6747 West Washington Street
Suite 3430
West Allis, Wisconsin 53214

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July 31, 2008

RECEIVED
AUG 11 2008
By VS

Mr. Eric Amadi
Hydrogeologist- State of Wisconsin\ Department of Natural Resources
Southeast Regional Headquarters
2300 N. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-0436

RE: Low Hazard Waste Material Reuse Exemption Request
Asphalt/Gravel Fill
Rawson Contractors Site, 11600 West Forest Home Avenue, Franklin, Wisconsin
Symbiont Project No. W083491

Dear Mr. Amadi:

Pursuant to our May 14, 2008 meeting with you, Symbiont has prepared the enclosed low hazard waste exemption request on behalf of Forest Home Investors, LLC (FHI) for reuse of approximately 4,000 tons of asphalt and gravel fill materials currently located at the former Rawson Contractors Site located at 11600 West Forest Home Avenue (Figure 1). Specifically, FHI is proposing to remove the fill material from the West Forest Home Avenue Site and reuse the material as base material for a new asphalt parking area to be constructed on the southeast portion of Lot 3 of FHI's property on Wilhar Road in the Town of Lisbon, Wisconsin (Figure 2). This Property is located south of the Village of Sussex, west of Duplainville Road and north of Lindsay Road. Although the Property has a Pewaukee address, it is located in the Town of Lisbon and is referred to in this exemption request as the "Town of Lisbon Property".

Per the requirements of NR 500.08(4), Wisconsin Administrative Code (WAC), the following information has been compiled to support this exemption request.

EXEMPTION REQUEST SUPPORTING INFORMATION

Population of the Area Being Served

According to the 2000 U.S. census, the zip code for the Town of Lisbon Property has a population of 20,761. FHI's Town of Lisbon Property is located in an industrial park located within a predominantly agricultural area of the Town of Lisbon. Two residences are located within ¼ mile of the Property, one of which is located approximately 150 feet south of the proposed fill area (see Figure 2).

Amount of Waste Being Generated

Approximately 4,000 tons of low hazard asphalt and gravel fill materials.

Geologic and Hydrogeologic Conditions at the Accepting Facility
According to the soil boring log for a boring (P-5) completed by Environmental & Development Solutions (EDS) north of the Town of Lisbon Property[1] the following soils were encountered: topsoil underlain by silty clay and clayey silt to approximately 4 feet below ground surface (bgs); silty gravel from approximately 4 to approximately 5.5 feet bgs; sandy silt from approximately 5.5 to approximately 8 feet bgs. Limestone bedrock was encountered at approximately 8 feet bgs. This boring was located approximately 750 to 800 feet north of the proposed fill area (Figure 2), but is located at a similar elevation and in a similar area to that of the proposed fill area. Four borings (P-1 through P-2) were drilled on Lot 1 of the Town of Lisbon Property in an elevated area underlain by approximately 4 to 5 feet of imported fill overlying 3 to 4 feet of silt and clay native soils.

Native soils across the Town of Lisbon Property are described by the United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS)[2] as generally consisting of silt and clay loam suggesting relatively consistent native soil conditions across the Property.

No evidence of groundwater is indicated in any of the EDS soil boring logs. The water table is located below the top of bedrock. According to the Southeastern Wisconsin Regional Planning Commission (SEWRPC) the water table in the general vicinity of the Town of Lisbon Property is between 25 and 50 feet bgs[3]

Design of the Accepting Facility
The material will be used as a base for an asphalt parking area and the material will be covered with fresh asphalt pavement. The specific placement area for the fill material will be on the southeast portion of Lot 3 (see Figure 2).

Operational History of the Accepting Facility
Based on the information available to Symbiont, the Town of Lisbon Property appears to have been historically vacant other than for use as agricultural land. Four to five feet of imported fill materials were identified at Lot 1 approximately 570 feet northwest of the proposed fill area. It is anticipated that similar thicknesses of fill may be present at Lot 3.

Physical and Chemical Characteristics of the Waste
The fill material from the former Rawson Contractors Site to be reused at the Town of Lisbon Property consists of a mixture of gravel and asphalt shavings.

The fill material contains various PAHs at concentrations that exceed the acceptable cancer risk for non-industrial properties: benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo[a]anthracene, and indeno[1,2,3-cd]pyrene. The fill material also contains benzo(a)pyrene at concentrations that exceed the acceptable cancer risk for industrial properties. The attached Table 1 provides the measured concentrations for the analyzed samples of the fill materials. The original locations of these samples are shown in Figure 1.

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[1] EDS, 2005, *Results of Soil Sampling at Mierow Property in the Town of Lisbon, Wisconsin letter report*, completed for North Shore Bank, December 21, 2005.
[2] USDA NRCS Web Soil Service, http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx, accessed July 1, 2008.
[3] SEWRPC, *Groundwater Resources of Southeastern Wisconsin*, Waukesha, Wisconsin, Technical Report 37, June 2002, 203 pp.

Based on observations of the nature of the fill materials and the wide distribution of the fill material with elevated contaminant concentrations, the PAH detects appear to originate from the asphalt component of the fill material. Asphalt is a type of residual petroleum and is known to commonly contain elevated PAH concentrations. However, due to its characteristics that tightly bind PAHs to the asphalt matrix, asphalt is generally not considered a significant PAH contaminant source.

Other Appropriate Information

No other appropriate or relevant information has been identified for this exemption request.

REQUESTED ACTION

Please review the enclosed information and provide a response to this exemption request.

Please contact us if you have any questions regarding this request.

Sincerely,

SYMBIONT®

Troy R. Thompson, P.G., CPG, CHMM
Senior Hydrogeologist

SYMBIONT®

David B. Holmes, P.G.
Project Manager

Attachments
c: Mr. Ken Servi, Forest Home Investors, LLC

TABLE

TABLE 1
SOIL CHEMISTRY DATA
RAWSON CONTRACTOR'S STORAGE YARD SITE
11600 WEST FOREST HOME AVENUE, FRANKLIN, WI
SYMBIONT PROJECT NO. W083491

Group	Chemical Constituent	Generic Groundwater Pathway RCL	Generic Non-Industrial Direct Contact RCL	Generic Industrial Direct Contact RCL	Boring/Well No., Sample Depth (feet below ground surface), Firm Name Collecting Samples, and Sample Date															
					B-1/MW-1		B-2/MW-2		B-3/MW-3		B-4		B-5				B-6			
					1-2	4-5	1-2	4-5	1-2	4-5	1-2	10-11	3-4	10-11	10-12	10-11	1-2	10-11	10	10-11
					STS								STS		Symbiont		STS		Symbiont	
					9/21/06								9/21/06		4/14/08	6/23/08	9/21/06		4/14/08	6/23/08
					AST Area		Storage Yard (NW)		Storage Yard (NE)		Storage Yard (SE)		Storage Yard (center)				Storage Yard (west center)			
		Milligrams per kilogram			Concentrations (milligrams per kilogram)															
PAHs	1-Methylnaphthalene	23	1100	80000	<0.024	<0.024	<0.023	<0.023	<0.47	<0.025	<0.024	<0.024	<0.023	<0.46	<0.00890	<0.00372	<0.024	<0.023	<0.00909	<0.0375
	2-Methylnaphthalene	20	6600	40000	<0.046	<0.046	<0.043	<0.044	<0.89	<0.047	<0.046	<0.045	<0.044	<0.87	<0.00856	<0.00372	<0.045	<0.043	<0.00875	<0.0375
	Acenaphthene	38	900	60000	**0.13**	<0.033	<0.031	<0.031	**1.3**	**0.52**	<0.032	<0.032	**0.29**	<0.62	<0.0132	<0.00372	<0.032	<0.031	<0.0135	<0.0375
	Acenaphthylene	0.7	18	360	<0.023	<0.023	<0.022	<0.022	<0.45	**0.03**	<0.023	<0.023	**0.042**	<0.44	<0.0155	<0.188	<0.022	<0.022	<0.0158	<0.19
	Anthracene	3000	5000	300000	<0.016	<0.016	<0.015	<0.015	<0.31	<0.016	<0.016	<0.015	<0.015	<0.30	<0.00423	<0.0248	<0.015	<0.015	<0.00432	<0.025
	Benzo(a)anthracene	17	0.088	3.9	**0.017**	**0.0096**	**0.0069**	**0.001**	**0.49**	**0.0081**	**0.066**	**0.0045**	**0.011**	**0.28**	<0.00334	<0.00451	**0.0021**	<0.00091	<0.00341	<0.00455
	Benzo(a)pyrene	48	0.0088	0.39	**0.032**	**0.028**	**0.039**	**0.005**	**0.53**	**0.04**	**0.19**	<0.0011	<0.0010	**0.35**	<0.00300	<0.00338	**0.0041**	**0.06**	<0.00284	<0.00341
	Benzo(b)fluoranthene	360	0.088	3.9	**0.031**	**0.014**	**0.01**	**0.0095**	**0.6**	**0.018**	**0.042**	<0.00047	**0.066**	**0.27**	<0.00307	<0.00676	**0.0038**	<0.00046	<0.00278	<0.00683
	Benzo(ghi)perylene	6800	1.8	39	**0.021**	**0.012**	<0.0023	<0.0023	**0.31**	**0.0095**	<0.0024	<0.0024	<0.0023	**0.19**	<0.00278	<0.0282	<0.0024	<0.0023	<0.00296	<0.0284
	Benzo(k)fluoranthene	870	0.88	39	**0.011**	**0.0073**	**0.0048**	**0.0036**	**0.21**	**0.0051**	<0.00096	<0.00095	<0.00096	**0.12**	<0.00267	<0.00676	**0.0049**	<0.00091	<0.00330	<0.00683
	Chrysene	37	8.8	390	**0.028**	**0.02**	**0.014**	**0.0033**	**0.8**	**0.012**	**0.024**	<0.0034	<0.0034	**0.45**	<0.00356	<0.00564	**0.0034**	<0.0033	<0.00364	<0.00569
	Dibenz (a,h) anthracene	38	0.0088	0.39	<0.0028	<0.0028	<0.0026	<0.0026	<0.054	<0.0028	<0.0028	<0.0027	<0.0027	<0.053	<0.00345	<0.0113	<0.0027	<0.0026	<0.00500	<0.0114
	Fluroanthene	500	600	40000	**0.043**	**0.028**	**0.012**	**0.0026**	**1.1**	**0.018**	<0.0023	<0.0023	**0.011**	0.56	<0.00367	<0.00789	<0.0025	<0.0022	<0.00375	<0.00796
	Fluorene	100	600	40000	<0.011	<0.011	<0.0099	<0.010	<0.20	<0.011	<0.010	<0.010	<0.010	<0.20	<0.00434	<0.0192	<0.010	<0.0099	<0.00443	<0.0193
	Indeno(1,2,3-cd)pyrene	680	0.088	3.9	<0.0013	**0.021**	<0.0013	**0.007**	**0.34**	**0.0085**	**0.03**	<0.0013	<0.0013	**0.23**	<0.00289	<0.0158	<0.0013	<0.0013	<0.00296	<0.0159
	Naphthalene	0.4	20	110	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Phenanthrene	1.8	18	390	**0.018**	**0.0079**	**0.0057**	<0.0032	**0.3**	**0.018**	<0.0034	<0.0033	**0.0053**	**0.35**	<0.0129	<0.0237	<0.0033	<0.0032	<0.0132	<0.0239
	Pyrene	8700	500	30000	**0.016**	**0.038**	**0.033**	**0.01**	**1.3**	**0.03**	**0.064**	<0.0091	**0.019**	**1.00**	<0.00500	<0.0101	<0.0090	<0.0088	<0.00512	<0.0102
TPH	DRO	100	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Metals	Cadmium	1.5	8	510	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Lead	NE	50	500	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

PAH = Polycyclic aromatic hydrocarbons
DRO = Diesel range organic
NS = Analyte not sampled
RCLs for cadmium, lead and DRO are from NR 720 WAC
RCLs for PAHs are from WDNR Publication RR-519-97

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RAWSON CONTRACTOR'S STORAGE YARD SITE
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SYMBIONT PROJECT NO. W083491

Group	Chemical Constituent	Generic Ground-water Pathway RCL	Generic Non-Industrial Direct Contact RCL	Generic Industrial Direct Contact RCL	Boring/Well No., Sample Depth (feet below ground surface), Firm Name Collecting Samples, and Sample Date															
					GP-1		GP-2		GP-3	GP-3	GP-4		GP-5		GP-6		GP-7		GP-8	
					2-4	4-6	0-2	2-4	0-2	2-4	0-2	4-6	0-2	2-4	0-2	4-6	2-4	4-6	0-2	2-4
					STS															
					10/29/07															
					AST Area		AST Area		AST Area		Storage Yard (NE)		Storage Yard (SE)		Storage Yard (south center)		Storage Yard (east center)		Storage Yard (north center)	
		Milligrams per kilogram			Concentrations (milligrams per kilogram)															
PAHs	1-Methylnaphthalene	23	1100	80000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	2-Methylnaphthalene	20	6600	40000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Acenaphthene	38	900	60000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Acenaphthylene	0.7	18	360	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Anthracene	3000	5000	300000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Benzo(a)anthracene	17	0.088	3.9	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Benzo(a)pyrene	48	0.0088	0.39	<0.0063	**0.0057**	**0.0038**	**0.0054**	**0.035**	**0.0085**	**1.5**	**0.051**	**0.0075**	**0.0049**	**0.0071**	**0.005**	<0.0036	<0.0034	**0.64**	<0.0035
	Benzo(b)fluoranthene	360	0.088	3.9	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Benzo(ghi)perylene	6800	1.8	39	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Benzo(k)fluoranthene	870	0.88	39	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Chrysene	37	8.8	390	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Dibenz (a,h) anthracene	38	0.0088	0.39	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Fluroanthene	500	600	40000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Fluorene	100	600	40000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Indeno(1,2,3-cd)pyrene	680	0.088	3.9	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Naphthalene	0.4	20	110	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Phenanthrene	1.8	18	390	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Pyrene	8700	500	30000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TPH	DRO	100	NE	NE	<1.2	<1.2	<1.2	**6.7**	<1.2	**3.2**	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Metals	Cadmium	1.5	8	510	**12.0**	**0.69**	**0.81**	**0.6**	**0.67**	**0.55**	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Lead	NE	50	500	**0.69**	**8.00**	**11.5**	**7.4**	**12**	**6.5**	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

PAH = Polycyclic aromatic hydrocarbons
DRO = Diesel range organic
NS = Analyte not sampled
RCLs for cadmium, lead and DRO are from NR 720 WAC
RCLs for PAHs are from WDNR Publication RR-519-97

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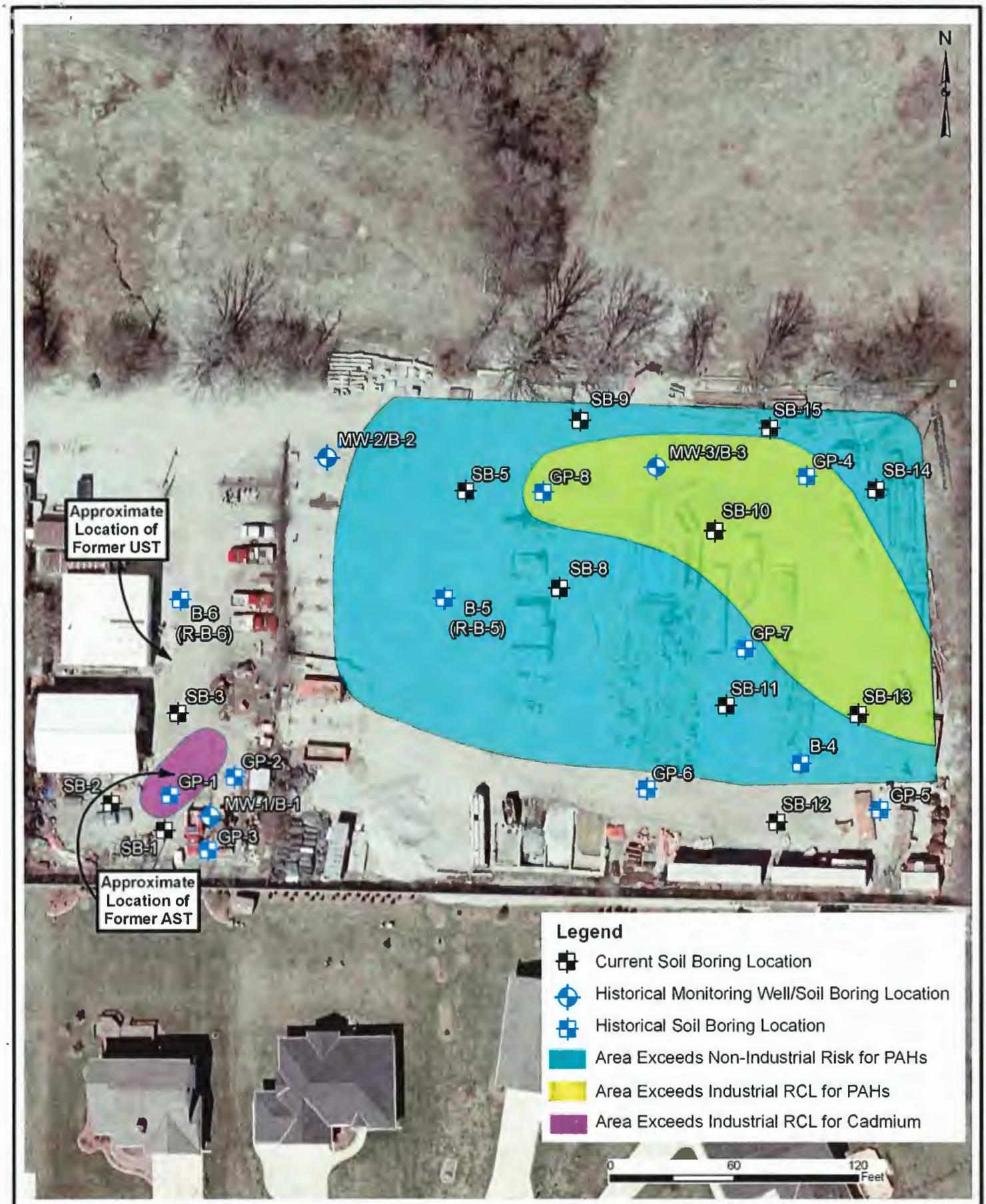
Group	Chemical Constituent	Generic Ground-water Pathway RCL	Generic Non-Industrial Direct Contact RCL	Generic Industrial Direct Contact RCL	Boring/Well No., Sample Depth (feet below ground surface), Firm Name Collecting Samples, and Sample Date														
					SB-1		SB-2		SB-3		SB-5	SB-8	SB-9	SB-10	SB-11	SB-12	SB-13	SB-14	SB-15
					0-1	3-6	0-2	3-6	0-2	3-6	0-2	0-2	0-2	0-2	0-2	0-2	0-2	0-2	0-2
					Symbiont														
					4/14/08														
					???		???		Storage yard (SW corner)		Storage Yard (north center)		Storage Yard (north	Storage Yard (NE)	Storage Yard (SE)	Storage Yard (SE)	Storage Yard (SE)	Storage Yard (NE)	Storage Yard (NE)
		Milligrams per kilogram			Concentrations (milligrams per kilogram)														
PAHs	1-Methylnaphthalene	23	1100	80000	NS	NS	NS	NS	<0.00871	<0.00896	<0.00837	<0.00942	<0.00936	**0.131**	<0.00884	<0.00936	<0.00861	<0.00915	<0.00963
	2-Methylnaphthalene	20	6600	40000	NS	NS	NS	NS	<0.00838	<0.00863	**0.211**	**0.259**	<0.00901	**2.19**	**0.250**	<0.00901	**0.896**	**0.0828**	**0.387**
	Acenaphthene	38	900	60000	NS	NS	NS	NS	<0.0130	<0.0133	**0.334**	**0.458**	<0.00667	**3.72**	**0.453**	<0.0139	**2.63**	**0.147**	**0.704**
	Acenaphthylene	0.7	18	360	NS	NS	NS	NS	<0.0151	<0.0156	<0.0146	<0.0164	<0.0163	<0.0141	<0.0154	<0.0163	<0.0150	<0.0159	<0.0167
	Anthracene	3000	5000	300000	NS	NS	NS	NS	<0.00414	<0.00426	**0.736**	**0.526**	<0.00445	5.98	<0.0274	<0.00445	**4.60**	<0.00435	**2.17**
	Benzo(a)anthracene	17	0.088	3.9	NS	NS	NS	NS	<0.00327	<0.00336	**0.198**	**0.217**	**0.0385**	**1.16**	**0.192**	**0.0112**	**0.785**	**0.0809**	**0.333**
	Benzo(a)pyrene	48	0.0088	0.39	NS	NS	NS	NS	**0.0126**	<0.00303	**0.266**	**0.289**	**0.0813**	**1.15**	**0.316**	**0.0121**	**1.05**	**0.0848**	**0.368**
	Benzo(b)fluoranthene	360	0.088	3.9	NS	NS	NS	NS	**0.0222**	<0.00303	**0.228**	**0.271**	**0.0675**	**1.04**	**0.285**	**0.0144**	**0.853**	**0.0968**	**0.312**
	Benzo(ghi)perylene	6800	1.8	39	NS	NS	NS	NS	**0.0274**	<0.00280	**0.478**	**0.283**	**0.0873**	**0.752**	**0.295**	<0.00293	**0.755**	**0.0928**	**0.276**
	Benzo(k)fluoranthene	870	0.88	39	NS	NS	NS	NS	**0.0150**	<0.00269	**0.143**	**0.208**	**0.0501**	**0.613**	**0.227**	<0.00339	**0.548**	**0.0854**	**0.176**
	Chrysene	37	8.8	390	NS	NS	NS	NS	<0.00348	<0.00325	**0.222**	**0.291**	**0.0639**	**1.27**	**0.308**	<0.00374	**0.954**	**0.104**	**0.344**
	Dibenz (a,h) anthracene	38	0.0088	0.39	NS	NS	NS	NS	<0.00337	<0.00493	<0.00325	**0.108**	**0.0151**	**0.336**	**0.160**	<0.00515	**0.412**	**0.0315**	<0.00373
	Fluroanthene	500	600	40000	NS	NS	NS	NS	**0.0313**	<0.00527	**0.511**	**0.619**	**0.145**	**6.43**	**0.700**	0.0435	**3.50**	**0.355**	**1.40**
	Fluorene	100	600	40000	NS	NS	NS	NS	<0.00425	<0.00437	<0.00440	**0.0594**	<0.00456	**0.988**	<0.00431	<0.00456	**0.563**	<0.00446	**0.125**
	Indeno(1,2,3-cd)pyrene	680	0.088	3.9	NS	NS	NS	NS	**0.0481**	<0.00381	**0.498**	**0.558**	**0.136**	**1.22**	**0.433**	<0.00304	**1.18**	**0.167**	**0.479**
	Naphthalene	0.4	20	110	NS	NS	NS	NS	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	Phenanthrene	1.8	18	390	NS	NS	NS	NS	<0.0126	<0.0130	**0.215**	**0.251**	**0.0281**	**2.22**	**0.180**	<0.0136	**0.830**	**0.128**	**0.797**
	Pyrene	8700	500	30000	NS	NS	NS	NS	<0.00490	<0.00504	**0.372**	**0.421**	**0.0759**	**3.35**	**0.373**	<0.00527	**1.71**	**0.206**	**0.795**
TPH	DRO	100	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Metals	Cadmium	1.5	8	510	<1.08	<1.08	<1.13	<1.12	<1.05	<1.14	NS	NS	NS	NS	NS	NS	NS	NS	NS
	Lead	NE	50	500	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

PAH = Polycyclic aromatic hydrocarbons
DRO = Diesel range organic
NS = Analyte not sampled
RCLs for cadmium, lead and DRO are from NR 720 WAC
RCLs for PAHs are from WDNR Publication RR-519-97

FIGURES



6737 West Washington Street
Suite 3440
West Allis, Wisconsin 53214
414.291.8840
FAX 414.291.8841

DSGN: SGH	CHK: SGH		
DR: JAB	APVD: SGH		
PATH: G:\Projects\Rawson Contractors\Fig 1 Site Plan Prop.mxd			

Rawson Contractors Site
11600 West Forest Home Avenue
Franklin, WI

FIGURE 1
SITE PLAN

SCALE	1 IN = 60 FT
DWG	Fig1SitePlanProp
DATE	MAY, 2008
PROJ NO.	W083491

6737 West Washington Street
Suite 3440
West Allis, Wisconsin 53214
414.291.8840
FAX 414.291.8841

DSGN: SGH	CHK: SGH	FOREST HOME INVESTORS SUSSEX, WI	FIGURE 2 TOWN OF LISBON SITE PROPOSED FILL AREA
DR: JAB	APVD:		
PATH: G:\Projects\Rawson Contractors\Town_of_Lisbon.mxd			

SCALE	1 IN = 300 FT
DWG	Site Plan
DATE	JUN, 2008
PROJ NO.	W083491