



October 15, 2019

Mr. Eric Ogden  
Oak Creek Rawson Industrial, LLC  
100 S. Wacker Drive, Suite 950  
Chicago, IL 60606

SUBJECT: Review of Post-Remediation Groundwater Monitoring Plan Addendum  
Biogenesis (Former), 610 W. Rawson Avenue, Oak Creek, WI  
DNR BRRTS # 02-41-107191 & 06-41-582006 FID # 241020010

Dear Mr. Ogden:

On August 7, 2019, the Wisconsin Department of Natural Resources (DNR) received the *Post-Remediation Groundwater Monitoring Plan Addendum* (Addendum), dated August 5, 2019, by The Sigma Group, Inc. (Sigma) for the site referenced above. Sigma proposes replacing a number of monitoring wells and one piezometer to confirm groundwater contaminant trends are stable or decreasing following completion of remedial actions and property redevelopment. The DNR is providing the following comments, based upon the review of the Addendum and file information.

#### **Additional Site Investigation Needed**

In a letter dated December 19, 2018, the DNR requested that the investigation for the above referenced site be expanded to include groundwater sampling for per- and polyfluoroalkyl substances (PFAS). The results of March and May 2019 sampling conducted by Sigma at five monitoring wells confirms that PFAS chemicals are present at the site. The highest concentrations were detected at wells TW-104 and TW-104R, near the center of the property; ranging from 7 to 4,500 parts per trillion. PFAS concentrations were also detected in the three monitoring wells that were sampled on the southwest portion of the site. In addition, 1,4-dioxane concentrations exceeded the enforcement standard at MW-14, in the southwest corner, and at MW-27, near the center of the property. To complete the investigation, per Wis. Admin. Code § NR 716.11 (3), the degree and extent of PFAS and 1,4-dioxane contamination must be defined in all affected media. The DNR requests that you submit a work plan for defining the extent of PFAS and 1,4-dioxane in soil as well as groundwater at the site. Soil sampling for these compounds should be conducted during the installation of the new and replacement monitoring wells, especially those within the new building footprint, while this area is accessible. Additional soil and groundwater investigation activities may be necessary to adequately define the degree and extent of PFAS contamination.

#### **Groundwater Monitoring Plan Revisions**

The proposed network of 13 monitoring wells and 2 piezometers for groundwater monitoring is generally acceptable as the next step in the investigation with the following revisions, which should be incorporated into the work plan requested above:

- One additional piezometer should be placed within the central portion of the property, preferably nested with MW-27R, to evaluate the trends in chlorinated compounds, including the vinyl chloride that was previously detected above the enforcement standard in PZ-4.
- Replacement monitoring well MW-14R should be added to the list of wells for PFAS groundwater sampling, as these compounds were previously detected in this location and it appears to be upgradient of the other wells to be analyzed for these compounds.

- Additional monitoring wells may need to be installed and/or analyzed for PFAS based on the requested soil investigation results.

As indicated in the Addendum, after completion of two quarterly rounds of sampling, the data should be evaluated, and an updated sampling plan proposed.

### Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.09 (1), the DNR is requesting submittal of a supplemental site investigation work plan for the investigation of PFAS and 1,4-dioxane in soil and other media, as necessary, within 60 days of the date of this letter, **by December 16, 2019**. The work plan must comply with Wis. Admin. Code § NR 716.09 (2).
- Per Wis. Admin. Code § NR 716.11 (2g), the additional site investigation activities must begin within 90 days of the submittal of the work plan.
- Per Wis. Admin. Code § NR 716.15 (1), a site investigation addendum report shall be submitted within 60 days after completion of the field investigation.
- NR 700 semi-annual progress reports are required until the case is closed.

Thank you for your efforts to protect Wisconsin's environment. If you have any questions, please contact me in writing at the letterhead address, by email at [Linda.Michalets@wisconsin.gov](mailto:Linda.Michalets@wisconsin.gov), or by telephone at (414) 263-8757.

Sincerely,



Linda Michalets  
Hydrogeologist  
Remediation and Redevelopment Program

cc: Mr. Stephen Meer and Mr. Joshua Neudorfer, The Sigma Group, Inc.