

11/4/14 called Bill Scott.
Lgt mag for him to call
me. (signature)



RECEIVED

OCT 23 2014

BY: _____

October 21, 2014

VIA ELECTRONIC MAIL

Ms. Nancy Ryan, Hydrogeologist
Remediation and Redevelopment
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-3128

Re: Express Cleaners
3941 North Main Street
Racine, Wisconsin
BRRTS #02-52-547631

Dear Ms. Ryan:

This letter has been prepared to respond to your letter dated May 30, 2014. Consistent with the ERM proposal dated December 24, 2013 proposal, ERM continues to recommend in-situ blending of soil with zero valent iron (ZVI) to reduce contaminant concentrations to levels in compliance with non-industrial direct contact standards. While these standards are being applied to the upper 4 feet of the soil, we will be blending to a depth of 6 to 8 feet, to access groundwater which is necessary for the ZVI process. By blending from the surface through that depth, we also treat the upper 4 to 6 feet of the aquifer and impart treatment capacity to treat contaminants brought up to shallow depths by a rise in the water table.

The Ehrlich Family Limited Partnership ("EFLP") will solicit bids for the demolition of the building's superstructure. For purposes of the DERF program, we are defining demolition to include primarily the superstructure. Testing has found the concrete slab to contain contaminants, and given the high and fluctuating water table we believe the lower extremities of the slab and foundation are contaminated and we are therefore characterizing demolition of the northernmost 60 feet of the floor slab and foundation as a remedial activity. However, in accordance with the EFLP's waste determination, additional testing will be used to delineate the contaminated portions of the concrete as hazardous waste. Segregation, handling and disposal of those contaminated materials will be a remedial activity, whereas handling and disposal of the uncontaminated concrete (solid waste) will be a demolition activity.

GONZALEZ SAGGIO & HARLAN LLP
Attorneys at Law

www.gshllp.com

00036472.1

Affiliated with Gonzalez, Saggio and Harlan, L.L.C.

Milwaukee
111 East Wisconsin Avenue
Suite 1000
Milwaukee, WI 53202
Tel (414) 277-8500
Fax (414) 277-8521

Atlanta, GA
Boca Raton, FL
Boston, MA
Chicago, IL
Cleveland, OH

Indianapolis, IN
Los Angeles, CA
Miami, FL
Nashville, TN
New York, NY

Pasadena, CA
Phoenix, AZ
Washington, D.C.
Wayne, NJ
West Des Moines, IA

With respect to concrete, an initial assumption is being made that impacted concrete does not extend southward further than 60 feet from the north wall of the former dry cleaning facility. Samples of the concrete from that area are now being analyzed for verification and additional samples of deep footings will be collected during their removal. In the event that the concrete south of that 60 foot area is impacted, a request will be made for additional funding to remove the additional concrete as a remedial expense.

1. Please provide a copy of the Request for Proposals that was sent to consultants for Remedial Action bids.

Response: The Requests for Proposals are attached at Appendix A.

2. Please inform us as to whether a hazardous waste determination has been made for solid waste generated at the site.

Response: A hazardous waste determination has been prepared and is attached at Appendix B. Please note, a request for technical assistance is being prepared to request Department's "contained out" determination with respect to debris that will be generated during the course of the project. When additional testing is complete, we will request the Department's contained out determination. If a technical assistance request is not necessary to receive a contained out determination under the DERP program, please advise the undersigned.

3. Please confirm that it is the intent of EFLP to have the entire building demolished. EFLP can solicit bids for demolition of the building (separate from the remedial proposals) and the Department can approve up to \$15,000 as eligible for reimbursement under the DERF program as long as you provide sub-contractor bid/cost estimates. Demolition costs exceeding \$15,000 would not be approved.

Response: Demolition of the entire building will be necessary to fully access impacted soil beneath the building. It is the opinion of ERM that the entire building needs to be demolished rather than just the portion that overlies the impacted soil because the structure would not be stable with only partial demolition. Preliminary sampling of the concrete floor slab in the former dry cleaner area shows the concrete has been impacted by tetrachloroethene (see laboratory report and sample locations in Appendix C). Consequently, the demolition, segregation and disposal of the concrete slab and foundation are being considered part of the remediation process, rather than the demolition process. The remediation consultant has provided costs for slab demolition and disposal for approximately the northern 60 feet portion of the foundation and slab based on the assumption it will be determined to be "contained out" and will not be a hazardous waste. The EFLP is obtaining new competitive bids for the demolition of the

building superstructure.

4. ERM refers to Figure 1 as illustrating treatment areas, location of wells to be abandoned and location of replacement wells. The figure included in their December 2013 proposal does not indicate these items. They need to submit a figure identifying these locations.

Response: Attached at Appendix D is Figure 1, which has been modified to address your concerns. Wells that will require abandonment prior to soil mixing include MW-1, -2, -3, -4 and -8. These wells will be replaced after soil mixing is complete but prior to the commencement of the eight rounds of groundwater monitoring.

5. ERM needs to provide a more detailed cost estimate to show breakdown of ERM labor costs/task and details on subcontractor estimates. This would best be accomplished using the DERF linking spreadsheet.

Response: The DERF linking spreadsheet for ZVI is attached as Appendix E. Also attached, is a DERF linking spreadsheet for Cool-Ox, at Appendix F.

6. ERM's proposal must include more detail regarding how the soil amendments will be applied/mixed into soil.

Response: The zero valent iron (ZVI) will be mechanically blended into the soil. Please also refer to the following vendor's website for a video showing the process in action: <http://www.redux-tech.com/News/new-soil-blender-debuts-in-cambridge-mass.html>

7. The ERM proposal does not include costs associated with obtaining an injection permit from DNR which would be required under Ch. NR 140 Wis. Adm. Code for their proposed remedy.

Response: As shown on the DERF-linking spreadsheets at Appendices E and F, \$1,500 has been added for the permitting. The injection permit will consist of the approval for adding ZVI or Cool-Ox, as well as a WPDES permit, if required.

8. The ERM proposal does not include post remedial action soil sampling to confirm effectiveness of the remedy. It will be a requirement for case closure to know what residual contaminant levels are.

Response: As shown on the DERF-linking spreadsheets at Appendices E and F, fees for collecting and analyzing hand-augered soil samples have been added.

9. ERM does not provide sufficient information to justify not conducting a pilot test. They

should provide references to cases where successful remediation has occurred using ZVI treatment or Cool-Ox for similar contaminants in similar geologic settings especially if not proposing a pilot study.

Response: Based on site conditions and considering that part of the remedial strategy is to construct a reactive curtain to treat groundwater, ERM has decided to proceed with the ZVI process. A bench-scale pilot test will be conducted using site soils. The bench-scale study will be used to confirm the effectiveness of ZVI at the site. This test will also help determine the optimal ZVI content for achieving the remedial objectives. In contrast, we believe a pilot test is not necessary for Cool-Ox based on available case studies, which are attached as Appendix F.

10. What is the "risk review"- what does it consist of? What criteria would they use to determine that the proposed treatment option is not appropriate? If they want to propose an alternate remedy, they must include a description of it and provide cost estimate for same. We would not approve the "risk review" costs without further detail on what the review is.

Response: This task has been removed from the cost estimate, and is being replaced with the bench-scale pilot test study. The appropriateness of the remedy will be determined based on the cost-effectiveness and estimated time required to achieve satisfactory reduction of contaminant concentrations. Specifically, EFLP believes a satisfactory reduction is one in which the actual remedial application at the property will reduce all soil concentrations to below all applicable RCLs and "contained out" concentrations within 12 months, and groundwater must show significant overall reducing trends in contaminant concentration within 12 months, and the entire contiguous contaminated area must be ready for natural attenuation closure and issuance of a VPLE Certificate of Completion within 24 months. If a pilot test is performed, the results of the pilot test will be extrapolated to determine whether a satisfactory reduction will result from the remedial method proposed.

11. Regarding your request for approval of one round of groundwater sampling beyond the ERM bid, costs associated with this work should be added to the total cost estimate for the selected remedy.

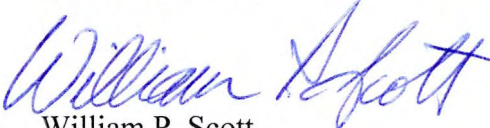
Response: These costs have been added to the DERF-linked spreadsheet at Appendices E and F. With respect to groundwater sampling, ERM and the EFLP understand that purge water can be applied to the surface of the ZVI remediation cells within the contiguous contaminated area ("AOC") without need for permit and without being deemed "disposal" or "placement;" and without making the remediation or the remediation site a RCRA corrective action, RCRA facility, a CERCLA site or a Wisconsin solid waste facility. ERM and the EFLP understand that all of the foregoing are possible under the NR 700 rules through application of the AOC concept in accordance with the One Cleanup MOU, as explained in the RR-705 Guidance and various communications between the Department and the US EPA, which are posted on the Department's web page for hazardous waste. All

Ms. Nancy Ryan
October 21, 2014
Page 5

such purge water application would take place within the AOC. Moreover, the contaminated purge water would not be a waste as it would not be discarded but would be used for its natural qualities, would continue to serve its purpose of filling interstices between grains of soil within the treatment area, and would serve to facilitate both the transport of contamination to the treatment compound and the interaction of the treatment compound with contamination present within the AOC.

Nancy, under separate cover, I am requesting technical assistance in the form of a meeting to discuss the Department's satisfaction with and response to this letter and the proposed remediation. Rather than issue a written response to this letter, kindly contact me to set a date for that meeting. At the conclusion of that meeting, we can discuss the appropriate response to this letter.

Very truly yours,



William P. Scott

WPS/sv

cc: James C. Small

Appendix A



November 20, 2013

VIA ELECTRONIC MAIL

James Bannantine
Geosyntec
10200 North Port Washington Road
Suite 200
Mequon, Wisconsin 53092
JBannantine@Geosyntec.com

**RE: Request for Updated DERP Proposal – Former Express Cleaners,
3941 N. Main Street, Racine, Wisconsin (the “Property”)**

Dear Jim:

You are receiving this letter because your company formerly provided a proposal for remediation of the above-referenced Property. Since that time, our client, the Ehrlich Family Limited Partnership, the owner of the Property, has been negotiating with S.C. Johnson & Son with respect to the cleanup of the adjacent property, located just east of the Property, with street address 3936 North Bay Avenue. This November, our client purchased that adjacent property, so now our options for remediating the site are not constrained. Consequently, we are inviting you, along with two other consultants, to submit a revised or updated proposal for the remediation and the demolition work.

Your updated proposal need not be constrained by your previous proposal but should address current regulations, remedial methods, proposed schedule and costs. Regarding the remediation, we ask that you state the cleanup objective(s) and the time required to achieve the objective(s). If your proposal would render the soil unsuitable for building construction, please discuss the location, severity and duration of such limitations.

In addition, we ask that you comment on the benefits of removing the northern portion of the building, in terms of providing greater access to contaminated soil and groundwater for purposes of investigation, removal and/or treatment of contaminated soil and groundwater. The dry cleaning machine was located in the northern part of the building. We recently analyzed three cores from the concrete floor in the dry cleaning area, and the core location map and laboratory reports are attached. The concrete slab in that area is contaminated and underlain by contaminated soil and groundwater. If removing the northern portion of the building is beneficial to achieving any of your cleanup objectives, then we want you to provide a bid for demolition of the entire building. We understand that NR 169 will allow reimbursement of up to \$15,000 of those costs.

GONZALEZ SAGGIO & HARLAN LLP
Attorneys at Law

www.gshllp.com

Milwaukee
111 East Wisconsin Avenue
Suite 1000
Milwaukee, WI 53202
Tel (414) 277-8500
Fax (414) 277-8521

Atlanta, GA
Boca Raton, FL
Boston, MA
Chicago, IL
Cleveland, OH

Indianapolis, IN
Los Angeles, CA
Nashville, TN
New York, NY
Phoenix, AZ

Stamford, CT
Washington, D.C.
Wayne, NJ
West Des Moines, IA

James Bannantine
Geosyntec
November 20, 2013
Page 2

To make the demolition bidding uniform, we would like line-item costs on the following demolition tasks:

- Demolish building and dispose at a landfill
- Remove footings and concrete floors, and backfill as necessary
- Remove exterior concrete and asphalt
- Perform sewer, water and utility disconnects
- Supply and erect temporary fencing as required or appropriate
- Supply and erect silt fencing as required or appropriate
- Obtain all necessary permits
- Supply and perform backfill as necessary throughout the property
- Other miscellaneous costs, as necessary

To aid in obtaining bids for building demolition, I have attached copies of the asbestos inspection and abatement documentation.

We request that sealed bids be submitted to the following:

William P. Scott
Gonzalez, Saggio & Harlan
111 East Wisconsin Avenue, Suite 1000
Milwaukee, WI 53202

Ms. Nancy Ryan
Wisconsin Department of Natural Resources
2300 Dr. Martin Luther King Jr. Dr.
Milwaukee, WI 53212

We request that bids be provided no later than close of business on Wednesday, December 18, 2013.

If you have any questions or no longer have the background materials on the site, please contact me.

Sincerely yours,



William P. Scott

Enclosures



November 20, 2013

VIA ELECTRONIC MAIL

David DeCourcy-Bower
ERM
700 W Virginia Street Suite 601
Milwaukee, Wisconsin 53204
David.DeCourcy-Bower@erm.com

**RE: Request for Updated DERP Proposal – Former Express Cleaners,
3941 N. Main Street, Racine, Wisconsin (the “Property”)**

Dear David:

You are receiving this letter because your company formerly provided a proposal for remediation of the above-referenced Property. Since that time, our client, the Ehrlich Family Limited Partnership, the owner of the Property, has been negotiating with S.C. Johnson & Son with respect to the cleanup of the adjacent property, located just east of the Property, with street address 3936 North Bay Avenue. This November, our client purchased that adjacent property, so now our options for remediating the site are not constrained. Consequently, we are inviting you, along with two other consultants, to submit a revised or updated proposal for the remediation and the demolition work.

Your updated proposal need not be constrained by your previous proposal but should address current regulations, remedial methods, proposed schedule and costs. Regarding the remediation, we ask that you state the cleanup objective(s) and the time required to achieve the objective(s). If your proposal would render the soil unsuitable for building construction, please discuss the location, severity and duration of such limitations.

In addition, we ask that you comment on the benefits of removing the northern portion of the building, in terms of providing greater access to contaminated soil and groundwater for purposes of investigation, removal and/or treatment of contaminated soil and groundwater. The dry cleaning machine was located in the northern part of the building. We recently analyzed three cores from the concrete floor in the dry cleaning area, and the core location map and laboratory reports are attached. The concrete slab in that area is contaminated and underlain by contaminated soil and groundwater. If removing the northern portion of the building is beneficial to achieving any of your cleanup objectives, then we want you to provide a bid for demolition of the entire building. We understand that NR 169 will allow reimbursement of up to \$15,000 of those costs.

GONZALEZ SAGGIO & HARLAN LLP
Attorneys at Law

www.gshllp.com

Affiliated with Gonzalez, Saggio and Harlan, L.L.C.

Milwaukee
111 East Wisconsin Avenue
Suite 1000
Milwaukee, WI 53202
Tel (414) 277-8500
Fax (414) 277 8521

Atlanta, GA
Boca Raton, FL
Boston, MA
Chicago, IL
Cleveland, OH

Indianapolis, IN
Los Angeles, CA
Nashville, TN
New York, NY
Phoenix, AZ

Stamford, CT
Washington, D.C.
Wayne, NJ
West Des Moines, IA

David DeCourcy-Bower
ERM
November 20, 2013
Page 2

To make the demolition bidding uniform, we would like line-item costs on the following demolition tasks:

- Demolish building and dispose at a landfill
- Remove footings and concrete floors, and backfill as necessary
- Remove exterior concrete and asphalt
- Perform sewer, water and utility disconnects
- Supply and erect temporary fencing as required or appropriate
- Supply and erect silt fencing as required or appropriate
- Obtain all necessary permits
- Supply and perform backfill as necessary throughout the property
- Other miscellaneous costs, as necessary

To aid in obtaining bids for building demolition, I have attached copies of the asbestos inspection and abatement documentation.

We request that sealed bids be submitted to the following:

William P. Scott
Gonzalez, Saggio & Harlan
111 East Wisconsin Avenue, Suite 1000
Milwaukee, WI 53202

Ms. Nancy Ryan
Wisconsin Department of Natural Resources
2300 Dr. Martin Luther King Jr. Dr.
Milwaukee, WI 53212

We request that bids be provided no later than close of business on Wednesday, December 18, 2013.

If you have any questions or no longer have the background materials on the site, please contact me.

Sincerely yours,


William P. Scott

Enclosures



November 20, 2013

VIA ELECTRONIC MAIL

Stuart J. Gross
Stantec
12075 North Corporate Parkway, Suite 210
Mequon, Wisconsin 53092
stu.gross@stantec.com

**RE: Request for Updated DERP Proposal – Former Express Cleaners,
3941 N. Main Street, Racine, Wisconsin (the “Property”)**

Dear Stuart:

You are receiving this letter because your company formerly provided a proposal for remediation of the above-referenced Property. Since that time, our client, the Ehrlich Family Limited Partnership, the owner of the Property, has been negotiating with S.C. Johnson & Son with respect to the cleanup of the adjacent property, located just east of the Property, with street address 3936 North Bay Avenue. This November, our client purchased that adjacent property, so now our options for remediating the site are not constrained. Consequently, we are inviting you, along with two other consultants, to submit a revised or updated proposal for the remediation and the demolition work.

Your updated proposal need not be constrained by your previous proposal but should address current regulations, remedial methods, proposed schedule and costs. Regarding the remediation, we ask that you state the cleanup objective(s) and the time required to achieve the objective(s). If your proposal would render the soil unsuitable for building construction, please discuss the location, severity and duration of such limitations.

In addition, we ask that you comment on the benefits of removing the northern portion of the building, in terms of providing greater access to contaminated soil and groundwater for purposes of investigation, removal and/or treatment of contaminated soil and groundwater. The dry cleaning machine was located in the northern part of the building. We recently analyzed three cores from the concrete floor in the dry cleaning area, and the core location map and laboratory reports are attached. The concrete slab in that area is contaminated and underlain by contaminated soil and groundwater. If removing the northern portion of the building is beneficial to achieving any of your cleanup objectives, then we want you to provide a bid for demolition of the entire building. We understand that NR 169 will allow reimbursement of up to \$15,000 of those costs.

GONZALEZ SAGGIO & HARLAN LLP
Attorneys at Law

www.gshllp.com

Milwaukee
111 East Wisconsin Avenue
Suite 1000
Milwaukee, WI 53202
Tel (414) 277-8500
Fax (414) 277-8521

Atlanta, GA
Boca Raton, FL
Boston, MA
Chicago, IL
Cleveland, OH

Indianapolis, IN
Los Angeles, CA
Nashville, TN
New York, NY
Phoenix, AZ

Stamford, CT
Washington, D.C.
Wayne, NJ
West Des Moines, IA

Stuart J. Gross
Stantec
November 20, 2013
Page 2

To make the demolition bidding uniform, we would like line-item costs on the following demolition tasks:

- Demolish building and dispose at a landfill
- Remove footings and concrete floors, and backfill as necessary
- Remove exterior concrete and asphalt
- Perform sewer, water and utility disconnects
- Supply and erect temporary fencing as required or appropriate
- Supply and erect silt fencing as required or appropriate
- Obtain all necessary permits
- Supply and perform backfill as necessary throughout the property
- Other miscellaneous costs, as necessary

To aid in obtaining bids for building demolition, I have attached copies of the asbestos inspection and abatement documentation.

We request that sealed bids be submitted to the following:

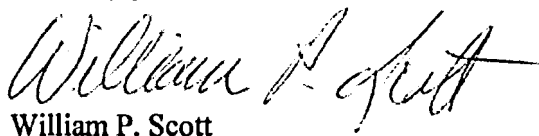
William P. Scott
Gonzalez, Saggio & Harlan
111 East Wisconsin Avenue, Suite 1000
Milwaukee, WI 53202

Ms. Nancy Ryan
Wisconsin Department of Natural Resources
2300 Dr. Martin Luther King Jr. Dr.
Milwaukee, WI 53212

We request that bids be provided no later than close of business on Wednesday, December 18, 2013.

If you have any questions or no longer have the background materials on the site, please contact me.

Sincerely yours,


William P. Scott

Enclosures

Appendix B

WASTE DETERMINATION

3941 N. Main Street, Racine, Wisconsin

For the purposes of this waste determination, the Ehrlich Family Limited Partnership (“EFLP”) assumes that a release of spent dry cleaning solvent containing more than 10% tetrachloroethene (“PCE”) occurred at the Main Street property at some time in the past. This assumption is based on (i) the knowledge that a dry cleaning establishment formerly operated at in the northernmost section of the building at the property, (ii) the presence of PCE (but not other chlorinated solvents) in the concrete floor slab at the former location of a piece of dry cleaning equipment and (iii) the presence soil and groundwater under and in the vicinity of the former dry cleaning location that are contaminated with PCE and common breakdown products of PCE.

Contaminated Debris

Concrete in a portion of the floor slab in the former dry cleaning location at the property is contaminated with PCE. One of three core samples through the 6-inch slab tested positive for PCE (84 micro-grams/Kg). The contaminated concrete is not a solid waste and therefore is not a hazardous waste, even if it is contaminated with an assumed listed hazardous waste, because it has not been disposed of and is serving its intended purposes. However, when the concrete is broken and removed to allow access to the contaminated soil below, the broken concrete that is contaminated will be F002 ‘hazardous debris’ waste by application of the mixture rule. Additional testing of concrete samples being performed and will be used to segregate the concrete into hazardous debris and non-hazardous debris. A hazardous waste manifest and generator report would be prepared for all hazardous debris if the WDNR does not agree with the EFLP that, considering the extent of contamination, the contaminated debris is no longer contaminated with hazardous waste. The EFLP will formally request the WDNR to make a Contained Out Determination with respect to the hazardous debris, in the form of request for technical assistance pursuant to s. NR 661.03(6)(b), Wis. Admin. Code. If the Contained Out Determination finds the debris is no longer contaminated with hazardous waste, the contaminated debris would be disposed off-site as solid waste at a licensed facility and no hazardous waste manifest and no hazardous waste generator report would be prepared. Alternatively, if the WDNR would approve beneficial reuse of the concrete, it would be crushed and reused for road construction, rather than disposed as solid waste.

Contaminated Media

The contaminated soil and groundwater at the property and within the contiguous contaminated area (“AOC”) are not solid waste, and therefore are not hazardous waste, even if they are contaminated with assumed listed hazardous wastes. An in-situ remedial approach is proposed to address the contaminated soil and the groundwater -- no excavation of impacted soil is anticipated. The proposed in-situ mixing of remediation compound with soil and groundwater will not convert the soil and groundwater to waste because each media would not be disposed of

and would continue to serve its purpose. Post-remedial sampling and analysis will demonstrate the effectiveness of the in-situ treatment. The remedial treatment is expected to reduce soil concentrations of the various solvents (PCE, TCE, DCE, VC) to far less than the respective contained-out value and toxicity characteristic value that would apply if the soil was a waste.

Although no off-site transport of excavated soil is currently anticipated, following satisfactory post-remedial testing the EFLP will request a 'Contained Out Determination' for the remediated soil and groundwater, to facilitate future redevelopment of the property. The EFLP understands that even if a 'Contained Out Determination' finds the soil and groundwater do not contain a listed hazardous waste, any soil removed would for transport outside the AOC would need to be tested for toxicity to determine whether it was a toxicity characteristic hazardous waste. As a contingency, if for some reason soil is excavated from the AOC for removal for removal from the AOC before completion of satisfactory post-remedial testing, it will be segregated into suitable covered containers and tested to ensure that it meets both the applicable contained-out and toxicity characteristic standards before it is removed from the property.

Remedial Option – Contingent Waste Determination

Soil excavation is not proposed and therefore is optional. If soil excavation were performed, the excavated soil would not be removed from the contiguous area of contamination ("AOC"). If contaminated soil was excavated, it would be relocated within the AOC. Such movement of contaminated soil would not constitute "placement" for purposes of RCRA and would not constitute "disposal" under Wisconsin law. If this optional soil excavation is approved by WDNR, contaminated soil from the AOC could be consolidated within the AOC for treatment by moving some contaminated soil from a portion of the 2936 North Bay Drive property to the Main Street property, where soil amendment would be added and the amended soil would be combined and mixed with contaminated soil being treated in-situ at the Main Street property. Based on case studies, the treatment is expected to reduce contaminant concentrations to less than the "contained out" values for contaminated media. Post-remedial sampling and analysis would demonstrate the effectiveness of the treatment. No hazardous waste manifest or generator report would be prepared. Such excavation and movement of soil will not occur unless the Department allows the movement under the NR 700 Rules without creation of any RCRA or solid waste facility and performs a Contained Out Determination in recognition that the added soil amendment will treat the soil to below contained out standards, based on results of the pilot test performed for the overall site remediation. If this option is pursued, a change order would be sought to cover the cost of the excavation and additional soil amendment.

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Chicago

2417 Bond Street

University Park, IL 60484

Tel: (708)534-5200

TestAmerica Job ID: 500-62697-1

Client Project/Site: Express Cleaners

For:

RJN Environmental Services LLC

4631 County Road A

Oregon, Wisconsin 53575

Attn: Robert J Nauta



Authorized for release by:

9/23/2013 5:00:35 PM

Sandie Fredrick, Project Manager I

sandie.fredrick@testamericainc.com



LINKS

Review your project results through

Total Access

Have a Question?



Visit us at:

www.testamericainc.com

The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

Table of Contents

Cover Page	1
Table of Contents	2
Case Narrative	3
Detection Summary	4
Method Summary	5
Sample Summary	6
Client Sample Results	7
Definitions	8
QC Association	9
Surrogate Summary	10
QC Sample Results	11
Chronicle	13
Certification Summary	14
Chain of Custody	15
Receipt Checklists	16



Case Narrative

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Job ID: 500-62697-1

Laboratory: TestAmerica Chicago

Narrative

Job Narrative
500-62697-1

Comments

No additional comments.

Receipt

The samples were received on 9/10/2013 9:10 AM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 2.4° C.

GC/MS VOA

Method(s) 5030B: The extract was prepared from a 2 oz. jar more than 48 hours after sampling. Core 1 (500-62697-1), Core 2 (500-62697-2), Core 3 (500-62697-3).

No other analytical or quality issues were noted.

Metals

No analytical or quality issues were noted.

3

4

5

9

10

13

15

Detection Summary

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Client Sample ID: Core 1

Lab Sample ID: 500-62697-1

No Detections.

Client Sample ID: Core 2

Lab Sample ID: 500-62697-2

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Tetrachloroethene	84		55	9.2	ug/Kg	50	*	8260B	Total/NA

Client Sample ID: Core 3

Lab Sample ID: 500-62697-3

No Detections.

This Detection Summary does not include radiochemical test results.

TestAmerica Chicago

Method Summary

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Method	Method Description	Protocol	Laboratory
8260B	Volatile Organic Compounds (GC/MS)	SW846	TAL CHI
Moisture	Percent Moisture	EPA	TAL CHI

Protocol References:

EPA = US Environmental Protection Agency

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL CHI = TestAmerica Chicago, 2417 Bond Street, University Park, IL 60484, TEL (708)534-5200



Sample Summary

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
500-62697-1	Core 1	Solid	09/09/13 10:15	09/10/13 09:10
500-62697-2	Core 2	Solid	09/09/13 10:30	09/10/13 09:10
500-62697-3	Core 3	Solid	09/09/13 10:45	09/10/13 09:10



Client Sample Results

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Client Sample ID: Core 1

Date Collected: 09/09/13 10:15
Date Received: 09/10/13 09:10

Lab Sample ID: 500-62697-1

Matrix: Solid
Percent Solids: 95.6

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Tetrachloroethene	<9.1		55	9.1	ug/Kg	*	09/13/13 20:41	09/16/13 17:20	50
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	110		75 - 125				09/13/13 20:41	09/16/13 17:20	50
Toluene-d8 (Surr)	97		75 - 120				09/13/13 20:41	09/16/13 17:20	50
4-Bromofluorobenzene (Surr)	106		75 - 120				09/13/13 20:41	09/16/13 17:20	50
Dibromofluoromethane	84		75 - 120				09/13/13 20:41	09/16/13 17:20	50

Client Sample ID: Core 2

Date Collected: 09/09/13 10:30
Date Received: 09/10/13 09:10

Lab Sample ID: 500-62697-2

Matrix: Solid
Percent Solids: 95.1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Tetrachloroethene	84		55	9.2	ug/Kg	*	09/13/13 20:41	09/16/13 17:44	50
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	109		75 - 125				09/13/13 20:41	09/16/13 17:44	50
Toluene-d8 (Surr)	99		75 - 120				09/13/13 20:41	09/16/13 17:44	50
4-Bromofluorobenzene (Surr)	102		75 - 120				09/13/13 20:41	09/16/13 17:44	50
Dibromofluoromethane	85		75 - 120				09/13/13 20:41	09/16/13 17:44	50

Client Sample ID: Core 3

Date Collected: 09/09/13 10:45
Date Received: 09/10/13 09:10

Lab Sample ID: 500-62697-3

Matrix: Solid
Percent Solids: 94.0

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Tetrachloroethene	<9.4		57	9.4	ug/Kg	*	09/13/13 20:41	09/16/13 18:09	50
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	110		75 - 125				09/13/13 20:41	09/16/13 18:09	50
Toluene-d8 (Surr)	98		75 - 120				09/13/13 20:41	09/16/13 18:09	50
4-Bromofluorobenzene (Surr)	103		75 - 120				09/13/13 20:41	09/16/13 18:09	50
Dibromofluoromethane	83		75 - 120				09/13/13 20:41	09/16/13 18:09	50

TestAmerica Chicago

Definitions/Glossary

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
□	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

QC Association Summary

Client: RJN Environmental Services LLC
 Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

GC/MS VOA

Prep Batch: 202204

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-62697-1	Core 1	Total/NA	Solid	5030B	
500-62697-2	Core 2	Total/NA	Solid	5030B	
500-62697-3	Core 3	Total/NA	Solid	5030B	
500-62697-3 MS	Core 3	Total/NA	Solid	5030B	
500-62697-3 MSD	Core 3	Total/NA	Solid	5030B	
LB3 500-202204/11-A LB3	Method Blank	Total/NA	Solid	5030B	
LCS 500-202204/12-A	Lab Control Sample	Total/NA	Solid	5030B	

Analysis Batch: 202708

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-62697-1	Core 1	Total/NA	Solid	8260B	202204
500-62697-2	Core 2	Total/NA	Solid	8260B	202204
500-62697-3	Core 3	Total/NA	Solid	8260B	202204
500-62697-3 MS	Core 3	Total/NA	Solid	8260B	202204
500-62697-3 MSD	Core 3	Total/NA	Solid	8260B	202204
LB3 500-202204/11-A LB3	Method Blank	Total/NA	Solid	8260B	202204
LCS 500-202204/12-A	Lab Control Sample	Total/NA	Solid	8260B	202204
LCS 500-202708/4	Lab Control Sample	Total/NA	Solid	8260B	
MB 500-202708/6	Method Blank	Total/NA	Solid	8260B	

General Chemistry

Analysis Batch: 202316

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-62697-1	Core 1	Total/NA	Solid	Moisture	
500-62697-2	Core 2	Total/NA	Solid	Moisture	
500-62697-3	Core 3	Total/NA	Solid	Moisture	

Surrogate Summary

Client: RJN Environmental Services LLC
 Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Matrix: Solid

Prep Type: Total/NA

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)			
		12DCE (75-125)	TOL (75-120)	BFB (75-120)	DBFM (75-120)
500-62697-1	Core 1	110	97	106	84
500-62697-2	Core 2	109	99	102	85
500-62697-3	Core 3	110	98	103	83
500-62697-3 MS	Core 3	109	96	98	88
500-62697-3 MSD	Core 3	111	95	99	90
LB3 500-202204/11-A LB3	Method Blank	110	97	103	88
LCS 500-202204/12-A	Lab Control Sample	109	94	101	95
LCS 500-202708/4	Lab Control Sample	101	94	97	92
MB 500-202708/6	Method Blank	110	94	104	91

Surrogate Legend

12DCE = 1,2-Dichloroethane-d4 (Surr)
 TOL = Toluene-d8 (Surr)
 BFB = 4-Bromofluorobenzene (Surr)
 DBFM = Dibromofluoromethane

QC Sample Results

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Lab Sample ID: LB3 500-202204/11-A LB3

Matrix: Solid

Analysis Batch: 202708

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 202204

Analyte	LB3 Result	LB3 Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Tetrachloroethene	<8.4		50	8.4	ug/Kg		09/13/13 20:45	09/16/13 18:34	50

Surrogate	LB3 %Recovery	LB3 Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	110		75 - 125	09/13/13 20:45	09/16/13 18:34	50
Toluene-d8 (Surr)	97		75 - 120	09/13/13 20:45	09/16/13 18:34	50
4-Bromofluorobenzene (Surr)	103		75 - 120	09/13/13 20:45	09/16/13 18:34	50
Dibromofluoromethane	88		75 - 120	09/13/13 20:45	09/16/13 18:34	50

Lab Sample ID: LCS 500-202204/12-A

Matrix: Solid

Analysis Batch: 202708

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 202204

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	Limits
Tetrachloroethene	2500	2380		ug/Kg		95	70 - 123

Surrogate	LCS %Recovery	LCS Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	109		75 - 125
Toluene-d8 (Surr)	94		75 - 120
4-Bromofluorobenzene (Surr)	101		75 - 120
Dibromofluoromethane	95		75 - 120

Lab Sample ID: 500-62697-3 MS

Matrix: Solid

Analysis Batch: 202708

Client Sample ID: Core 3

Prep Type: Total/NA

Prep Batch: 202204

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	Limits
Tetrachloroethene	<9.4		2830	3130		ug/Kg	☒	111	70 - 123

Surrogate	MS %Recovery	MS Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	109		75 - 125
Toluene-d8 (Surr)	96		75 - 120
4-Bromofluorobenzene (Surr)	98		75 - 120
Dibromofluoromethane	88		75 - 120

Lab Sample ID: 500-62697-3 MSD

Matrix: Solid

Analysis Batch: 202708

Client Sample ID: Core 3

Prep Type: Total/NA

Prep Batch: 202204

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	Limits	RPD	Limit
Tetrachloroethene	<9.4		2830	2870		ug/Kg	☒	101	70 - 123	9	30

Surrogate	MSD %Recovery	MSD Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	111		75 - 125
Toluene-d8 (Surr)	95		75 - 120
4-Bromofluorobenzene (Surr)	99		75 - 120
Dibromofluoromethane	90		75 - 120

TestAmerica Chicago

QC Sample Results

Client: RJN Environmental Services LLC
 Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 500-202708/6
Matrix: Solid
Analysis Batch: 202708

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Tetrachloroethene	<0.17		1.0	0.17	ug/Kg			09/16/13 10:45	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	110		75 - 125					09/16/13 10:45	1
Toluene-d8 (Surr)	94		75 - 120					09/16/13 10:45	1
4-Bromofluorobenzene (Surr)	104		75 - 120					09/16/13 10:45	1
Dibromofluoromethane	91		75 - 120					09/16/13 10:45	1

Lab Sample ID: LCS 500-202708/4
Matrix: Solid
Analysis Batch: 202708

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Analyte	Spike Added	LCS	LCS	Unit	D	%Rec	%Rec. Limits
		Result	Qualifier				
Tetrachloroethene	50.0	51.6		ug/Kg		103	70 - 123
Surrogate	%Recovery	Qualifier	Limits				
1,2-Dichloroethane-d4 (Surr)	101		75 - 125				
Toluene-d8 (Surr)	94		75 - 120				
4-Bromofluorobenzene (Surr)	97		75 - 120				
Dibromofluoromethane	92		75 - 120				

Lab Chronicle

Client: RJN Environmental Services LLC
Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Client Sample ID: Core 1

Date Collected: 09/09/13 10:15
Date Received: 09/10/13 09:10

Lab Sample ID: 500-62697-1

Matrix: Solid
Percent Solids: 95.6

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5030B			202204	09/13/13 20:41	WRE	TAL CHI
Total/NA	Analysis	8260B		50	202708	09/16/13 17:20	BDA	TAL CHI
Total/NA	Analysis	Moisture		1	202316	09/12/13 09:08	CMV	TAL CHI

Client Sample ID: Core 2

Date Collected: 09/09/13 10:30
Date Received: 09/10/13 09:10

Lab Sample ID: 500-62697-2

Matrix: Solid
Percent Solids: 95.1

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5030B			202204	09/13/13 20:41	WRE	TAL CHI
Total/NA	Analysis	8260B		50	202708	09/16/13 17:44	BDA	TAL CHI
Total/NA	Analysis	Moisture		1	202316	09/12/13 09:08	CMV	TAL CHI

Client Sample ID: Core 3

Date Collected: 09/09/13 10:45
Date Received: 09/10/13 09:10

Lab Sample ID: 500-62697-3

Matrix: Solid
Percent Solids: 94.0

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5030B			202204	09/13/13 20:41	WRE	TAL CHI
Total/NA	Analysis	8260B		50	202708	09/16/13 18:09	BDA	TAL CHI
Total/NA	Analysis	Moisture		1	202316	09/12/13 09:08	CMV	TAL CHI

Laboratory References:

TAL CHI = TestAmerica Chicago, 2417 Bond Street, University Park, IL 60484, TEL (708)534-5200

Certification Summary

Client: RJN Environmental Services LLC
 Project/Site: Express Cleaners

TestAmerica Job ID: 500-62697-1

Laboratory: TestAmerica Chicago

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
Alabama	State Program	4	40461	04-30-14
California	NELAP	9	01132CA	04-30-14
Georgia	State Program	4	N/A	04-30-14
Hawaii	State Program	9	N/A	04-30-14
Illinois	NELAP	5	100201	04-30-14
Indiana	State Program	5	C-IL-02	04-30-14
Iowa	State Program	7	82	05-01-14
Kansas	NELAP	7	E-10161	10-31-13
Kentucky	State Program	4	90023	12-31-13
Kentucky (UST)	State Program	4	66	04-30-14
Louisiana	NELAP	6	30720	06-30-14
Massachusetts	State Program	1	M-IL035	06-30-14
Mississippi	State Program	4	N/A	04-30-14
North Carolina DENR	State Program	4	291	12-31-13
North Dakota	State Program	8	R-194	04-30-14
Oklahoma	State Program	6	8908	08-31-14
South Carolina	State Program	4	77001	09-30-13 *
Texas	NELAP	6	T104704252-09-TX	02-28-14
USDA	Federal		P330-12-00038	02-06-15
Wisconsin	State Program	5	999580010	08-31-14
Wyoming	State Program	8	8TMS-Q	04-30-14

* Expired certification is currently pending renewal and is considered valid.

TestAmerica

THE LEADER IN ENVIRONMENTAL TF

2417 Bond Street, University Park, IL 60484
Phone: 708.534.5200 Fax: 708.534.62



500-82897 COC

Report To (optional)
Contact: BOB NAUTA
Company: RIN ENV. SVC.
Address: 4631 COUNTY RD. A
OREGON, WI 53575
Phone: 608.576.3001
Fax:
E-Mail:

Bill To (optional)
Contact: SAME
Company:
Address:
Address:
Phone:
Fax:
PO#/Reference#

Chain of Custody Record

Lab Job #: 500-62697
Chain of Custody Number: _____
Page _____ of _____
Temperature °C of Cooler: 2.4

Client		Client Project #		Preservative		Parameter		Matrix		Preservative Key	
Project Name		Project Location/State		Lab Project #		Sampler		Lab PM			
<u>RIN ENV. SVC.</u>		<u>WI</u>				<u>NAUTA</u>				1. HCL, Cool to 4° 2. H2SO4, Cool to 4° 3. HNO3, Cool to 4° 4. NaOH, Cool to 4° 5. NaOH/Zn, Cool to 4° 6. NaHSO4 7. Cool to 4° 8. None 9. Other	
<u>EXPRESS CLEANERS</u>											
Lab ID	MS/MSD	Sample ID	Date	Time	# of Containers	Matrix	Comments				
<u>1</u>		<u>CORE 1</u>	<u>9/9</u>	<u>1015</u>	<u>1</u>	<u>0</u>	<u>X</u>	<u>PCE</u>			
<u>2</u>		<u>CORE 2</u>	<u>"</u>	<u>1030</u>	<u>1</u>	<u>0</u>	<u>X</u>				
<u>3</u>		<u>CORE 3</u>	<u>"</u>	<u>1045</u>	<u>1</u>	<u>0</u>	<u>X</u>				

Turnaround Time Required (Business Days)

1 Day 2 Days 5 Days 7 Days X 10 Days 15 Days Other

Sample Disposal

Return to Client Disposal by Lab Archive for _____ Months (A fee may be assessed if samples are retained longer than 1 month)

Relinquished By <u>[Signature]</u>	Company <u>RIN</u>	Date <u>9/9/13</u>	Time <u>1415</u>	Received By <u>[Signature]</u>	Company <u>TA</u>	Date <u>9/19/13</u>	Time <u>0910</u>
Relinquished By	Company	Date	Time	Received By	Company	Date	Time
Relinquished By	Company	Date	Time	Received By	Company	Date	Time

Lab Courier: _____
Shipped: FX
Hand Delivered: _____

Matrix Key
 WW - Wastewater SE - Sediment
 W - Water SO - Soil
 S - Soil L - Leachate
 SL - Sludge Wf - Wipe
 MS - Miscellaneous DW - Drinking Water
 OL - Oil O - Other
 A - Air

Client Comments

Lab Comments:



Login Sample Receipt Checklist

Client: RJN Environmental Services LLC

Job Number: 500-62697-1

Login Number: 62697

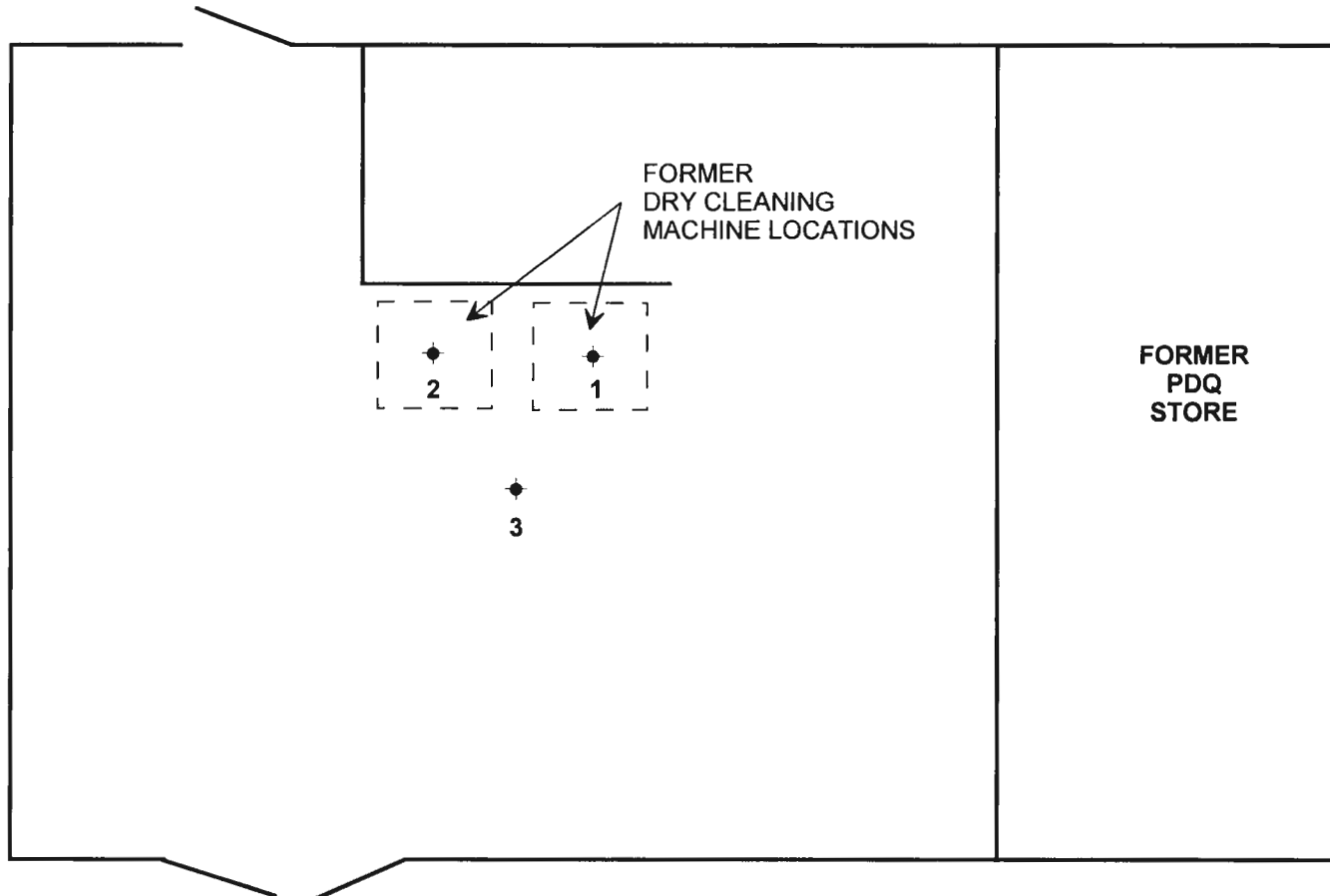
List Source: TestAmerica Chicago

List Number: 1

Creator: Lunt, Jeff T

Question	Answer	Comment
Radioactivity wasn't checked or is \neq background as measured by a survey meter.	True	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	2.4
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ ($1/4''$).	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

**EXPRESS CLEANERS
RACINE, WISCONSIN
CONCRETE SAMPLE LOCATIONS**

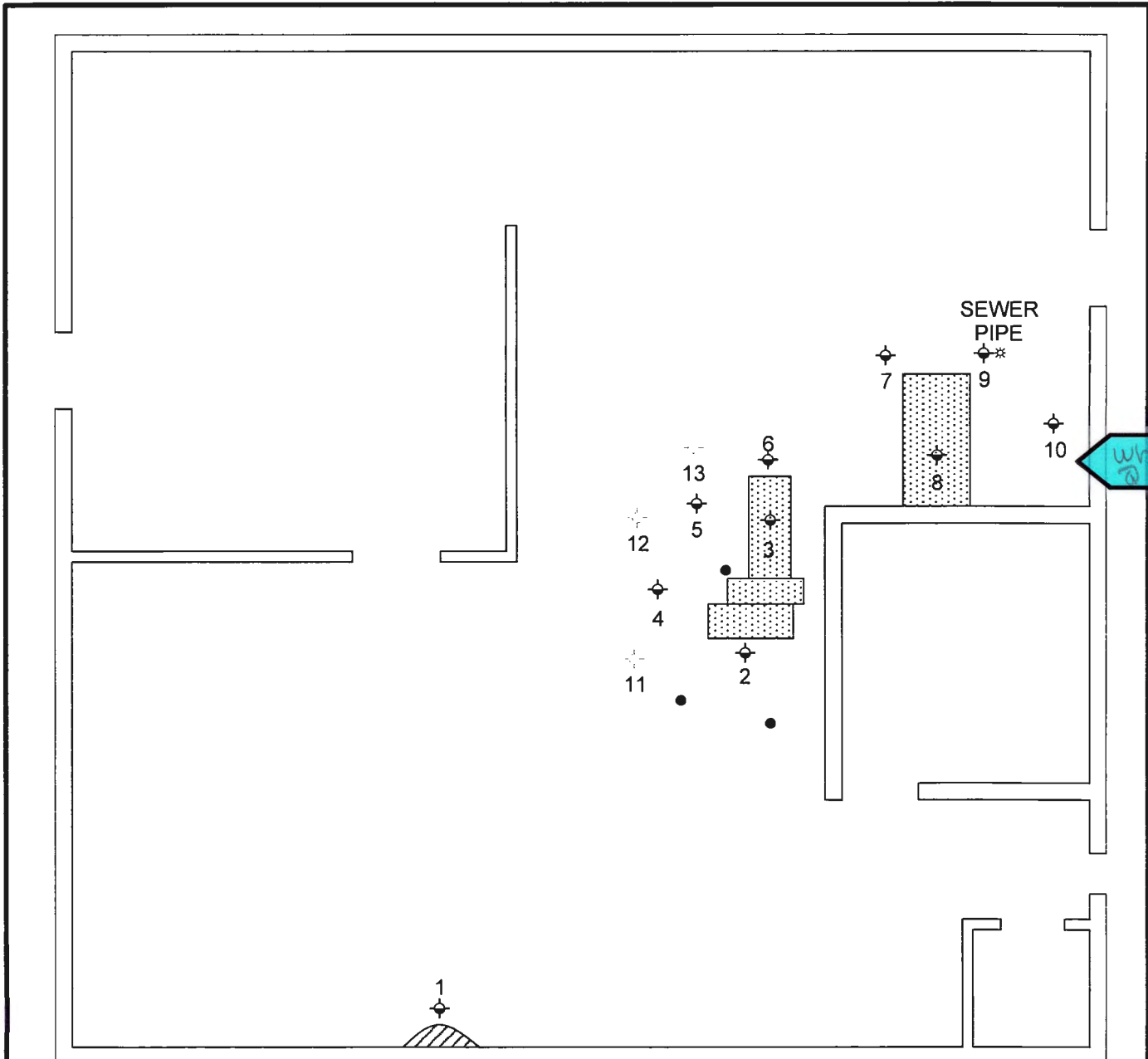


Sample Loc'n Map - 3941 N. Main St. - 9/9/13

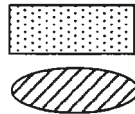
◆ CONCRETE SAMPLE LOCATION



NOT TO SCALE



SCALE IN FEET
0 3 6



MACHINE FOOTPRINT

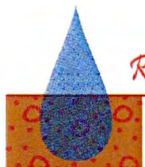
LINT

● EXISTING CORE

★ CORE FOR IMMEDIATE ANALYSIS

◆ CORE TO HOLD

Sample Loc'n Map - 3941 N. Main St. - 10/15/14



RIN Environmental Services, LLC

Surface Water Studies
Groundwater Studies
Site Investigations

4631 COUNTY ROAD A, OREGON, WISCONSIN 53575 (608) 576-3001

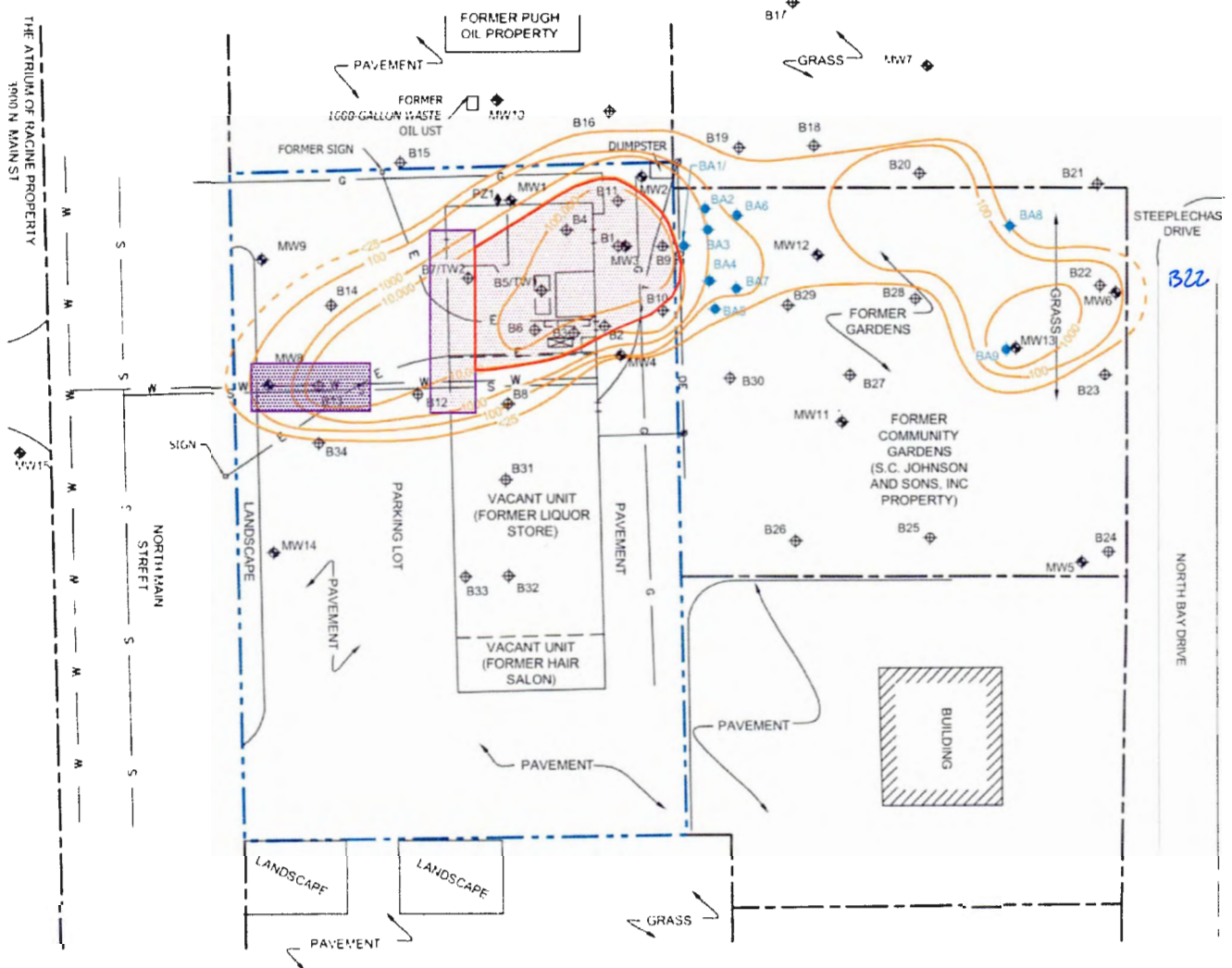
GONZALEZ, SAGGIO & HARLAN
EXPRESS CLEANERS
CORE LOCATIONS

DRAWN BY	PROJ. No.	DATE	FILE
RN	10-203	10 OCT 14	CORE LOC

FIGURE

3

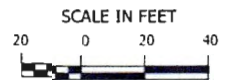
SOIL MIXING AREAS – ZVI ONLY



LEGEND

- SUBJECT PROPERTY BOUNDARY
- ADJACENT PROPERTY BOUNDARY
- SOIL MIXING TREATMENT AREA
- PRB AREA

NOTE: MONITORING WELLS MW1, MW2, MW3, MW4 AND MW8 WILL BE REPLACED AFTER SOIL MIXING HAS BEEN COMPLETED



08/26/14



EXPRESS CLEANERS, INCORPORATED

3941 N. MAIN STREET
RACINE, WISCONSIN

Environmental Resources Management

CADD Review
NA

CHK'D CS-MIL

RFP

FIGURE 1

R:\Cadd\CintE-H\ExpressCleaners\Drawing1.dwg-Layout1 - Letter - 10/2/2014 - robert.keen

Site Name: Express Cleaners (ZVI)

BRRTS #: 02-52-547631

Type of Action: Site Remediation

Dry Cleaner Environmental Response Program
 Reimbursement Cost Detail Linking Spreadsheet Form 4400-214D (R 08/12)

TASKS	BUDGET			DERF COST BREAKOUT (this claim)								Budget Remaining Use (-) to indicate cost over-run	% Task Complete, Remarks
	Bid / Budgeted Amount	Total Approved Budget	Previous Claims (If applicable)	A Soil Investigation	B Soil Remediation	C Groundwater Investigation	D Groundwater Remediation	E Air/Vapor Investigation	F Air/Vapor Remediation	G Lab & Other Analysis	H Miscellaneous Costs		
Consultant Costs													
Pilot/Bench test	\$ 3,500.00	\$ -			\$ 3,500.00								
Remedial action implementation	\$ 40,050.00				\$ 40,050.00								
Post-remediation groundwater monitoring	\$ 34,720.00					\$ 34,720.00							
Site closure report	\$ 8,040.00										\$ 8,040.00		
Expenses	\$ 15,150.00				\$ 6,470.00	\$ 8,650.00					\$ 30.00		
Pre-remediation groundwater sampling	\$ 4,340.00					\$ 4,340.00							
Post-remediation soil sampling	\$ 3,500.00				\$ 3,500.00								
Mixing area slab and foundation removal/disposal (non-haz)	\$ 4,900.00				\$ 4,900.00								
Consultant Cost Total	\$ 114,200.00	\$ -	\$ -										
Sub-Contractor Costs													
Drilling	\$ 7,020.00	\$ -			\$ 7,020.00								
Utility locator	\$ 1,620.00				\$ 1,620.00								
Laboratory	\$ 9,820.00								\$ 9,820.00				
Remediation contractor	\$ 118,200.00				\$ 118,200.00								
WDNR fees	\$ 1,500.00				\$ 750.00						\$ 750.00		
Waste contractor	\$ 650.00					\$ 650.00							
Slab and foundation removal/disposal contractor (non-haz)	\$ 18,900.00				\$ 18,900.00								
Pilot/Bench test	\$ 6,500.00				\$ 6,500.00								
Sub-Contractor Cost Total	\$ 164,010.00	\$ -	\$ -										
DERF ELIGIBLE SUB-TOTALS	\$ 278,210.00	\$ -	\$ -	\$ -	\$ 211,410.00	\$ 48,360.00	\$ -	\$ -	\$ -	\$ 9,820.00	\$ 8,820.00	\$ -	

Non-DERF Eligible Expenses			
Non-DERF Cost Total		\$ -	
INVOICE GRAND TOTAL		\$ -	

Total DERF Eligible Costs This Claim \$ 278,210.00
 #REF!

Check Numbers

Site Name: Express Cleaners (Cool Ox)

BRRTS #: 02-52-547631

Type of Action: Site Remediation

Dry Cleaner Environmental Response Program

Reimbursement Cost Detail Linking Spreadsheet Form 4400-214D (R 08/12)

TASKS	BUDGET		DERF COST BREAKOUT (this claim)										Budget Remaining Use (-) to Indicate cost over-run	% Task Complete, Remarks
	Bid / Budgeted Amount	Total Approved Budget	Previous Claims (If applicable)	A Soil Investigation	B Soil Remediation	C Groundwater Investigation	D Groundwater Remediation	E Air/Vapor Investigation	F Air/Vapor Remediation	G Lab & Other Analysis	H Miscellaneous Costs			
Consultant Costs														
Pilot/Bench test	\$ 3,500.00	\$ -			\$ 3,500.00									
Remedial action implementation	\$ 40,050.00				\$ 40,050.00									
Post-remediation groundwater monitoring	\$ 34,720.00					\$ 34,720.00								
Site closure report	\$ 8,040.00										\$ 8,040.00			
Expenses	\$ 15,150.00				\$ 6,470.00	\$ 8,650.00					\$ 30.00			
Pre-remediation groundwater sampling	\$ 4,340.00					\$ 4,340.00								
Post-remediation soil sampling	\$ 3,500.00				\$ 3,500.00									
Mixing area slab and foundation removal/disposal (non-haz)	\$ 4,900.00				\$ 4,900.00									
<i>Consultant Cost Total</i>	\$ 114,200.00	\$ -	\$ -											
Sub-Contractor Costs														
Drilling	\$ 7,020.00	\$ -			\$ 7,020.00									
Utility locator	\$ 1,620.00				\$ 1,620.00									
Laboratory	\$ 9,620.00									\$ 9,620.00				
Remediation contractor	\$ 69,382.00				\$ 69,382.00									
WDNR fees	\$ 1,500.00				\$ 750.00						\$ 750.00			
Waste contractor	\$ 850.00					\$ 650.00								
Slab and foundation removal/disposal contractor (non-haz)	\$ 18,900.00				\$ 18,900.00									
Pilot/Bench test	\$ 6,500.00				\$ 6,500.00									
<i>Sub-Contractor Cost Total</i>	\$ 115,192.00	\$ -	\$ -											
DERF ELIGIBLE SUB-TOTALS	\$ 229,392.00	\$ -	\$ -	\$ -	\$ 162,592.00	\$ 48,360.00	\$ -	\$ -	\$ -	\$ 9,620.00	\$ 8,820.00	\$ -		

Non-DERF Eligible Expenses			
<i>Non-DERF Cost Total</i>		\$ -	
INVOICE GRAND TOTAL		\$ -	

Total DERF Eligible Costs This Claim \$ 229,392.00
#REF!

Check Numbers



October 22, 2014

VIA ELECTRONIC & U.S. MAIL

Ms. Nancy Ryan, Hydrogeologist
Remediation and Redevelopment
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-3128

Re: Express Cleaners
3941 North Main Street
Racine, Wisconsin
BRRTS #02-52-547631

Dear Ms. Ryan:

This letter provides Appendix G that should have accompanied by my letter to you dated October 21, 2014. Appendix G was inadvertently omitted as the result of a typographic error in the last line of my response to Item 9, on page 4 of that letter, where Appendix F should have said Appendix G. Accordingly, I attach Appendix G, which consists of the vendor's case study of the Cool-Ox product on soil and groundwater at a dry cleaner location and a summary of an independent case study of the effectiveness of Cool-Ox in soil at a location in Madison, Wisconsin.

Very truly yours,

William P. Scott

WPS/sv

Enclosures

cc: **James C. Small**

GONZALEZ SAGGIO & HARLAN LLP
Attorneys at Law

www.gshllp.com

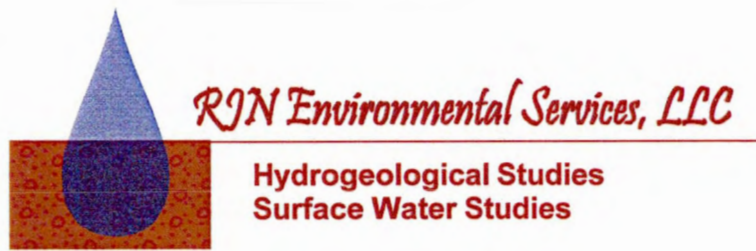
Milwaukee
111 East Wisconsin Avenue
Suite 1000
Milwaukee, WI 53202
Tel (414) 277-8500
Fax (414) 277-8521

Atlanta, GA
Boca Raton, FL
Boston, MA
Chicago, IL
Cleveland, OH

Indianapolis, IN
Los Angeles, CA
Miami, FL
Nashville, TN
New York, NY

Pasadena, CA
Phoenix, AZ
Washington, D.C.
Wayne, NJ
West Des Moines, IA

Appendix G



MEMORANDUM

TO: Nancy Ryan

FROM: Bob Nauta

PROJECT: Madison-Kipp

DATE: October 22, 2014

SUBJECT: Cool-Ox Injection for CVOCs

I have successfully used the Cool-Ox injection process on several sites, including the Madison-Kipp site, which has tetrachloroethene as the primary contaminant of concern. In the late summer of 2005, I was working at Kipp on a Cool-Ox injection in a loading dock area that was known to have very high concentrations of PCE in soil. The injection spanned the depth of 0 to 8 feet below ground surface. After injection, I collected samples at locations adjacent to the three samples that had yielded the highest pre-injection concentrations. Samples were collected 2 weeks after injection. They were collected approximately 6 inches from the previous samples and at the same depth. The Cool-Ox contractor was not told where the sample locations were, and therefore did not apply more product to those areas than he did in others. The pre- and post-injection concentrations for PCE are presented in the Table 1, below. The data for the daughter products is not immediately available, but were comparable to the reductions seen for PCE.

Table 1. Demonstrated Effect of Cool-Ox Injection on Soil at the Madison Kipp Property.

Sample No.	PCE mg/kg	
	Pre-Injection	Post-Injection
BE-2	487	0.22
BE-13	782	1.3
BE-7	708	3.2

It should be noted that the Madison-Kipp site has both clay and sand strata, so the project included soil conditions comparable to those at the Express Cleaners site.

CASE HISTORY®

Work Summary (Site History)

CHS-0005 (Perchloroethylene)

Probable off-site migration of dissolved perchloroethylene was the remedial action driver for this confidential client. Repeated releases of recycled perc over several years from a dry cleaning operation were complicated by the presence of smeared naphtha, along with oil and diesel range hydrocarbons. Action by the State required the property owner to address the problem immediately. It was concluded that chemical oxidation could provide the quickest most effective solution. Permanganate was ruled out because of the presence of hydrocarbons and Fenton peroxide was considered to reactive because much of the plume was located beneath the building. The recently developed Cool-Ox™ Technology was selected because of its effectiveness at treating mixed contaminants and its greater safety. Five weeks after completing injections of the sources, perc levels decreased to below residential levels for soil.

Project at a Glance

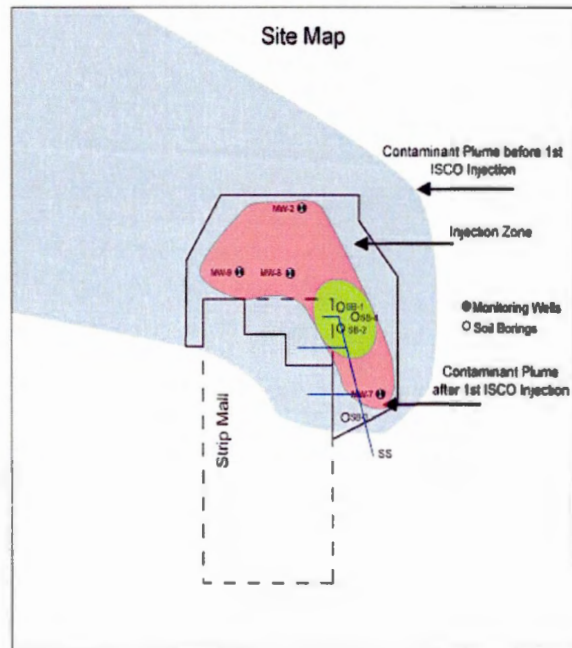
Site 0005 - Site Information

Type of site	Former Drycleaner
Contaminants	Recycled Perchloroethylene
Work Scope	Inject Oxidizer
Media Treated	Soil & Groundwater
Soil Type	Dense Clay over claystone
Groundwater Depth	14 fbg
Remedial Objective	Locate and mitigate soil sources and reduce perc concentrations in GW

Site 0005 - Application Information

Technology Selected	Chemical Oxidation
Application Method	DPT Probe Rod
Area Treated	9,520 square feet
Vertical Interval	0 to 24 feet bgs = 24 feet
Injection Point (IP) Spacing	6 feet
Media Volume Treated	8,460 cubic yards
Number of Injection Points	265
Oxidizer Volume	29,700 gal
Oxidizer per IP	112 gal

Site Map



The green area on the site map depicts the extent of soil contaminants exceeding MCLs prior to the first Cool-Ox™ injection. During the injection work, free product was observed in several of the injection points in this area. However, post injection sampling data revealed that all soil contaminant concentrations had been reduced to levels below maximum concentrations for site closure. Groundwater (blue area prior to treatment) samples collected 18 months after the Cool-Ox™ injection, revealed that contaminant concentrations exceeding MCL closure levels had been reduced to the area depicted in red. During the injection work high concentrations of hydrocarbons (light oils) were also discovered. These were confined mainly to the green area on the Site Map.

Current Status

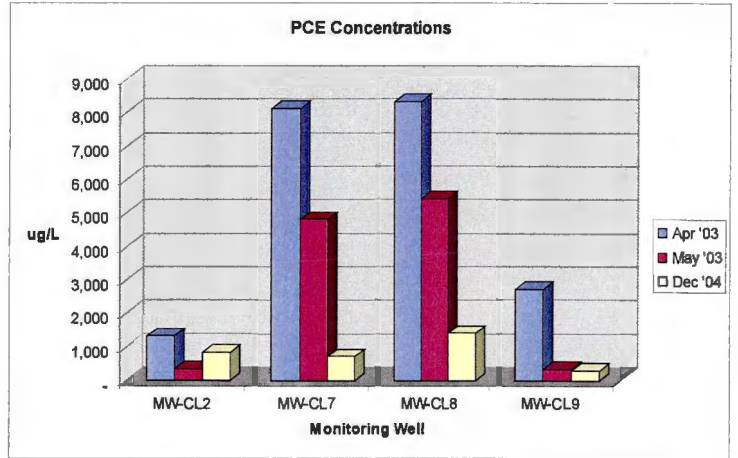
The Cool-Ox™ application successfully located all soil sources and reduced soil levels to less than those required by the state agency for residential standards. Groundwater is currently monitored on a quarterly basis. The site is under evaluation to ascertain future remedial needs if any.

CASE HISTORY
Results

CHS-0005 (Perchloroethylene) (Cont.)

Site 0005- Contaminant Data-GW (PCE)

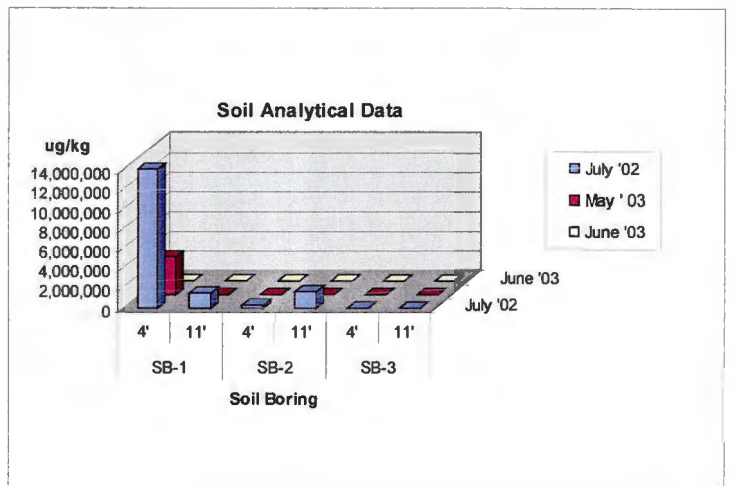
Groundwater Samples	Pre ⁽¹⁾ Injection Samples	30 day Post Injection Samples	18 months Post Injection Samples
MW-CL2	1,300	340	830
MW-CL7	8,100	4,800	710
MW-CL8	8,300	5,400	1,400
MW-CL9	2,700	320	300



⁽¹⁾ All data reported in µg/L

Site 0005- Contaminant Data-Soil (PCE)

Soil Boring	Depth	07/09/02	05/28/03	06/24/03
SB-1	4'	14,000,000	3,800,000	1,700
	11'	1,500,000	2,900	320
SB-2	4'	280,000	NS	120
	11'	1,700,000	120	110
SB-3	4'	5,000	NS	59
	11'	1,100	0	12



⁽¹⁾ All data reported in µg/Kg

Contact: Jeff Citrone – Higgins & Associates, LLC

DeepEarth Technologies, Inc. – 12635 Kroll Drive – Alsip, IL 60803 – tech@deepearthtech.com (877) 266-5691

This document is a copyright of DeepEarth Technologies, Inc. – all rights reserved.