

Christine A. M. Straate
PO Box 530031
New Berlin, WI 53151-0031

July 14, 2014

WDNR
John Hnat
2300 Dr. Martin Luther King Drive
Milwaukee, WI 53212

FID 341156860
Bcmts 02-41-550899

Dear John:

It was so nice talking with you today. I still have the important file with the Environmental issues relating to 8655 N. 43rd Street, even though the business has been closed since December 31, 2009. So, I have enclosed all of the documents we discussed this morning for your review.

The oldest document is a certified survey of the property dated 12/12/57 which clearly shows that there is virtually no "back yard" to the property. *The 309.07 Ft., N 12° 38' 33" W is property line,*

Second is the Phase I study dated 5/6/03, and I highlighted their finding that "Drains within the shop area lead to the city sewer system." *Also 2 Asts, 1 - uST + Wtr supply Well,*

Third, the 7/9/09 notification letter to the WDNR from Robert Landon of BT Squared Inc. *- hired BT²*

Fourth, records of email and phone correspondence dated 7/20/09, 7/22/09, and 9/3/09 with their recommendations.

Finally, enclosed is my 9/22/09 letter to the WDNR with my proposed Work Plan and Schedule.

Please note that I have placed a red "X" on the certified survey of where WE Energies took the soil samples, to the best of my recollection. Perhaps you have documentation that I do not have. WE Energies placed a stake there, and it is still there, so I will take more photos and show them to you.

I will call you again in one week after you have had an opportunity to review these materials because your help in clearing up this matter is urgently needed.

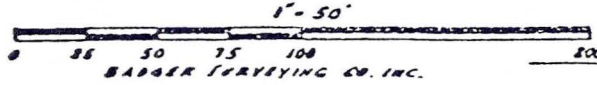
Respectfully yours,

Christine Straate

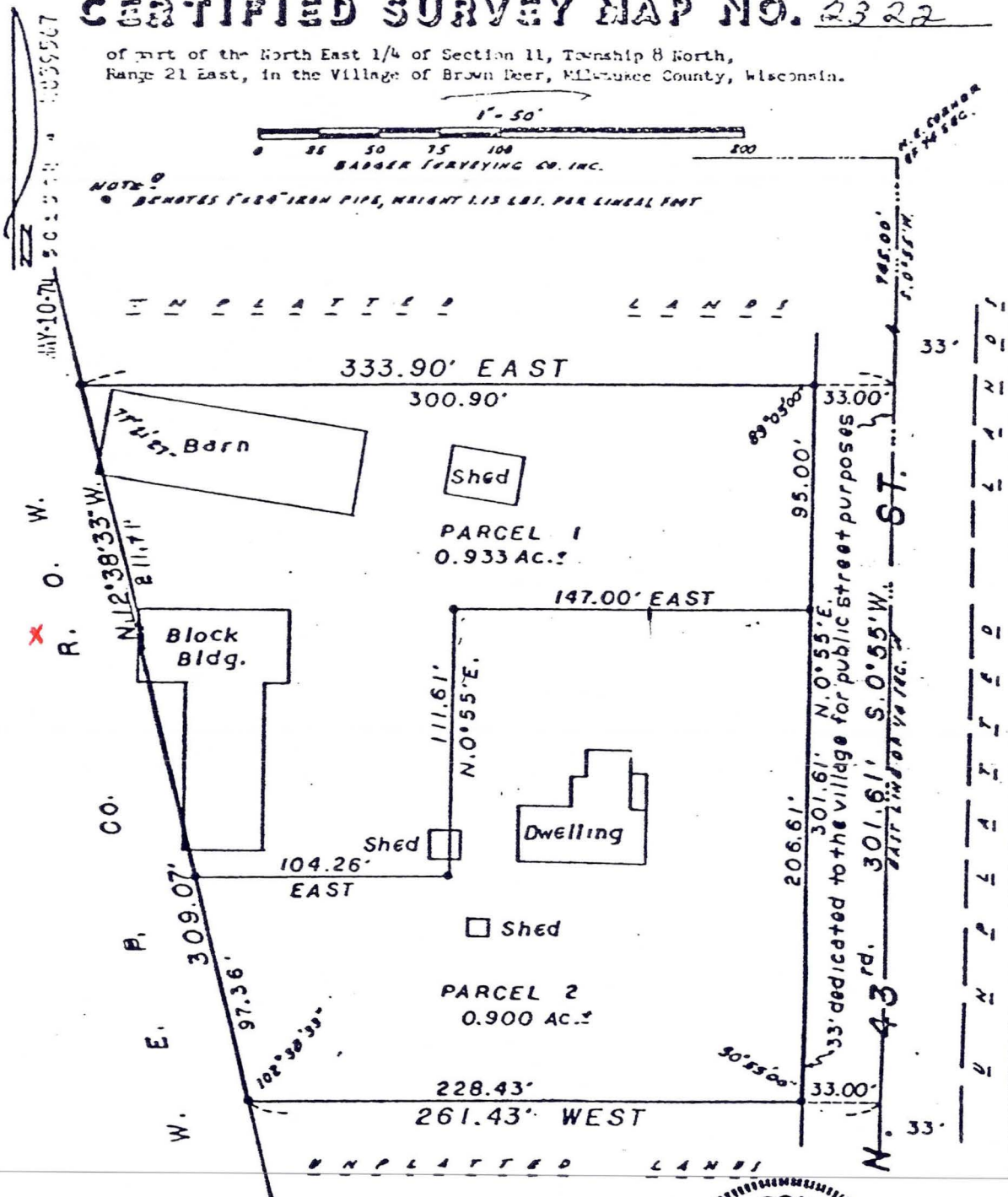
Christine Straate

CERTIFIED SURVEY MAP NO. 2322

of part of the North East 1/4 of Section 11, Township 8 North,
 Range 21 East, in the Village of Brown Deer, Milwaukee County, Wisconsin.



NOTE:
 • DENOTES 1" DIA IRON PIPE, WEIGHT 1.15 LBS. PER LINEAL FOOT



305
 74-202

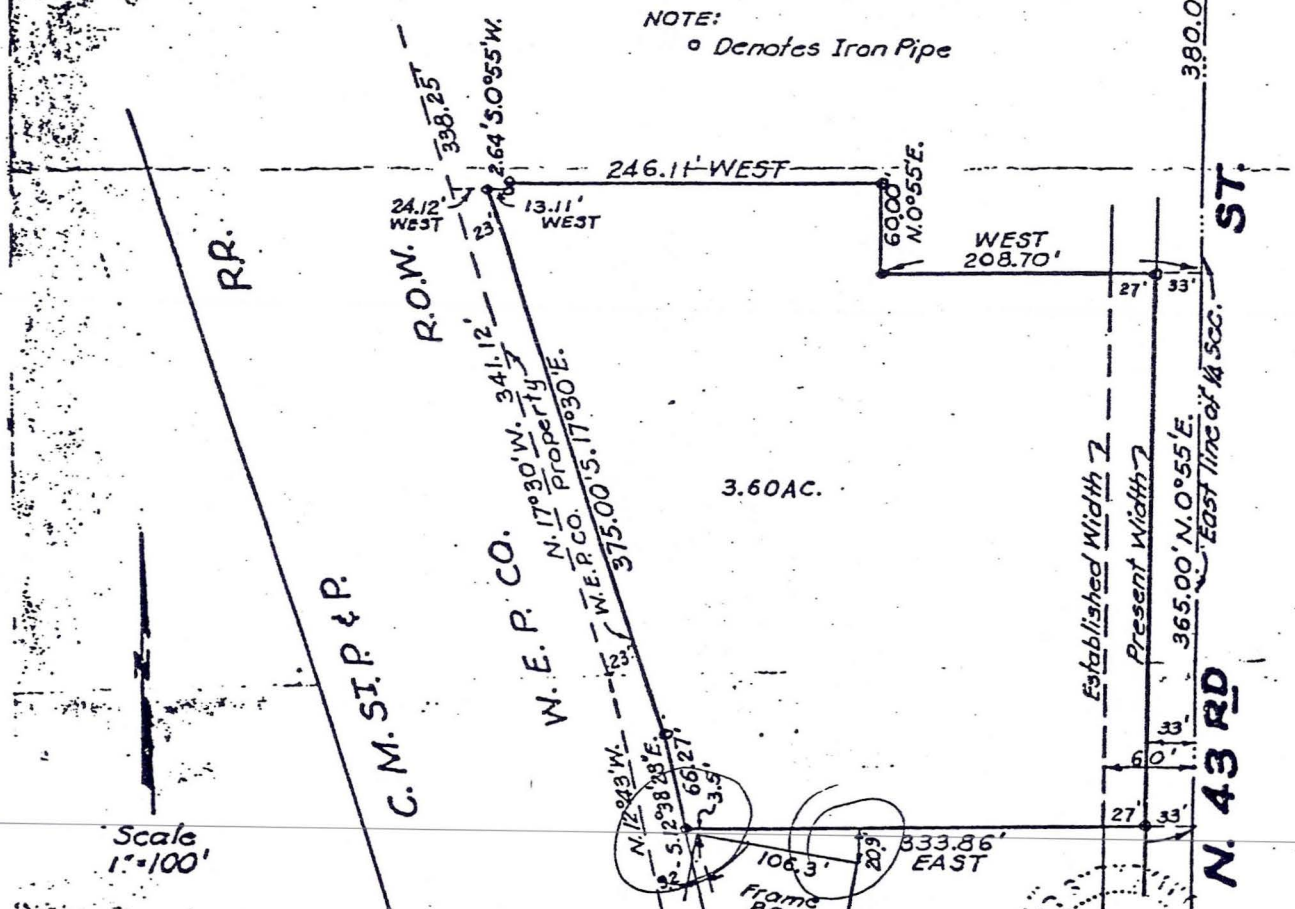


PLAT OF SURVEY

PROPERTY AT N.43rd Street (OWNER)

LEGAL DESCRIPTION That part of the North 1/2 of the North East 1/4 of Section 11, Town 8 North, Range 21 East, in the Town of Granville, Milwaukee County, Wisconsin, bounded and described as follows: Commencing at a point in the east line, 380.00 feet S. 0°55'W. of the northeast corner of said 1/4 Section; thence West on a line parallel with the north line of said 1/4 Section, 208.70 feet to a point; thence N.0°55'E. on a line parallel with the east line of said 1/4 Section, 60.00 feet to a point; thence West on a line parallel with the north line of said 1/4 Section, 246.11 feet to a point; thence S.0°55'W. on a line parallel with the east line of said 1/4 Section, 2.64 feet to a point; thence West on a line parallel with the north line of said 1/4 Section, 13.11 feet to a point in the east line of Wisconsin Electric Power Co. property; thence S. 17°30'E. along the east line of W. BROWN DEER R said property, 375.00 feet to a point; thence S. 12°38'28"E. along the east line of said property, 66.27 feet to a point; thence East on a line parallel with the north line of said 1/4 Section, 333.86 feet to a point in the east line of said 1/4 Section; thence N.0°55'E. along the east line of said 1/4 Section, 365.00 feet to the point of beginning, containing 3.60 acres of land.

NOTE:
 o Denotes Iron Pipe



Scale
 1"=100'

Prepared for Raymond J. Diederich

State of Wisconsin,)
 County of Milwaukee)

I hereby certify that on the 12th day of December 1951, I have surveyed the property described above according to the official records and that the above plat is a correct representation of the boundary lines and measurements of all buildings and other structures thereon.

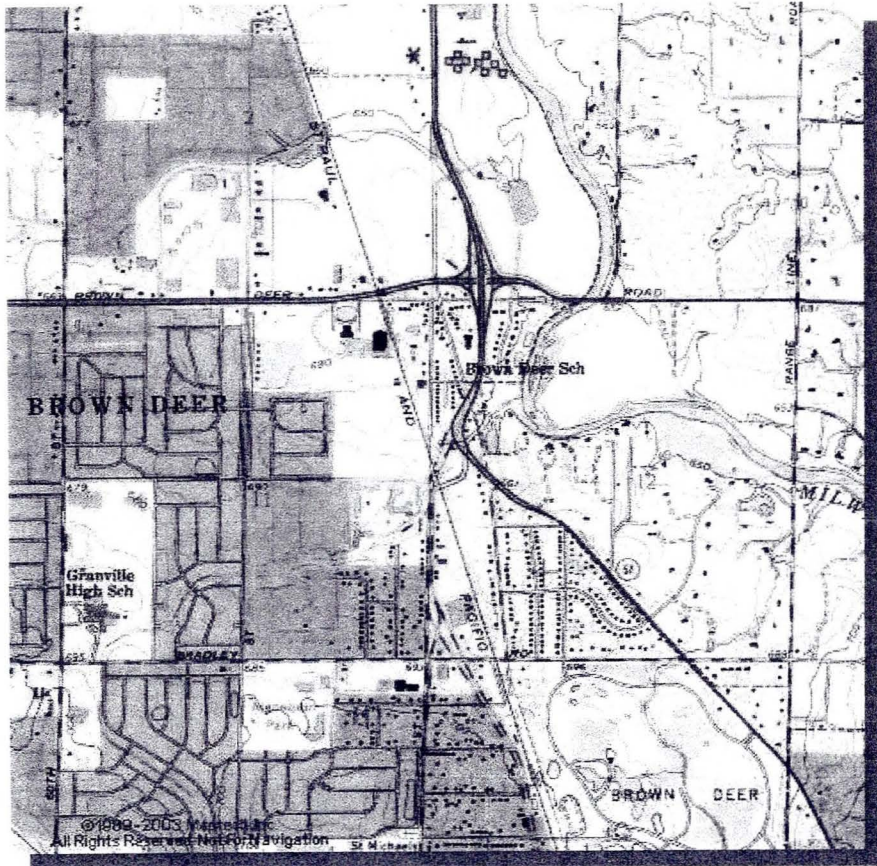
Plat No. 51-823

Signed James A. Esde
 Surveyor

Secker
 Mutz
 Copy
 7-17-86

Phase I Environmental Assessment

Hillcrest Landscaping
8655 N. 43rd Street
Brown Deer, WI

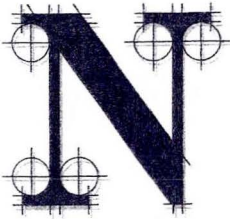


Topographic Map

Prepared By:

Norris
& Associates, Inc

Engineers, Scientists, and Planners



Norris & Associates, Inc
Engineers, Scientists, Planners
7100 West Center Street
Milwaukee, Wisconsin 53210
(414) 302-9156 / Fax (414) 302-9157
www.norris-assoc.com

May 6, 2003

Ms. Ramona Moore
Legacy Bank
2102 West Fond du Lac Avenue
Milwaukee, WI 53210

**Subject: Phase I Environmental Site Assessment of
Hillcrest Landscaping
8655 North 43rd Street, Brown Deer, Wisconsin 53209**

Norris & Associates, Inc. (NAI) has performed a Phase I Environmental Site Assessment (ESA) at Hillcrest Landscaping located at 8655 North 43rd Street in the Village of Brown Deer, Wisconsin. An interested party is looking to purchase the landscaping business along with the real estate.

The Phase I ESA was performed in accordance with the guidelines established under the American Society of Testing and Materials (ASTM) standard document E-1527-00, entitled "*Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.*" The objective of the Phase I ESA was to identify recognized environmental conditions at the subject property, which are defined by the ASTM standard as follows:

The term recognized environmental condition means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The **Scope of Services** performed by NAI during the Phase I ESA for the subject property included the following:

1. A site reconnaissance to note the existing features and any potential indications of environmental impairments;
2. A review of historical uses and occupancy of the property, by reviewing available aerial photographs, Sanborn Fire Insurance maps, historical records, and interviews with individuals who appear to be knowledgeable of the subject property's history;
3. Review of files and databases maintained by
 - a. Local agencies - Village of Brown Deer;
 - b. State of Wisconsin agencies - Wisconsin Department on Natural Resources (WDNR) and Wisconsin Department of Commerce (WDCOM); and
 - c. Federal agencies - U.S. Environmental Protection Agency (US EPA); and
4. Provide a written report describing the findings of the assessment.

1. SITE BACKGROUND AND DESCRIPTION

The following section presents the site location, description, and relevant soil and groundwater information. These descriptions are based on the information collected through the site reconnaissance, interviews, and record searches.

1.1 Site Location

The subject property is defined by the area bounded by North 43rd Street to the east, WE Energies right-of way and Soo Line Railroad to the west, the Village of Brown Deer Municipal Complex to the north, and a residential property to the south. The subject property is located at 8655 North 43rd Street, Village of Brown Deer, Milwaukee County, Wisconsin and is a part of the Northwest $\frac{1}{4}$ of the Northwest $\frac{1}{4}$ of Section 12, Township 8 North, Range 21 East (Figure 1). The subject property is also located within the Historical Planned Development District zoning code.

1.2 Area Geology and Hydrogeology

The soils of the subject property are described by the Ozaukee-Morely-Mequon soil association. Soils within this association are described as well drained to somewhat poorly drained and have a silty clay loam to silty clay subsoil. They generally develop from thin loess parent material and silty clay loam glacial till. Limestone bedrock is expected to underlie the soil. The site gently slopes to the northeast and has an elevation around 670 feet, MSL. However, there is a steep grade change of a few feet along the western property line, which borders the WE Energies right-of-way. The grade change is due to fill material. The Milwaukee River is located approximately 1,500 feet due east and the Soo Line Railroad is approximately 215 feet west of the site. This information was provided by the U.S. Natural Resource Conservation Service Soil Manual, the Wisconsin Natural History and Geological Survey, and the U.S. Geological Survey 7.5 Minute Topographic Map, the site visit, and the WDNR file review.

2. SITE HISTORY

Information regarding the site's history was obtained from city documents, interviews with individuals knowledgeable of the site, and aerial photographs. Sanborn Fire Insurance maps were not available for the site (Appendix A). This section summarizes the historical information.

2.1 Site Reconnaissance

A site reconnaissance was conducted on May 1, 2003 to observe existing site features and any potential environmental impairment of the site. Mr. Richard Briere, the subject property owner, led the reconnaissance. Photographs of the site are included in Appendix B.

The subject property was originally part of a farm and contained a barn and shed that are no longer present. The farm had been in operation starting in the 1850's and remained within the Diderrich family until Mr. Briere acquired the property in 1975 for his landscaping business. Mr. Briere had already been renting the subject property since the late 1960's.

The property measures 1.1 acres in area. There is one, rectangular 4,070 ft² building, which contains the office and shop, and there is also one open shed. The former owner constructed the building in 1950 for the Northshore Fire Department and the Department of Public Works. The building is heated with natural gas and a wood stove. Fuel oil was not used. The floor of the shop is surfaced with concrete and appears to be in good condition. **Drains within the shop area lead to the city sewer system.** Along the northern portion of the property, there are nursery stock and mulch. The rest of the property is covered with gravel for parking and equipment storage.

Two, 55-gallon waste oil drums and two, 55-gallon bulk oil drums are located within the shop. When they are full/empty, a commercial business replaces them when necessary. In addition, granular fertilizers contained in bags are also stored on shelves within the shop. Mr. Briere stated that he did not store bulk pesticides on the property.

Two aboveground storage tanks (ASTs) are present along the driveway. One tank is 250-gallons in size and contains off-road diesel, and the second tank is 500-gallons in size and contains road grade diesel. Both tanks appear to be in good condition. The tanks have been placed at the same location since the early 1970's. However, the ground between the tanks and the driveway is gravel. Given the probability for spillage during tank filling and fuel dispensing, there is potential for surface soil contamination by petroleum hydrocarbon compounds. **This is considered a recognized environmental condition.**

One underground storage tank (UST) was formerly located along the driveway. The tank was originally used by the former owner of the subject property for leaded gasoline storage. Mr. Briere removed the tank once he began to use the property in 1968. Mr. Briere stated that the tank was 50-gallon in capacity. A representative of the Fire Department was present to observe the tank removal. In 1987, the Village of Brown Deer Building Inspector inquired about the UST, but did not conduct a further investigation.

One water supply well was formerly located in the northern portion of the property. Mr. Briere had the well abandoned by 1977 under the supervision of the Village of Brown Deer. The well was filled with concrete to the ground surface. The area is now covered with gravel.

Within the WE Energies right-of-way, juxtaposed along the western side of the subject property, are two standpipes belonging to Badger Meter, Inc. The pipes are located northwest of the subject property. Steve Vogt, of Badger Meter, Inc. was interviewed on May 5, 2003 regarding the pipes, which cover two monitoring wells. A spill occurring on the Badger Meter property was reported to the WDNR on July 25, 1990. The two, upgradient monitoring wells were placed within the WE Energies right-of-way to monitor trichloroethene (TCE) and its daughter products *cis*- and *trans*-dichloroethene (DCE), vinyl chloride (VC), and ethene. Groundwater flows northeast, and bedrock is encountered between 12 feet and 14 feet below grade. A soil excavation was completed in 1998 where the spill occurred. Concentrations of TCE, DCE, and VC in the groundwater sampled from the two wells measure between the compounds' respective NR 140 Preventive Action Limits (PAL) and Enforcement Standards (ES) and below their respective PALs. The WDNR has not required further groundwater plume delineation towards the subject property. It is anticipated that the contaminants originating from the Badger Meter, Inc. property do not adversely affect the subject property above NR 140 standards.

2.2 Aerial Photograph Review

Aerial photographs were reviewed at the Southeast Wisconsin Regional Planning Commission at a scale of 1 inch = 500 feet. The photographs capture the general vicinity of the subject property for years 1963, 1967, 1970, 1975, 1980, 1985, 1990, 1995, and 2000.

- **1963.** The subject property appears as it does today. The properties located due southeast and south of the subject property appear as they do today. A large, open field is located east of the subject property, and the property to the north is undeveloped, which is currently occupied by the Brown Deer Village Municipal Complex. The Soo Line Railroad is present to the west of the subject property, and it appears that a second line was formerly present due east of the current rail line.
- **1967.** The Brown Deer Village Municipal Complex at 8717 North 43rd Street is present.
- **1970 through 2000.** No significant observations are apparent.

No environmental recognized conditions are apparent from the aerial photograph review.



July 9, 2009

Victoria Stovall
Wisconsin Department of Natural Resources
Remediation & Redevelopment
2300 Dr M L King Drive
Milwaukee, WI 53212

SUBJECT: Bella Landscaping
8655 North 43rd Street, Brown Deer, Wisconsin
BRRTS # 02-41-550899
BT² Project # 3855

Dear Ms Stovall:

This letter serves to notify the Department that Bella Landscaping has hired BT², Inc. as their environmental consultant for the above-noted project. This letter is provided in accordance with the Department's June 11, 2009 letter.

Please contact me at 608.216.7329 if you have any questions regarding this letter.

Sincerely,
BT², Inc.



Robert Langdon
Senior Project Manager

cc: Christine Straate, Bella Landscaping
Josh Levy, Crivello Carlson, S.C.

RT/LR/RT
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Christine Straate

From: "Rob Langdon" <rlangdon@bt2inc.com>
To: <christine@bellalandscaping.net>
Cc: <jlevy@crivellocalison.com>
Sent: Monday, July 20, 2009 10:52 AM
Attach: Table_2_Soil_PCBs.xls; Table_1_Soil_VOCs.xls
Subject: Bella Landscaping

Christine, it was nice meeting with you and Josh on Thursday to discuss our findings and potential next steps.

The soil results from the We Energies investigation documented the presence of polychlorinated biphenyls (PCBs) and petroleum contaminants (see attached tables). PCBs were used as coolants and insulating fluids and could have originated from a variety of sources, such as electrical transformers, capacitors, or lubricating oils. The petroleum contamination is within the "diesel range" and could come from sources such as diesel fuel or motor oils.

The PCB concentrations are well below EPA cleanup standards, but the petroleum contaminants exceed State diesel range organic (DRO) cleanup levels. It is likely that the Wisconsin Department of Natural Resources (WDNR) will require further investigation and cleanup activities to address the contamination on the We Energies property. Potential additional work could include further soil sampling, soil excavation, and groundwater investigation to evaluate potential impacts to groundwater.

On Thursday we discussed potential next steps. Options include:

- 1) Contacting the WDNR and see if they would consider a "No Further Action" (NFA) request. The WDNR may allow this since the concentrations are relatively low and some cleanup in the vicinity of the contamination has occurred already. I will contact We Energies to see if they removed any soil for disposal and contact the WDNR to see if this NFA is an option.
- 2) Seeking assistance from the Phase 1 consultant (Norris & Associates, Inc). As discussed, we will prepare a letter summarizing findings for Josh to forward to Norris & Associates. Keep in mind, Norris & Associates may want more information regarding the pipe and floor drain to determine if there is a connection between the two.
- 3) Performing further assessment of site history. The Phase 1 report documented nearby contaminant sources and site histories. It's possible that the clay tile pipe uncovered in the right-of-way is part of an old drainage system, which could connect to other potential sources of contamination in the area. Considerable time and effort could be spent evaluating other sources and may not result in identification of responsible parties.
- 4) Collecting additional soil samples to define the extent of the contamination and perform excavation to remove the remaining impacted soil. As discussed above, some of the soil may have already been removed by We Energies. The excavation would likely be small and extend to a depth of approximately four feet below ground surface. Field instrumentation and field observations could be used to direct the excavation. Soil confirmation samples should be collected at the excavation limits to document removal of the contaminants.

As requested, we plan to move forward with Options 1 and 2. We'll contact We Energies and the WDNR to evaluate No Further Action. We'll also prepare a letter summarizing findings for Josh to forward to Norris & Associates. We'll prepare this letter as a draft so that both you and Josh can review it before we finalize the letter.

This e-mail completes our first phase of work described in our Work Authorization dated July 9, 2009. We will proceed with the additional tasks on a time and materials basis. We estimate approximately \$500 to complete the additional work.

Please contact me at 608.216.7329 if you have any questions.

Work Plan
G Probe
Monitoring Well?
Shallow Excavation
of our own.
Recover Costs
from Phase I.
updated Invoice

1. Contact landfill + get it approved
2. we can excavate + load onto licensed hauler
3. Take samples (monitor)
4. Submit Samples to lab.
5. Ask for closure to DNR



RECORD OF TELEPHONE CONVERSATION

PROJECT: Bella Landscaping PROJ. #: 3855
DATE: July 22, 2009 TIME: 09:00
WITH: John Hnat PHONE #: 414-263-8644
OF: WDNR
RE: Potential request for No Further Action

I call John to follow up on my 7/21/09 e-mail which summarized We Energies findings and attempted to open discussion on closing the case without further action. John's 7/21/09 e-mail response stated only that the Department requires a fee for technical evaluation.

During the phone call John said, "You can pay the fee and take your chances." But then he hinted that more was needed, such as polycyclic aromatic hydrocarbon (PAH) sampling. He also hinted that extent definition; assessment of groundwater pathway potential, groundwater evaluation and identification of the source should be considered, too.

He seemed focused on determining the cause of the release. I got the impression that plugging off the drain and removing the debris would not be enough unless we specifically determine that the source was the drain or the debris.

John also indicated that his comments regarding the project were "hypothetical." I believe John added this statement because he did not want the potential scope items we discussed to be taken as the Department's final opinion or specific steps necessary for closure. In other words, we could complete the tasks and more work may be necessary to get the case closed. However, it is my opinion that his comments give us some outline for what the Department would expect.

TO DO: Follow-up with client and attorney
BY WHOM: Robert Langdon
COPY TO: File
BY: Robert Langdon
SIGNATURE: _____

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Christine Straate

From: "Rob Langdon" <rlangdon@bt2inc.com>
To: <christine@bellalandscape.net>
Cc: <JLevy@CrivelloCarlson.com>
Sent: Thursday, September 03, 2009 1:33 PM
Attach: Hnat_NFA_Potential_Scope_090722_phone.pdf
Subject: Next Steps for WE Energies Right of Way

Hi Christine, hope all is well with you. I can't believe it's September already. Where did the summer go?

I'm writing to let you know that I spoke with Josh Levy this morning to discuss next steps for the WE Energies Right-of-Way issue. Last time I talked with you, I believe the plan was to request help from Norris & Associates, Inc since they incorrectly reported that the shop drain "lead to" the sanitary sewer.

My last communication with DNR was with their project manager, John Hnat on July 22, 2009. I had contacted John to see if the DNR would consider closing the case "as is" with no additional work. John had initially requested payment of a \$500 DNR review fee to evaluate this option. However, during my phone call with him he indicated that the DNR would not close the case and that additional work was necessary. John outlined what additional work may be needed. Please see the attached phone note for more details.

You should keep in mind that there are some deadlines for completing the work. The DNR's June 11, 2009 letter specifies two deadlines. The first was to hire an environmental consultant by July 13, 2009. You met that deadline and we notified the DNR of our contract with you on July 9, 2009. The other deadline was for submittal of a site investigation workplan by August 6, 2009. Since a workplan has not been submitted, it's possible that DNR will take "enforcement action" against you as specified in their letter.

My suggestion is to get a workplan to DNR as soon as possible to show them that you're making progress and to potentially push off any enforcement action. There do not appear to be any other deadlines at this point. There is a schedule requirement for submitting a site investigation report within 30 days of completing the site investigation work. However, there's no deadline for completing the site investigation!

To engage Norris & Associates, I suggest that Josh contact them and ask them to complete the investigation according to your workplan. Another option would be to have us (or another reputable firm) do the work and have Norris & Associates pay. Either way, you'll want to submit a workplan to DNR. If Norris & Associates have issues with the workplan, and we all agree it can be modified, then we can modify it later.

The most important thing for now is to submit a workpan and get off of DNR's clock.

Hope this helps. Feel free to give me a call at 608.216.7329 if you want to discuss this further.

-Rob

Robert Langdon, Senior Project Manager

Direct: 608.216.7329

www.bt2inc.com



2830 Dairy Drive
 Madison, WI 53718-6751
 Phone: 608.224.2830 | Fax: 608.224.2839

Table 1
Soil Analytical Results Summary - VOCs
We Energies Right-of-Way, 8655 N. 43rd Street, Brown Deer, WI / BT² Project #3855
(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (Feet)	Lab Notes	DRO (mg/kg)	GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	MTBE	Other VOCs
#1	7/13/2007	0.5	(1)	8,900	47	<25	75 Q	<25	430	710	260	<25	Hexachlorobutadiene 56 Q Isopropylbenzene 100 Naphthalene 340 n-Propylbenzene 180 p-Isopropyltoluene 850 s-Butylbenzene 430
	7/13/2007	1-2	(2)	2,300	93	56 Q	720	130	3,900	3,500	950	<25	1,2,4-Trichlorobenzene 57 Q Isopropylbenzene 280 Naphthalene 1,200 n-Butylbenzene 1,100 n-Propylbenzene 660 p-Isopropyltoluene 710 s-Butylbenzene 560
#1A	7/13/2007	0.5	(1)	1,800	<3.5	<25	<25	<25	<75	<25	<25	<25	Methylene Chloride 37 QB Naphthalene 38 Q Styrene 53 Q
#1B	7/13/2007	0.5	(1)	13,000	89	<25	<25	<25	<75	72 Q	87	<25	p-Isopropyltoluene 300 s-Butylbenzene 130
#2	7/13/2007	0.5	(1)	1,400	7.3	<25	<25	<25	<75	<25	<25	<25	ND
	7/13/2007	1-2	(1)	1,400	6.1	<25	<25	<25	<75	<25	<25	<25	ND
#2A	7/13/2007	0.5	(1)	3,600	<3.1	<25	<25	<25	36 Q	100	43 Q	<25	Naphthalene 34 Q
#2B	7/13/2007	0.5	(1)	1,900	6.9	<25	<25	<25	<75	<25	<25	<75	Methylene Chloride 38 QB
#3	7/13/2007	0.5	(1)	340	<3.2	<25	<25	<25	<75	<25	<25	<25	Methylene Chloride 38 QB
	7/13/2007	1-2	(1)	640	<3.2	<25	<25	<25	<75	<25	<25	<25	Methylene Chloride 37 QB
#3A	7/13/2007	0.5	(1)	350	<2.8	<25	<25	<25	<75	<25	<25	<25	Methylene Chloride 34 QB
#3B	7/13/2007	0.5	(1)	1,100	5.1	<25	<25	<25	<75	<25	<25	<25	Methylene Chloride 38 QB

Table 1
Soil Analytical Results Summary - VOCs
We Energies Right-of-Way, 8655 N. 43rd Street, Brown Deer, WI / BT² Project #3855
(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (Feet)	Lab Notes	DRO (mg/kg)	GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	MTBE	Other VOCs
NR 720 Residual Contaminant Level (RCL)				100	100	5.5	2,900	1,500	4,100	NE	NE	NE	
NR 746 Table 1				NE	NE	8,500	4,600	38,000	42,000	83,000	11,000	NE	Naphthalene 2,700
NR 746 Table 2				NE	NE	1,100	NE	NE	NE	NE	NE	NE	1,2-Dichloroethane 540

ABBREVIATIONS:

µg/kg = micrograms per kilogram or parts per billion (ppb)
DRO = Diesel Range Organics
MTBE = Methyl-tert-butyl ether

mg/kg - milligrams per kilogram or parts per million (ppm)
GRO = Gasoline Range Organics
ND = Not Detected

VOCs = Volatile Organic Compounds
TMB = Trimethylbenzene
NE = Not Established

NOTES:

Bold+underlined values exceed NR 720 RCLs.

NR 720 RCL - Wisconsin Administrative Code (WAC), Chapter NR 720 Residual Contaminant Level.

NR 746 Table 1 - WAC, Chapter NR 746.06(2)(b) Table 1 - Indicators of Residual Petroleum Product in Soil Pores.

NR 746 Table 2 - WAC, Chapter NR 746.06(2)(b) Table 2 - Protection of Human Health from Direct Contact with Contaminated Soil.

LABORATORY NOTES/QUALIFIERS:

See laboratory report for additional sample comments.

B = Analyte is present in the method blank. Method blank criteria is evaluated to the laboratory method detection limit. Additionally, method blank acceptance may be based on project specific criteria or determined from analyte concentrations in the sample and are evaluated on a sample by sample basis.

Q = The analyte has been detected between the limit of detection (LOD) and limit of quantitation (LOQ). The results are qualified due to the uncertainty of analyte concentrations within this range.

(1) 1,1,2,2-Tetrachloroethane analysis - Laboratory Control Spike recovery not within control limits.

(2) 1,1,2,2-Tetrachloroethane analysis - Laboratory Control Spike recovery not within control limits. 4-Bromofluorobenzene analysis - Surrogate results outside control criteria.

Created by: LMH Date: 7/14/2009
Last revision by: LMH Date: 7/14/2009
Checked by: JSN Date: 7/15/2009

C:\Documents and Settings\Owner\My Documents\[Table_1_Soil_VOCs.xls]Soil VOCs

Table 2
Soil Analytical Results Summary - PCBs
We Energies Right-of-Way, 8655 N. 43rd Street, Brown Deer, WI / BT² Project #3855
 (Results are in mg/kg, except where noted otherwise)

Sample	Date	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260
#1	6/14/2007	<0.019	<0.019	<0.019	<0.019	<0.019	0.043 Q	<0.019
#2	6/14/2007	<0.017	<0.017	<0.017	<0.017	<0.017	0.060	0.022 Q
#3	6/14/2007	<0.017	<0.017	<0.017	<0.017	<0.017	<0.017	<0.017

ABBREVIATIONS:

PCB = Polychlorinated Biphenyls mg/kg = milligrams per kilogram

LABORATORY NOTES/QUALIFIERS:

Q = The analyte has been detected between the limit of detection (LOD) and limit of quantitation (LOQ). The results are qualified due to the uncertainty of analyte concentrations within this range.

Created by: LMH Date: 7/14/2009
 Last revision by: REL Date: 7/15/2009
 Checked by: JSN Date: 7/15/2009

C:\Documents and Settings\Owner\My Documents\[Table_2_Soil_PCBs.xls]Soil PCBs

REVISION HISTORY

Table 2 Soil Analytical Results Summary - PCBs

Date Revisions Made	Revisions Made By <i>(initials)</i>	Summary of Revisions	Revisions Checked By <i>(initials)</i>	Date Revisions Checked
7/14/2009	LMH	Created new table from results dated 06/14/2007.	JSN	7/15/2009
7/15/2009	REL	Hid EPA standard row since this applies to totals not individual aroclors	JSN	7/15/2009

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September 22, 2009

**Victoria Stovall
Wisconsin Department of Natural Resources
Remediation & Redevelopment
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, WI 53212-3128**

Dear Ms. Stovall:

I have hired Robert Langdon, Senior Project Manager with BT2 as my environmental consultant for the purpose of advising me with respect to developing an Assessment, Work Plan, and Schedule related to WE Energies discovery of a 10' x 10' section of soil contamination in the WE Energies Right of Way behind our shop.

Because the shop is one of the original Village of Brown Deer buildings, and was used as the Fire Station for a number of years, there is no way to know what may have been flushed through the shop drain over 60 + years. The Phase I Report from Norris & Associates in 2003 stated that the drain led to the sanitary sewer system. When I became aware that the drain released to the rear of the property I cemented up the drain.

There are no windows or cameras looking out towards the subject drain, and the land is accessible to the public, as it is drivable and many people use it as a jogging path. No one knows if chemicals have been dumped in the WE Energies Right of Way which runs south of Brown Deer Road and south to Green Bay Road, behind my business as well as many other properties.

Robert Langdon completed a site assessment and obtained the Soil Analytical Results Summary, Project #3855, from WE Energies. It is his opinion that the following Work Plan and Schedule should be adopted.

Work Plan and Schedule

- 1. Contact a nearby landfill and obtain approval to dump the subject soil.**
- 2. Bella may excavate to a depth of 4' under his supervision. The waste soil would be hauled by a licensed hauler to the approved landfill.**
- 3. PAH sampling should be done so that all contaminated soil is removed.**
- 4. Samples should be submitted to a lab for analysis.**
- 5. A final report should be made to the DNR, and hopefully closure would be**



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accomplished, or alternately more work would become evident.

All of the above work could be completed within one month's time, assuming that a suitable landfill may be located.

If this Work Plan is satisfactory, please advise me and we can schedule the work.

Very truly yours,

A handwritten signature in cursive script that reads "Christine A. M. Straate".

**Christine A. M. Straate
Owner & CEO**

**Cc: Robert Langdon
Joshua Levy**