon drums and PCE stored within the building had been released to soil at the Site.

The results of the Phase II ESA were reported to the Wisconsin Department of Natural Resources (WDNR) who subsequently requested a site investigation and appropriate remedial action be performed. During January 2007, Northern Environmental Technologies, Incorporated (Northern Environmental) completed site investigation scoping (Northern Environmental, 2007) according to section NR 169.05(27), Wisconsin Administrative Code (s. NR 169.05[27], Wis. Adm. Code). The purpose of the site investigation scoping was to ensure the scope and detail of the subsequent field investigation is appropriate to the complexity of the Site.

3.0 SITE INVESTIGATION WORKPLAN

This workplan was designed to make maximum use of existing information and satisfy the regulatory requirements of Wisconsin Statute §292.11. The project will be completed in a phased approach. Each phase uses information gathered in previous tasks to better focus subsequent portions of the investigation.

The goal of the project is to quantify the extent of released CVOCs, evaluate contaminant fate and transport, and consider the potential for identified contaminants to affect environmental and human health and welfare. Work will be performed according to WDNR guidelines, the requirements of Chapters NR 169 and the NR 700 Series, Wisconsin Administrative Code (NR 169 and NR 700 series, Wis. Adm. Code). The proposed workplan consists of the following tasks.

- | | |
|----------|-----------------------------------|
| Task 1.0 | Investigate Site |
| Task 2.0 | Prepare Site Investigation Report |

Project assumptions and tasks are described below.

Task 1.0 Investigate Site

The goal of the site investigation is to define the vertical and lateral extent of the CVOCs in soil and groundwater. This information is essential in determining the risk to human health and the environment associated with the release and evaluating the necessity of a remedial action program. The field investigation will be performed according to s. NR 716.11, Wis. Adm. Code.

Subtask 1.1 Soil Investigation

The soil investigation will follow the scope of work included in Northern Environmental's February 2007 proposal. Specifically, the soil investigation will include:

- ▲ Notifying Diggers Hotline of subsurface work to allow marking of buried utilities at the Site. In addition, private utilities will be located and marked. The drilling subcontractor selected for the project will be responsible for marking utilities.
- ▲ Installing fourteen soil boreholes; thirteen boreholes will be completed to a depth of 16 feet below grade (fbg) and one borehole will be completed to a depth of 30 fbg. Nine soil boreholes will be completed outside the building using a combination of GeoProbe® and hollow-stem auger drilling techniques. Due to limited access, five boreholes will be completed within the Site building using a cart-mounted GeoProbe®. Please refer to Figure 1 for proposed soil borehole locations.
- ▲ Containerizing, labeling, and securing soil cuttings in 55-gallon metal drums. The drums will be characterized upon receipt of laboratory analytical reports.
- ▲ Collecting and logging soil samples continuously from each borehole and preparation of WDNR Soil Borehole Logs (Form 4400-122). Soil classification will be conducted according to American Society of Testing and Materials (ASTM) Standard 2488-06.
- ▲ Screening soil samples for the presence of volatile organic compounds (VOCs) using a field instrument capable of detecting VOCs in the parts per billion (ppb) range. Specifically, a Rae Systems PPB Rae photoionization detector (PID) will be used to detect VOCs in the ppb range. A Thermo Environmental Instruments, Incorporated Model 580 PID will be used to screen for VOCs in the parts per million range.
- ▲ Preserving each soil sample for potential laboratory analysis
- ▲ Submitting up to three soil samples from each borehole to a WDNR-certified laboratory for analysis of VOCs using Environmental Protection Agency (EPA) Method 8260B. Samples will be selected to evaluate CVOC concentrations in the upper 4 feet of soil (direct-contact threat), evaluate CVOC concentrations in the sample exhibiting the greatest PID reading, and/or to evaluate the vertical extent of CVOC impacts.
- ▲ Submitting four soil samples to a WDNR-certified laboratory for total organic carbon and dry bulk density. The data will be used to develop site-specific soil screening levels.
- ▲ Abandoning any borehole not completed as a monitoring well according to NR 141, Wis. Adm. Code. A WDNR borehole abandonment form (Form 3300-5B) will be completed for each abandoned borehole.
- ▲ Measuring the vertical and horizontal position of each soil borehole and creation of a site map depicting borehole locations and relevant site features (e.g., buildings, utilities, etc.).

Subtask 1.2 Groundwater Investigation

The groundwater investigation will follow the scope of work included in Northern Environmental's February 2007 proposal. Specifically, the groundwater investigation will include:

- ▲ Installing four 2-inch diameter groundwater monitoring wells in select hollow-stem auger boreholes completed during Subtask 1.1. The wells will be constructed to intercept the shallow water table, which will be based on field observation of soil moisture. It is anticipated the wells will be completed to 15 fbg with 10 feet of screened interval. The monitoring wells will be constructed according to NR141, Wis. Adm. Code. No glues, solvents, or lubricants will be used in well construction. All wells will be completed with flush-mount protective covers with locks and protective gasket seals. Please refer to Figure 1 for proposed monitoring well locations
- ▲ Installing two 1-inch diameter monitoring wells in select GeoProbe® soil boreholes completed as part of Subtask 1.1. The wells will be constructed to intercept the shallow water table, which will be based on field observation of soil moisture. It is anticipated the wells will be completed to 15 fbg with 10 feet of screened interval. A variance to NR 141, Wis. Adm. Code will be requested for the 1-inch diameter wells. No glues, solvents, or lubricants will be used in well construction. Each well will be completed with a flush-mount cover with a protective gasket seal. The proposed 1-inch diameter well locations will be determined based on field screening data.
- ▲ Installing one 2-inch diameter piezometer in a select hollow-stem auger borehole installed as part of Subtask 1.1. The piezometer will be completed to a depth of approximately 30 fbg with 5 feet of screened interval. Construction will be conducted according to NR 141, Wis. Adm. Code. No glues, solvents, or lubricants will be used in well construction. The piezometer will be completed with a flush-mount protective cover, lock, and protective gasket seal. Please refer to Figure 1 for the proposed piezometer location.
- ▲ Measuring the horizontal location of each monitoring well and surveying of the vertical elevation of each well. A benchmark referenced to feet mean sea level (fmsl) will be established at the Site. All vertical elevations measured at the Site will be referenced to fmsl.
- ▲ Collecting pre-development water levels from the wells using an electronic water level indicator probe.
- ▲ Developing the monitoring wells and piezometer according to NR 141, Wis. Adm. Code and WDNR guidance documents. The monitoring wells will be developed using a variable-capacity bailer or pump to remove the effects of drilling and well installation, to allow collection of samples representative of ambient groundwater quality, and to maximize well yield. During development, measurements of specific conductance, pH, temperature, and turbidity will be recorded. All well development and sampling equipment will be thoroughly cleaned between wells.
- ▲ Completing bailer recovery tests on each of the 2-inch diameter monitoring wells to determine hydraulic conductivity of the underlying saturated soil.
- ▲ Collecting post-development water levels from each of the wells and piezometer.
- ▲ Completing WDNR Monitoring Well Development Forms (Form 4400-113B) for each of the wells and piezometer
- ▲ Containerizing, labeling, and securing monitoring well development and purge water in 55-gallon steel drums. The drummed water will be characterized and disposed upon receipt of laboratory analytical results.
- ▲ Collecting groundwater samples from each of the wells using low flow sampling techniques according to WDNR guidance documents. Measurements of pH, temperature, dissolved

oxygen, oxidation reduction potential, and conductivity will be collected at the flow cell during well purging using a YSI multimeter. The wells will be considered stable and ready for sampling when three consistent readings are recorded for each of the parameters. The groundwater samples will be submitted to a WDNR-certified laboratory for analysis for VOCs using EPA Method 8260B. In addition, samples will also be laboratory analyzed for nitrates, sulfates, total organic carbon, alkalinity, and dissolved gases (ethene, ethane, and methane) from select monitoring wells (i.e., upgradient, downgradient, and source area) to assist in evaluation of natural attenuation (i.e., reductive dechlorination) as a remedial alternative. Quality assurance/quality control measures will be taken with each sampling event according to s. NR 716.13 (11), Wis. Adm. Code. This includes a trip blank, field blank, and duplicate sample for each event.

- ▲ Preparation of a map depicting monitoring well and piezometer locations.

Subtask 1.3 Interpret Data

Data collected during the previous tasks will be compiled and analyzed to determine if the extent of CVOC contamination has been adequately defined. The data evaluation will include:

- ▲ Review and tabulation of soil field screening and laboratory analytical data
- ▲ Preparation of a map depicting the distribution of CVOCs in soil at the Site
- ▲ Review and tabulation of groundwater elevation data and preparation of a map depicting groundwater elevation iso-contours and flow direction
- ▲ Calculation of hydraulic conductivity at each monitoring well based on bailer recovery data
- ▲ Review and tabulation of groundwater laboratory analytical data
- ▲ Preparation of a map depicting the distribution of CVOCs in groundwater at the Site
- ▲ Preparation of cross sections depicting the site geology and vertical distribution of CVOCs in soil and groundwater

Task 2.0 Prepare Site Investigation Report

If no additional site investigation is required, the results of Task 1.0 will be detailed in a report that documents the investigation and summarizes the results and conclusions. The report will include sufficient text, tables, figures, field data, and laboratory reports necessary to support the findings and conclusions. Specifically the report will:

- ▲ Describe investigative methods in detail
- ▲ Provide a conceptual model of site hydrogeology
- ▲ Present and interpret analytical data
- ▲ Assess the significance of identified contaminant migration pathways
- ▲ Assess the ultimate fate and significance of the identified contaminants

Project work will be supervised by a Northern Environmental professional hydrologist, professional geologist, a professional engineer, and/or a WDNR-certified hydrogeologist. After review and incorporation of any

comments by the Ehrlich Family Partnership and DeWitt, Ross, And Stevens, SC, the report may be submitted to the WDNR. Information collected during the site investigation will be used to determine appropriate response actions.

4.0 REFERENCES

American Society for Testing and Materials, *Standard Practice for Description and Identification of Soil*, Designation: D2488, December 1997.

Gabriel Environmental Services (Gabriel), “*Phase I Environmental Site Assessment, 3921-3941 North Main Street, Racine, Wisconsin*”, March 6, 2006(a).

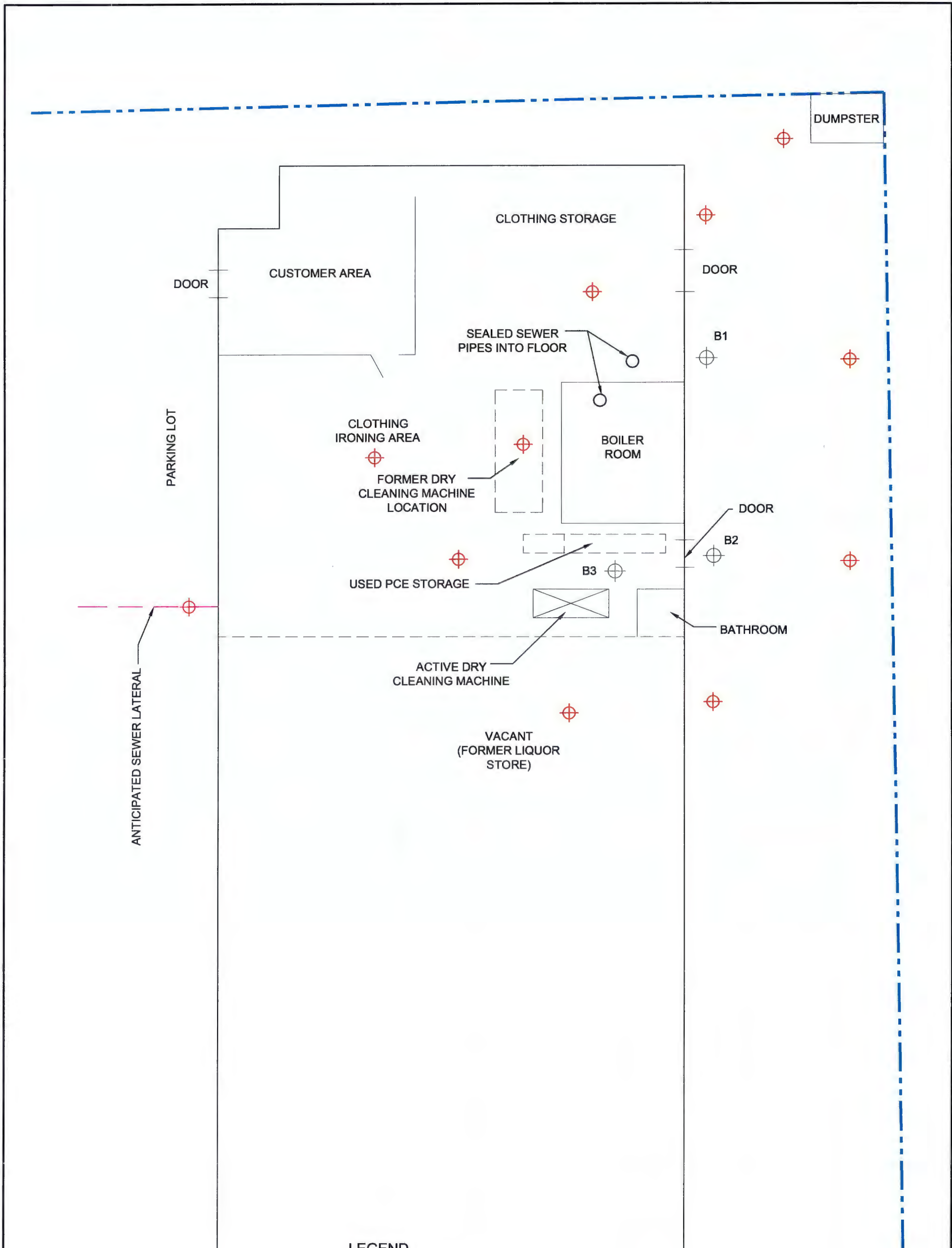
Gabriel Environmental Services (Gabriel), “*Limited Focused Phase II Environmental Site Assessment, 3921-3941 North Main Street, Racine, Wisconsin*”, March 6, 2006(b).

Northern Environmental Technologies “*Site Investigation Scoping, 3921-3941 North Main Street, Racine, Wisconsin*”, January 17, 2007.

Wisconsin Department of Natural Resources, “*Site Investigation*,” *Wisconsin Administrative Code*, Chapter 716, October 2001.

Wisconsin Department of Natural Resources, “*Groundwater Quality*,” *Wisconsin Administrative Code*, Chapter NR 140, February 2004.

Wisconsin Department of Natural Resources, “*Dry Cleaner Environmental Response Program*,” *Wisconsin Administrative Code*, Chapter NR 169, July 2005.



LEGEND

- - - - - PROPERTY BOUNDRY
- B3 GABRIEL ENVIRONMENTAL BOREHOLE LOCATION AND IDENTIFICATION
- PROPOSED BOREHOLE LOCATION



SCALE IN FEET



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WISCONSIN ▲ MICHIGAN ▲ ILLINOIS ▲ IOWA

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DATE: 12/20/06 DRAWN BY: BMP TASK NUMBER: 1

SITE LAYOUT WITH PROPOSED SOIL BOREHOLE AND MONITORING WELL LOCATIONS

EXPRESS CLEANERS, INCORPORATED
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 RACINE, WISCONSIN

PROJECT NUMBER: ECI 01-2300-3057 FIGURE 1