

August 10, 2007 (ECI 01-2300-3057)

Mr. Mark Drews Wisconsin Department of Natural Resources 141 Northwest Barstow Street, Room 180 Waukesha, Wisconsin 53188

RE: Proposed Workplan and Cost Estimate, Express Cleaners, 3941 North Main Street, Racine, Wisconsin; WDNR BRRTS #02-52-547631

Dear Mr. Drews:

During March and April 2007, Northern Environmental Technologies, Incorporated (Northern Environmental) initiated the soil and groundwater sampling plan proposed in the March 14, 2007 Wisconsin Department of Natural Resources (WDNR) approved site investigation workplan for Express Cleaners, 3941 North Main Street, Racine, Wisconsin (the Site). We are requesting approval and funding for additional work at the Site.

BACKGROUND INFORMATION

Express Cleaners operates a dry cleaning business at the Site. The Site is owned by the Ehrlich Family Limited Partnership (the Owner). During March 2007, Northern Environmental initiated a site investigation workplan for the Site with approval of the WDNR. The workplan included investigation of a volatile organic compounds (CVOCs) release previously identified on the Site as part of a real estate transaction. Northern Environmental oversaw the completion of nine boreholes and five groundwater monitoring wells. The initial site investigation results indicated additional investigation was warranted north and east of the Site. A large vegetable garden was observed on the adjacent property to the east during the site investigation. Figure 1 shows the layout of the Site and adjacent properties. Northern Environmental provided a site investigation update and a workplan and cost estimate to complete additional investigation to the WDNR on June 26, 2007.

While awaiting the WDNR to review the workplan, the Owner's representatives (the Representatives) sought permission from S.C. Johnson to access the S.C. Johnson property located east of the Site. S.C. Johnson informed the Representatives about vegetable gardens in this area and requested that the Owner determine if CVOCs were present in the near-surface soils (root zones) and/or the edible portions of garden crops present in the garden. Based on S.C. Johnson's concerns for people that may work in the gardens or eat the vegetables grown there, a separate workplan was created to immediately assess the potential for CVOC exposure. The workplan was submitted to the WDNR on July 17, 2007 and consisted of sampling soil, soil vapor, and vegetable tissues within the garden. The WDNR provided conditional approval of the workplan on July 19, 2007

On July 19 and 20, 2007, Northern Environmental collected soil samples from nine boreholes (BA1 through BA9) to depths of up to 2-feet below grade (fbg) and two vapor samples from near-surface soil in the garden. In addition, samples of plant tissues consisting of the edible portions of garden crops (i.e., leaves, roots, and fruit) typically consumed by the general public were collected for laboratory analysis. Based upon the soil and soil vapor sampling results, tetrachloroethene (PCE) released at the Site has migrated to and is likely to be present throughout most of the garden on the S.C. Johnson property. The Representatives have requested from the Wisconsin Department of Health and Family Services (DHFS) to review our findings and provide their

expert opinion relative to the health issues represented in our findings. Further, while no detection of CVOCs were observed in any of the plant tissue samples, the owner has recommended to S.C. Johnson that the existing garden crop be removed from their property, containerized, and disposed of at an off-site licensed sanitary landfill. Northern Environmental submitted a summary of the sampling conducted on the S.C. Johnson property on August 1, 2007. Additional investigation to define the lateral and vertical extent of CVOCs in soil and groundwater is required.

PROPOSED WORKPLAN

The WDNR requires that the vertical and horizontal extent of CVOCs in soil and groundwater be defined. Additionally, an assessment of potential CVOC vapor migration should be completed to determine if there is a risk of infiltration of CVOC vapors into the Site building. The proposed work plan consists of the following tasks.

Task 1.0	Additional Site Investigation
Task 2.0	Data Analysis and Interpretation
Task 3.0	Project Management

Project assumptions and tasks are described below.

Task 1.0 Additional Site Investigation

The goal of the site investigation is to define the vertical and lateral extent of CVOCs in soil and groundwater. This information is essential for determining the risk to human health and the environment and evaluating the necessity of interim actions or a remedial action program. The field investigation will be performed according to section NR 716.11, Wisconsin Administrative Code.

Subtask 1.1 Vapor Intrusion Assessment

We propose to collect two sub-slab air samples from beneath Express Cleaners and one sub-slab air sample from beneath the vacant unit immediately next to Express Cleaners in the Site building. The proposed air sample locations are shown in Figure 2. The air sampling points will be constructed by drilling a ³/₈-inch diameter hole through the concrete floor. A ¹/₈-inch diameter nylon tube will be placed in the hole and sealed with a non-volatile organic compound (VOC)-containing sealant. The tubing will be equipped with a valve to seal the tubing at the surface and allow for sample collection. Approximately 1 day after installation, air "grab" samples will be collected from each location using a 1-liter Summa canister. The air samples will be analyzed for VOCs using Method TO-15.

Subtask 1.2 Obtain off-Site Access

Before drilling additional soil boreholes, Northern Environmental will petition neighboring property owners for permission to install and sample the boreholes and monitoring wells. Access agreements, or in the case of the S.C. Johnson property, access agreement amendments will be prepared as necessary. A waste oil underground storage tank (UST) formerly was present on the adjacent property to the north (Figure 1). Since soil sampling for VOCs was not completed near the UST nor required by the WDNR before closing this matter, additional negotiations for the access agreement may be required to address the potential of discovering contaminants associated with the UST. An on-site meeting with the adjacent property owners may be required before obtaining an access agreement.

Subtask 1.3 Drill and Sample Soil Exploration Boreholes

Twenty-one soil boreholes will be advanced and sampled to investigate the horizontal extent of CVOCs in soil. Proposed borehole locations are shown in Figure 2. The boreholes will be advanced to approximately 8 fbg using direct-push (e.g., GeoProbe[®]) soil sampling methods.

Soil samples will be collected continuously from each borehole. Soil sample field screening, descriptions, and laboratory analysis will be conducted using the methods outlined in the March 14, 2007 workplan submitted to the WDNR. Since the observed groundwater table is 2 to 4 fbg, only one unsaturated soil sample collected from each borehole will be laboratory analyzed to confirm the field screening results and to evaluate CVOC concentration and extent. Up to six soil samples collected beneath the water table will be analyzed to assist in groundwater monitoring well placement. Soil samples will be analyzed for VOCs using Environmental Protection Agency (EPA) Method 8260.

Subtask 1.4 Monitoring Well Construction

The proposed locations for six additional 2-inch diameter groundwater monitoring wells are illustrated in Figure 2. Data from the GeoProbe[®] boreholes completed in Subtask 1.3 will be used to determine the final well locations. The wells will be constructed using standard hollow-stem auger techniques and will intercept the shallow water table. It is anticipated the wells will be completed to 13 fbg with 10 feet of screened interval. The monitoring wells will be constructed, surveyed, developed, and sampled using the methods described in the March 14, 2007 workplan submitted to the WDNR.

Before sampling, groundwater elevations will be measured in all groundwater monitoring wells and the piezometer. 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 groundwater samples from the five existing wells and six new wells will be laboratory analyzed for VOCs using EPA Method 8260B.

Task 2.0 Data Analysis and Interpretation

Data collected during the previous tasks will be compiled and analyzed to determine if the extent of contamination has been defined. Analytical results from the soil, groundwater, and vapor sampling will be reviewed, tabulated, and incorporated into a comprehensive site investigation report.

If additional investigative work is necessary to define the extent of the CVOC release, the work will be discussed with the Owner and the WDNR. Any additional work will be performed at the unit costs included in this proposal. No additional work beyond the scope presented in this workplan will be conducted without the approval of the Owner and the WDNR.

Task 3.0 Project Management

Project management activities include bidding the drilling and laboratory services, invoicing, budget tracking, subcontractor invoice review, subcontractor coordination and client and regulatory correspondence.

PROJECT SCHEDULE AND PROBABLE PROJECT COSTS

The field component of the investigation will be started within 2 weeks of receiving WDNR approval of this workplan. The monitoring wells will be developed and sampled within a week of their installation. If the extent of contamination is defined, the site investigation report will be completed within 6 weeks of obtaining

the groundwater sampling laboratory reports. The probable cost to perform the additional site investigation is \$23,594 and is itemized on the attached WDNR forms.

We appreciate your consideration of this request. Please contact us if you have any questions or comments.

Sincerely, Northern Environmental Technologies, Incorporated

Mitoph

Christopher C. Hatfield, PG Registered Geologist

CCH/lmh Enclosures

c: Mr. Skip Glor, DeWitt, Ross & Stevens, S.C.

DERF Site Investigation Bid Sheet Consultant Bid Summary

Form 4400-233 (R 4/04) Page 2 of 6

Consultant Name NORTHERN ENVIRONM	Applicant Name Christopher Hatfield							
Bid Summary			1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	Ř				
Drilling Costs Total =	\$6,580.00							
Analytical Costs Total =	\$3,574.00							
Consulting Costs Total =	\$11,845.00							
Misc Costs Total =	\$1,595.00							
Grand Total =	\$23,594.00							

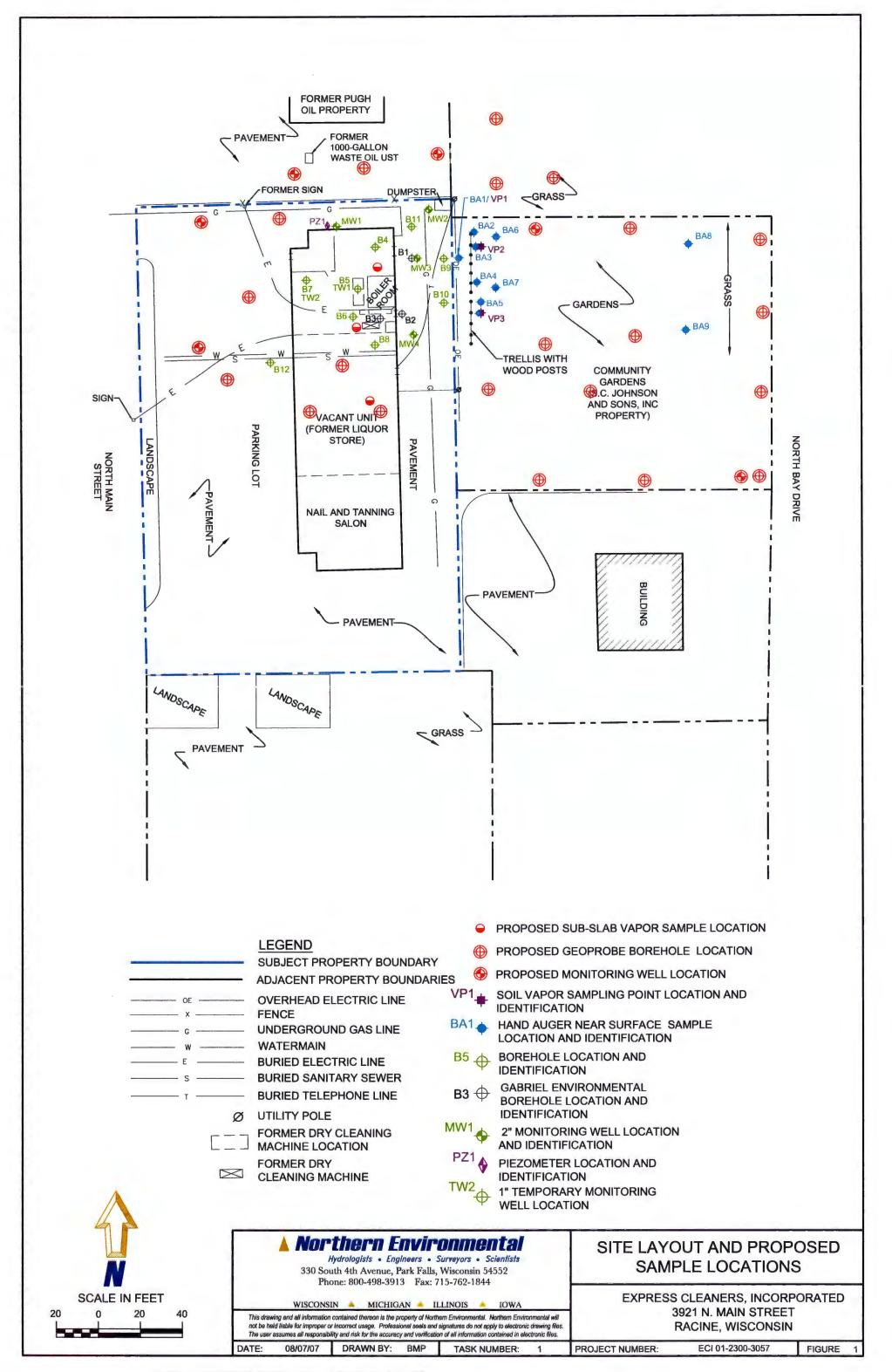
Site Information

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I certify that the costs are an accurate estimate of my total projected costs for the site investigation and I understand and will adhere to s.292.65 Stats, and ch NR 169, Wig) Adm. Code.

Consultant Signature	Date
Ma Hattib	8/10/07

Please attach to these forms a written narratige specifying how the tasks outlined in these sheets will be performed.



Consultant Name: Northern Environmental Site Name: Express Cleaners BRRTS #02-52-547631 Date: 08/07/07

DERF Site Investigation Bid Sheet Drilling Costs Form 4400-233 (R 4/04) Page 3 of 6

Task Interval Number of Borings or Wells Number of Days Total Number Feet Drilled Cost/feet, Day or Well Well installation and Completion 0_ft to _13_ft 6 2 78 25 Piezometer 0_ft to _0_ft 13_ft 6 2 78 25 Piezometer 0_ft to _0_ft	Total Cost \$1,950 \$150 \$325 \$663
HSA monitoring wells _0_ft to _13_ft 6 2 78 25 Piezometer _0_ft to _0_ft	\$150 \$325
Piezometer _0_ft to _0_ft Geoprobe Wells _0_ft to _0_ft >ft	\$150 \$325
Geoprobe Wells _0_ft to _0_ft >ft Decontamination Costs 1 Mobilization Costs 1 Auger Borings (continuous sampling)	\$325
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Decontamination Costs	
Mobilization Costs	
Direct Push Borings (per point)	
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Boreholes ft8 ft depth 21 2 168 \$9/foot	\$1,512
> ft depth	
Decontamination Costs	
Mobilization Costs	\$300
Well Development (if done by subcontractor)	
Monitoring Wells	
Piezometers	
Recovery Wells	
Other	
Drums 7 total \$40/drum	\$280
Flush Mount Covers 6 total \$150/cover	\$900
Protector Pipes	
Limited Access Geoprobe 3 boreholes 3 1 24 \$ 500/day	\$500
Total Drilling Costs	\$6,580

Consultant Name: Northem Environmental Site Name: Express Cleaners BRRTS #02-52-547631 Date: 08/07/07

DERF Site Investigation Bid Sheet Analytical Costs Form 4400-233 (R 4/04) Page 4 of 6

Date: 08/07/07	1. 1.4/1		l ab 🖓	la origi						(04) Page 4 of (
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	\$/ sample	# samples	Used	ہر sample		Used	\$/Sample \$/Day	# Days	Used	Total Costs
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VOCs	64	33	8260B							\$2,112.00
TCLP				i						\$0.00
RCRA Metals										\$0.00
Duplicate Analyses					-					\$0.00
Blank Analyses										\$0.00
Other: (Specify) TOC										\$0.00
Bulk Density										\$0.00
Water Analysis (low flow sampl	ing assum	ed unless	otherwise	indicate	d at bottom	of this she	et)	3 64 5 3		
VOCs	64	100	8260B	enitie <u>ein altille</u> r	1911 - H- H		ali	p., data control and	anc	\$704.00
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Dissolved Oxygen*						<u> </u>				\$0.00
Temperature*										\$0.00
Ferrous Iron*										\$0.00
Sulfate*	<u> </u>						<u> </u>			\$0.00
Sulfide*	<u> </u>									\$0.00
ORP*										\$0.00
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Hydrogen*				<u> </u>						\$0.00
Carbon Dioxide*										\$0.00
RCRA Metals										\$0.00
Duplicate Analyses	64		8260B							\$64.00
Blank Analyses	64	1	8260B							\$64.00
Other: (Specify)										\$0.00
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VOCs	210	3	TO-15							\$630.00
TCE										\$0.00
PCE (minimum detection limit is <10 ppbv)										\$0.00
Other: (Specify)										\$0.00
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Waste Analyses (soil/water)		and the second sec	「「「「「「」」」 「「」」 「」 「」 「」 「」 「」 「」 「」 「」 「	物植品 建二金	- 영화에 다양 : ~ 옷:	****	柳市 医腰骨	et a trace		を使使なな悪
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* Natural Attenuation parameter					L					\$3,374.00

* Natural Attenuation parameters required for consideration of NA as remedy.

Consultant Name: Northern Environmental Site Name: Express Cleaners BRRTS #02-52-547631 Date: 08/07/07

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	Hourly Rate	Workplan Development	Access	Receptor Survey	Waste	Drilling Oversight	Soil	Drilling:	Well Development	Hydraulic Conductivity Test	Groundwater sampling	Soil gas/vapor intrusion survey	SSRCL calculations calculations (contained out or remedial actions)	SI Report preparation	RAOR Repu	Project Management				Total Costs
Professional Staff	**	*10**					+20月1日 (19			lind@kray#r					18 - 19 - 19 					
Associate Geologist	\$123	1231	0.5											2		3				\$799.50
Registered Geologist	\$88				2	3					1	1		4		12				\$2,904.00
Geologist	\$76						20	20	4					8		1				\$4,256.00
Graduate Geologist	\$70										12	8	5	8						\$1,960.00
Senior Technician	\$72	1442	1											11			1			\$1,008.00
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Field Staff							<u>kálha</u>	-		Kalipaki	教養者		使事件	\$ \$ \$		癞嫩科			io parte	美国美国
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Total Consulting Costs		1024		[\$11,845.50

Consultant Name: Northern Environmental Site Name: Express Cleaners BRRTS #02-52-547631 Date: 08/07/07

DERF Site Investigation Bid Sheet Miscellaneous Costs

Form 4400-233 (R 4/04) Page 6 of 6

		Commodity Unit		Number of	表 7 T-4 10
Major Activity	Specifications	(specify)	Unit Rate	Units	Total Cost
	Non-Hazardous	per drum	\$75	7	\$525
	Hazardous		φ ι σ		φυΖα
Mobilization		per event	\$95		\$95
Equipment Rental (list and include sh	ipping costs if applical				
Rae System PPB Meter	and Technologie - Sector	per day	\$125/day	3	\$375
Shipping fees		per event	\$150/event	1	\$150
Field Supplies (list)					
Water level probe		per day	\$40	2	\$80
Low flow sampling Equipment		per day	\$100	1	\$100
YSI Multi-Meter		per day	\$120	1	\$120
Surveying					
Survey Equipment		per day	\$100	1	\$100
Personal Protection Equipment (list)					
Sample Shipping Costs					
Summa Cannisters (3)		one shipment	\$50	1	\$50
Other (specify)					
Total Miscellaneous Costs					\$1,595.00

Reminders: DERF does not reimburse for attorney, closure or GIS fees. Mileage and meals are also non-reimbursable. Also, costs to prepare a reimbursement application and discuss the application with the department are not reimburseable. No expedited shipping w/o prior PM approval.