

LETTER OF TRANSMITTAL

To: Ms. Linda Michalets
 Wisconsin Department of Natural Resources
 2300 N. Dr. Martin Luther King Jr. Drive
 Milwaukee, WI 53212

From: Stephen Meer, P.E.
 The Sigma Group, Inc.
 1300 W. Canal Street
 Milwaukee, WI 53233

Date: December 26, 2018

Site Name: Former Biogenesis

Address: 610 West Rawson Avenue
Oak Creek, WI

FID# 241020010

BRRTS # 02-41-107191

Please check the type(s) of documents you have enclosed. Submittals will be tracked and filed based on the information you provide. **Include the FID and BRRTS numbers which have been assigned to this site, and identify the intent of the document(s) you are submitting in order to speed processing.** Please attach any required fees to this checklist.

IS THIS RELEASE PECFA-ELIGIBLE?		
<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> UNKNOWN AT THIS TIME

Type of Submittal:

LUST ERP VPLE OTHER

CHECK Agreements	FEE
Tax assignment agreement - ss.75.106(2)(d) & 292.55	\$700
Tax cancellation agreement - ss. 75.106(2)(d) & 292.55	\$700
Negotiated agreements - s. 292.11(7)(d)2	\$1,400
Technical Assistance (s. 292.55)	FEE
NR 708 No Further Action Letter	\$350
NR 716 No Further Investigation	\$700
NR 716 Site Investigation Workplan	\$700
NR 716 Site Investigation Report	\$1,050
NR 720 Soil Cleanup Standards/Reports	\$1,050
NR 722 Remedial Action Options Report	\$1,050
NR 724 Remedial Design Report	\$1,050
NR 724 Operation and Maintenance Report	\$425
NR 724 Construction Documentation Reports	\$350
NR 724 Long-Term Monitoring Plan	\$425
NR 726 Case Closure Action	\$1,050
NR 506 Exemption for building on a historic waste site	\$700
Other Technical Assistance	\$700
Liability Clarification Letters	FEE
s. 292.13(3) Off-Site Exemption Letters	\$700
s. 292.55 Lease Letters - Single Properties	\$700
s. 292.55 Lease Letters - Multiple Properties	\$1,400
s. 292.55 General Liability Clarification Letters	\$700
s. 292.21(1)(c)1.d. Lender Assessments	\$700
Department Database Fees (ss. 292.12 and 292.	FEE
Sites with groundwater contamination that attains or exceeds ch. NR 140	\$350
Sites with soil contamination that attains or exceeds ch. 720 RCLs	\$300
Sites not otherwise addressed in this schedule, where the department imposes any other limitation or condition in accordance with s. 292.12(2)	\$350
Cases submitted for closure with monitoring wells not properly abandoned, without residual groundwater contamination	\$350
Modification or removal of a site or property from the database	\$1,050
Other / Miscellaneous	
<input checked="" type="checkbox"/> PECFA Change Order Request	

Remarks _____

December 26, 2018

Project Reference #16366

Ms. Linda Michalets
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53212

RE: PECFA U & C Cost Approval Request
Biogenesis Enterprises, Inc.
610 W. Rawson Avenue
Oak Creek, Wisconsin
BRRTS# 02-41-107191
PECFA# 53154-1437-10
FID# 241020010

Dear Ms. Michalets:

On behalf of Oak Creek Rawson Industrial, LLC (OCRI), The Sigma Group, Inc. (Sigma) is submitting this PECFA Usual & Customary (U&C) Cost Approval request to the Wisconsin Department of Natural Resources (WDNR) for collection of an additional round of groundwater samples to further evaluate impacts associated with the open leaking aboveground storage tank (LAST) case at the above referenced subject property (the "Site").

BACKGROUND

The subject property was historically used by a bulk fuel oil blending, storage, and distribution facility since development in the 1950s until the 1990s. Approximately thirty-nine (39) above ground storage tanks (ASTs) were historically located at the site for use in the blending, storage and distribution operations. The ASTs were reportedly taken out of service in 1986 and the bulk of the ASTs, with the exception of three large (800,000 gallon) ASTs, removed in 1990. The large ASTs were removed in the late 1990s/early 2000s.

A separate release associated with leaking underground storage tanks (USTs) associated with the site and tracked by BRRTS# 03-41-001132 was investigated, remediated and received regulatory case closure in July 1996.

Sigma and a previous environmental consultant, Natural Resource Technology, Inc. (NRT), have completed extensive site investigation activities at the Site. A summary of site investigation activities completed to date was submitted to WDNR in August 2018 in the report entitled *Summary of Site Investigation, Work Plan for Additional Investigation & Conceptual Remedial Action Plan to Support Voluntary Party Liability Exemption*.

In response to the August 2018 report, WDNR has requested completion of additional site investigation activities in a letter dated December 19, 2018, a portion of which are associated with further evaluation of impacts associated with the open LAST case at the Site. PECFA eligibility was already approved for a portion of the additional site investigation

activities in a letter from WDNR dated August 28, 2018. However, Sigma is requesting approval for PECFA eligibility for an additional portion of the site investigation activities associated with further definition of impacts associated with the LAST portion of the Site, specifically the following:

As part of the additional scope of work requested by WDNR, Sigma anticipates installing a piezometer to the east of SGP/MW-28 in the area of the former ASTs south of the former rail spur. Although the piezometer installation is not necessarily associated with the former ASTs, Sigma anticipates collecting up to two soil samples during completion of the soil boring associated with piezometer installation for laboratory analysis of VOCs. Therefore, Sigma is requesting approval for laboratory analytical costs associated with the soil samples from this boring.

In addition, WDNR has requested collection of an additional round of groundwater samples from the groundwater monitoring well network (18 previously installed wells and piezometers plus 4 additional wells/piezometers requested by WDNR (2 wells in the area of MW-30, 2 piezometers, 1 next to MW-28 and 1 east of MW-28) for laboratory analysis of VOCs. As installation of the additional wells/piezometers is not directly associated with the former petroleum storage and distribution activities but based on the chlorinated VOC impacts to shallow groundwater, Sigma is not requesting PECFA approval for costs associated with additional well installation. However, site-wide groundwater monitoring is arguably associated with historic petroleum storage and distribution activities. Therefore, Sigma believes a portion of the costs (sampling and a portion of the laboratory analytical) associated with the proposed groundwater sampling should be eligible for reimbursement under PECFA.

PECFA USUAL & CUSTOMARY COST ESTIMATE

Sigma has prepared a cost estimate using the current Usual & Customary rate schedule for the scope of work described above. A copy of the Usual & Customary cost spreadsheet based on the proposed scope of work is included as **Attachment A**.

Proposed Tasks

- Groundwater Sampling
- Investigative Waste (Purge Groundwater) Disposal
- PECFA Change Order
- Laboratory Costs

Project Total (**Attachment A**)


\$3,398.66

WDNR
PECFA Cost Approval
December 26, 2018
Page 3

Sigma, on behalf of OCRI, requests that the Wisconsin Department of Natural Resources review and approve associated U&C Costs.

If you have any questions, please contact us at (414)-643-4200.

Sincerely,
THE SIGMA GROUP, INC.



Stephen Meer, P.E.
Senior Engineer

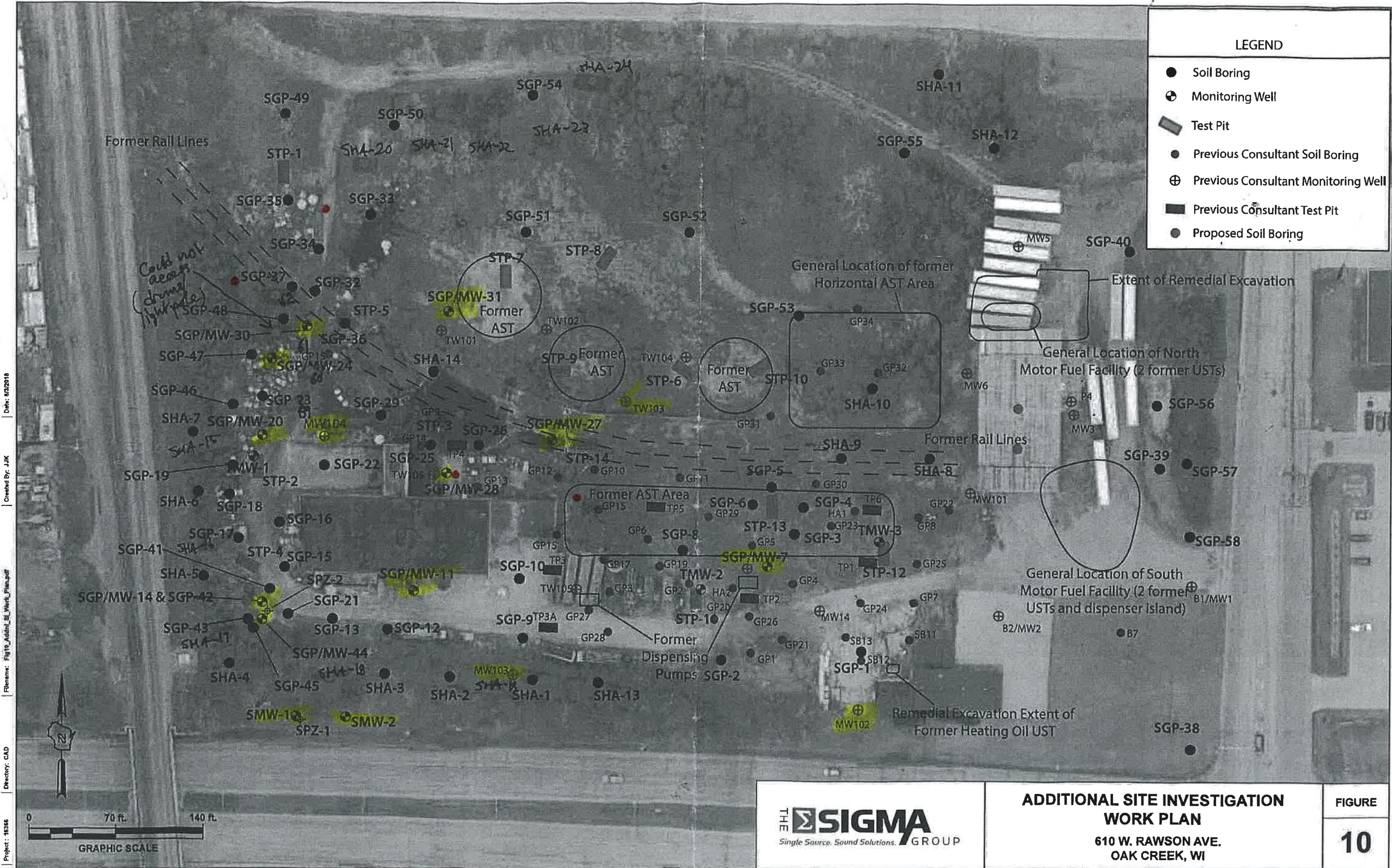


Joshua Neudorfer
Senior Consultant

Attachments

Cc: Mr. Eric Ogden – Oak Creek Rawson Industrial, LLC (E-Copy)
)

FIGURES



● = Existing Well to be Sampled

● = Proposed Additional Well/Piezometer



ADDITIONAL SITE INVESTIGATION WORK PLAN
 610 W. RAWSON AVE.
 OAK CREEK, WI

FIGURE
10

ATTACHMENT A

Usual and Customary Standardized Invoice #24

July 2018- December 2018



RR-100a

PECFA #: 53154-1437-10 Vendor Name: _____
 BRRTS #: 02-41-107191 Invoice #: _____
 Site Name: Former Biogenesis Enterprises, Inc. Invoice Date: _____
 Site Address: 610 W. Rawson Ave., Oak Creek, WI Check #: _____

U&C Total \$ 3,398.66
 Variance to U&C Total \$ -
 Grand Total \$ 3,398.66

TASK	TASK DESCRIPTION	SERVICES	ACTIVITY CODE	ACTIVITY REFERENCE CODE DESCRIPTION	UNIT	MAX UNIT COST	UNITS	TOTAL MAX
1	GW Sampling		GS05	Sample Collection	Well	\$ 72.45	22	\$ 1,593.90
1	GW Sampling		GS06	Sample Collection in well w/LNAPL	Well	\$ 87.45		\$ -
1	GW Sampling		GS10	Incremental Sample Collection (natural attenuation)	Well	\$ 47.67		\$ -
1	GW Sampling		GS15	Incremental Sample Collection (cadmium & lead)	Well	\$ 26.25		\$ -
1	GW Sampling		GS20	Measure Water Levels (for wells not being sampled)	Well	\$ 14.70		\$ -
1	GW Sampling		GS25	Primary Mob/Demob	Site	\$ 628.11	1	\$ 628.11
1	GW Sampling		GS30	Temporary Well Abandonment	Well	\$ 26.99		\$ -
2	O & M Reporting		OMR05	Semi-Annual GW Monitoring (Form 4400-194)	Report	\$ 823.73		\$ -
2	O & M Reporting		OMR10	Semi-Annual GW Monitoring (Form 4400-194) with LNAPL Removal per RR-628	Report	\$ 1,040.45		\$ -
3	LNAPL Assessment & Removal		LAR06	LNAPL Sample Collection (1 per site, unless otherwise direct	Site	\$ 68.25		\$ -
3	LNAPL Assessment & Removal		LAR10	Primary Mob/Demob	Site	\$ 518.07		\$ -
4	Waste Disposal	Consultant	WD05	Consultant Coordination	Site	\$ 137.13		\$ -
4	Waste Disposal	Commodity	WD10	GW Sample and/or Purge	Drum	\$ 42.11		\$ -
4	Waste Disposal	Commodity	WD15	Drill Cuttings	Drum	\$ 108.15		\$ -
4	Waste Disposal	Commodity	WD17	Landfill Environmental Fee (provide documentation)	ACTUAL COST			
4	Waste Disposal	Commodity	WD20	Free Product	Drum	\$ 118.76		\$ -
4	Waste Disposal	Commodity	WD25	Primary Mob/Demob	Site	\$ 287.70		\$ -
5	Closure Request		CR05	Primary Closure Request	Submittal	\$ 2,700.00		\$ -
5	Closure Request		CR15	Continuing Obligation Packet Submittal (For Source Property	Packet	\$ 507.36		\$ -
5	Closure Request		CR20	Continuing Obligation Packet Submittal (For off-site Propertie	Per Additional Property	\$ 222.71		\$ -
5	Closure Request		CR25	Closure Request Concurrent with SIR	Submittal	\$ 1,250.00		\$ -
6	Letter Report/Addendum		LRA05	Letter Report/Addendum	Letter	\$ 1,039.29		\$ -

TASK	TASK DESCRIPTION	SERVICES	ACTIVITY CODE	ACTIVITY REFERENCE CODE DESCRIPTION	UNIT	MAX UNIT COST	UNITS	TOTAL MAX
12	Direct Push	Commodity	DP70	GW Sample Collection	Each	\$ 39.27	\$ -	
12	Direct Push	Commodity	DP75	Temporary Well Installation	Ft	\$ 5.25	\$ -	
12	Direct Push	Commodity	DP80	Mob/Demob (Includes decon)	Site	\$ 526.05	\$ -	
13.a	Drilling In Unconsolidated Soils - With Soil Sampling	Consultant	DR05	0 - 25 ft bgs	Ft	\$ 5.40	\$ -	
13.a	Drilling In Unconsolidated Soils - With Soil Sampling	Consultant	DR10	26 - 50 ft bgs	Ft	\$ 5.67	\$ -	
13.a	Drilling In Unconsolidated Soils - With Soil Sampling	Consultant	DR15	51 - 75 ft bgs	Ft	\$ 7.30	\$ -	
13.a	Drilling In Unconsolidated Soils - With Soil Sampling	Consultant	DR20	Primary Mob/Demob	Site	\$ 593.04	\$ -	
13.b	Drilling In Unconsolidated Soils - Without Soil And/Or GW Sampling	Consultant	DR25	Consultant Oversight	Ft	\$ 1.58	\$ -	
13.b	Drilling In Unconsolidated Soils - Without Soil And/Or GW Sampling	Consultant	DR30	Primary Mob/Demob	Site	\$ 505.16	\$ -	
13.c	Drilling In Bedrock	Consultant	DR35	Consultant Oversight	Ft	\$ 6.20	\$ -	
13.c	Drilling In Bedrock	Consultant	DR40	Primary Mob/Demob	Site	\$ 593.04	\$ -	
13.d	Drilling In Unconsolidated Soils - With Soil Sampling	Commodity	DR45	0 - 25 ft bgs	Ft	\$ 16.70	\$ -	
13.d	Drilling In Unconsolidated Soils - With Soil Sampling	Commodity	DR50	26 - 50 ft bgs	Ft	\$ 18.38	\$ -	
13.d	Drilling In Unconsolidated Soils - With Soil Sampling	Commodity	DR55	51 - 75 ft bgs	Ft	\$ 21.53	\$ -	
13.e	Drilling In Unconsolidated Soils - Without Soil And/Or GW Sampling	Commodity	DR60	Drilling in Unconsolidated Soils	Ft	\$ 11.97	\$ -	
13.f	Drilling In Bedrock	Commodity	DR65	Drilling in Bedrock	Ft	\$ 33.18	\$ -	
13.f	Drilling In Bedrock	Commodity	DR70	Bedrock Drilling Setup Charge	Each	\$ 162.02	\$ -	
13.f	Drilling In Bedrock	Commodity	DR75	Air Compressor	Day	\$ 426.41	\$ -	
14	Monitoring Well Installation	Consultant	MWI05	0 - 25 ft bgs	Ft	\$ 3.89	\$ -	
14	Monitoring Well Installation	Consultant	MWI10	26 - 75 ft bgs	Ft	\$ 2.73	\$ -	
14	Monitoring Well Installation	Commodity	MWI15	2 inch PVC Casing	Ft	\$ 16.70	\$ -	
14	Monitoring Well Installation	Commodity	MWI20	Well Development	Well	\$ 147.63	\$ -	
14	Monitoring Well Installation	Commodity	MWI25	Mob/Demob (For development of grout or slurry sealed wells	Site	\$ 548.63	\$ -	
15	Misc. Drilling Activities & Supplies		MDT05	Drill Rig Mob/Demob	Mob/Demob	\$ 963.38	\$ -	
15	Misc. Drilling Activities & Supplies		MDT10	Well Cover/flushmount	Each	\$ 202.65	\$ -	
15	Misc. Drilling Activities & Supplies		MDT15	Stickup Well Cover	Each	\$ 163.91	\$ -	

Usual and Customary Standardized Invoice #24

July 2018- December 2018



RR-100A

TOTAL LAB CHARGES ##### TASK 33 24 ##### TASK 24 0 \$ -

MATRIX	REF CODE	REIMBURSABLE ANALYTE	UNITS	MAX COST	SAMPLES	TOTAL	MAX COST	SAMPLES	TOTAL
AIR	A1	Benzene	SAMPLE	\$ 44.94		\$ -			
AIR	A2	BETX	SAMPLE	\$ 49.46		\$ -			
AIR	A3	GRO	SAMPLE	\$ 46.10		\$ -			
AIR	A4	VOC's	SAMPLE	\$ 71.93		\$ -			
WATER	W1	GRO/PVOC	SAMPLE	\$ 29.19		\$ -			
WATER	W2	PVOC	SAMPLE	\$ 26.99		\$ -			
WATER	W3	PVOC + 1,2 DCA	SAMPLE	\$ 43.79		\$ -			
WATER	W4	PVOC + Naphthalene	SAMPLE	\$ 30.35	22	\$ 667.70			
WATER	W5	VOC	SAMPLE	\$ 71.93		\$ -			
WATER	W6	PAH	SAMPLE	\$ 72.98		\$ -			
WATER	W7	Lead	SAMPLE	\$ 12.39		\$ -			
WATER	W8	Cadmium	SAMPLE	\$ 13.55		\$ -			
WATER	W9	Hardness	SAMPLE	\$ 12.39		\$ -			
WATER	W10	BOD, Total	SAMPLE	\$ 23.63		\$ -			
WATER	W11	Nitrate	SAMPLE	\$ 11.24		\$ -			
WATER	W12	Total Kjeldahl	SAMPLE	\$ 20.27		\$ -			
WATER	W13	Ammonia	SAMPLE	\$ 16.91		\$ -			
WATER	W14	Sulfate	SAMPLE	\$ 10.19		\$ -			
WATER	W15	Iron	SAMPLE	\$ 10.19		\$ -			
WATER	W16	Manganese	SAMPLE	\$ 10.19		\$ -			
WATER	W17	Alkalinity	SAMPLE	\$ 10.19		\$ -			
WATER	W18	methane	SAMPLE	\$ 46.10		\$ -			
WATER	W19	Phosphorous	SAMPLE	\$ 18.06		\$ -			
WATER	W20	VOC Method 524.2	SAMPLE	\$ 176.30		\$ -			
WATER	W21	EDB Method 504	SAMPLE	\$ 95.45		\$ -	MAX COST	SAMPLES	TOTAL
SOILS	S1	GRO	SAMPLE	\$ 24.78		\$ -	\$ 24.78		\$ -
SOILS	S2	DRO	SAMPLE	\$ 30.35		\$ -	\$ 30.35		\$ -
SOILS	S3	GRO/PVOC	SAMPLE	\$ 28.14		\$ -	\$ 28.14		\$ -
SOILS	S4	PVOC	SAMPLE	\$ 25.83		\$ -	\$ 25.83		\$ -
SOILS	S5	PVOC + 1,2 DCA + Naphthalene	SAMPLE	\$ 49.46		\$ -	\$ 49.46		\$ -
SOILS	S6	PVOC + Naphthalene	SAMPLE	\$ 36.02	2	\$ 72.04	\$ 36.02		\$ -
SOILS	S7	VOC	SAMPLE	\$ 71.93		\$ -	\$ 71.93		\$ -
SOILS	S8	SPLP Extraction VOC only	SAMPLE	\$ 50.61		\$ -	\$ 50.61		\$ -
SOILS	S9	PAH	SAMPLE	\$ 72.98		\$ -	\$ 72.98		\$ -
SOILS	S10	Lead	SAMPLE	\$ 12.39		\$ -	\$ 12.39		\$ -