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August 15, 2013

Mr. Mike Higgins  
Mid-America Steel Drum Company  
9750 South Chicago Road  
Oak Creek, Wisconsin 53225

Via Email: [mhiggins@masdinc.com](mailto:mhiggins@masdinc.com)

Reference: *Project Summary*  
Former Kitzinger Site  
2529 East Norwich Avenue  
Saint Francis Wisconsin

KEY ENGINEERING GROUP, LTD.  
File No. 2306004

Dear Mr. Higgins:

This letter summarizes the activities performed by Key Engineering Group, Ltd. (KEY) for the above mentioned site for the period from June 2013 to the present.

**SITE INVESTIGATION ACTIVITIES AND ANALYTICAL RESULTS**

WM or MW?

Six probes (KGP-1, KGP-2, KGP-3, KWM-1, KWM-2, and KWM-3) were advanced using a Geoprobe unit on June 28, 2013 (Figure 2) to supplement previous site investigation performed by others. The probes used solely for the collection of soil samples were advanced approximately 15 feet below ground surface (bgs) with samples being collected from two-foot intervals for soil logging and also for field analysis of volatile organic compounds (VOCs) using a photoionization detector (PID). Three of the probes (KMW-1, KMW-2, and KMW-3) were advanced approximately 20 feet bgs to accommodate the construction of groundwater monitoring wells, which were then developed and sampled on July 11, 2013. Several existing monitoring wells on the subject and adjoining properties (SMW-3, SMW-4, SPM-4, MW-2, and MW-8) were also sampled at the same time to gather data for the area on a given point in time. Both the soil and groundwater samples were analyzed for VOCs. Included with this letter are tables summarizing analytical results for soil (Table 1) and groundwater (Table 2).

A summary of the site investigation activities and analytical findings is as follows:

KGP-1 was placed on the northwest portion of the subject property in an area identified in a previous investigation as having been significantly impacted by VOCs. Although several soil samples were previously collected below four feet below ground surface (bgs) and analyzed for

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August 15, 2013  
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VOCs, a sample was collected and analyzed from the 2 to 4 foot interval bgs for the purpose of determining direct contact requirements. Laboratory results indicated elevated levels of cis-1,2-dichloroethene, tetrachloroethene, 1,1,1 trichloroethene, and trichloroethene, which were above their respective NR 720 RCL for the Protection of Groundwater, but below their respective NR 720 Industrial Direct Contact RCL. 1,1 dichloroethane was also present in the sample, but below its Protection of Groundwater RCL.

KGP-2 was placed on the north-central portion of the subject property. The soil sample was collected and analyzed from the 2 to 4 foot bgs interval for the purpose of determining possible direct contact issues. Laboratory results did not indicate the presence of VOCs in the upper four feet of the soil column.

KMW-1 was placed on the northeast portion of the subject property near the existing site structure and converted to a groundwater monitoring well for the purpose of defining the eastern lateral extent of groundwater contamination. A soil sample was collected and analyzed from the 2 to 4 foot bgs interval for the purpose of determining possible direct contact issues. Laboratory results indicated the presence of cis-1,2-dichloroethene and trichloroethene, but at concentrations below their respective Protection of Groundwater RCL. Only cis-1,2-dichloroethene was detected in the groundwater sample, but at concentration significantly below its NR 140 Preventive Action Level (PAL).

KMW-2 was placed on the southeast portion of the subject property near the southern property boundary and converted to a groundwater monitoring well for the purpose of determining that an offsite source of VOCs did not exist to the south. A soil sample was collected and analyzed from the 2 to 4 feet bgs. Laboratory results did not indicate the presence of VOCs in upper four feet of the soil column. No VOCs were detected in the groundwater sample analyzed.

KMW-3 was placed on the southwest portion of the subject property near the southern boundary and converted to a groundwater monitoring well for the purpose of determining that an offsite source of VOCs did not exist to the south. A soil sample was collected and analyzed from the 2 to 4 foot interval for the purpose of determining possible direct contact issues. Laboratory results did not indicate the presence of VOCs in upper four feet of the soil column. No VOCs were detected in the groundwater sample analyzed.

KGP-3 was placed on the central portion of the subject property because historical background information indicated this might be a suspect source of contamination. Again, a soil sample was collected and analyzed from the 2 to 4 foot bgs interval for the purpose of determining possible direct contact issues. Laboratory results indicated elevated levels of cis-1,2-dichloroethene and trichloroethene, which were above their respective NR 720 RCL for the Protection of Groundwater, but below their respective NR 720 Industrial Direct Contact RCL.

An attempt was made to sample MW-15, (located in the right of way) however "free product" was observed in the monitoring well and it was therefore not sampled. Free product had been observed in MW-15 during previous sampling events according to other documents. As observed during previous investigations, elevated concentrations of VOCs at concentrations greater than their respective NR 140 enforcement standard (ES) were present in monitoring wells SMW-3, SMW-4. SPM-4. MW-2, MW-8, and MW-14.

## CONCLUSIONS

Results obtained during this investigation and previous investigations appear to indicate:

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## CONCLUSIONS

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- The soil and groundwater VOC impacts on the subject property appear basically confined to the northern half of the subject property.
- Shallow soil sample analytical results have the highest concentrations of VOCs on the northwest quadrant of the subject property.
- Soil VOC impacts do not appear to be an issue when compared to NR 720 industrial Direct Contact RCLs. We will still need to do the risk screening evaluation for the soil results.
- The groundwater analytical results from wells on the subject site and adjoining properties indicate that VOC impacts above each individual compound's respective PAL are present.
- VOCs were detected in monitoring wells SMW-3, SMW-4, SPM-4, and MW-2 at concentrations greater than their respective NR 140 enforcement standard (ES).
- Free product was observed in monitoring well MW-15, although this well is located in the right of way off site. The source of the free product is unknown.
- The groundwater flow pattern is generally south to north across the subject property.
- Based on the findings of the investigations completed to date, additional investigation may be required to determine the extent of the impacts. The soil impacts at the surface on the subject site are in the unsaturated zone which would suggest that a historical release may have occurred.


### RECOMMENDATIONS


We would suggest reviewing the collected data and determine the appropriate course of action to move this site towards closure and how the adjacent site would tie into the subject site. We would also suggest trying to determine where the free product originated in the well located in the right of way. The possibility of off-site groundwater migration is possible with the junk yard located across the street.

Please contact the undersigned at (414) 224-8300 with comments or questions.

Sincerely,

KEY ENGINEERING GROUP, LTD.

  
Stephen G. Bartoszewski, PE, PH  
Project Manager

  
Kenneth W. Wein, CHMM  
President

Enclosures:	Table 1	Summary of Soil Sample Analytical Results
	Table 2	Summary of Groundwater Analytical Results
	Figure 2	Soil Probes and Monitoring Well Location Map

TABLE 1

## SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS

Former Kitzinger Site  
2529 East Nowrich Avenue  
Saint Francis, Wisconsin

Fill indicated in soil  
borings?

PARAMETERS	SAMPLE IDENTIFICATION						RCL DIRECT CONTACT INDUSTRIAL (µg/kg)	RCL PROTECTION OF GROUNDWATER (µg/kg)
	KGP-1	KGP-2	KGP-3	KMW-1	KMW-2	KMW-3		
Date Collected	6/28/13	6/28/13	6/28/13	6/28/13	6/28/13	6/28/13		
Depth (feet bgs)	2-4	2-4	2-4	2-4	2-4	2-4		
Detected VOCs (µg/kg)								
Benzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Bromobenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Bromochloromethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Bromodichloromethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Bromoform	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Bromomethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
n-Butylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
sec-Butylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
tert-Butylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Carbon tetrachloride	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Chlorobenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Chloroethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Chloroform	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Chloromethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
2-Chlorotoluene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
4-Chlorotoluene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2-Dibromo-3-chloropropane	<49.8	<49.8	<49.8	<49.8	<49.8	<49.8		
Dibromochloromethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2-Dibromoethane (EDB)	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Dibromomethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2-Dichlorobenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,3-Dichlorobenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,4-Dichlorobenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Dichlorodifluoromethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,1-Dichloroethane	80.5	<25.0	<25.0	<25.0	<25.0	<25.0	23,700	483.6
1,2-Dichloroethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,1-Dichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
cis-1,2-Dichloroethene	87.7	<25.0	204	58.5J	<25.0	<25.0	2,040,000	41.2
trans-1,2-Dichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2-Dichloropropane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,3-Dichloropropane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
2,2-Dichloropropane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,1-Dichloropropene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
cis-1,3-Dichloropropene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
trans-1,3-Dichloropropene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Diisopropyl ether	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Ethylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Hexachloro-1,3-butadiene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Isopropylbenzene (Cumene)	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
p-Isopropyltoluene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Methylene Chloride	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Methyl-tert-butyl ether	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Naphthalene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
n-Propylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Styrene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,1,1,2-Tetrachloroethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,1,2,2-Tetrachloroethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Tetrachloroethene	655	<25.0	<25.0	<25.0	<25.0	<25.0	153,000	4.5
Toluene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2,3-Trichlorobenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2,4-Trichlorobenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,1,1-Trichloroethane	193	<25.0	<25.0	<25.0	<25.0	<25.0	640,000	140.2
1,1,2-Trichloroethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Trichloroethene	2,340	<25.0	35.9J	49.3J	<25.0	<25.0	8,810	3.6
Trichlorofluoromethane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2,3-Trichloropropane	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,2,4-Trimethylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
1,3,5-Trimethylbenzene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
Vinyl Chloride	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		
m&p-Xylene	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0		
o-Xylene Surrogates	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0		

WDNR website - residual contaminant level (RCL) spreadsheet as of June 2013

Bold concentrations exceed industrial direct contact RCL

bgs - below ground surface

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

µg/kg - micrograms per kilogram

VOCs - volatile organic compounds

GW depth?

TABLE 2  
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS

FORMER KITZINGER SITE  
2529 East Norwich Avenue  
St. Francis, Wisconsin

PARAMETERS	SAMPLE IDENTIFICATION									NR 140'	
	SMW-3	SMW-4	SPM-4	MW-2	MW-8	MW-14	KMW-1	KMW-2	KMW-3	ES	PAL
Date Collected	7/11/13	7/11/13	7/11/13	7/11/13	7/11/13	7/11/13	7/12/13	7/12/13	7/12/13	---	---
Detected VOCs (µg/l)											
Benzene	<50.0	1.6J	<2,500	<500	<0.50	<0.50	<0.50	<0.50	<0.50	5.0	0.5
Bromobenzene	<48.4	<1.2	<2,420	<484	<0.48	<0.48	<0.48	<0.48	<0.48	---	---
Bromochloromethane	<49.2	<1.2	<2,460	<492	<0.49	<0.49	<0.49	<0.49	<0.49	---	---
Bromodichloromethane	<45.3	<1.1	<2,260	<453	<0.45	<0.45	<0.45	<0.45	<0.45	0.6	0.05
Bromoform	<23.3	<0.58	<1,160	<233	<0.23	<0.23	<0.23	<0.23	<0.23	4.4	0.44
Bromomethane	<43.0	<1.1	<2,150	<430	<0.43	<0.43	<0.43	<0.43	<0.43	10	1.0
n-Butylbenzene	<40.0	7.5	<2,000	<400	5.9	<0.40	<0.40	<0.40	<0.40	---	---
sec-Butylbenzene	<60.5	3.5J	<3,020	<605	17.6	<0.60	<0.60	<0.60	<0.60	---	---
tert-Butylbenzene	<42.4	<1.1	<2,120	<424	1.1	<0.42	<0.42	<0.42	<0.42	---	---
Carbon tetrachloride	<36.5	<0.91	<1,830	<365	<0.37	<0.37	<0.37	<0.37	<0.37	5.0	0.5
Chlorobenzene	<35.8	<0.90	<1,790	<358	<0.36	<0.36	<0.36	<0.36	<0.36	---	---
Chloroethane	193	7.9	<2,220	<444	3.7	<0.44	<0.44	<0.44	<0.44	400.0	80
Chloroform	<68.9	<1.7	<3,440	<689	<0.69	<0.69	<0.69	<0.69	<0.69	6.0	0.6
Chloromethane	<38.8	<0.97	<1,940	<388	<0.39	<0.39	<0.39	<0.39	<0.39	30	3.0
2-Chlorotoluene	<47.7	<1.2	<2,380	<477	<0.48	<0.48	<0.48	<0.48	<0.48	---	---
4-Chlorotoluene	<48.4	<1.2	<2,420	<484	<0.48	<0.48	<0.48	<0.48	<0.48	---	---
1,2-Dibromo-3-chloropropane	<150	<3.7	<7,490	<1,500	<1.5	<1.5	<1.5	<1.5	<1.5	0.2	0.02
Dibromochloromethane	<190	<4.7	<9,480	<1,900	<1.9	<1.9	<1.9	<1.9	<1.9	60	6.0
1,2-Dibromoethane (EDB)	<38.1	<0.95	<1,900	<381	<0.38	<0.38	<0.38	<0.38	<0.38	0.05	0.005
Dibromomethane	<48.0	<1.2	<2,400	<480	<0.48	<0.48	<0.48	<0.48	<0.48	---	---
1,2-Dichlorobenzene	<43.9	<1.1	<2,190	<439	<0.44	<0.44	<0.44	<0.44	<0.44	600	60
1,3-Dichlorobenzene	<45.1	<1.1	<2,260	<451	<0.45	<0.45	<0.45	<0.45	<0.45	600	120
1,4-Dichlorobenzene	<43.4	<1.1	<2,170	<434	<0.43	<0.43	<0.43	<0.43	<0.43	75	15
Dichlorodifluoromethane	<40.1	<1.0	<2,000	<401	<0.40	<0.40	<0.40	<0.40	<0.40	1,000	200
1,1-Dichloroethane	1,720	10.2	14,200	2,990	44.6	4.1	<0.28	<0.28	<0.28	850	85
1,2-Dichloroethane	269	3.5	<2,380	518J	0.78J	<0.48	<0.48	<0.48	<0.48	5.0	0.5
1,1-Dichloroethene	152	1.2J	2,490J	<427	1.7	<0.43	<0.43	<0.43	<0.43	7.0	0.7
cis-1,2-Dichloroethene	29,800	398	409,000	79,400	30.7	1.1	1.3	<0.42	<0.42	70	7.0
trans-1,2-Dichloroethene	<37.1	5	2,830J	<371	1.1	<0.37	<0.37	<0.37	<0.37	100	20
1,2-Dichloropropane	<49.8	<1.2	<2,490	<498	<0.50	<0.50	<0.50	<0.50	<0.50	5.0	0.5
1,3-Dichloropropane	<46.3	<1.2	<2,320	<463	<0.46	<0.46	<0.46	<0.46	<0.46	---	---
2,2-Dichloropropane	<36.9	<0.92	<1,840	<369	<0.37	<0.37	<0.37	<0.37	<0.37	---	---
1,1-Dichloropropene	<50.7	<1.3	<2,540	<507	<0.51	<0.51	<0.51	<0.51	<0.51	---	---
cis-1,3-Dichloropropene	<29.0	<0.73	<1,450	<290	<0.29	<0.29	<0.29	<0.29	<0.29	0.4	0.04
trans-1,3-Dichloropropene	<26.2	<0.66	<1,310	<262	<0.26	<0.26	<0.26	<0.26	<0.26	0.4	0.04
Diisopropyl ether	<50.0	<1.2	<2,500	<500	<0.50	<0.50	<0.50	<0.50	<0.50	---	---
Ethylbenzene	898	17.4	<2,500	<500	4.2	<0.50	<0.50	<0.50	<0.50	700	140
Hexachloro-1,3-butadiene	<126	<3.1	<6,290	<1,260	<1.3	<1.3	<1.3	<1.3	<1.3	---	---
Isopropylbenzene (Cumene)	302	9.4	<1,700	<341	13.6	<0.34	<0.34	<0.34	<0.34	---	---
p-Isopropyltoluene	<39.7	4.9	<1,990	<397	<0.40	<0.40	<0.40	<0.40	<0.40	---	---
Methylene Chloride	<35.9	<0.90	<1,790	<359	<0.36	<0.36	<0.36	<0.36	<0.36	5.0	0.5
Methyl-tert-butyl ether	<49.4	<1.2	<2,470	<494	<0.49	<0.49	<0.49	<0.49	<0.49	60	12
Naphthalene	<250	16.7	<12,500	<2500	<2.5	<2.5	<2.5	<2.5	<2.5	100	10
n-Propylbenzene	<50.0	4.1	<2,500	<500	12.3	<0.50	<0.50	<0.50	<0.50	---	---
Styrene	<35.0	<0.87	<1,750	<350	<0.35	<0.35	<0.35	<0.35	<0.35	100.0	10
1,1,1,2-Tetrachloroethane	<45.0	<1.1	<2,250	<450	<0.45	<0.45	<0.45	<0.45	<0.45	70	7.0
1,1,2,2-Tetrachloroethane	<38.4	<0.96	<1,920	<384	<0.38	<0.38	<0.38	<0.38	<0.38	0.2	0.02
Tetrachloroethene	100	4.7	<2,360	<472	<0.47	3.1	<0.47	<0.47	<0.47	5.0	0.5
Toluene	2,160	2.4J	14,300	1,440	0.51J	<0.44	<0.44	<0.44	<0.44	800	160
1,2,3-Trichlorobenzene	<76.8	<1.9	<3,840	<768	<0.77	<0.77	<0.77	<0.77	<0.77	---	---
1,2,4-Trichlorobenzene	<250	<6.2	<12,500	<2,500	<2.5	<2.5	<2.5	<2.5	<2.5	70	14
1,1,1-Trichloroethane	4,850	33.6	95,500	7,860	3.9	12.4	<0.44	<0.44	<0.44	200	40
1,1,2-Trichloroethane	<39.0	1.6J	<1,950	<390	<0.39	<0.39	<0.39	<0.39	<0.39	5.0	0.5
Trichloroethene	311	77.1	37,100	<429	8.5	84.7	<0.43	<0.43	<0.43	5.0	0.5
Trichlorofluoromethane	<47.7	<1.2	<2,380	<477	<0.48	<0.48	<0.48	<0.48	<0.48	---	---
1,2,3-Trichloropropane	<46.8	<1.2	<2,340	<468	<0.47	<0.47	<0.47	<0.47	<0.47	60	12
1,2,4-Trimethylbenzene	392J	38.6	<2,860	<572	9.9	<0.57	<0.57	<0.57	<0.57	480	96
1,3,5-Trimethylbenzene	<250	8.4J	<12,500	<2,500	<2.5	<2.5	<2.5	<2.5	<2.5	480	96
Vinyl chloride	9,520	26.6	14,300	3,420	56.5	<0.18	<0.18	<0.18	<0.18	0.2	0.02
Xylenes	4,730	30.2	<7,250J	1,740J	<1.70J	<1.32	<1.32	<1.32	<1.32	2,000	400

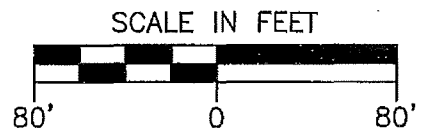
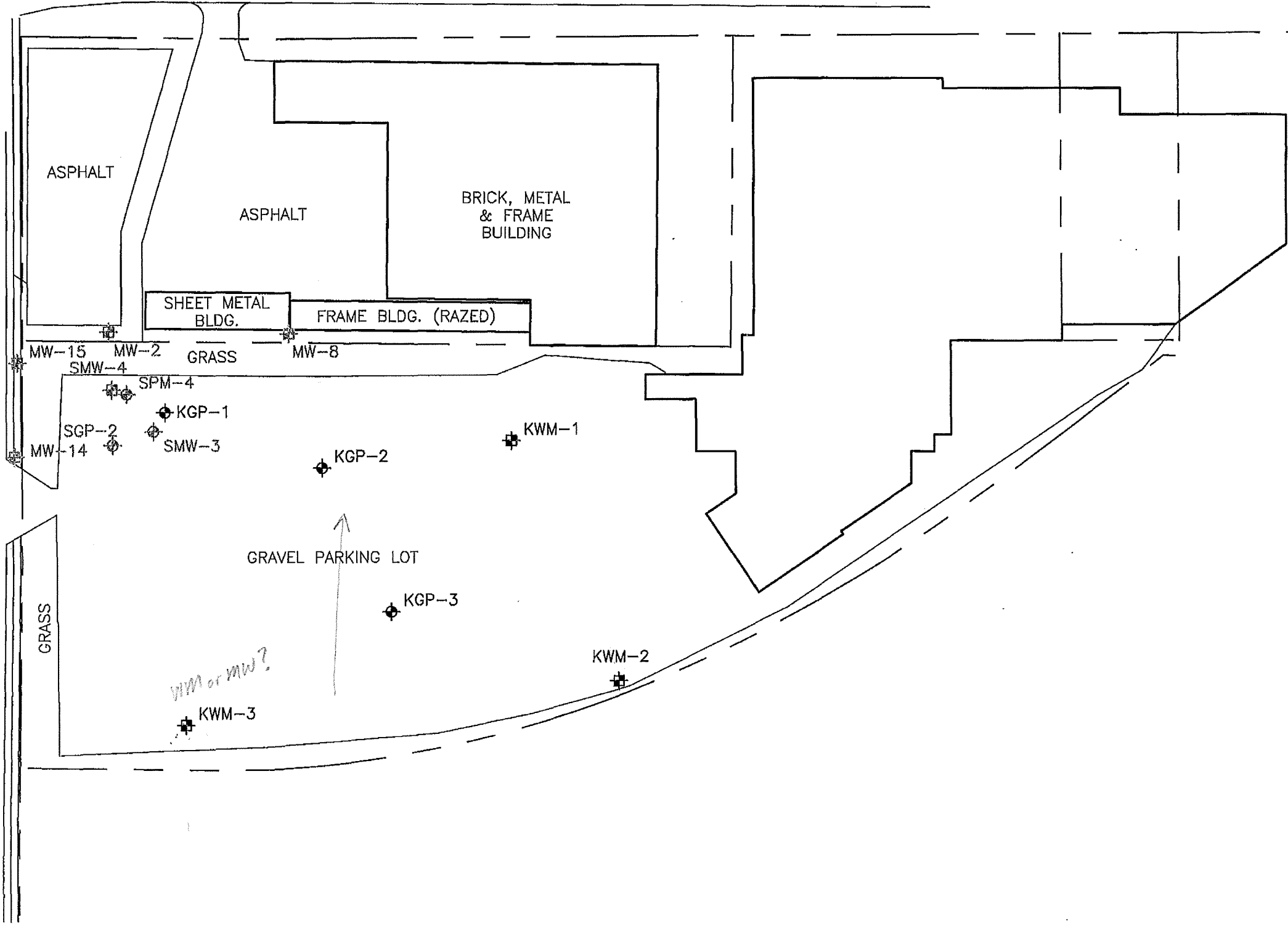
Notes:  
 Bold concentrations exceed NR 140 PAL  
 Bold & box concentrations exceed NR 140 ES  
 --- not analyzed, not applicable or no standard established  
 µg/l - micrograms per liter  
 J - Results between the limit of detection and limit of quantitation  
 VOCs - volatile organic compounds  
 PAHs - polynuclear aromatic hydrocarbons  
 PAL - preventive action limit  
 ES - enforcement standard  
 NR 140 standards per Wisconsin Administrative Code (January 2012)

LEGEND	
	MONITORING WELL (KEY)
	SOIL PROBE (KEY)
	MONITORING WELL BY OTHERS
	SOIL PROBE BY OTHERS

*Property line?  
off-site  
migration?*

S. PENNSYLVANIA AVENUE

NORWICH AVENUE



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DESIGNED BY SGB	DATE 8/7/13
DRAWN BY SAO	PROJECT 2306004
APPROVED BY KWW	SHEET NO. 1
CAD FILE & VACAD/2306004/FIGURE 2.dwg	
XREF LMAH	

FIGURE 2  
SOIL PROBE AND MONITORING WELL LOCATION MAP  
FORMER KITZINGER SITE  
2529 E. NORWICH AVENUE  
SAINT FRANCIS, WISCONSIN

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