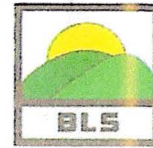


BLS ENVIRONMENTAL, INC.



RECEIVED

JUN 14 2013

BY: VS

*WDR
copy of
work plan*

Former City Services

10605 W. North Avenue
Wauwatosa, Wisconsin 53186
RP: Mr. Jay Walia

BRRT's Number: 03-41-560368

FID # 341229130

DSPS #53226- 2312-05

June 13th, 2013

BLS ENVIRONMENTAL, INC.



Former City Services

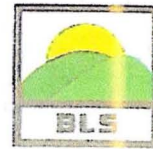
**10605 W. North Avenue
Wauwatosa, Wisconsin 53186**

RP: Mr. Jay Walia

BRRT's Number: 03-41-560368

FID # 341229130

DSPS #53226- 2312-05

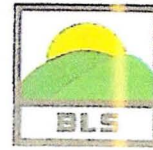


Remedial Investigation
Work Plan

RP: Mr. Jay Walia
Former City Services
10605 W. North Avenue
Wauwatosa, Wisconsin 53226

Prepared for:
Mr. Jay Walia
4725 N. 159th Street
Brookfield, Wisconsin 53005

June 13, 2013



Distribution List

Send to:

No. Of Copies:

Mr. Jay Walia
4725 N. 159th Street
Brookfield, Wisconsin 53005

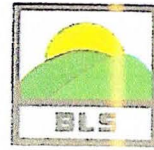
2

Ms. Victoria Stovall
Site Reviewer
Wisconsin Department of Natural Resources
2300 N. Martin Luther King Dr.
Milwaukee, Wisconsin 53212

1

Mr.
Wisconsin Department of Safety and Professional Services
PECFA Bureau
141 NW Barstow Street
Waukesha, Wisconsin 53188

1



Remedial Investigation Work Plan

Former City Services
10605 W. North Avenue
Wauwatosa, Wisconsin 53226

Prepared For:
Mr. Jay Walia
4725 N. 159th Street
Brookfield, Wisconsin 53005

I, Randy W. Rogness, hereby certify that I am in compliance with Administrative Code ILHR 10 and am authorized to perform Site Assessments.

A handwritten signature in blue ink, reading "Randy W. Rogness", is written over a horizontal line. The signature is fluid and cursive.

Randy W. Rogness
Site Assessor
Certification #41478

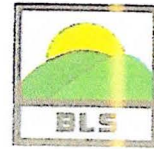


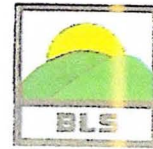
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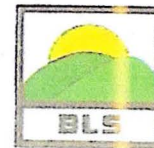
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- A. Soil Disposal Documentation
- B. Laboratory Analytical Results
- C. WDNR Correspondence



1. Introduction

Under contract to Mr. Jay Walia, owner of the Former City Services Property (Property) located at 10605 W. North Avenue, Wauwatosa, Wisconsin and on his behalf, BLS Environmental, Inc. (BLS) is pleased to submit this "*Remedial Investigation Work Plan*" to the Wisconsin Department of Natural Resources (WDNR) and Wisconsin Department of Safety & Professional Services (DSPS). This report presents the proposed site investigation activities to be conducted due to environmental impacts detected at the site. The environmental impacts were noted during site activities associated with installation of an Underground Storage Tank (UST) on the Property. The Property is the location of the Former City Services facility, a retail gas station.

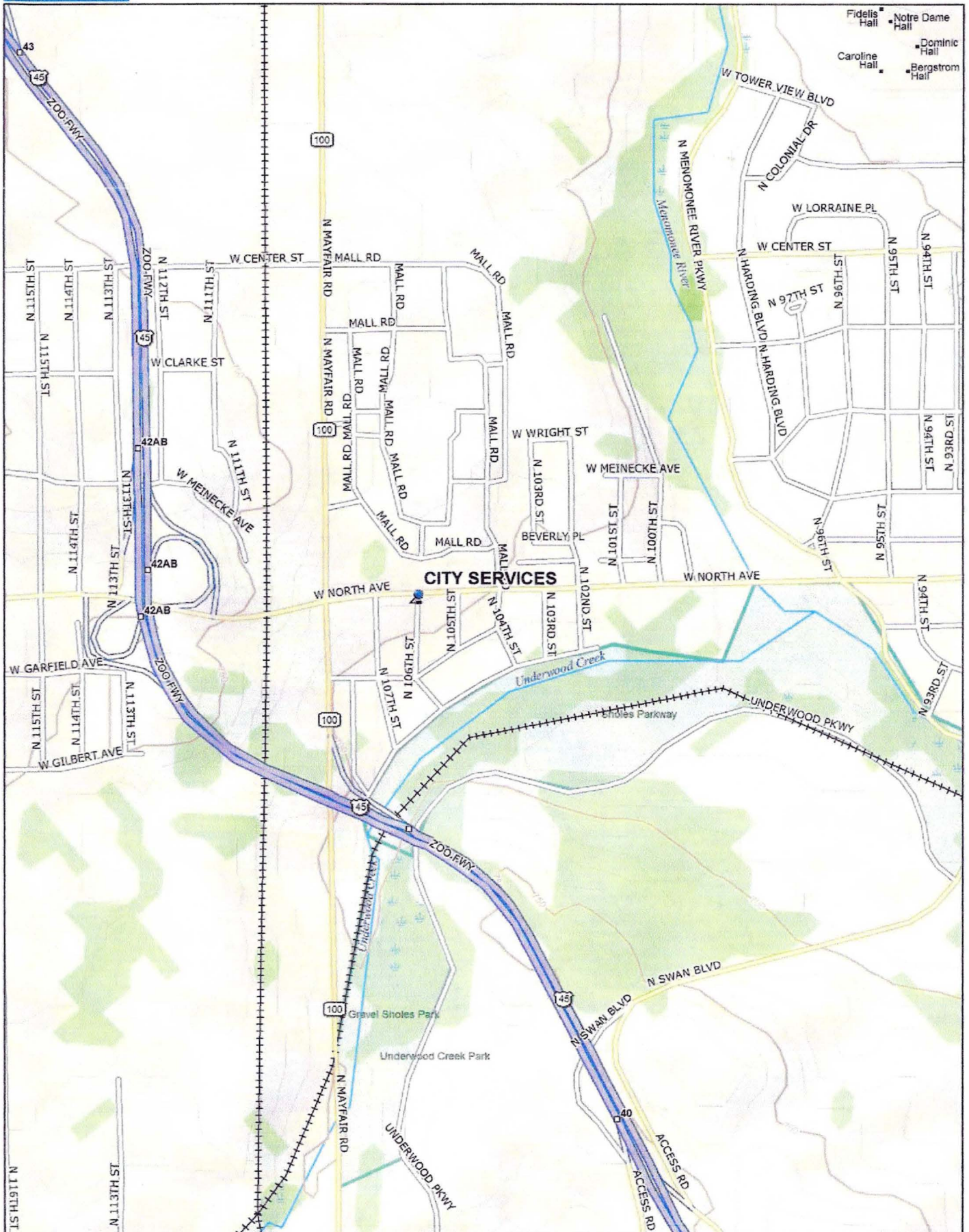
a. Site Name, Address, Location, Type of Site, and Material of Concern

The Property is located within the City of Wauwatosa, County of Milwaukee, Wisconsin. Detailed information regarding the site is provided as follows:

Site Name:	Former City Services
Site Address:	10605 W. North Avenue
Municipality:	Wauwatosa
County:	Milwaukee
Quadrangle Map:	Wauwatosa, WI (7.5 minute Series)
Land Office Grid System:	NW¼, NW¼, Section 20, Township 7 North, Range 21 E
Latitude:	43° 3' 36.02" N
Longitude:	88° 2' 42.09" W
Type of Site:	Commercial
Material of Concern:	Leaded/Unleaded Gasoline, Waste Oil & Diesel Fuel

Figure 1 presents the Property location on a United States Geological Survey (USGS) topographic map and Figure 2 presents the site layout at the Property. Figure 3 presents an aerial photograph of the former City Services facility.

b. Name and Phone Number of Owner and Client



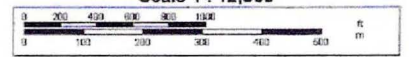
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Scale 1 : 12,800



1" = 1,066.7 ft

Date Zoom 14.0

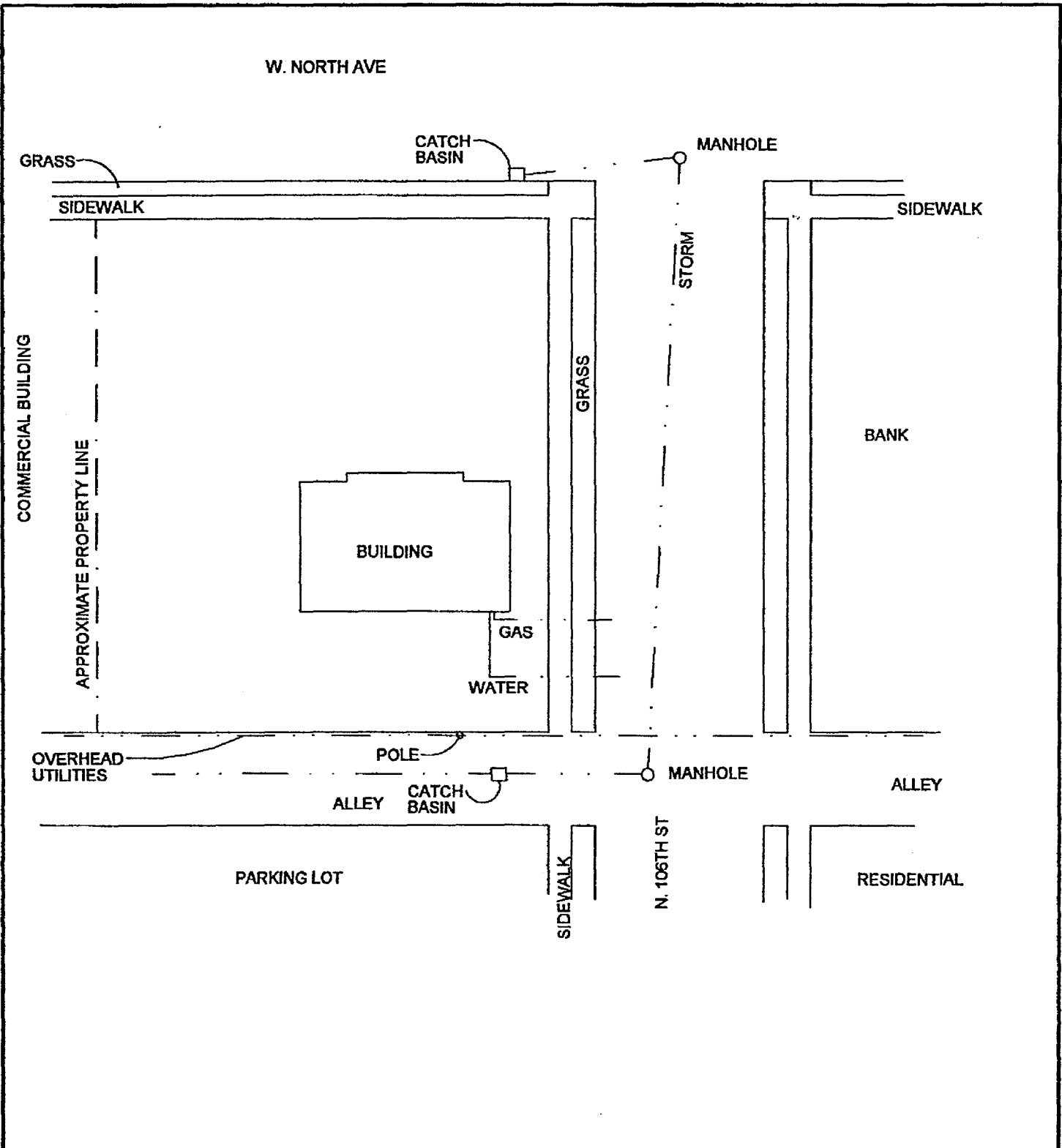


FIGURE 2

SITE PLOT PLAN
 CITY SERVICES PROPERTY
 WAUWATOSA, WISCONSIN

BRRTS: 03-41-560368

DSPS:

SCALE: 1" = 30'

DATE: 5/02/13

BLS ENVIRONMENTAL, INC.



MILWAUKEE COUNTY INTERACTIVE MAP SERVICE



Legend

- County Boundary
 - Highways, to 8k
 - Street Centerlines, 0k to 8k
 - Railroad 8k
 - Water 8k
 - Rivers 8k
 - Landmarks 8k
 - County Parks 8k
 - Municipal Subdivisions 25k
 - Tax Parcels
- AERIAL PHOTO 1963 LOW R
- High : 255
 - AERIAL PHOTO 1963 LOW RES
 - Low : 0

1: 861



DISCLAIMER: This map is a user generated static output from the Milwaukee County Land Information Office Interactive Mapping Service website. The contents herein are for reference purposes only and may or may not be accurate, current or otherwise reliable. No liability is assumed for the data delineated herein either expressed or implied by Milwaukee County or its employees.

Notes

FIGURE 3
CITY SERVICES
WAUWATOSA, WI



b. Name and Phone Number of Owner and Client

The Responsible Party for the Site and UST system is:

Mr. Jay Walia
4725 N. 159th Street
Wauwatosa, Wisconsin 53005
(414) 588-0554

The contact person is:

Mr. Jay Walia
(Same address and telephone number)

c. Consultant's Name

The consultant and the consulting firm for the project are:

Mr. Randy Rogness
Senior Project Manager
BLS Environmental, Inc.
1825 N. 166th Street
Brookfield, WI 53005
(414) 690-6685

2. Description of Site Conditions

a. Regional Geology and Hydrogeology

The geology of Milwaukee County is characterized by Quaternary-aged unconsolidated deposits (i.e. clayey silty tills and sand and gravel outwash). The deposits are glacial in origin, and were deposited during the Wisconsin advance of the Ice Age glaciers. Underlying these deposits is a thick sequence of Silurian-, Ordovician-, and Cambrian-aged dolomites, shale and sandstone overlying Precambrian-aged igneous and metamorphic rocks.

The Property site is located within the Lake Michigan Border Moraine System, which consists of several terminal moraines and associated narrow valleys lying in a north-south belt that extends from northern Illinois through Kenosha, Racine, Milwaukee and eastern Waukesha counties. Several advances and retreats of the Lake Michigan Lobe deposited the moraines during the Woodfordian substage of glaciation (late Wisconsin stage).

The Lake Border System is composed of fine grade till, lacustrine clay and silty sands, and some glaciofluvial sand and gravel of the Oak Creek Formation and represents



deposition from the Lake Michigan Lobe and its associated melt waters (glacifluvial sand and gravel).

The clay of the Oak Creek Formation is characterized by its gray color, the presence of numerous shale fragments, overall silty clay texture, high elite content, and fine matrix texture which reflects its lacustrine source. Sand and gravels are present in the Oak Creek Formation as pockets of variable thickness and laterally highly variable discontinues lenses, which reflect their high-energy glaciofluvial deposition. These sediments are usually well sorted and stratified.

The Niagarian Formation, the uppermost bedrock formation directly underlying the unconsolidated material, acts as a regional water supply aquifer. Recharge of this aquifer is local and groundwater flow paths are generally short. Local groundwater flow is to the southeast toward Underwood Creek and the Menomonee River.

b. Local Geology and Hydrogeology

Site elevations range between 700 feet above mean sea level (msl) elevation to 710 feet above msl. The site is relatively level with a slight slope to the south. Moderate topographic high elevations in excess of 720 feet above mean sea level (msl) are located to the west and north of the site (Figure1).

Site geological conditions were observed during the installation of a new UST for a proposed service station at the Property. Information compiled during these activities indicates that the site is underlain primarily by silty clay with discontinuous lenses/layers of sandy clay, poorly sorted sand and gravel, and fill to a depth of approximately 10-12 feet below grade. Bedrock (fractured dolomitic limestone) was encountered at 10-12 feet below grade.

Groundwater was not encountered within the upper 12-feet of soil during the installation activities conducted.

3. Remedial Investiagtion Activities

In January, 2013, Mr. Jay Walia initiated activities to develop the Property into a gasoline service station. These activities consisted of installing one (1) UST in the western portion of the property (Figure 4). During the excavating of the soil for installation of the UST, petroleum impacted soils were encountered. Mr. Walia contracted BLS to arrange for disposal of the soil at the Veolia ES Emerald Park Landfill in Muskego, Wisconsin. A total of 119.19 tons of impacted soils were transported and disposed at the Landfill. Soil disposal documentation is included in Attachment A.

Following excavation of the UST pit, BLS collected soil samples from the sidewalls of the excavation for analysis of Gasoline Range Organics (GRO) and Petroleum Volatile Organic Compounds (PVOCs) to determine if residual impacts remained at the site. Table 1 presents the analytical results obtained from the soil samples, and the laboratory

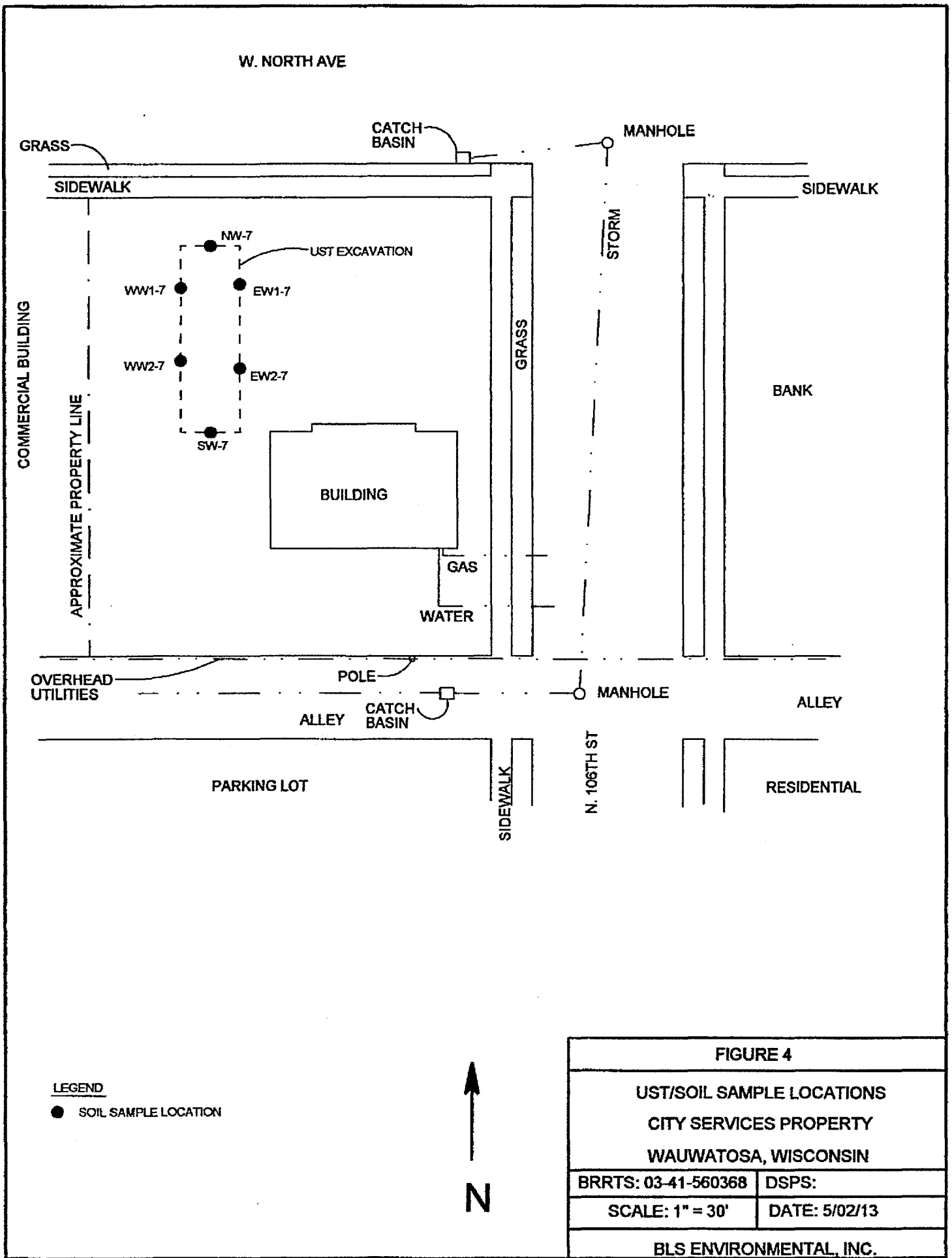


FIGURE 4	
UST/SOIL SAMPLE LOCATIONS CITY SERVICES PROPERTY WAUWATOSA, WISCONSIN	
BRRTS: 03-41-560368	DSPS:
SCALE: 1" = 30'	DATE: 5/02/13
BLS ENVIRONMENTAL, INC.	



BLS ENVIRONMENTAL, INC.

Table 1
Soil Sample Analytical Results
City Services Property, 10605 W. North Ave., Wauwatosa, Wis

Sample Name Collection Date Depth (feet)				NW-7	EW1-7	EW2-7	WW1-7	WW2-7	SW-7
				1/24/13	1/24/13	1/24/13	1/24/13	1/24/13	1/24/13
				7	7	7	7	7	7
Parameter	units	NR746 Table 1	NR720 Table 1						
Benzene	mg/kg	8.5	<i>0.0055</i>	<0.025	<0.250	<0.500	<0.250	<0.100	<0.250
Ethylbenzene	mg/kg	4.6	<i>2.9</i>	0.137	25.0	37.9	14.5	6.910	14.1
Methyl-tert-butyl-ether	mg/kg	N STD	N STD	<0.025	0.353J	<0.500	<0.250	<0.100	<0.250
Tolulene	mg/kg	38	<i>1.5</i>	<0.025	<i>4.010</i>	<i>5.780</i>	<i>0.597J</i>	<i>0.167J</i>	<i>0.419J</i>
1,2,4-Trimethylbenzene	mg/kg	83	N STD	2.600	51.6	80.8	53.5	27.6	55.2
1,3,5-Trimethylbenzene	mg/kg	11	N STD	0.976	17.2	26.7	17.4	8.400	18.0
Total Xylene	mg/kg	42	<i>4.1</i>	0.742	112	171	59.8	28.0	59.6
GRO	mg/kg	N STD	<i>N STD</i>	17.5	699	1120	677	277	694
Percent Moisture	%	N STD	N STD	22.4	14.5	15.4	16.1	16.0	15.2

N STD = No Standard

J=Estimated Concentration above Detection Limit and below Reporting Limit

Bold = Exceeds NR746 Table 1 Standards

Italic = Exceeds NR746 Table 2 Standard



analytical results are included in Attachment B. It should be noted that no samples were collected from the base of the excavation. Bedrock was encountered at a depth of approximately 10-12 feet below grade, and therefore soil samples could not be obtained. Figure 4 presents the soil sample locations.

Following receipt of the analytical results, BLS informed the WDNR on April 11, 2013 of a release at the Property (Attachment C). The WDNR then forwarded a letter of responsibility to Mr. Walia (Attachment C).

The proposed remedial investigation is designed to evaluate the degree and extent of soil, sediment, and groundwater quality contamination. Site-specific environmental data compiled as part of the remedial investigation will be obtained from the installation of soil borings/groundwater monitoring wells and collection of soil and groundwater samples for laboratory analysis. Additional activities conducted as part of the remedial investigation will consist of the performance of slug tests to evaluate groundwater and contaminant flow velocities and an evaluation of natural attenuation to restore site conditions.

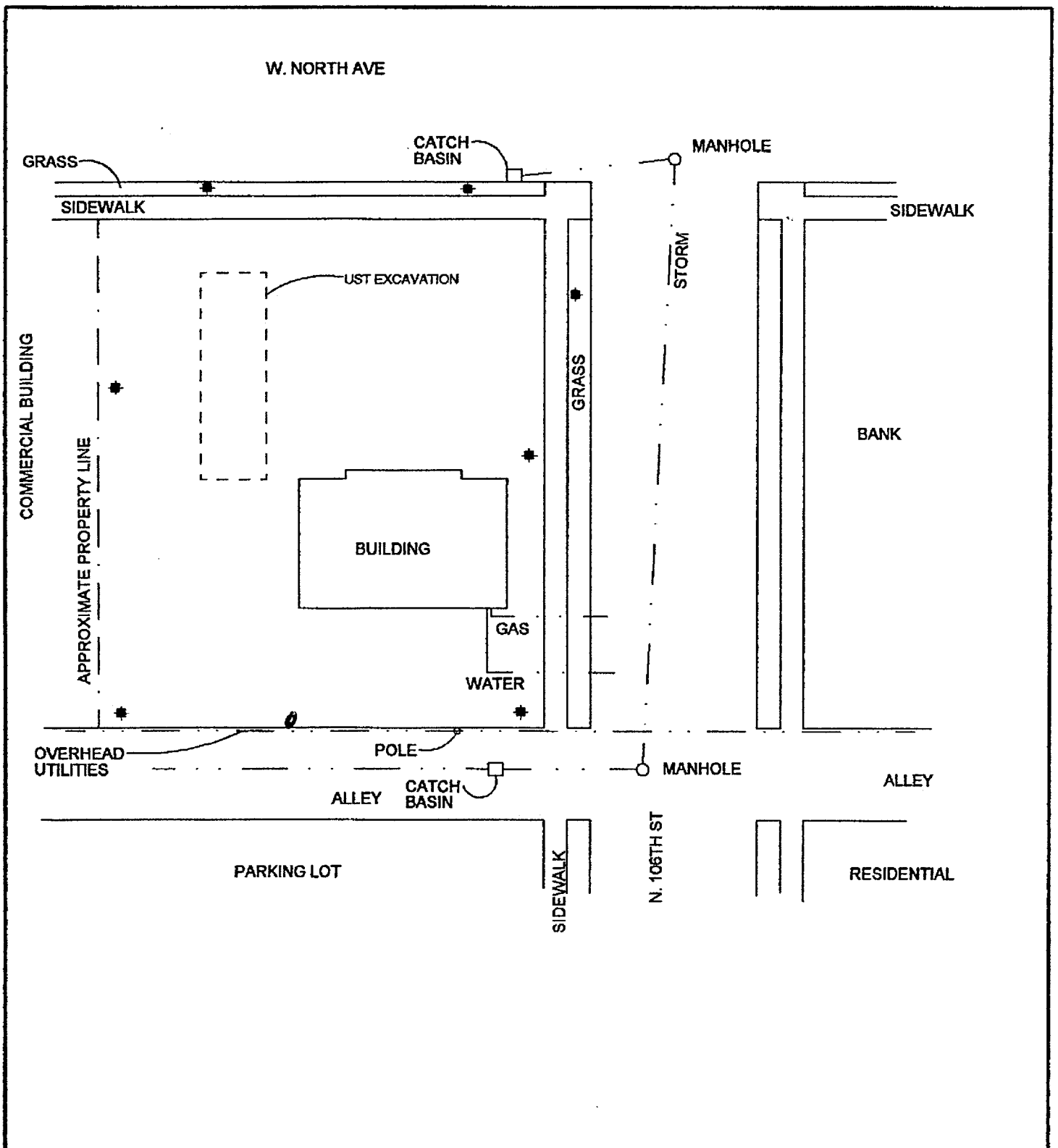
The information collected during the remedial investigation will be evaluated and compared to current regulatory concentration levels related with both soil and groundwater quality administered by the WDNR and DSPS. Based upon this evaluation, a remedial action will be selected and undertaken at the site. Following completion of the remedial activities, an evaluation of the results obtained from these activities will be conducted to determine the potential for obtaining site closure.

a. Soil Boring Installation

As part of the remedial investigation, BLS will document the installation of **up to eight (7)** soil/bedrock borings. A maximum of eight (8) groundwater monitoring wells will be installed within the various borings. The proposed locations of the soil/bedrock borings and groundwater monitoring wells are presented on Figure 5. The soil borings will be conducted using conventional Geo-Probe drilling methods in order to drive a split spoon soil sampling device to the required sample collection depth. Bedrock borings will be core-drilled.

Soil samples will be collected continuously every two feet using standard split spoon sampling techniques in accordance with ASTM Procedure D, 1586 ("Penetration Test and Split Barrel Sampling of Soil"). During sampling activities, all down hole soil sampling equipment will be washed with a trisodium phosphate (TSP) soap and water solution and rinsed with potable water between sampling intervals to negate the potential for cross-contamination.

During the soil sampling activities, a portion of each sampling will be subjected to photoionization detector (PID) screening to evaluate the samples for the possible presence of volatile organic compounds typical of petroleum products. Screening will be performed by transferring approximately one hundred grams of sample from each split



LEGEND

* PROPOSED BORING LOCATION



FIGURE 5	
SOIL BORING/WELL LOCATIONS CITY SERVICES PROPERTY WAUWATOSA, WISCONSIN	
BRRTS: 03-41-560368	DSPS:
SCALE: 1" = 30'	DATE: 5/02/13
BLS ENVIRONMENTAL, INC.	



spoon or geoprobe interval into a Ziploc plastic bag, breaking up the sample, and allowing the sample to equilibrate in a warm environment for at least one half hour. After equilibrium, the bag will be punctured with the PID probe extension, and the highest stable PID reading will be recorded. The PID used during soil and sediment sampling activities will be a Thermo Environmental Instrument (580B) Organic Vapor Meter equipped with a 10.6eV and Organic Vapor Meter calibrated for direct response to 99.40 parts per million (ppm) isobutylene span gas and 0.0ppm air standards. The PID utilized during field activities will be calibrated before readings were collected and after periodic work breaks.

Final borehole logs will be completed for all borings conducted as part of the remedial investigation in conformance with ASTM 2488 Standards. These logs will include information on soil type, PID field data, moisture content, gradation, color, plasticity, estimated soil classifications, group symbol, bedrock classification, and fractures.

b. Soil Sample Analyses

As part of the remedial investigation activities, soil samples will be submitted for laboratory analyses to define the extent of petroleum contamination on the property. Soil and sediment samples collected will be analyzed for Total Solids, Gasoline Range Organics (GRO), Diesel Range Organics (DRO), Volatile Organic Compounds (VOC's) or Petroleum Volatile Organic Compounds (PVOCs) plus Naphthalene, Polycyclic Aromatic Hydrocarbons (PAHs), and lead in accordance with WDNR's guidance document entitled "Leaking Underground Storage Tank Analytical and Quality Assurance Guide" dated July 1993 (PUBL- SW 13093).

Soil samples submitted for chemical analyses from the investigative borings will be analyzed by a WDNR Certified Laboratory. Soil samples submitted for laboratory analyses will be placed within decontaminated glassware provided by the laboratory during the sampling effort. Samples analyzed for VOC's/PVOCs will be preserved in the field with 20mils (ml) of methanol provided by the analytical laboratory. After collection, all samples submitted for laboratory analyses will be immediately placed within an iced insulated cooler for shipment to the laboratory. Strict chain of custody control will be maintained at all times during sampling activities.

c. Monitor Well Installation

In order to evaluate the local groundwater quality conditions at the Property facility, a maximum of eight (8) soil borings will be converted to groundwater monitoring wells. Figure 5 presents the location of the proposed monitoring wells.

All monitoring wells installed as part of the remedial investigation will be constructed in accordance with NR141 Standards. All monitoring wells will be constructed to bracket the local watertable interface allowing for the measurement of seasonal watertable fluctuations and to detect for the presence of free phase petroleum product, if any.



Each of the groundwater monitoring wells will be installed within 8.25-inch outside diameter (OD) boreholes if completed within the overburden. If the monitoring wells are completed within bedrock, the wells will be installed within 4.0-inch OD boreholes.

All wells will be constructed of nominal 2.0-inch diameter, schedule 40, flush joint, polyvinyl chloride (PVC) well screen and casing sections. Screen sections installed at each monitor well location will consist of fifteen-foot sections of 0.010-inch (#10) slotted well screen. The bottom caps will consist of sealed, pointed, PVC plugs. Top caps at each location will consist of two-inch diameter, water tight, expandable locking well cap plugs. The annular space around each well screen will be filled with Number 30 Badger-Brand flint sand, filled to at least one-half foot above the top of the screened interval. One to one-half foot of Number 45/55 Badger Brand fine flint sand will be placed above the coarse flint sand to complete the filter pack. Granular bentonite will be placed above the sand pack to just below grade and hydrated to provide an impermeable annular seal. At grade, all monitor well locations will be completed within steel flush mounted watertight protective cover assemblies set in concrete.

During well screen and casing installation, the position or depth of the filter pack, filter pack seal, annular space seal, and the surface sealant backfills will be confirmed using a measuring tape. No glues, solvents, lubricants, or other similar substances will be used during well installation activities.

Monitoring wells construction forms (WDNR Form 440-113A) will be completed for each monitoring well.

d. Monitor Well Development

After the completion of well installation, all monitoring wells will be developed in accordance with NR 141.21 Standards. To the extent of practicable, a minimum of three well volumes will be purged from each monitor well prior to sample collection to assure that groundwater samples are representative of the aquifer and not stagnant well water. Well development documentation (WDNR Form 4400-113B) will be prepared for each monitoring well.

All well development equipment will be thoroughly cleaned between locations to negate the potential for cross contamination. Well development equipment will be washed with a Trisodium Phosphate soap and water solution and double rinsed with potable deionized water between locations. At no time will fluids be introduced into any well to aid in well development. Fluids purged from each location will be disposed.

e. Groundwater Sampling and Analyses

Groundwater samples will be collected from each site monitoring well. Prior to groundwater sampling efforts, each monitor well will be developed in accordance with the procedures presented in Section 3.4. Each monitor well will be sampled approximately one-half hour after the completion of well development activities. A



dedicated 1.66-inch OD bailer will be used to develop and sample each monitor well. Groundwater samples will be placed within decontaminated sample containers provided by the laboratory after the completion of development activities. No agitation of samples will be permitted during the sample collection efforts. After collection, all samples will be immediately placed within an iced insulated cooler for shipment to the laboratory. Strict chain of custody control will be maintained at all times.

Groundwater samples collected from the site monitoring wells will be analyzed for PAHs, lead, and VOC's. Additional rounds of groundwater sampling from these wells will be analyzed for PVOCs and PAHs as determined by the results obtained from the initial sampling event.

All groundwater samples collected during the remedial investigation will be analyzed by a WDNR Certified Laboratory

f. Liquid Level Measurements

In addition to aforementioned tests, liquid level measurements will be collected from all monitor wells during groundwater sampling efforts and during random visits to the site. All liquid level measurements will be correlated to a nearby USGS benchmark to allow for the direct hydrostatic comparison of water levels. Data collected in the field will be referenced to the top of the PVC casing at each well location and correlated to site survey information. All liquid level measurements will be collected using an electronic water level interface probe capable of detecting water levels to 0.01 feet.

g. Potable Well Survey

This task will involve obtaining of well records from the Wisconsin Geologic & Natural History Survey to determine the location of potable water supply wells in the vicinity of the site. The well owners within 1000 feet of the site will be contacted to verify the existence of the water supply well and determine the well's function (potable vs non-potable use).

h. Vapor Pathway Analysis

This task will involve two phases. The first phase will be conducted during the drilling of the soil borings/groundwater monitoring wells at the Property (Section 3a). All soil samples collected during the drilling of the soil borings will be screened with the PID to obtain a generalized aerial distribution of the petroleum soil vapors on the Property. These readings will be recorded on the soil boring logs, and utilized to assist in placement of vapor monitoring wells.

The second phase will consist of drilling and constructing two vapor monitoring wells on the Property. Unless otherwise directed by the soil vapor data collected from the soil borings, it is anticipated that one vapor well will be located along the western Property

boundary adjacent to the 10625 West North Avenue building, and the second vapor well along the northern side of the Property building.



The wells will be extended to the top of bedrock, with the screened portion of the well extending from the top of bedrock to approximately 1.5 feet below grade. The upper 1.5 feet of the well will be solid pipe to permit placement of the protective well cover. The wells will be constructed with 1-inch O.D. PVC piping in a 3-inch borehole. The screened portion of the well will be backfilled with washed pea gravel, while the upper 1.5-feet of the well will be backfilled with bentonite and concrete.

One vacuum canister sample will be collected from each well for analysis of PVOCs. Based upon the results of the two phases of investigative data, additional vapor pathway analysis may be required, including sub-slab sampling and/or additional vapor wells.

i. Schedule

Approved 6/17/13
At the time of preparation of this work plan, a definitive schedule can not be produced. Mr. Jay Walia is currently awaiting approval from DSPS for PECFA eligibility. The anticipated schedule is as follows:

7/1 Week 2 following approval – install soil borings and monitoring wells

7/1³ Week 3 following approval – sample collection completed

7/29 Week 6 following approval – laboratory analysis completed

8/26 Week 10 following approval – submittal of the investigation report

4. Limitations of Liability

This report was prepared under constraints of cost, time, and scope, and reflects a limited assessment and evaluation rather than a full, total, complete, or extensive assessment and evaluation.

Our assessment was performed using the degree of care and skill ordinarily exercised, under similar circumstances, by Professional Consultants practicing in this or similar localities. No warranty or guarantee, expressed or implied, is made as to the conclusions and professional advice included in this report.

The findings of this report are valid as of the present date of the assessment. However, changes in the condition of the property can occur with the passage of time, whether due to natural processes or the works of man and this or adjacent properties. In addition, changes in applicable or appropriate standards may occur, whether they result from legislation, from the broadening of knowledge, or from other reasons. Accordingly, the



findings of this report may be invalidated, wholly or partially, due to changes outside our control.

The interpretations and conclusions contained in this report are based upon the result of independent laboratory tests and analysis intended to detect the presence and/or concentrations of certain chemical constituents in the samples taken from the subject property. BLS has no control over such testing and analyses and therefore disclaims and any responsibility for errors and omissions arising therefore.

A subsurface exploration was performed and presented in this report. However, subsurface exploration cannot reveal totally what is below the surface. Depending upon the sampling method and frequency, every soil condition may be observed, and some materials or layers that are present in the subsurface may not be detected.

This report is issued with the understanding that it is the responsibility of the owner(s) to ensure that the information and recommendations contained herein are brought to the attention of the appropriate regulatory agency (ies).

This report has been prepared specifically for Mr. Jay Walia, owner of the Former City Services Property. Reproduction or distribution of this report should not be performed without the written consent of Mr. Walia and BLS Environmental, Inc.



Attachment A

Soil Disposal Documentation

Customer Number: 972

①

Manifest No.

Advanced Disposal Services Emerald Park Landfill, LLC.
Non-Hazardous Special Waste Manifest

1102665

Bill to - BLS ENVIRONMENTAL

Transporter Name - STARLINE Truck # 2

Generator Name - FORMER CITY SERVICE GAS STATION - 10605 W. NORTH AVE

Generator Signature - Sof Date 1/24/13

Description of Waste - BIO-SOIL

Profile Number - EPL2013-012

Driver Signature - Date 1/24/13

Landfill Signature - Date 1/24/13

Quantity - 18.99 Ton

Generator Copy-Yellow Transporter Copy-Pink Landfill-White

EMERALD PARK LANDFILL, LLC.
W124 S10629 S. 124th STREET
MUSKEGO, WI 53150
4145291360

①

000972
BLS ENVIRONMENTAL, INC
1825 N. 166TH ST
BROOKFIELD, WI 53005

CASH
INBOUND

SITE		CELL	TICKET #	OPERATOR	
F1			1102665	66491	
TRUCK		CONTAINER		LICENSE	
2STARLINE					
REFERENCE				IN	OUT
				1/24/13 11:50 am	1/24/13 12:07 pm

CONTRACT: BIOEPL2013-012
BOL:

GROSS 67,280.00LBS Scale In
TARE 29,320.00LBS Scale Out
NET 37,960.00 LBS

QTY	UNIT	DESCRIPTION	ORIGIN	%	RATE	TAX	TOTAL
18.98	TN	EX-33@ C- SOIL-PETRO USTs		0.00	\$26.00	\$ 57.14	\$550.62
1.00	EA	EX-PROFILING		0.00	\$50.00	\$ 5.79	\$55.79

SERVICE FIRST, SAFETY ALWAYS!

Fuel/Environmental Fee

Tax Total

Total	\$606.41
Paid	\$606.41
Change	\$0.00
Check#	
Recpt #	

I hereby certify that this load does not contain any unauthorized hazardous waste.

SIGNATURE: _____

CUSTOMER COPY

Customer Number: 972

2

Manifest No.

1102670

Advanced Disposal Services Emerald Park Landfill, LLC.
Non-Hazardous Special Waste Manifest

Bill to - BLS ENVIRONMENTAL

Transporter Name - EATON'S Truck # 1137

Generator Name - FORMER CITY SERVICE GAS STATION - 10605 W. NORTH AVE

Generator Signature - SOT Date 1/24/13

Description of Waste - BIO-SOIL

Profile Number - SPH2013-012

Driver Signature - [Signature] Date 1/24/13

Landfill Signature - [Signature] Date 1/24/13

Quantity - 21.11 Ton

Generator Copy-Yellow Transporter Copy-Pink Landfill-White

EMERALD PARK LANDFILL, LLC.
W124 S10629 S. 124th STREET
MUSKEGO, WI 53150
4145291360

2

000972
BLS ENVIRONMENTAL, INC
1825 N. 166TH ST
BROOKFIELD, WI 53005

CASH
INBOUND

SITE		CELL	TICKET #	OPERATOR	
F1			1102670	66491	
TRUCK		CONTAINER		LICENSE	
1137EATONS					
REFERENCE				IN	OUT
				1/24/13 12:02 pm	1/24/13 12:19 pm

CONTRACT: BIOEPL2013-012
BOL:

GROSS 70,760.00LBS Scale In
TARE 28,540.00LBS Scale Out
NET 42,220.00LBS

QTY	UNIT	DESCRIPTION	ORIGIN	%	RATE	TAX	TOTAL
21.11	TN	EX-33@ C- SOIL-PETRO USTs		0.00	\$26.00	\$ 63.56	\$612.42

SERVICE FIRST, SAFETY ALWAYS!

Fuel/Environmental Fee

Tax Total	Total	\$612.42
	Paid	\$612.42
	Change	\$0.00
	Check#	
	Recpt #	0

I hereby certify that this load does not contain any unauthorized hazardous waste.

SIGNATURE: _____

CUSTOMER COPY

Customer Number 972

(3)

Manifest No.

1102696

Advanced Disposal Services Emerald Park Landfill, LLC.
Non-Hazardous Special Waste Manifest

Bill to - BLS ENVIRONMENTAL

Transporter Name -

Truck #

1874

Generator Name - FORMER CITY SERVICE GAS STATION - 10605 W. NORTH AVE

Generator Signature -

Sof

Date

1/1

Description of Waste - BIO-SOIL

Profile Number - EPL2013-012

Driver Signature -

Date

1/1

Landfill Signature -

Date

1/1

Quantity -

18.06

Ton

Generator Copy-Yellow

Transporter Copy-Pink

Landfill-White

EMERALD PARK LANDFILL, LLC.
W124 S10629 S. 124th STREET
MUSKEGO, WI 53150
4145291360

(2)

000972
BLS ENVIRONMENTAL, INC
1825 N. 166TH ST
BROOKFIELD, WI 53005

CASH
INBOUND

SITE		CELL	TICKET #	OPERATOR	
F1			1102696	66491	
TRUCK		CONTAINER		LICENSE	
999					
REFERENCE				IN	OUT
Little Bros. Truck				1/24/13 1:15 pm	1/24/13 1:29 pm

CONTRACT: BIOEPL2013-012
BOL:

GROSS 64,460.00LBS Scale In
TARE 28,340.00LBS Scale Out
NET 36,120.00LBS

QTY	UNIT	DESCRIPTION	ORIGIN	%	RATE	TAX	TOTAL
18.06	TN	EX-33@ C- SOIL-PETRO USTS		0.00	\$26.00	\$ 54.38	\$523.94

SERVICE FIRST, SAFETY ALWAYS!

Fuel/Environmental Fee

Tax Total

Total

\$523.94

Paid

\$523.94

Change

\$0.00

Check#

Recpt #

0

SIGNATURE: _____

CUSTOMER COPY

hereby certify that this load does not contain any unauthorized hazardous waste.

Customer Number: 972

4

Manifest No. 1102709

Advanced Disposal Services Emerald Park Landfill, LLC.
Non-Hazardous Special Waste Manifest

Bill to - BLS ENVIRONMENTAL

Transporter Name - STARLINE Truck # 88

Generator Name - FORMER CITY SERVICE GAS STATION - 10605 W. NORTH AVE

Generator Signature - Sof Date 1/24/13

Description of Waste - BIO-SOIL

Profile Number - SPL2013-012

Driver Signature - [Signature] Date 1/24/13

Landfill Signature - [Signature] Date 1/24/13

Quantity - 16.17 Ton

Generator Copy-Yellow Transporter Copy-Pink Landfill White

EMERALD PARK LANDFILL, LLC.
W124 S10629 S. 124th STREET
MUSKEGO, WI 53150
4145291360

6

000972
BLS ENVIRONMENTAL, INC
1825 N. 166TH ST
BROOKFIELD, WI 53005

CASH
INBOUND

SITE		CELL	TICKET #	OPERATOR	
F1			1102709	66491	
TRUCK		CONTAINER		LICENSE	
2STARLINE					
REFERENCE				IN	OUT
				1/24/13 1:59 pm	1/24/13 1:59 pm

CONTRACT: BIOEPL2013-012
BOL:

GROSS 61,660.00LBS Scale In
TARE 29,320.00LBS Tare Out
NET 32,340.00 LBS

QTY	UNIT	DESCRIPTION	ORIGIN	%	RATE	TAX	TOTAL
16.17	TN	EX-33@ C- SOIL-PETRO USTs		0.00	\$26.00	\$ 48.68	\$469.10

SERVICE FIRST, SAFETY ALWAYS!

Fuel/Environmental Fee

Tax Total

Total	\$469.10
Paid	\$469.10
Change	\$0.00
Check#	
Recpt #	0

I hereby certify that this load does not contain any unauthorized hazardous waste.

SIGNATURE: _____

CUSTOMER COPY

Customer Number 972

⑤

Manifest No.

1102713

Advanced Disposal Services Emerald Park Landfill, LLC.
Non-Hazardous Special Waste Manifest

Bill to - BLS ENVIRONMENTAL

Transporter # _____ Truck # 1137

General Name - ROMBER CITY SERVICE GAS STATION - 10605 W. NORTH AVE

Generator Signature - SDF Date 1/1

Description of Waste - BIO-SOIL

Profile Number - E2L2013-012

Driver Signature - _____ Date 1/1

Landfill Signature - _____ Date 1/1

Quantity - 20.11 Ton

Generator Copy-Yellow Transporter Copy-Pink Landfill-White

EMERALD PARK LANDFILL, LLC.
W124 S10629 S. 124th STREET
MUSKEGO, WI 53150
4145291360

⑤

000972
BLS ENVIRONMENTAL, INC
1825 N. 166TH ST
BROOKFIELD, WI 53005

CASH
INBOUND

SITE		CELL	TICKET #	OPERATOR	
F1			1102713	66491	
TRUCK		CONTAINER		LICENSE	
1137EATONS					
REFERENCE				IN	OUT
				1/24/13 2:14 pm	1/24/13 2:14 pm

CONTRACT: BIOEPL2013-012
BOL:

GROSS 68,760.00LBS Scale In
TARE 28,540.00LBS Tare Out
NET 40,220.00LBS

QTY	UNIT	DESCRIPTION	ORIGIN	%	RATE	TAX	TOTAL
20.11	TN	EX-33@ C- SOIL-PETRO USTs		0.00	\$26.00	\$ 60.55	\$583.41

SERVICE FIRST, SAFETY ALWAYS!

Fuel/Environmental Fee

Tax Total

Total	\$583.41
Paid	\$583.41
Change	\$0.00
Check#	
Recpt #	0

I hereby certify that this load does not contain any unauthorized hazardous waste.

SIGNATURE: _____

CUSTOMER COPY

Customer Number: 972

4

Manifest No.

1102736

Advanced Disposal Services Emerald Park Landfill, LLC.
Non-Hazardous Special Waste Manifest

Bill to - BLS ENVIRONMENTAL

Transporter Name - _____ Truck # _____

Generator Name - FORMER CITY SERVICE GAS STATION - 10605 W. NORTH AVE

Generator Signature - _____ Date / /

Description of Waste - BIO-SOIL

Profile Number - EPL2013-012

Driver Signature - _____ Date / /

Landfill Signature - _____ Date / /

Quantity - 24.76 Ton

Generator Copy-Yellow Transporter Copy-Pink Landfill-White

EMERALD PARK LANDFILL, LLC.
W124 S10629 S. 124th STREET
MUSKEGO, WI 53150
4145291360

le

000972
BLS ENVIRONMENTAL, INC
1825 N. 166TH ST
BROOKFIELD, WI 53005

CASH
INBOUND

SITE		CELL	TICKET #	OPERATOR	
F1			1102736	66491	
TRUCK		CONTAINER		LICENSE	
999					
REFERENCE				IN	OUT
				1/24/13 2:51 pm	1/24/13 2:51 pm

CONTRACT: BIOEPL2013-012
BOL:

GROSS 77,860.00LBS Scale In
TARE 28,340.00LBS Manual Out
NET 49,520.00LBS

QTY	UNIT	DESCRIPTION	ORIGIN	%	RATE	TAX	TOTAL
24.76	TN	EX-33@ C- SOIL-PETRO USTs		0.00	\$26.00	\$ 74.55	\$718.31

SERVICE FIRST, SAFETY ALWAYS!

Fuel/Environmental Fee

Tax Total

Total	\$718.31
Paid	\$718.31
Change	\$0.00
Check#	
Recpt #	0

I hereby certify that this load does not contain any unauthorized hazardous waste.

SIGNATURE: _____

CUSTOMER COPY

Detail Customer Activity Report

January 24, 2013 to January 24, 2013

Specific Customer: 972

All Facilities

Activity Types
Current Tickets Only

000972- BLS ENVIRONMENTAL, INC

Ticket Date	Facility & Ticket Number	Contract	Truck #	Container	Material	Material Rate	Billing Quantity		Material Total	Tax Total	Total
01/24/2013	C F1 1102665	BIOEPL2013-012	2STARLINE		EX-33@ C- SOIL-PETRO U	\$26.00 F	18.98 TN		\$493.48	\$57.14	\$550.62
01/24/2013	C F1 1102665	BIOEPL2013-012	2STARLINE		EX-PROFILING	\$50.00 F	1.00 EA		\$50.00	\$5.79	\$55.79
01/24/2013	C F1 1102670	BIOEPL2013-012	1137EATONS		EX-33@ C- SOIL-PETRO U	\$26.00 F	21.11 TN		\$548.86	\$63.56	\$612.42
01/24/2013	C F1 1102696	BIOEPL2013-012	999		EX-33@ C- SOIL-PETRO U	\$26.00 F	18.06 TN		\$469.56	\$54.38	\$523.94
01/24/2013	C F1 1102709	BIOEPL2013-012	2STARLINE		EX-33@ C- SOIL-PETRO U	\$26.00 F	16.17 TN		\$420.42	\$48.68	\$469.10
01/24/2013	C F1 1102713	BIOEPL2013-012	1137EATONS		EX-33@ C- SOIL-PETRO U	\$26.00 F	20.11 TN		\$522.86	\$60.55	\$583.41
01/24/2013	C F1 1102736	BIOEPL2013-012	999		EX-33@ C- SOIL-PETRO U	\$26.00 F	24.76 TN		\$643.76	\$74.55	\$718.31

Tickets Reported: 6 Items Reported: 7 Customer Totals: \$3,148.94 \$364.65 \$3,513.59

Material Summary	Weight		Volume		Count		Billing Quantity	Material Total	Tax Total	Total
	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound				
74 - EX-33@ C- SOIL-PI	119.19	0.00 TN	0.00	0.00 YD	196.00	0.00	119.19 TN	\$3,098.94	\$358.86	\$3,457.80
94 - EX-PROFILING	0.00	0.00 TN	0.00	0.00 YD	1.00	0.00	1.00 EA	\$50.00	\$5.79	\$55.79

Cash Totals: \$3,148.94 \$364.65 \$3,513.59
 Invoice Totals:
 Report Totals: \$3,148.94 \$364.65 \$3,513.59

Tickets Reported: 6 Items Reported: 7

Material Summary	Weight		Volume		Count		Billing Quantity	Material Total	Tax Total	Total
	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound				
EX-33@ C- SOIL-PETR	119.19	0.00 TN	0.00	0.00 YD	196.00	0.00	119.19 TN	\$3,098.94	\$358.86	\$3,457.80
EX-PROFILING	0.00	0.00 TN	0.00	0.00 YD	1.00	0.00	1.00 EA	\$50.00	\$5.79	\$55.79

Detail Customer Activity Report
January 24, 2013 to January 24, 2013
Specific Customer: 972

REPORT SUMMARY

Total Tickets: 6
Total Weight: 119.19 TN In
0.00 TN Out
Total Volume:
Total Count: 197.00 In
Total Sales: \$3,513.59

BLS ENVIRONMENTAL
CUST #972

VEOLIA ES EMERALD PK
124TH ST
MUSKEGO, WI 53160

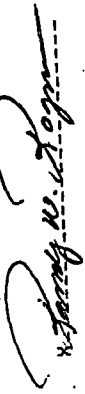
01/24/2013 16101163
MID: 000000002706094
TID: 04011106
348548160886

CREDIT CARD
VISA SALE

CARD: XXXXXXXXXXXXX2447
INVOICE 0003
Batch #: 000071
APP Code: 024222
Entry Mode: Manual
Mode: Online
Tax Amt: \$0.00
Avs Code: NYZ

SALE AMT \$3513.59

I agree to pay above
total amount according
to card issuer agreement
(Merchant Agreement if
Credit Voucher)



MERCHANT COPY



Attachment B

Laboratory Analytical Results

May 21, 2013

Randy Rogness
BLS ENVIRONMENTAL
1825 N. 166th ST.
Brookfield, WI 53005

RE: Project: VILA PROPERTY
Pace Project No.: 4077411

Dear Randy Rogness:

Enclosed are the analytical results for sample(s) received by the laboratory on May 07, 2013. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Brian Basten

brian.basten@pacelabs.com
Project Manager

Enclosures



REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

CERTIFICATIONS

Project: VILA PROPERTY
Pace Project No.: 4077411

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302
Florida/NELAP Certification #: E87948
Illinois Certification #: 200050
Kentucky Certification #: 82
Louisiana Certification #: 04168
Minnesota Certification #: 055-999-334

New York Certification #: 11888
North Dakota Certification #: R-150
South Carolina Certification #: 83006001
US Dept of Agriculture #: S-76505
Wisconsin Certification #: 405132750

SAMPLE SUMMARY

Project: VILA PROPERTY
Pace Project No.: 4077411

Lab ID	Sample ID	Matrix	Date Collected	Date Received
4077411001	F-11'	Solid	05/06/13 00:00	05/07/13 14:45
4077411002	WW-5.5'	Solid	05/06/13 00:00	05/07/13 14:45
4077411003	EW-5.5'	Solid	05/06/13 00:00	05/07/13 14:45
4077411004	NW-5.5'	Solid	05/06/13 00:00	05/07/13 14:45
4077411005	SW-5.5'	Solid	05/06/13 00:00	05/07/13 14:45

REPORT OF LABORATORY ANALYSIS

SAMPLE ANALYTE COUNT

Project: VILA PROPERTY
Pace Project No.: 4077411

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
4077411001	F-11'	WI MOD DRO	DAL	1	PASI-G
		WI MOD GRO	LCF	10	PASI-G
		ASTM D2974-87	BLF	1	PASI-G
4077411002	WW-5.5'	WI MOD DRO	DAL	1	PASI-G
		WI MOD GRO	LCF	10	PASI-G
		ASTM D2974-87	BLF	1	PASI-G
4077411003	EW-5.5'	WI MOD DRO	DAL	1	PASI-G
		WI MOD GRO	LCF	10	PASI-G
		ASTM D2974-87	BLF	1	PASI-G
4077411004	NW-5.5'	WI MOD DRO	DAL	1	PASI-G
		WI MOD GRO	LCF	10	PASI-G
		ASTM D2974-87	BLF	1	PASI-G
4077411005	SW-5.5'	WI MOD DRO	DAL	1	PASI-G
		WI MOD GRO	LCF	10	PASI-G
		ASTM D2974-87	BLF	1	PASI-G

REPORT OF LABORATORY ANALYSIS

PROJECT NARRATIVE

Project: VILA PROPERTY
Pace Project No.: 4077411

Method: WI MOD DRO
Description: WIDRO GCS
Client: BLS ENVIRONMENTAL
Date: May 21, 2013

General Information:

5 samples were analyzed for WI MOD DRO. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:

The samples were prepared in accordance with WI MOD DRO with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Surrogates:

All surrogates were within QC limits with any exceptions noted below.

Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

Analyte Comments:

QC Batch: OEXT/18161

T4: Result reported for hydrocarbons within the method-specific range that do not match pattern of laboratory standard.

- EW-5.5' (Lab ID: 4077411003)
 - Diesel Range Organics
- F-11' (Lab ID: 4077411001)
 - Diesel Range Organics
- NW-5.5' (Lab ID: 4077411004)
 - Diesel Range Organics
- SW-5.5' (Lab ID: 4077411005)
 - Diesel Range Organics
- WW-5.5' (Lab ID: 4077411002)
 - Diesel Range Organics

REPORT OF LABORATORY ANALYSIS

PROJECT NARRATIVE

Project: VILA PROPERTY
Pace Project No.: 4077411

Method: WI MOD GRO
Description: WIGRO GCV
Client: BLS ENVIRONMENTAL
Date: May 21, 2013

General Information:

5 samples were analyzed for WI MOD GRO. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:

The samples were prepared in accordance with TPH GRO/PVOC WI ext. with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Internal Standards:

All internal standards were within QC limits with any exceptions noted below.

Surrogates:

All surrogates were within QC limits with any exceptions noted below.

Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

ANALYTICAL RESULTS

Project: VILA PROPERTY
Pace Project No.: 4077411

Sample: F-11' Lab ID: 4077411001 Collected: 05/06/13 00:00 Received: 05/07/13 14:45 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
WIDRO GCS		Analytical Method: WI MOD DRO Preparation Method: WI MOD DRO							
Diesel Range Organics	3.1 mg/kg		2.1	0.84	1	05/09/13 08:43	05/10/13 10:47		T4
WIGRO GCV		Analytical Method: WI MOD GRO Preparation Method: TPH GRO/PVOC WI ext.							
Benzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	71-43-2	W
Ethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	100-41-4	W
Methyl-tert-butyl ether	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	1634-04-4	W
Naphthalene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	91-20-3	W
Toluene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	108-88-3	W
1,2,4-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	95-63-6	W
1,3,5-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	108-67-8	W
m&p-Xylene	<50.0 ug/kg		120	50.0	1	05/08/13 08:31	05/08/13 18:41	179601-23-1	W
o-Xylene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:41	95-47-6	W
Surrogates									
a,a,a-Trifluorotoluene (S)	99 %		80-120		1	05/08/13 08:31	05/08/13 18:41	98-08-8	
Percent Moisture		Analytical Method: ASTM D2974-87							
Percent Moisture	16.2 %		0.10	0.10	1		05/20/13 14:05		

Sample: WW-5.5' Lab ID: 4077411002 Collected: 05/06/13 00:00 Received: 05/07/13 14:45 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
WIDRO GCS		Analytical Method: WI MOD DRO Preparation Method: WI MOD DRO							
Diesel Range Organics	4.7 mg/kg		2.0	0.82	1	05/09/13 08:43	05/10/13 10:53		T4
WIGRO GCV		Analytical Method: WI MOD GRO Preparation Method: TPH GRO/PVOC WI ext.							
Benzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	71-43-2	W
Ethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	100-41-4	W
Methyl-tert-butyl ether	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	1634-04-4	W
Naphthalene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	91-20-3	W
Toluene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	108-88-3	W
1,2,4-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	95-63-6	W
1,3,5-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	108-67-8	W
m&p-Xylene	<50.0 ug/kg		120	50.0	1	05/08/13 08:31	05/08/13 19:07	179601-23-1	W
o-Xylene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:07	95-47-6	W
Surrogates									
a,a,a-Trifluorotoluene (S)	97 %		80-120		1	05/08/13 08:31	05/08/13 19:07	98-08-8	
Percent Moisture		Analytical Method: ASTM D2974-87							
Percent Moisture	16.2 %		0.10	0.10	1		05/20/13 14:05		

ANALYTICAL RESULTS

Project: VILA PROPERTY
Pace Project No.: 4077411

Sample: EW-5.5' Lab ID: 4077411003 Collected: 05/06/13 00:00 Received: 05/07/13 14:45 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
WIDRO GCS		Analytical Method: WI MOD DRO Preparation Method: WI MOD DRO							
Diesel Range Organics	2.6 mg/kg		2.1	0.83	1	05/09/13 08:43	05/10/13 10:59		T4
WIGRO GCV		Analytical Method: WI MOD GRO Preparation Method: TPH GRO/PVOC WI ext.							
Benzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	71-43-2	W
Ethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	100-41-4	W
Methyl-tert-butyl ether	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	1634-04-4	W
Naphthalene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	91-20-3	W
Toluene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	108-88-3	W
1,2,4-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	95-63-6	W
1,3,5-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	108-67-8	W
m&p-Xylene	<50.0 ug/kg		120	50.0	1	05/08/13 08:31	05/08/13 18:16	179601-23-1	W
o-Xylene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 18:16	95-47-6	W
Surrogates									
a,a,a-Trifluorotoluene (S)	96 %		80-120		1	05/08/13 08:31	05/08/13 18:16	98-08-8	
Percent Moisture		Analytical Method: ASTM D2974-87							
Percent Moisture	17.9 %		0.10	0.10	1		05/20/13 14:05		

Sample: NW-5.5' Lab ID: 4077411004 Collected: 05/06/13 00:00 Received: 05/07/13 14:45 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
WIDRO GCS		Analytical Method: WI MOD DRO Preparation Method: WI MOD DRO							
Diesel Range Organics	3.9 mg/kg		2.1	0.84	1	05/09/13 08:43	05/10/13 11:05		T4
WIGRO GCV		Analytical Method: WI MOD GRO Preparation Method: TPH GRO/PVOC WI ext.							
Benzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	71-43-2	W
Ethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	100-41-4	W
Methyl-tert-butyl ether	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	1634-04-4	W
Naphthalene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	91-20-3	W
Toluene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	108-88-3	W
1,2,4-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	95-63-6	W
1,3,5-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	108-67-8	W
m&p-Xylene	<50.0 ug/kg		120	50.0	1	05/08/13 08:31	05/08/13 19:32	179601-23-1	W
o-Xylene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:32	95-47-6	W
Surrogates									
a,a,a-Trifluorotoluene (S)	99 %		80-120		1	05/08/13 08:31	05/08/13 19:32	98-08-8	
Percent Moisture		Analytical Method: ASTM D2974-87							
Percent Moisture	15.4 %		0.10	0.10	1		05/20/13 14:05		

ANALYTICAL RESULTS

Project: VILA PROPERTY
Pace Project No.: 4077411

Sample: SW-5.5' Lab ID: 4077411005 Collected: 05/06/13 00:00 Received: 05/07/13 14:45 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
WIDRO GCS		Analytical Method: WI MOD DRO Preparation Method: WI MOD DRO							
Diesel Range Organics	4.6 mg/kg		2.0	0.81	1	05/09/13 08:43	05/10/13 11:11		T4
WIGRO GCV		Analytical Method: WI MOD GRO Preparation Method: TPH GRO/PVOC WI ext.							
Benzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	71-43-2	W
Ethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	100-41-4	W
Methyl-tert-butyl ether	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	1634-04-4	W
Naphthalene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	91-20-3	W
Toluene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	108-88-3	W
1,2,4-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	95-63-6	W
1,3,5-Trimethylbenzene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	108-67-8	W
m&p-Xylene	<50.0 ug/kg		120	50.0	1	05/08/13 08:31	05/08/13 19:58	179601-23-1	W
o-Xylene	<25.0 ug/kg		60.0	25.0	1	05/08/13 08:31	05/08/13 19:58	95-47-6	W
Surrogates									
a,a,a-Trifluorotoluene (S)	97 %		80-120		1	05/08/13 08:31	05/08/13 19:58	98-08-8	
Percent Moisture		Analytical Method: ASTM D2974-87							
Percent Moisture	15.9 %		0.10	0.10	1		05/20/13 14:05		

QUALITY CONTROL DATA

Project: VILA PROPERTY
Pace Project No.: 4077411

QC Batch: GCV/10200 Analysis Method: WI MOD GRO
QC Batch Method: TPH GRO/PVOC WI ext. Analysis Description: WIGRO Solid GCV
Associated Lab Samples: 4077411001, 4077411002, 4077411003, 4077411004, 4077411005

METHOD BLANK: 786041 Matrix: Solid
Associated Lab Samples: 4077411001, 4077411002, 4077411003, 4077411004, 4077411005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,2,4-Trimethylbenzene	ug/kg	<25.0	60.0	05/08/13 11:52	
1,3,5-Trimethylbenzene	ug/kg	<25.0	60.0	05/08/13 11:52	
Benzene	ug/kg	<25.0	60.0	05/08/13 11:52	
Ethylbenzene	ug/kg	<25.0	60.0	05/08/13 11:52	
m&p-Xylene	ug/kg	<50.0	120	05/08/13 11:52	
Methyl-tert-butyl ether	ug/kg	<25.0	60.0	05/08/13 11:52	
Naphthalene	ug/kg	<25.0	60.0	05/08/13 11:52	
o-Xylene	ug/kg	<25.0	60.0	05/08/13 11:52	
Toluene	ug/kg	<25.0	60.0	05/08/13 11:52	
a,a,a-Trifluorotoluene (S)	%	97	80-120	05/08/13 11:52	

Parameter	Units	786042		786043			% Rec Limits	RPD	Max RPD	Qualifiers
		Spike Conc.	LCS Result	LCSD Result	LCS % Rec	LCSD % Rec				
1,2,4-Trimethylbenzene	ug/kg	1000	1020	1000	102	100	80-120	1	20	
1,3,5-Trimethylbenzene	ug/kg	1000	1010	995	101	99	80-120	1	20	
Benzene	ug/kg	1000	1060	1050	106	105	80-120	2	20	
Ethylbenzene	ug/kg	1000	1020	1010	102	101	80-120	2	20	
m&p-Xylene	ug/kg	2000	2050	2020	103	101	80-120	2	20	
Methyl-tert-butyl ether	ug/kg	1000	1040	1020	104	102	80-120	2	20	
Naphthalene	ug/kg	1000	1060	1020	106	102	80-120	4	20	
o-Xylene	ug/kg	1000	1020	1010	102	101	80-120	1	20	
Toluene	ug/kg	1000	1030	1010	103	101	80-120	2	20	
a,a,a-Trifluorotoluene (S)	%				103	103	80-120			

QUALITY CONTROL DATA

Project: VILA PROPERTY
Pace Project No.: 4077411

QC Batch: OEXT/18161 Analysis Method: WI MOD DRO
QC Batch Method: WI MOD DRO Analysis Description: WIDRO GCS
Associated Lab Samples: 4077411001, 4077411002, 4077411003, 4077411004, 4077411005

METHOD BLANK: 786654 Matrix: Solid
Associated Lab Samples: 4077411001, 4077411002, 4077411003, 4077411004, 4077411005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Diesel Range Organics	mg/kg	<0.80	2.0	05/10/13 09:12	

LABORATORY CONTROL SAMPLE & LCSD: 786655		786656								
Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS % Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Diesel Range Organics	mg/kg	40	33.1	32.8	83	82	70-120	1	20	

QUALITY CONTROL DATA

Project: VILA PROPERTY
Pace Project No.: 4077411

QC Batch: PMST/8458 Analysis Method: ASTM D2974-87
QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture
Associated Lab Samples: 4077411001, 4077411002, 4077411003, 4077411004, 4077411005

SAMPLE DUPLICATE: 792934

Parameter	Units	4077400007 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	13.6	13.8	1	10	

QUALIFIERS

Project: VILA PROPERTY
Pace Project No.: 4077411

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

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

MDL - Adjusted Method Detection Limit.

PRL - Pace Reporting Limit.

RL - Reporting Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-G Pace Analytical Services - Green Bay

ANALYTE QUALIFIERS

T4 Result reported for hydrocarbons within the method-specific range that do not match pattern of laboratory standard.

W Non-detect results are reported on a wet weight basis.

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: VILA PROPERTY
Pace Project No.: 4077411

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
4077411001	F-11'	WI MOD DRO	OEXT/18161	WI MOD DRO	GCSV/9517
4077411002	WW-5.5'	WI MOD DRO	OEXT/18161	WI MOD DRO	GCSV/9517
4077411003	EW-5.5'	WI MOD DRO	OEXT/18161	WI MOD DRO	GCSV/9517
4077411004	NW-5.5'	WI MOD DRO	OEXT/18161	WI MOD DRO	GCSV/9517
4077411005	SW-5.5'	WI MOD DRO	OEXT/18161	WI MOD DRO	GCSV/9517
4077411001	F-11'	TPH GRO/PVOC WI ext.	GCV/10200	WI MOD GRO	GCV/10201
4077411002	WW-5.5'	TPH GRO/PVOC WI ext.	GCV/10200	WI MOD GRO	GCV/10201
4077411003	EW-5.5'	TPH GRO/PVOC WI ext.	GCV/10200	WI MOD GRO	GCV/10201
4077411004	NW-5.5'	TPH GRO/PVOC WI ext.	GCV/10200	WI MOD GRO	GCV/10201
4077411005	SW-5.5'	TPH GRO/PVOC WI ext.	GCV/10200	WI MOD GRO	GCV/10201
4077411001	F-11'	ASTM D2974-87	PMST/8458		
4077411002	WW-5.5'	ASTM D2974-87	PMST/8458		
4077411003	EW-5.5'	ASTM D2974-87	PMST/8458		
4077411004	NW-5.5'	ASTM D2974-87	PMST/8458		
4077411005	SW-5.5'	ASTM D2974-87	PMST/8458		

Client Name: BLS Env. Project # 4077411

Courier: Fed Ex UPS USPS Client Commercial Pace Other _____

Tracking #: _____

Custody Seal on Cooler/Box Present: yes no Seals intact: yes no

Custody Seal on Samples Present: yes no Seals intact: yes no

Packing Material: Bubble Wrap Bubble Bags None Other _____

Thermometer Used N/A Type of Ice: Wet Blue Dry None Samples on ice, cooling process has begun

Cooler Temperature Uncorr: ROJ / Corr: _____ Biological Tissue is Frozen: yes

Temp Blank Present: yes no no

Person examining contents:
Date: 5/7/13
Initials: EMH

Temp should be above freezing to 6°C for all sample except Biota.
Frozen Biota Samples should be received ≤ 0°C.

Comments:

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
- VOA Samples frozen upon receipt	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date/Time:
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
-Pace Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
-Pace IR Containers Used:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <u>5</u>		
All containers needing preservation have been checked. (Non-Compliance noted in 13.)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13.
All containers needing preservation are found to be in compliance with EPA recommendation. (HNO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH ≥12)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, TOX, TOH, O&G, WIDROW, Phenolics, OTHER:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Initial when completed
		Lab Std #ID of preservative
		Date/Time:
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):		

Client Notification/ Resolution: _____ If checked, see attached form for additional comments

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: RR

Date: 5-8-13

(Please Print Clearly)

Company Name: *BHS Environmental, Inc*
 Branch/Location: *Brookfield*
 Project Contact: *Randy Rogness*
 Phone: *(414)690-6685*
 Project Number: *-*
 Project Name: *Vila Property*
 Project State: *Wisconsin*
 Sampled By (Print): *Randy Rogness*
 Sampled By (Sign): *Randy W. Rogness*
 PO #: _____ Regulatory Program: _____

Data Package Options (billable)
 EPA Level III
 EPA Level IV

MS/MSD
 On your sample (billable)
 NOT needed on your sample

Matrix Codes
 A = Air W = Water
 B = Biota DW = Drinking Water
 C = Charcoal GW = Ground Water
 O = Oil SW = Surface Water
 S = Soil WW = Waste Water
 SI = Sludge WP = Wipe

PACE LAB #	CLIENT FIELD ID	COLLECTION		MATRIX	Y/N	N	N	N	PICK LETTER	ANALYSES REQUESTED	PICK LETTER	CLIENT COMMENTS	LAB COMMENTS (Lab Use Only)	Profile
		DATE	TIME											
001	F-11'	5/6/13	Am	S		X	X	X		DRO		3 Residential	1-40ml F; 1-4ozcg A; 1-4ozcg	
002	WW - 5.5'	5/6	Am	S		X	X	X		PVOC + W/P		0.7 Home Heating		
003	EW - 5.5'	5/6	Am	S		X	X	X				0.3 Oil-Tank		
004	NW - 5.5'	5/6	Am	S		X	X	X				1.2 Removal		
005	SW - 5.5'	5/6	Am	S		X	X	X		Dry wt		0.9		



UPPER MIDWEST REGION
 MN: 612-607-1700 WI: 920-469-2436

4077411

CHAIN OF CUSTODY

***Preservation Codes**
 A=None B=HCL C=H2SO4 D=HNO3 E=DI Water F=Methanol G=NaOH
 H=Sodium Bisulfate Solution I=Sodium Thiosulfate J=Other

Y/N	N	N	N											
	A	F	A											

Quote #: _____
 Mail To Contact: _____
 Mail To Company: _____
 Mail To Address: _____
 Invoice To Contact: _____
 Invoice To Company: _____
 Invoice To Address: _____
 Invoice To Phone: _____

CLIENT COMMENTS	LAB COMMENTS (Lab Use Only)	Profile
Residential	1-40ml F; 1-4ozcg A; 1-4ozcg	
Home Heating		
Oil-Tank		
Removal		

Rush Turnaround Time Requested - Prelims (Rush TAT subject to approval/surcharge)
 Date Needed: _____

Transmit Prelim Rush Results by (complete what you want):

Email #1: _____
 Email #2: _____
 Telephone: _____
 Fax: _____

Samples on HOLD are subject to special pricing and release of liability

Relinquished By: *Randy W. Rogness* Date/Time: *5/7/13 6am*
 Relinquished By: *Mary Fannin* Date/Time: *5/7/13 1300*
 Relinquished By: *Mark W. Eganke* Date/Time: *5/7/13 1445*
 Relinquished By: _____ Date/Time: _____
 Relinquished By: _____ Date/Time: _____

Received By: *Mary Fannin* Date/Time: *5/7/13 12:00*
 Received By: *Mark W. Eganke* Date/Time: *5/7/13 1300*
 Received By: *E. Helwig Pace6B* Date/Time: *5/7/13 1445*
 Received By: _____ Date/Time: _____
 Received By: _____ Date/Time: _____

PACE Project No. *4077411*
 Receipt Temp = *ROI*
 Sample Receipt pH *OK / Adjusted*
 Cooler Custody *Sea Present / Not Present*
 Intact / Not Intact

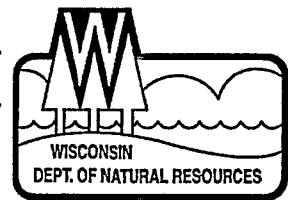


Attachment C

WDNR Correspondence

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

Scott Walker, Governor
Cathy Stepp, Secretary
Eric Nitschke, Regional Director
Telephone 414-263-8500
FAX 414-263-8483
TTY 414-263-8713



April 17, 2013

Jay Walia
4725 N. 159th St,
Brookfield, WI 53005

Subject: Reported Contamination at Former City Services, 10605 W. North Ave., Wauwatosa
WDNR BRRTS Activity # 03-41-560368
WDNR FID # 341229130

Dear Mr. Walia:

On April 11, 2013, Randy Rogness from BLS Environmental, Inc., on your behalf notified the Wisconsin Department of Natural Resources ("WDNR") that soil contamination had been detected at the site described above.

Based on the information that has been submitted to the WDNR regarding this site, we believe you are responsible for investigating and restoring the environment at the above-described site under Section 292.11, Wisconsin Statutes, known as the hazardous substances spills law.

This letter describes the legal responsibilities of a person who is responsible under section 292.11, explains what you need to do to investigate and clean up the contamination, and provides you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with the WDNR, Department Safety and Professional Services or the Department of Agriculture, Trade and Consumer Protection.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Statutes, states:

- **RESPONSIBILITY.** A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Code chapters NR 700 through NR 749 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

Steps to Take:

The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. These are the first steps to take:

1. Within the next **30 days**, by May 17, 2013, you should submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. If you do not take action within this time frame, the WDNR may initiate enforcement action against you.
2. Within the next **60 days**, by June 17, 2013, your consultant should submit a work plan and schedule for the investigation. The consultant must comply with the requirements in the NR 700 Wis. Adm. Code rule series and should adhere to current WDNR technical guidance documents.

In addition, within 30 days of completion of the site investigation, your consultant should submit a site investigation report to the department or other agency with administrative authority.

For sites with petroleum contamination, when your investigation has established the degree and extent of contamination, your consultant will be able to determine whether the Department of Commerce or the WDNR has authority over the case. For agrichemicals, your case will be transferred to the Department of Agriculture, Trade and Consumer Protection for oversight.

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System ("BRRTS"), a version of which appears on the WDNR's internet site. You may view the information related to your site at any time (<http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>) and use the feedback system to alert us to any errors in the data.

If you want a formal written response from the department on a specific submittal, please be aware that a review fee is required in accordance with ch. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you should proceed under the advice of your consultant to complete the site investigation and cleanup to maintain your compliance with the spills law and chapters NR 700 through NR 749. **Do not delay the investigation of your site by waiting for an agency response.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

All correspondence regarding this site should be sent to:

Victoria Stovall
Environmental Program Associate
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2300 N. Martin Luther King Dr.
Milwaukee, WI 53212 Victoria.Stovall@wisconsin.gov

Unless otherwise requested, please send only one copy of plans and reports. In addition to the paper copy, an electronic copy may also be submitted. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

Site Investigation and Vapor Pathway Analysis

As you develop the site investigation workplan, we want to remind you to include an assessment of the vapor intrusion pathway. Chapter NR 716, Wisconsin Administrative Code outlines the requirements for investigation of contamination in the environment. Specifically, s. NR 716.11(3)(a) requires that the field investigation determine the "nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media". In addition, section NR 716.11(5) specifies that the field investigation include an evaluation of the "pathways for migration of the contamination, including drainage improvements, utility corridors, bedrock and permeable material or soil along which vapors, free product or contaminated water may flow".


You will need to include documentation with the Site Investigation Report that explains how the assessment was done. If the pathway is being ruled out, then the report needs to provide the appropriate justification for reaching this conclusion. If the pathway cannot be ruled out, then investigation and, if appropriate, remedial action must be taken to address the risk presented prior to submitting the site for closure. The WDNR has developed guidance to help responsible parties and their consultants comply with the requirements described above. The guidance includes a detailed explanation of how to assess the vapor intrusion pathway and provides criteria which identify when an investigation is necessary. The guidance is available at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf>.

We encourage you to visit our website at <http://dnr.wi.gov/topic/Brownfields/>, where you can find information on selecting a consultant, financial assistance and understanding the cleanup process. You will also find information there about liability clarification letters, post-cleanup liability and more.

If you have questions, call the DNR Project Manager Nancy Ryan at (414) 263-8533 for more information or visit the RR web site at the address above.

Thank you for your cooperation.

Sincerely,



Victoria Stovall
Environmental Program Associate
Remediation & Redevelopment Program

Selecting a Consultant – RR-502
<http://dnr.wi.gov/files/PDF/pubs/rr/RR502.pdf>

Environmental Services Contractor List – RR-024
<http://dnr.wi.gov/files/PDF/pubs/rr/RR024.pdf>

Underground Storage Tanks, Clarifying Local Government Unit's Responsibility to Remove Tanks on Properties They Own, RR-627 (if applicable)
<http://dnr.wi.gov/files/PDF/pubs/rr/RR627.pdf>

cc: Randy Rogness – BLS Env., Inc.
WI DNR Case File