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By VS

August 13, 2004

Ms. Margaret Brunett
Wisconsin Department of Natural Resources
P.O. Box 12436
Milwaukee, WI 53212

RE: FALK CORPORATION, 3001 WEST CANAL STREET, MILWAUKEE, WISCONSIN
KEYSEATER AREA
FID 241008240
BRRTS 02-41-528895

Dear Margaret:

This correspondence is prepared by ENSR Corporation (ENSR) on behalf of Falk Corporation (Falk) in response to the Wisconsin Department of Natural Resources' (WDNR) letter of July 29, 2004. This letter also serves as a status report, as requested in the WDNR letter. Falk has retained ENSR to conduct the necessary work associated with the keyseater area at the facility.

Falk and ENSR have conducted appropriate response actions within an aggressive schedule. As you are aware, the following steps have already been completed:

- Upon discovery of foundation water and quench oil under the building floor in the keyseater area, WDNR was consulted regarding immediate actions taken to allow resumption of the construction activities in the keyseater area. These actions included staging and characterizing impacted soil for disposal, removal of water and accumulated oil from the keyseater excavations and collection and analysis of soil samples from the excavations to establish the nature of the impacts. Based on these findings, it is appropriate that the WDNR retain authority over this case rather than transfer authority to the Department of Commerce.
- The initial data generated as part of the immediate action were compiled and a soil and groundwater investigation plan was developed and presented for your input and approval on July 6, 2004.
- The investigation was conducted (a data summary table and site map are attached for your reference). Soils at the site exceed the NR 720 residual contaminant levels (RCLs) for diesel range organics and exceed the interim guidance direct-contact and/or groundwater-route RCLs for polynuclear aromatic hydrocarbons in some locations. Additionally, free product was noted in well KMW-2. Groundwater from all wells (except KMW-2, which was not sampled due to the presence of free product) are in compliance with NR 140 criteria. No preventive action limits or enforcement standards were exceeded in groundwater samples collected from the keyseater area.

Based on these findings, additional investigation will be conducted to define the boundaries of impacts. You will be advised of the findings prior to implementing corrective action at the site.

Given the degree to which the response work has progressed, we respectfully recommend that Step 2 outlined in the July 29 WDNR correspondence be waived. Further, it is our intention to continue conducting required response actions in a timely manner and communicate the findings of those actions to WDNR as they occur. Therefore, we recommend that status reports be submitted as appropriate to the site activities, rather than on a fixed schedule.

If you do not concur with these recommendations or require additional information, please contact Kristine Casper at 262-523-2040 ext. 232. Thank you for your continued assistance in guiding this case toward closure.

Sincerely,

ENSR Corporation

Kristine M. Casper, P.G.
Program Manager

Rick Smith
Client Service Manager

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cc: Mr. Donald Paulus
Mr. Scott Moyer
Mr. Mark Citroni
Ms. Tori Haines