RJR
500 Ridge Road, Ward, Colorado 80481 | 303-459-0164

June 6, 2018

Mr. Michael Schmoller
Wisconsin Department of Natural Resources (WDNR)-South Central Region
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711

Subject: **Group A Closure Polychlorinated Biphenyls (PCB) Borings 1, 4 and 6 Further Sampling Delineation Results Report; Trent Tube Plant No. 1, 2188 Church St., East Troy, Wisconsin FID # 265097030; BRRTS NO. 02-65-245827; U.S. EPA ID WID 006097281**

Dear Mr. Schmoller:

On behalf of EnPro Holdings, Inc. (EH), RJRudy LLC (RJR) is submitting this Group A PCB Borings 1, 4 and 6 Further Sampling Delineation Results Report ("Report") to WDNR. The Report summarizes the results of soil sampling for PCBs that occurred at Trent Tube Plant No. 1 on April 17 and 18, 2018 and includes laboratory results and field documentation. RJR prepared this Report to comply with the requirements of Wis. Admin. Code § NR 716.14 (2).

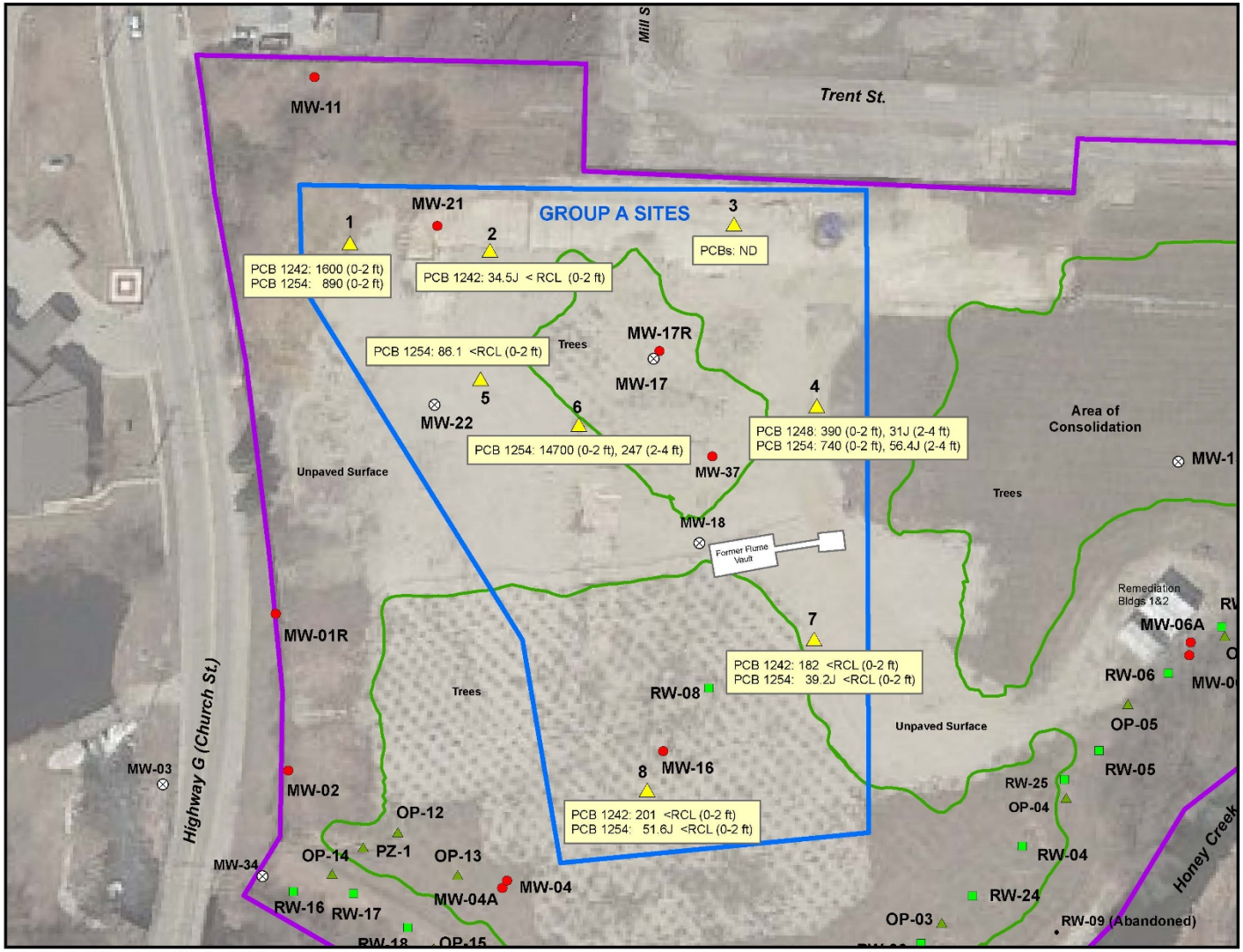
INTRODUCTION

On March 27, 2017, RJR submitted the Trent Tube Plant 1 Group A Closure Application Form 4400-202 and Attachments to WDNR. In a letter dated May 3, 2017, WDNR stated that additional site work was necessary to meet the requirements for site closure. That additional work included shallow soil sampling for PCBs at eight locations with samples to be taken at two depths at each location. In response, RJR submitted a Letter Work Plan dated June 4, 2017 ("Plan") to WDNR which described the proposed PCB sampling plan. Sampling was performed on June 21, 2017. Analytical results showed PCB concentrations at three sampling locations (borings 1, 4 and 6) above Residential Non-Industrial Direct Contact Residual Contaminant Levels (RCLs) (see Figure 1). RJR submitted the results to WDNR in an August 8 letter that also included a workplan to delineate the extent of PCBs exceeding RCLs in these three areas. This letter presents the results of the further PCB delineation sampling conducted on April 17 and 18, 2018 at borings 1, 4 and 6.

METHODOLOGY

RJR installed eight (8) additional borings around borings 1, 4 and 6 for a total of 24 additional borings. Four borings were located five (5) feet to the northeast, southeast, southwest, and northwest of the original boring while four (4) were located 10 feet to the north, east, south and west of the original boring. Using a GeoProbe, RJR collected soil samples from intervals at 0-2 feet below ground surface ("bgs") at all 24 borings and from 2-4 feet bgs at the additional eight (8) borings around boring 6. RJR visually inspected, logged and photographed the continuous GeoProbe cores at each location (see Attachment C). RJR composited the sample from each interval of the GeoProbe sampling sleeve and placed each sample in 4-ounce jars. Three (3) duplicate samples were collected for QA/QC purposes.

Each sample was labeled with project information, date, boring number, depth and time. RJR preserved the samples on ice and transported the samples to Pace Analytical ("Pace") located at1241 Bellevue Street - Suite 9, Green Bay, Wisconsin 54302 (WDNR ID No. 405132750). Pace analyzed the soil samples using EPA Method 8082 for PCBs including Aroclors 1016, 1221, 1232, 1242, 1248, 1254 and 1260. RJR and Pace completed Chain-Of-Custody (COC) forms for all samples.



Base Map: Aerial Photo, April 4, 2014, Google Earth

N

Legend

- Phytoremediation Areas
- Monitoring Well
- Abandoned MW
- Recovery Well
- Observation Probe
- Geoprobe Sample Location (2016)
- Temporary Monitoring Well
- Historic Soil and/or Groundwater Sample Location
- PCB Soil Sample Location (Results reported in micrograms/kg)

PCB RCLs:
Aroclor 1242- 235ug/kg
Aroclor 1248- 236ug/kg
Aroclor 1254- 239ug/kg

0 35 70 140 Feet

FIGURE 1
PCB SOIL SAMPLE RESULTS
FORMER TRENT TUBE PLANT 1
June 2017

RJRudyLLC

RESULTS

The laboratory analysis detected PCB concentrations exceeding the Wisconsin RCLs for Aroclors 1242 and 1254 in soil samples taken from the 0-2 feet bgs at one location in the boring 1 area; from 7 locations at the boring 4 area plus the duplicate sample at 4-1A; and from the 0-2 feet bgs at 6-7A and from both the 0-2 feet and 2-4 feet bgs at 6-8A and 6-8B. Figure 2 shows the boring locations and a summary of the PCB results at each location. The PCB sampling results are also summarized in Table 1 in Attachment A. The Pace laboratory data report is included in Attachment B. As shown in Table 1 in Attachment A, the results for each of the three duplicate samples was similar to the results for the original sample except for the duplicate collected at boring 6-3A. The primary sample at that location did not show PCB detections while the duplicate was positive.

FURTHER ACTION

Based on the results of the April 17, 2018 sampling, the extent of PCB-impacted soil has been delineated at boring 1. The extent of PCB-impacted soil has not been delineated at areas 4 and 6.

PCB BORING AREAS 4 AND 6 FURTHER DELINEATION WORKPLAN

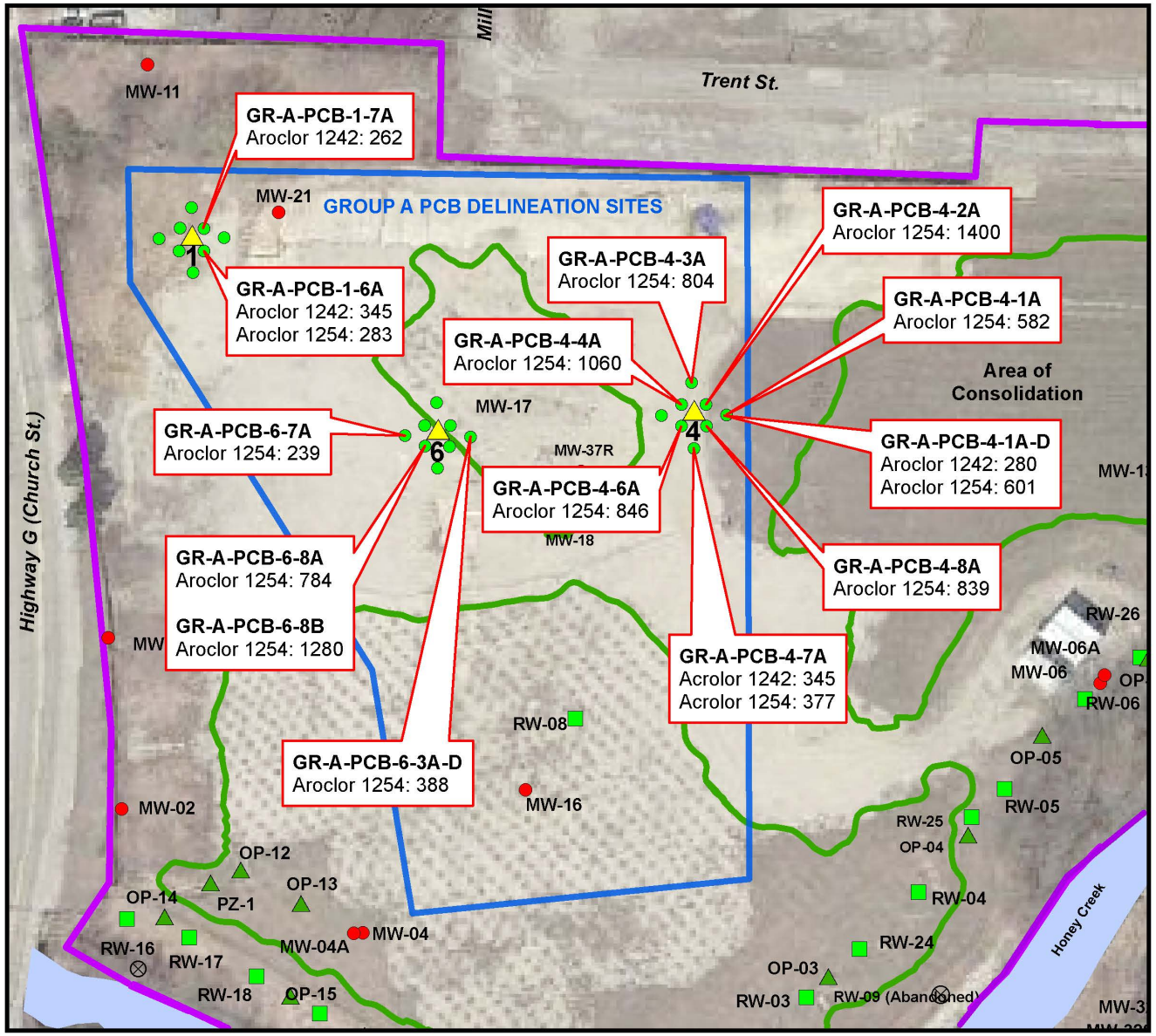
Group A Closure Boring Areas 4 and 6 Further PCB Delineation Sampling

To determine the extent of PCB-impacted soil in boring area 4, RJR will collect samples from four (4) locations 15 feet to the northeast, southeast, southwest and northwest and from four (4) locations 20 feet to the north, east, south and west of the original boring 4. To determine the extent of PCB-impacted soil in boring area 6, RJR will collect four (4) samples to the southwest boring 6. Two (2) samples will be 15 feet from the original boring 6 and two (2) will be 20 feet from the original boring 6. RJR will collect all samples at a depth interval of 0-2 feet bgs. RJR has depicted these sampling locations on Figure 3. One (1) duplicate sample will also be collected.

PCB Delineation Methodology

RJR will collect soil samples with a GeoProbe. RJR will clear all samples locations for utilities prior to sampling. RJR will use a Mini RAE 3000 PID to screen the borehole and field samples, with readings for each sample recorded on the boring log. In addition, RJR will use screening for field staff safety level action.

RJR will visually inspect, log, and photograph the continuous GeoProbe cores at each location. RJR will composite each sample from the two (2) foot GeoProbe sampling sleeve and place the samples in four (4)-ounce jars. RJR will label each sample with project information, date, boring number, depth, and time. RJR will preserve the samples on ice for transport to Pace Analytical in Green Bay, Wisconsin. Pace will analyze all soil samples using EPA Method 8082 for PCBs including Aroclors 1016, 1221, 1232, 1242, 1248, 1254 and 1260. RJR and Pace will complete chain-of-custody forms for all samples.



Base Map: Aerial Photo, April 4, 2014, Google Earth

N

Legend

SAMPLE NAME
PCB SAMPLE RESULTS (µg/kg)

* results not listed were below the WDNR Residential Non-Industrial Direct Contact Residual Contaminant Level (DC-RCL) for PCBs

- Monitoring well
- Observation probe
- Recovery well
- Abandoned well
- Phytoremediation areas
- TT-1 Site Border

- Orginal PCB sample site
- PCB Delineation sample site

WDNR PCB Residential Non-Industrial DC RCLs:

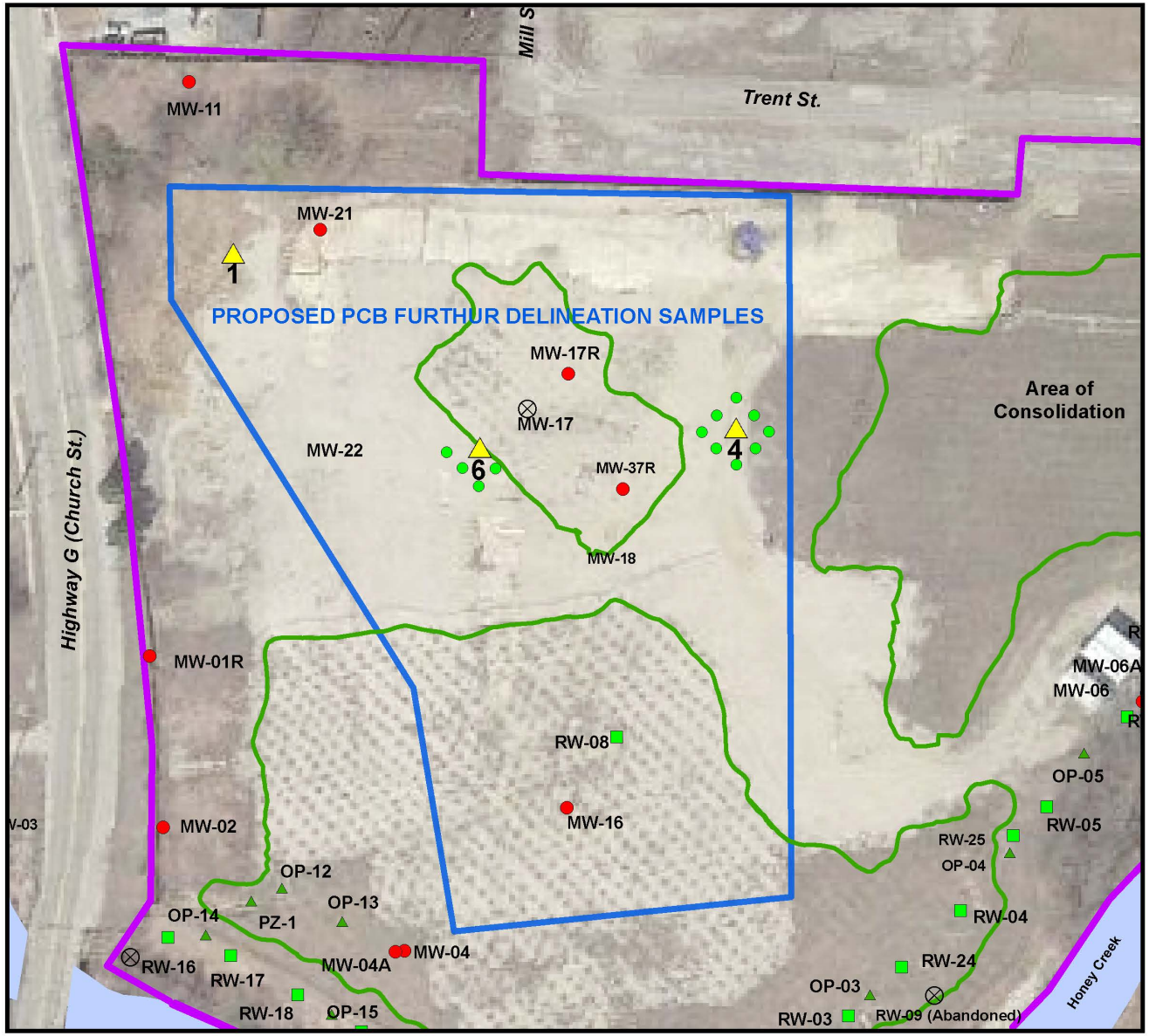
Aroclor 1242: 235 µg/kg
Aroclor 1254: 239 µg/kg

*All soil borings "A" 0-2 feet
*All soil borings "B" 2-4 feet

0 40 80 160 Feet

FIGURE 2
PCB DELINEATION
SOIL SAMPLE RESULTS
FORMER TRENT TUBE PLANT 1
APRIL 17, 2018

RJRudyLLC



Base Map: Aerial Photo, April 4, 2014, Google Earth

N

Legend

- Monitoring well
- Observation probe
- Recovery well
- Abandoned well
- Phytoremediation areas
- TT-1 site border

- Orginal PCB sample site
- PCB Furthur Delineation sample

- Eight (8) Samples at 15 and 20 foot distance from Original Boring 4.
- Four (4) Samples at 15 and 20 foot distance in Southwest Quadrant from Original Boring 6.
- All Samples collected from 0-2 feet.

0 40 80 160 Feet

FIGURE 3
BORING AREAS 4 & 6
PROPOSED PCB FURTHER DELINEATION SAMPLES

RJRudyLLC

PCB Delineation Sampling Schedule
RJR proposes to collect the PCB delineation samples in June 2018.

Please let me know if you have any comments regarding these results and the PCB Delineation Workplan.

Sincerely,
RJR

Richard J. Rudy, PG
Project Director

cc: Benne Hutson, EnPro Industries, Inc.
Charles Merrill, Husch Blackwell LLP
Phillip Bower, Husch Blackwell LLP

Attachments: A - Table 1 - Group A PCB Delineation Soil Sampling Results Summary Table
B - Pace Analytical Data and Chain of Custody
C - Field Documentation: Soil Boring Logs and Soil Sample Photos