

**LETTER OF TRANSMITTAL**

To: 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

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.

Date: August 5, 2019  
 Site Name: Former Biogenesis  
 Address: 610 W. Rawson Ave.  
Oak Creek, WI  
 FID# 241020010  
 BRRTS # 02-41-107191 & 06-41-582006

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

**Type of Submittal:**  
 LUST     ERP     VPLE     OTHER

<b>CHECK Agreements</b>		<b>FEE</b>
	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
<b>Technical Assistance (s. 292.55)</b>		<b>FEE</b>
	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
<b>Liability Clarification Letters</b>		<b>FEE</b>
	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
<b>Department Database Fees (ss. 292.12 and 292.</b>		<b>FEE</b>
	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
<b>Other / Miscellaneous</b>		
<b>x</b>	Post-Remediation Groundwater Monitoring Plan Addendum	

Remarks \_\_\_\_\_

August 5, 2019

Project #16366

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

RE: Post-Remediation Groundwater Monitoring Plan Addendum  
Former Biogenesis  
610 W Rawson Ave  
Oak Creek, WI  
FID No. 241020010  
BRRTS No. 02-41-107191 & 06-41-582006

Dear Ms. Michalets:

The Sigma Group, Inc. (Sigma) on behalf of Oak Creek Rawson Industrial, LLC (OCRI) has prepared this letter to provide additional details on the plans for post-remediation groundwater sampling that have been provided in documents submitted to date. Most recently, in Sigma's *Emerging Contaminants Assessment* letter report dated June 27, 2019, Sigma provided a revised figure illustrating proposed locations for replacement/additional monitoring wells to be installed as part of post-remediation/post-construction groundwater monitoring.

#### **PROPOSED WELL LOCATION UPDATE**

Based on comments received at our meeting on July 29, 2019, Sigma has updated the recommended locations for select replacement/additional groundwater monitoring wells. A map illustrating the updated proposed locations is included as **Figure 1**.

Changes in the proposed replacement/additional groundwater monitoring well locations are summarized as follows:

- The replacement monitoring well formerly proposed to be located near former well SGP/MW-11 is relocated adjacent to SGP/MW-27 (inside the proposed building footprint). Shallow groundwater impacts were not identified in samples previously collected from MW-11; therefore, the location for the replacement monitoring well will be shifted to near former well MW-27 where shallow groundwater impacts had been previously identified.
- An additional well location is proposed to be located at the location of former well TW-104/TW-104R (inside the proposed building footprint). Although it was previously determined that a replacement monitoring well would be required within the building footprint, a specific location for the well within the building footprint had not been specified to date.

- The proposed location for the additional monitoring well to be located north of the new building near the northern property boundary is shifted further to the east. Based on available shallow groundwater measurements, a location further to the east is more likely to be down-gradient from the location of former wells TW-104 and TW-104R, where previously collected samples have identified the presence of per- and polyfluoroalkyl substances (PFAs).

Rationale for placement of remaining replacement/additional wells is based on the location of impacts to shallow groundwater identified during pre-remediation investigation activities as well as the interpreted shallow groundwater flow direction. Specifically:

- a replacement well and piezometer are proposed near the southwest site corner in the area of former well MW-14 and SPZ-2;
- replacement monitoring wells are proposed to the west of the new site building in an area where VOCs had been identified within shallow groundwater during site investigation activities;
- a replacement monitoring well is proposed to the north of the new site building in the area of former well MW-101 (a location determine to be down-gradient from the west-central part of the site based on pre-remedial investigation activities);
- a replacement monitoring well is proposed for the former Northern Environmental MW-14 location where shallow groundwater impacts had been identified; and
- remaining proposed well locations are near the down-gradient property boundaries.

#### **PROPOSED SAMPLING PLAN**

Sigma anticipates that the replacement and/or additional groundwater monitoring wells will be installed as soon as construction activities at the site allow. Following installation and development of the wells, post-remediation monitoring activities will be initiated. Sigma proposes the following initial sampling plan:

Groundwater Monitoring Frequency: quarterly, at least two rounds

Static Water Level Measurements: all 14 wells and 2 piezometers

*In-Situ* Parameter Measurements: all 14 wells and 2 piezometers

Sampling for Laboratory Analysis of VOCs: all 14 wells and 2 piezometers

Sampling for PFAs: 6 proposed replacement/additional monitoring wells labeled in yellow as illustrated on attached **Figure 1**, (SMW-2, SMW-3, SMW-4, SMW-5, SMW-6 and SMW-104R).

Submittal of groundwater samples for 1,4-dioxane is not proposed for the initial sampling event. Based on results of sampling for 1,4-dioxane completed to date, concentrations of 1,4-dioxane demonstrated a strong correlation to concentrations of trichloroethene (TCE). Therefore, to reduce analytical expenses, Sigma recommends delaying sampling for 1,4-dioxane until the second sampling event. During the second sampling event, groundwater samples will be collected and submitted for laboratory analysis of 1,4-dioxane during the

from wells where trichloroethene (TCE) is reported greater than laboratory detection limits within initial post-remediation samples.

Following completion of the two quarterly rounds, the groundwater analytical data will be reviewed and the proposed monitoring plan modified.


Based on the information presented in this submittal we are requesting that the WDNR provide concurrence on the proposed post-remediation groundwater monitoring plan. Please call us at (414) 643-4200 with any questions related to this submittal.

Sincerely,

**THE SIGMA GROUP, INC.**



Stephen R. Meer, P.E.  
Senior Engineer



Joshua Neudorfer  
Senior Consultant



Randy E. Boness, P.G.  
Geosciences Group Leader

**LEGEND**

- Soil Boring
- ⊕ Monitoring Well
- ⊕ Piezometer
- Test Pit
- Previous Consultant Soil Boring
- ⊕ Previous Consultant Monitoring Well
- Previous Consultant Test Pit
- ★ Proposed Monitoring Well
- ▲ Proposed Piezometer
- ★ Proposed Well/PFAs Sampling Location
- Existing well/piezometer to be included in post-remediation sampling



**LEGEND:**

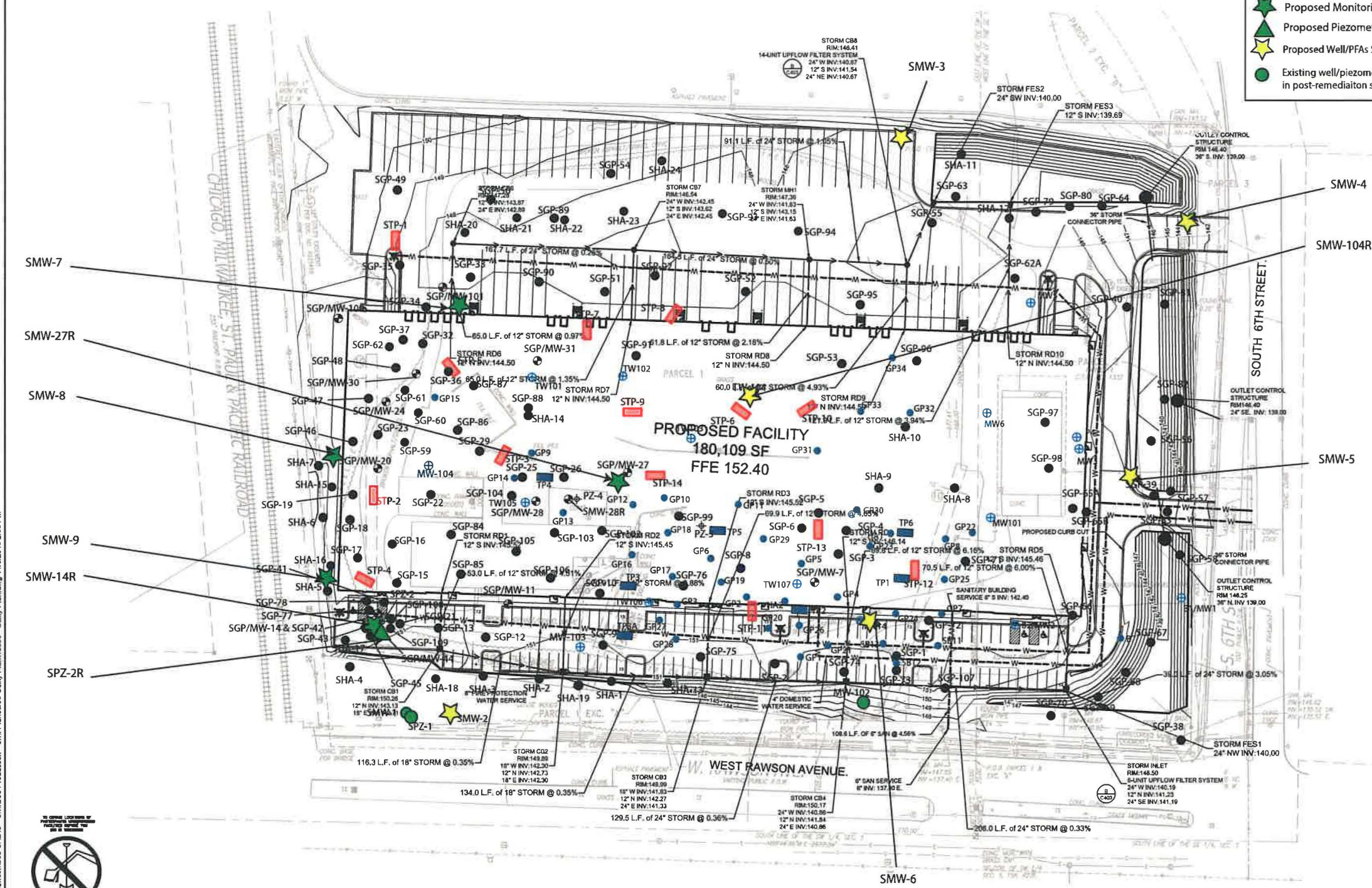
- W --- PROPOSED WATER SERVICE
- SAN --- PROPOSED SANITARY SERVICE
- ST --- PROPOSED STORM SEWER
- PROPOSED STORM INLET
- PROPOSED STORM MANHOLE
- PROPOSED SANITARY MANHOLE

**GENERAL NOTES:**

1. THE UNDERGROUND UTILITY INFORMATION SHOWN ON THIS DRAWING IS BASED ON FIELD LOCATIONS AND/OR RECORDS FURNISHED BY MUNICIPALITIES AND UTILITY COMPANIES. THE LOCATION AND ACCURACIES OF WHICH CANNOT BE GUARANTEED. THERE MAY BE ADDITIONAL UNDERGROUND UTILITY INSTALLATIONS WITHIN THE PROJECT AREA THAT ARE NOT SHOWN.
2. VERIFY ACTUAL LOCATIONS AND INVERTS IN THE FIELD. ANY POTENTIAL ERRORS, OMISSIONS, OR DISCREPANCIES SHALL BE BROUGHT TO THE ATTENTION OF THE ENGINEER PRIOR TO PROCEEDING WITH CONSTRUCTION.
3. WORK TO BE COMPLETED IS INDICATED IN BOLD TYPE LINES AND EXISTING CONDITIONS ARE INDICATED BY LIGHT TYPE LINES.
4. ELECTRONIC CIVIL FILES ARE AVAILABLE UPON WRITTEN REQUEST. DO NOT USE ELECTRONIC CIVIL FILES TO LAYOUT FOUNDATIONS, COLUMN LINES, LIGHT POLES, OR OTHER NON CIVIL SITE WORK. REFER TO ARCHITECTURAL DRAWINGS FOR DIMENSIONS OF BUILDING AND ARCHITECTURAL FEATURES.
5. ALL UTILITIES WITHIN 5 FEET OF PAVED AREAS SHALL REQUIRE GRANULAR BACKFILL. SLURRY BACKFILL IS REQUIRED FOR ALL WORK IN PUBLIC RIGHT OF WAY.
6. PRIVATE STORM INLETS IN PAVEMENT SHALL REQUIRE DRAIN TILE STUBS OF 10 FEET IN TWO DIRECTIONS FOR SUBDRAINAGE. RIM GRADE FOR STORM INLETS IN CURB AND GUTTER ARE FLOW LINE GRADES.
7. WORK IN PUBLIC RIGHT OF WAY SHALL FOLLOW MATERIAL AND INSTALLATION REQUIREMENTS PER MUNICIPAL AND/OR COUNTY.
8. PRIVATE STORM SEWER 12-INCH DIAMETER OR LARGER SHALL BE HDPE. BELOW 12-INCH DIAMETER SHALL BE PVC SDR-35 ASTM D3034. PRIVATE WATER MAIN SHALL BE CLASS 150 DR 18 PVC CONFORMING TO AWWA C-900. PRIVATE SANITARY SEWER SHALL BE PVC SDR-35 ASTM D3034.
9. COORDINATE FINAL LOCATION AND DESIGN OF PRIVATE UTILITY SERVICES (ELECTRIC, GAS, PHONE, CABLE) WITH UTILITY COMPANIES.
10. IF PROJECT IS DESIGN BUILD MEP, THE GENERAL CONTRACTOR IS REQUIRED TO PROVIDE FINAL SEWER AND WATER DESIGN SHOWING LOCATION, INVERTS AND SIZES TO THE ENGINEER FOR FINAL REVIEW AND VERIFICATION PRIOR TO STARTING UNDERGROUND UTILITY CONSTRUCTION.

SOUTH 6TH STREET & WEST RAWSON AVENUE  
 OAK CREEK, WISCONSIN

**PROPOSED WELL LOCATIONS**



CALL DIGGERS HOTLINE  
 1-800-242-8511  
 TOLL FREE  
 WE SERVICE SUBURBAN AREAS AND A 24 HOUR SERVICE CENTER IS AVAILABLE  
 MILWAUKEE AREA 256-1181

File: N:\ISA Commercial\16366\_01n & Rawson\060 CAD/C - Civil\16366-Utility Plan.dwg 11/8/18 2:06 PM

THE UNDERGROUND UTILITY INFORMATION SHOWN ON THIS MAP IS BASED ON FIELD MARKINGS AND INFORMATION FURNISHED BY UTILITY COMPANIES AND THE LOCAL MUNICIPALITY. WHILE THIS INFORMATION IS BELIEVED TO BE RELIABLE, ITS ACCURACY AND COMPLETENESS CANNOT BE GUARANTEED.

NO.	REVISION	DATE	BY

DRAWING NO.	16366 - Utility Plan.dwg
DRAWN BY:	---
DATE:	11/8/18
PROJECT NO.:	16366
CHECKED BY:	---
APPROVED BY:	---
SHEET NO.:	---

**Figure 1**