



Known for excellence.  
Built on trust.

GEOTECHNICAL

ENVIRONMENTAL

ECOLOGICAL

WATER

CONSTRUCTION  
MANAGEMENT

20900 Swenson Drive  
Suite 150  
Waukesha, WI 53186  
T: 262.754.2560  
F: 262.754.9711  
www.gza.com

May 31, 2019  
File No. 20.0155935.01

Mr. Michael Schmoller, Advanced Hydrogeologist  
Wisconsin Department of Natural Resources  
3911 Fish Hatchery Road  
Fitchburg, Wisconsin 53711-5367

Re: Proposed Schedule of Activities  
Former Trent Tube Plant No. 1  
2188 Church Street  
East Troy, Wisconsin  
BRRTS #02-65-245827

Dear Mr. Schmoller:

GZA GeoEnvironmental, Inc. (GZA) is pleased to submit the proposed schedule of investigation and remedial alternative evaluation activities for the former Trent Tube Plant No. 1 property located at 2188 Church Street in East Troy, Wisconsin ("Site"). On April 17, 2019, Benne Hutson of EnPro Holdings, Inc., Phil Bower of Husch Blackwell LLP, and I met at the Village of East Troy offices with Steve Martin, Michael Prager, and you of the Wisconsin Department of Natural Resources (WDNR). We discussed a remedial approach for the Site that can accommodate the development of the property proposed by the Village of East Troy while being protective of human health and the environment and also satisfying the requirements of Wisconsin Administrative Code (Wis. Adm. Code) NR 700. The remedial approach we presented relies on the in-situ treatment of groundwater using a known electron donor to reduce the mass and concentration of the chlorinated hydrocarbon plume, and institutional controls over portions of the Site to restrict access to soils that represent a direct-contact risk. We also recognize that there may be areas of the Site that require additional investigation to delineate affected soils or to collect data to evaluate the nature and extent of chemicals of concern.

This letter proposes a schedule for the additional activities we discussed at the meeting. It also serves as a notification to the WDNR regarding the installation of additional monitoring wells on the Site. The installation of the wells will be coordinated to accommodate the upcoming groundwater sampling in June 2019.

#### **PROPOSED SCHEDULE**

Based on the discussions at the meeting, GZA prepared a list of activities to address WDNR's concerns regarding additional investigation and the strategy and approach to evaluate alternative treatments to advance groundwater remediation at the Site. We anticipate that these activities, when completed by GZA, will position the Site for WDNR concurrence that the Site investigation activities have been completed and that a Remedial Action Plan (RAP) can be prepared for WDNR's consideration and approval by early 2020. The activities identified during the meeting and included in this proposed schedule are as follows:



- Supplemental investigation:
  - Polychlorinated biphenyl (PCB) grid soil sampling and delineation across the Site;
  - Additional soil sampling in the Area of Consolidation (AOC) to characterize the materials and evaluate the performance of the phytoremediation system;
  - Additional sampling in other areas of the Site to delineate affected soils; and
  - Installation of additional monitoring wells within the affected groundwater area beneath the former building to understand the extent of the groundwater contaminant distribution.
- Annual groundwater sampling event.
- Phytoremediation system sampling and analysis.
- Confirmation of saturated hydraulic conductivity.
- Enhanced reductive dechlorination (ERD) pilot testing and performance monitoring:
  - Preparation of an ERD Work Plan;
  - Amendment evaluation and selection; and
  - Application for NR 140 variance and Wisconsin Pollutant Discharge Elimination System (WPDES) Permit for Injection of Amendment.
- Development of a work plan for a full-scale ERD injection program.

The proposed schedule for completing the activities listed above is provided in Attachment 1. Some of the activities, such as the ERD Work Plan, NR 140 variance, and WPDES permit, will require review and approval by the WDNR. This review and approval process has been considered in the proposed schedule but may require adjustment based on the results of sampling performed.

#### **ADDITIONAL MONITORING WELL INSTALLATION**

Based on the discussions at the April 17, 2019 meeting, we believe additional monitoring wells are necessary to evaluate groundwater quality in areas within the former building area and in areas where monitoring wells were previously abandoned during the demolition of the building. We will install a total of seven monitoring wells to complete the monitoring well network that will allow for an understanding of the groundwater distribution at the Site and development of the groundwater remedy. A map showing the location of the additional monitoring wells is provided in Attachment 2.

The installation of these wells is currently being coordinated and is anticipated to occur in early June 2019. This timing will allow us to sample the wells during the annual groundwater sampling event scheduled for mid-June 2019. The installation of these monitoring wells in early June will allow time for the development of the wells prior to the sampling event and will provide additional groundwater data to be considered in selecting the ERD pilot testing location.

The wells will be installed in accordance with Wis. Adm. Code NR 141 requirements. The wells will be constructed of Schedule 40 polyvinyl chloride (PVC) screen and riser to a depth of about 20 feet below ground surface (bgs) and will intersect the water table. During drilling, soils will be continuously sampled for lithologic description and field screening with a photoionization detector (PID). The well screen will be set based on the depth to groundwater observed at the time of drilling, the lithology observed in each boring, and the depth of groundwater in adjacent wells. Soil samples are not anticipated to be collected from these borings for laboratory analysis unless there is visual evidence of potential impairment such as staining or free product.



Following well installation, the newly installed monitoring wells will be developed using a surge block to agitate the sediment in the well and sand filter pack and a pump to remove the water and sediment from the well. The wells will be developed until the groundwater in the well is sediment-free; this is anticipated to require approximately 10 well volumes. The development water will be placed in the existing Groundwater Extraction and Treatment System (GETS) for treatment and discharge. The top of casing elevations of the newly installed wells will be referenced to the existing well survey and the coordinates for each well will be measured. Well construction and development forms will be completed and included in the report of the June groundwater sampling results.

GZA appreciates your consideration of the proposed schedule and will continue with the monitoring well installation as indicated. The schedule will likely require adjustments as we complete activities and analyze results and our understanding of the Site changes. If adjustments are required, the schedule will be adjusted and submitted to the WDNR for consideration.

If you have questions regarding the information presented in this letter, please feel free to contact Mr. Kevin Hedinger at (262) 754-2578 at your convenience.

Sincerely,

**GZA GeoEnvironmental, Inc.**

A handwritten signature in blue ink, appearing to read "Kevin M. Hedinger".

Kevin M. Hedinger  
Senior Hydrogeologist

A handwritten signature in blue ink, appearing to read "James F. Drought".

James F. Drought  
Principal Hydrogeologist

J:\155900to155999\155935 Trent Tube\01 2019 Regulatory Support\WDNR Proposed Schedule\FINAL 20.0155935.01 Proposed Schedule\_Trent Tube 5-31-19.docx

Attachments: Proposed Schedule  
Proposed Monitoring Well Locations



**ATTACHMENT 1**

**Proposed Schedule**

**Proposed Investigation Remedial Alternative Evaluation Schedule**  
**Former Trent Tube Plant No. 1**  
**2188 Church Street**  
**East Troy, WI**

	<u>Field Activities</u>	<u>Reporting and Regulatory Interaction</u>
May 2019	<ul style="list-style-type: none"> <li>- Additional Monitoring Well Installation</li> <li>- Free Product Recovery</li> </ul>	
June 2019	<ul style="list-style-type: none"> <li>- June Groundwater Sampling Event- 50 Wells</li> <li>- Confirm Hydraulic Conductivity, if needed</li> </ul>	<ul style="list-style-type: none"> <li>- Work Plan</li> <li>-PCB Grid Sampling</li> <li>-AOC Sampling</li> <li>-Additional Soil Sampling</li> <li>- Well Sampling Modification</li> </ul>
July 2019	<ul style="list-style-type: none"> <li>- PCB Grid Sampling</li> <li>- AOC Characterization Sampling</li> <li>- Additional Soil Sampling</li> </ul>	<ul style="list-style-type: none"> <li>- Work Plan</li> <li>-ERD Pilot Testing</li> <li>-WPDES Permit</li> <li>-Discontinue Recovery Wells- East</li> </ul>
August 2019	<ul style="list-style-type: none"> <li>- PCB Delineation</li> <li>- ERD Pilot Test Coordination/ Procurement</li> </ul>	<ul style="list-style-type: none"> <li>- Reporting</li> <li>-PCB Sampling Results</li> <li>-AOC Characterization Results</li> <li>-Additional Soil Sampling</li> <li>- Annual Groundwater Sampling Report</li> </ul>
September 2019	<ul style="list-style-type: none"> <li>- ERD Pilot Test Implementation and Monitoring</li> </ul>	

**Proposed Investigation Remedial Alternative Evaluation Schedule**  
**Former Trent Tube Plant No. 1**  
**2188 Church Street**  
**East Troy, WI**

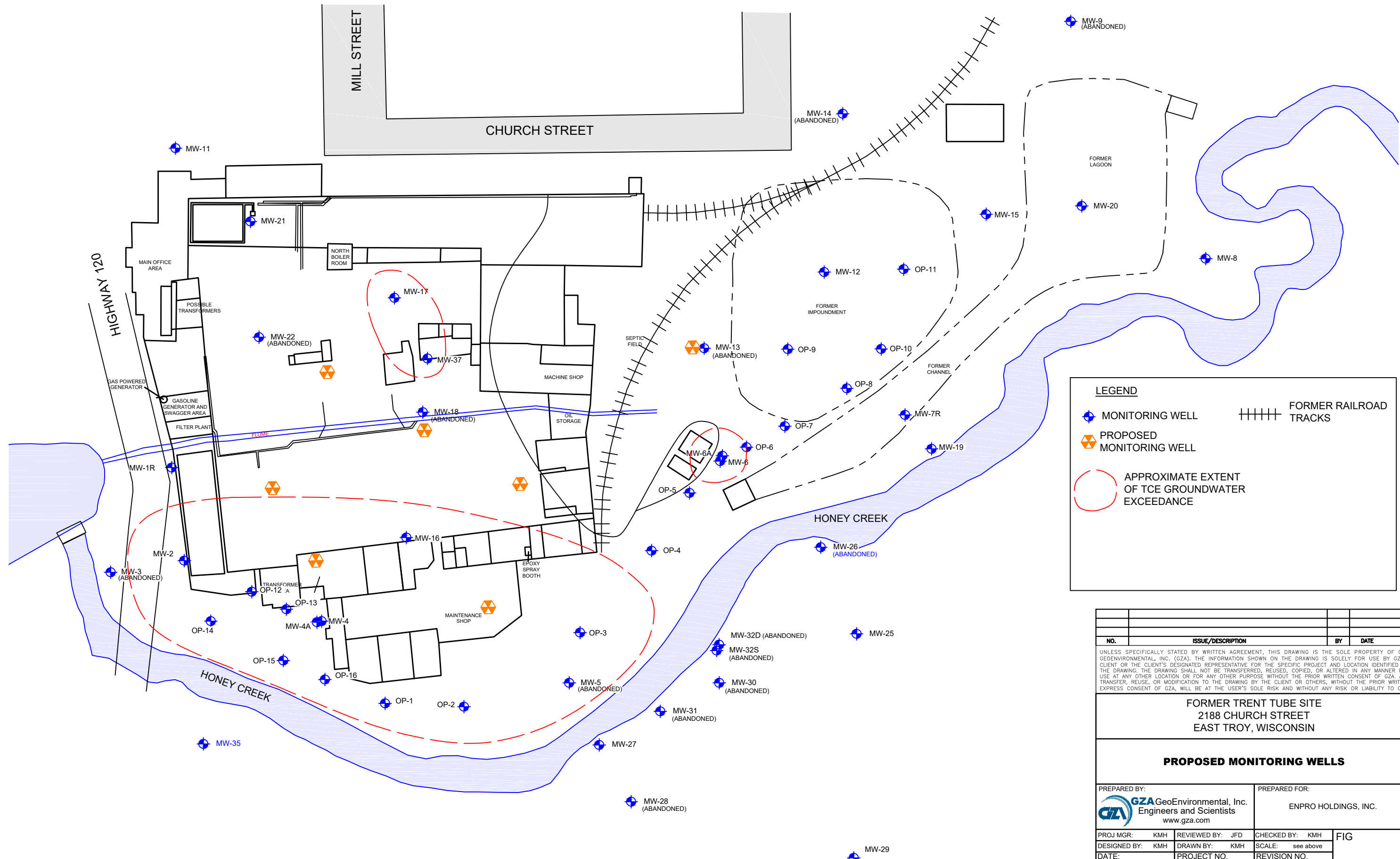
	<u>Field Activities</u>	<u>Reporting and Regulatory Interaction</u>
October 2019	<ul style="list-style-type: none"> <li>- ERD Pilot Test Monitoring</li> <li>- Semi-Annual Groundwater Monitoring Coordination/ Procurement</li> </ul>	<ul style="list-style-type: none"> <li>- Reporting               <ul style="list-style-type: none"> <li>- Pilot Test Implementation Report</li> <li>- PCB Delineation Results</li> </ul> </li> </ul>
November 2019	<ul style="list-style-type: none"> <li>- Semi- Annual Groundwater Sampling Event Implementation and Monitoring</li> </ul>	
December 2019		<ul style="list-style-type: none"> <li>- Reporting               <ul style="list-style-type: none"> <li>- Semi-Annual Groundwater Sampling Report</li> </ul> </li> </ul>
January 2020		<ul style="list-style-type: none"> <li>- Reporting               <ul style="list-style-type: none"> <li>- ERD Design/ Implementation Plan</li> </ul> </li> </ul>



**ATTACHMENT 2**

**Proposed Monitoring Well Locations**

©2018 - GZA GeoEnvironmental, Inc. GZA-J:\155900T0155935 TRENT TUBE\WORK\STAKEHOLDER MEETING- 04-17-2019\CAD\BASE MAP.DWG PROPOSED MW MAY 7, 2019 KEVIN HEDINGER



**LEGEND**

- ◆ MONITORING WELL
- ◆ PROPOSED MONITORING WELL
- APPROXIMATE EXTENT OF TCE GROUNDWATER EXCEEDANCE
- FORMER RAILROAD TRACKS

NO.	ISSUE/DESCRIPTION	BY	DATE

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

**FORMER TRENT TUBE SITE**  
2188 CHURCH STREET  
EAST TROY, WISCONSIN

**PROPOSED MONITORING WELLS**

PREPARED BY: <b>GZA GeoEnvironmental, Inc.</b> Engineers and Scientists www.gza.com		PREPARED FOR: ENPRO HOLDINGS, INC.	
PROJ MGR: KMH	REVIEWED BY: JFD	CHECKED BY: KMH	FIG
DESIGNED BY: KMH	DRAWN BY: KMH	SCALE: see above	
DATE: MAY, 2019	PROJECT NO. 20.0155935.00	REVISION NO.	SHEET NO. OF