



September 2, 2020

Mr. Eric Ogden
Oak Creek Rawson Industrial, LLC
100 S. Wacker Drive, Suite 950
Chicago, IL 60606
Email: eogden@hsacommercial.com

SUBJECT: Status Report Review
Biogenesis Enterprises Inc. (Former), 610 W. Rawson Avenue, Oak Creek, WI
DNR BRRTS #02-41-107191/06-41-582006 FID #241020010

Dear Mr. Ogden:

On July 7, 2020, the Wisconsin Department of Natural Resources (DNR) received the *Additional Soil, Groundwater and Vapor Sampling Report*, (Report) dated July 7, 2020, prepared by The Sigma Group, Inc. (Sigma) for the site referenced above. The Report summarizes the post-remedial environmental work conducted in late 2019 through mid 2020. Sigma requested DNR's review of the Report and concurrence with their conclusion that no additional soil or vapor sampling is required, and their proposal for one additional round of groundwater monitoring of the current well network be conducted and reevaluated for the overall completion of the investigation. The DNR has reviewed the Report and provides the following comments.

Soil Investigation

The degree and extent of PFAS contamination has not been fully defined in soil. Additional soil sampling is required to define these contaminants. Going forward, the laboratory should include the suite of 36 compounds that are listed for PFAS analysis in aqueous and non-aqueous matrices in Wisconsin. The list of 36 compounds, from the DNR's *Notice of Final Guidance and Certification*, dated December 16, 2019, is enclosed for your reference.

The detection limits for 1,4-dioxane in shallow soil samples (32 to 57 micrograms per kilogram (ug/kg)) were more than an order of magnitude greater than the groundwater protection residual contaminant level (RCL) of 1.2 ug/kg. Explain why the lab was unable to meet the groundwater protection RCL of 1.2 ug/kg, and whether the detection limit equal or less than the RCL can be attained by a Wisconsin certified laboratory. Additional soil sampling for this contaminant should be conducted with a detection limit that meets the RCL, if possible.

Groundwater Investigation

The degree and extent of PFAS and 1,4-dioxane have not yet been defined in groundwater to the north, south and west of the site. Additional wells should be installed to further define the limits of contamination. The Wisconsin Department of Health Services (DHS) has set the recommended groundwater standard of 20 parts per trillion (ppt) for PFOS and PFOA, individually and combined, which should be used as a guide in defining the extent of contamination (<https://www.dhs.wisconsin.gov/chemical/pfas.htm>). Going forward, PFAS analysis should include the suite of 36 compounds.

It appears that the post-remedial extent of benzene may not be defined to the south/southeast of SMW-6 and the extent of chlorinated volatile organic compounds (CVOCs) may not be defined to the west of SMW-14R. There

should be continued evaluation of the variations in the water table to determine whether it is influencing the contaminant trends over time, and whether additional monitoring wells are needed to define the extent of these contaminants as well.

Surface Water/Sediment Investigation

PFAS and 1,4-dioxane are present in groundwater at the northeastern property line. The investigation of groundwater contamination in this area should include an updated assessment of potential contaminant migration to the Oak Creek tributary located to the northeast of the site.

Vapor Investigation

Considering that the building was constructed not long before vapor sampling occurred, one additional round of vapor sampling should be conducted during the winter months. The building and its heating and cooling systems may have resulted in new preferential pathways for contaminant migration or vapor accumulation in the subsurface after these dynamic conditions have equilibrated.

General Comments

The units of measurement on many of the tables are not clear and should be corrected. For example, the PFAS soil data in Table 1 includes a column with the units of ug/kg on the left and then units of ng/L on the right, which would not be applicable for soil data. The 'Notes' section at the bottom of the page describes the analytical units as "mg/kg = milligrams..." Other tables also include units that do not match the unit description in the 'Notes' section and should be corrected.

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 activities outlined above within 60 days of the date of this letter, **by November 2, 2020**. 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 by email at Linda.Michalets@wisconsin.gov or by telephone at (414) 435-8010.

Sincerely,



Linda Michalets
Hydrogeologist
Remediation and Redevelopment Program

Enclosure

cc: Mr. Stephen Meer, The Sigma Group (email: smeer@thesigmagroup.com)