

July 25, 2018

Mr. Jeff Ackerman
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711

RE: Response to Partial Approval of Revised Work Plan for Conducting Environmental Services for the DB Oak Property (former Thomas Industries) Located at 700-710 Oak Street in Fort Atkinson, Wisconsin — FEC Project No. 170503; DNR BRRTS # 02-28-176509

Dear Mr. Ackerman:

This letter is in response to your partial approval and associated comments to our revised work plan in your letter dated June 20, 2018. The revised work plan specifically addressed limited soil removal near the storm sewer outfall at the southeast corner of the DB Oak property, the vapor sampling within the southeastern portion of the building and at several locations downgradient of the DB Oak Property, and collecting a groundwater sample from MW-12A to confirm the impacts and the current site conditions. As indicated in our work plan, these activities are to be conducted prior to proposing additional soil, vapor, or groundwater investigation.

Per your letter, we are proceeding with the sub-slab and sewer vapor evaluation. We have contacted the City of Fort Atkinson for permit and access to install vapor points within the right-of-way adjacent to the sewer, as well as contacted a probe contractor to conduct the utility clearance and install the vapor points. This work is proposed for the week of August 6, 2018.

As you are aware, the sediment removal is proposed near the outfall at the southeast corner of the DB Oak property. Your letter indicated that certain elements of NR 724.05 were missing. Based on our review of the code (please see attached) the only elements we believe were missing were the name, address, and telephone number of the RP for the site, the DNR BRRTS # for the site (which are included), the location of the site by quarter-quarter section, township and range (attached), the county geographic position (WTM 615029, 274600) and latitude and longitude (42.94, -88.84). Please clarify what additional elements you feel were missing from the plan, so we may assure future compliance with the administrative code.

Prior to conducting additional site investigation, FEC proposed to collect a groundwater sample from MW-12A to confirm the impacts and the current site conditions. This sampling will be conducted by or under supervision of a professional engineer, hydrogeologist, OR scientist in accordance with NR 712.05(1): "All sampling, field work and development of plans for field activities for response actions being taken to satisfy requirements of ss. 708.09 to 708.15

or chs. NR716 to 754 shall be conducted by or under the supervision of a professional engineer, hydrogeologist or scientist, unless sub (2) or an exemption in s. NR 712.11 is applicable". If impacts are confirmed above the groundwater quality ES, additional wells and piezometers would be proposed to the south and east of MW-12A.

It is our understanding that the proposed limited soil removal, the vapor sampling, and the collection of a groundwater sample from MW-12A do not require certification or oversight by a certified hydrogeologist. As such, a signed certification statement was not provided at this time. Following receipt and review of the laboratory analytical testing, FEC will provide the results of the testing to the DNR along with its evaluation and proposed scope of work for additional investigation. If additional soil, vapor, or groundwater investigation or remediation is proposed, we will provide additional documentation along with the appropriate certification statements at that time.

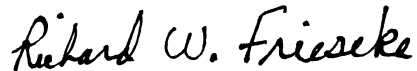
We appreciate this opportunity to clarify the proposed scope of work outlined in our revised work plan. Please recall that a \$500 review fee was provided in our technical meeting with you and the review of the work plan was going to be covered under that fee. Please call us at (414) 228-9815 if you have any questions or if you need additional information.

Respectfully,

FRIESS ENVIRONMENTAL CONSULTING, INC.



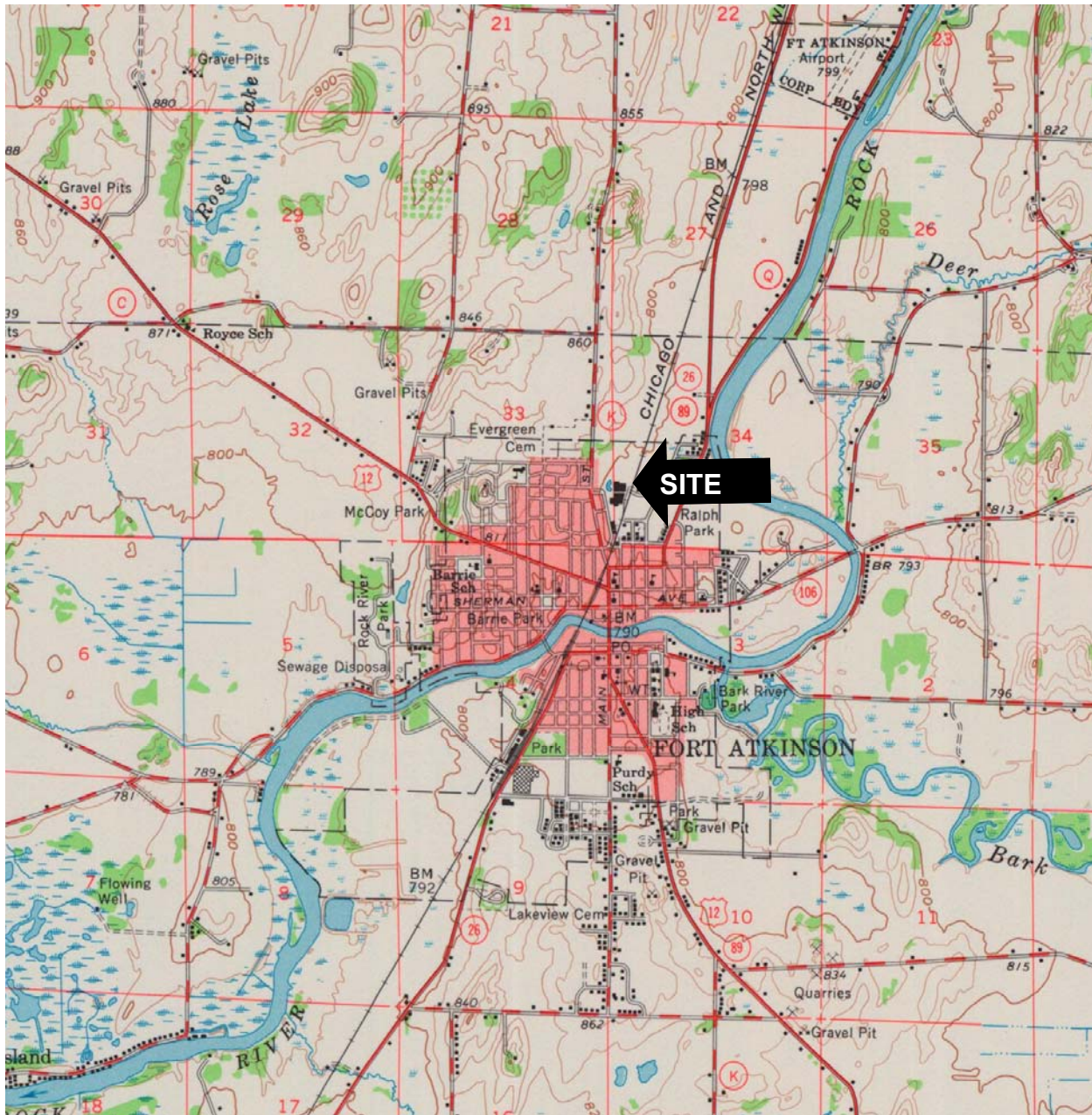
Trenton J. Ott
Project Manager



Richard W. Friesseke, P.E.
President

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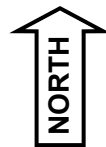


Approximate
Scale

1" = 3,000'

United States Geological Survey Topographic Map
Fort Atkinson Quadrangle

W 1/2 of the SW 1/4 of Section 34, Township 6 North, Range 14 East



Vicinity Diagram
700-710 Oak Street
Fort Atkinson, Wisconsin

Figure
1

NR 724.05

(2) GENERAL REQUIREMENTS

(a) The plans, reports and specifications required by ss. [NR 724.09](#), [724.11](#), [724.13 \(2\)](#) and [724.17 \(2\)](#) shall be submitted simultaneously and may be combined in a single report.

FEC does not believe this is applicable.

(b) One paper copy and one electronic copy of each plan or report shall be submitted to the department, in accordance with s. [NR 700.11 \(3g\)](#).

FEC believes we have complied with this requirement.

(c) The department may require by the issuance of an administrative order or consent order that these plans and reports be prepared in accordance with a site-specific schedule.

FEC does not believe this is applicable.

(d) At sites or facilities where multiple remedial or interim actions are taken, all of the following requirements apply:

1. All submittals required by this chapter shall include a brief discussion of the interrelationship between the actions. *FEC believes we have complied with this requirement.*

2. The design report required by s. [NR 724.09](#) and the design plans and specifications required by s. [NR 724.11](#) that are prepared for subsequent remedial or interim actions may include the design details for the subsequent action without repeating design work that was included in previous submittals to the department for other remedial or interim actions. *FEC does not believe this is applicable.*

(e) Each submittal under this chapter shall include all of the following:

1. A brief cover letter that includes:

a. The month, day and year of the submittal. *FEC believes we have complied with this requirement.*

b. The department-issued identification number for the site or facility. *FEC believes we have complied with this requirement.*

c. The purpose of the submittal and the desired department action or response. *FEC believes we have complied with this requirement.*

d. A brief narrative summarizing the contents of the submittal. *FEC believes we have complied with this requirement.*

e. The regulatory status of the site or facility. *FEC believes we have complied with this requirement.*

2. A report or plan that includes following general information:

a. Project title and purpose, including the department-issued identification number for the site or facility;

FEC believes we have complied with this requirement.

b. Name, address, and telephone number of the property owner, lessee, operator or any individual or company responsible for the discharge of hazardous substances or environmental pollution on the site or facility.

FEC believes we have complied with this requirement.

c. Name, address, and telephone number of any consultants or contractors involved with the response action at the site or facility. *FEC believes we have complied with this requirement.*

d. Site name, address, and location by quarter-quarter section, township, range and county, geographic position determined in accordance with the requirements of s. [NR 716.15 \(5\) \(d\)](#), and the latitude and longitude of the property. *FEC believes we have complied with this requirement.*

e. A location map that meets the requirements of s. [NR 716.15 \(4\) \(a\)](#). *FEC believes we have complied with this requirement.*

f. Month, day and year of the submittal. *FEC believes we have complied with this requirement.*

g. A summary of the nature and extent of contamination at the site or facility. *FEC believes we have complied with this requirement.*