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ERR/ERP

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May 30, 1995

Ms. Pam Mylotta
ERR/ERP
Wisconsin Department of Natural Resources
4041 North Richard Street
P.O. Box 12436
Milwaukee, WI 53212

Re: Queensway Drycleaner
4300 North Oakland Avenue
Shorewood, WI 53211

Dear Ms. Mylotta:

This letter is written in response to the responsible party ("RP") letter from the Wisconsin Department of Natural Resources ("WDNR") to Queensway Drycleaner ("Queensway") dated April 26, 1995. As required by the RP letter, Queensway hereby notifies the WDNR that it has hired STS Consultants, Ltd. as its environmental consultant.

Although Queensway has complied with the WDNR request of April 26, 1995 to hire an environmental consultant, Queensway disputes its RP designation at this early juncture and requests that the WDNR re-examine its RP designation. The designation of Queensway as an RP is completely unsupported by any factual data. The limited soil assessment prepared by Cooper Environmental, dated March 14, 1995, does not demonstrate that Queensway is in the possession or control of a hazardous substance discharged into the environment or that Queensway caused the discharge of a hazardous substance into the environment. Instead, the single soil boring taken by Cooper Environmental in which perchlorethylene is located on property owned by the Village of Shorewood and thus indicates that the Village of Shorewood is in the possession of a hazardous substance discharged into the environment.

Cooper Environmental has not supplied any data which supports the designation of Queensway as the RP for this discharge. It is our position, as the party in possession or

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control of a hazardous substance discharged into the environment, the Village of Shorewood should be required to investigate the discharge on its property. Only if the Village of Shorewood's investigation indicates that the perchlorethylene discharge was caused by Queensway, should Queensway be designated as the RP responsible for remediation of the environment. To date however, the Village of Shorewood has not presented any evidence that Queensway is the source of the discharge. The discharge located on the Village of Shorewood's property could just as easily have been caused by a spill from transportation and/or product delivery operations in the right of way.

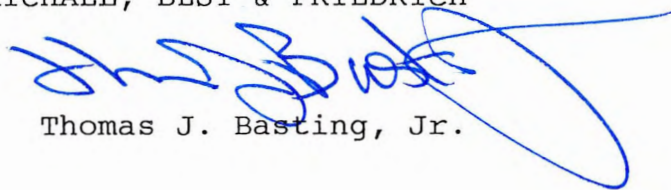
In conclusion, Queensway requests the WDNR to designate the Village of Shorewood the RP for this discharge. The perchlorethylene is located on Village of Shorewood property and no data currently indicates that Queensway was the source of the discharge. The designation of Queensway as the RP for this cleanup is premature and based on pure supposition.

Queensway takes its environmental responsibilities very seriously and intends to cooperate with the WDNR. However, Queensway believes that, as the party in possession or control of a hazardous substance discharged in the environment, the onus should be on the Village of Shorewood to investigate the discharge on its property. Only if and/or when the Village of Shorewood investigation indicates that the discharge originated from the Queensway parcel, should Queensway be designated the RP for this cleanup.

If you have any questions regarding this letter, please contact me at (414) 271-6560.

Very truly yours,

MICHAEL, BEST & FRIEDRICH



Thomas J. Basting, Jr.

TJB/kjb

cc: Ms. Shirley Carlson
Donald P. Gallo, Esq.