



September 29, 2023

**-Sent by email-**

EnPro Holdings, Inc.  
C/O Mr. Benne Hutson, Director, ESG, and Deputy General Counsel  
5605 Carnegie Boulevard, Suite 500  
Charlotte, North Carolina 28209

Subject: Review of Site Investigation Report for the Former Trent Tube Property  
2811 Church Street, East Troy, Wisconsin BRRTS #02-65-245827

Dear Mr. Hutson:

The Department of Natural Resources (Department) reviewed the "Site Investigation Report" (Report) for the Former Trent Tube Property in East Troy, Wisconsin (Property). The Report was prepared on your behalf by GZA GeoEnvironmental Inc. (GZA) and submitted to the Department on EnPro Holdings, Inc.'s (EnPro) behalf on December 7, 2022. A Wis. Admin Code ch. NR 749 review fee was included with the submittal. The nature of the Report and the complexity of the varied environmental conditions at the Property necessitated an extended review time.

The Department reviewed the Report for compliance with Wis. Admin. Code ch. NR 716 and determined additional investigation of discharges and environmental pollution and site investigation report are needed.

The Department appreciates the large undertaking and challenges of preparing a comprehensive summary for such a large scale project, and recommends a teleconference with the involved parties a path forward following your review and evaluation of the issues presented herein.

This letter includes an overview discussion of:

1. The conceptual model and framing of environmental conditions at the Property
2. Soil contamination and the appropriate residual contaminant levels for the Property
3. Groundwater contamination and potential data gaps
4. Vapor Intrusion evaluation and need for additional work
5. Possible effects to Honey Creek
6. Characterization of the geology and hydrogeology at the Property
7. Proposed and enacted remedial actions
8. Data presentation and corrections

### **1. The conceptual model and framing of environmental conditions at the Property**

#### Framework of the Report

The Property has a long history of environmental concerns, investigations, and response actions and the Report presents a summary of the issues. The Report discusses multiple "sites" (per the Wis. Adm. Code s. NR700.03 (56) definition) and areas of "environmental pollution" (per the Wis. Stats. s.292.12 (1) (c) definition). The background section of the Report discusses individual site operations, process, and some individual source areas, but in general, the Report treats the entire Property as one "Site", and the narrative and accompanying presentation (ie. the figures and the tables) lump different source areas by contaminant type rather than by

addressing each site and area of environmental pollution as its own concern. Each site and area of environmental contamination must individually meet the Wis. Adm. Code ch. NR 716 reporting requirements for Site Investigation.

Provide recommendations as required under Wis. Adm. Code s. NR 716.15(6).

#### Potential for DNAPL

Site data may suggest the presence of one or more areas of dense non-aqueous phase (DNAPL) chlorinated solvent. The US Environmental Protection Agency's September 1993, "Evaluation of the Likelihood of DNAPL Presence at NPL Sites", indicates a trichloroethylene (TCE) groundwater concentration of about 10 mg/L indicate a potential for DNAPL in the subsurface. Concentrations of TCE at MW-17R routinely exceeded 100 mg/L and were reportedly as high as 310 mg/L. Provide an evaluation on the potential for DNAPL.

#### Evaluation of Sources of Contamination

Each source area needs full evaluation of the nature, degree and extent of impacted media. Additional site-specific presentation will aid in the understanding of the site issues. Examples regarding source characterization include:

- The significance of elevated TCE concentrations and confluence of many site utilities at and near MW-17R needs further evaluation.
- The source of TCE groundwater concentrations at MW-16, MW-31, and MW-42 is unknown.
- Elevated concentrations of TCE in some areas may be indicative of DNAPL. Additional evaluation should be conducted.
- The source of chlorinated volatile organic compound (CVOC) contamination near the southeast side of the building is unclear. The Report proffers a leaking underground sewer as a potential source. However, other sources may be equally plausible, such as dumping, or contamination of soil by impacted groundwater. Further discuss the potential sources of CVOC contamination.
- The source of the PCBs is unknown, and the data density does not appear high enough to find all hot spots (as discussed in detail below).
- The data density near the TCE tank at the southwest corner of the main building does not appear adequate to characterize this area.
- The old flume is not fully evaluated with respect residual contamination in the flume and/or the potential that the old flume acting as a contaminant transport pathway.

#### Cis-1,2-DCE and CVOC Degradation

The Report is unclear on the occurrence of cis-1,2 dichloroethylene (cis-1,2-DCE) in soil. Cis-1,2-DCE commonly forms during degradation of TCE, yet it is also a chemical used in manufacturing. The Report states, "TCE may have migrated through the unsaturated soils without degradation", and "cis-1,2-DCE and vinyl chloride exceedance areas are in similar areas as the TCE because they are degradation products from the TCE. Yet cis-1,2-DCE is a common soil contaminant at the site, which seems to suggest either the cis-1,2-DCE is a contaminant discharged at the site, or the CVOC degradation at the Property is not fully understood. Additional data presentation and evaluation will be helpful. For instance, the assumption that unsaturated soils are in the upper 10 feet (Section 6.1), may need to be reevaluated to gain a better understanding of contaminant distribution and CVOC degradation.

#### Free Product at RW-3

The nature of the free product at recovery well RW-3 is uncertain. The narrative of the Report states, "Petroleum free product was only present in recovery well RW-3." The groundwater data for RW-3 shows only CVOCs and no petroleum compounds. The basis for determining the product in RW-3 was petroleum must be provided or otherwise explained.

### Anthropogenic Features

The Report states utility line are not affected by contamination but does not include adequate supporting data or analysis to support this claim.

The septic field needs to be evaluated for site contaminants.

The concrete at the Property needs to be evaluated for site contaminants.

### Emerging Contaminants

#### *1,4-Dioxane*

The potential issue of 1,4-Dioxane as a site contaminant has been reasonably addressed. Based on the information provided to the Department to-date, no further testing is needed for 1,4-Dioxane at this time.

## **2. Soil contamination and the appropriate residual contaminant levels**

### Residual Soil Contaminant Levels

The applicable RCLs for the Property are non-industrial, based on current residential zoning. Soil data table and figures should be updated using the appropriate non-residential RCLs.

### Arsenic

The source and extent of the arsenic is not well characterized. The Report states, “The source of the arsenic appears to either be related to activities that occurred in the manufacturing process after the former channel and lagoon began receiving cooling water or is associated with the material used to fill the former channel and lagoon.” The depth of the contamination and human exposure potential is not well documented. Much of the uncertainty could be removed with evaluation of concentrations vs depth and geology. Cross sections through the former lagoon would help illustrate the nature and extent of the problem, as discussed below.

Restoration of the soil arsenic issue is needed in addition to capping. The Spill Law, s. 292.11(3), Wis. Stats, and s. 722.07 (3)(a), Wis. Adm. Code require a Responsible Party to “restore the environment to the extent practicable”. An alternative cleanup concentration for the arsenic contamination will be needed if the 8ppm background is not practical.

### Polychlorinated Biphenyls (PCBs)

The Report states the extent of PCBs is adequately defined. However, the grid sampling was based on a model that used an assumed potential release radius of 70 feet to detect 95 % of the releases. So the grid spacing was approximately 135 feet. The actual detected release radii were closer to 7, 10, and 30 feet, which means the initial sampling grid was not adequate due to an assumption of a release radius of 70 feet. Based on the size of the known PCB impact areas, the grid sampling was not adequate.

Additional sampling for PCBs is needed. The area of additional sampling could be reduced from the entire property. The 1955 air photo appears to show a courtyard or similar feature that encompasses all the known areas of PCB contamination. The contamination might be related to activities at this area or contaminated fill material at this area.

EPA should be involved in aspects of PCB investigation and cleanup at this site. The EPA contact should be listed in the Report. Responsible parties for PCB sites must request participation of the coordinated EPA/DNR review process - see DNR [guidance document RR-786](#) “PCB Remediation in Wisconsin under the One Cleanup Program Memorandum of Agreement” for additional information.

### Polycyclic Aromatic Hydrocarbons (PAHs)

The Report states, “Benzo(a)pyrene soil concentrations exceed the industrial direct contact RCL in the former impoundment area and the soil to groundwater RCL in a limited area near the southeast corner of the former

building.” This is not clear from the map, because the map does not show the impoundment area. Also, the appropriate RCLs for the site are non-industrial. PAHs at the site may require restoration in addition to capping.

### TCE

Additional soil sampling for TCE is needed in the vicinity of the former 4,000 gallon TCE tank and in proximity to monitoring well MW-17R. The samples by the former 4,000 gallon TCE tank appear too shallow and the data density by MW-17 is sparse.

The presentation of TCE data on the soil map needs correction. Eleven of the 22 highest soil concentration samples for TCE are not included on the TCE soil map. Other TCE soil data may also be missing. Figures must include all data and/or have proper explanations for data exclusion to be relied.

The Report doesn't mention the high TCE concentration at MW-18R, which was relatively recently installed by GZA. The sample was in the top 10 highest TCE soil concentrations, yet this finding is not mapped or discussed.

The soil data table (Table 1) shows at least two soil samples that exceeded the industrial direct contact RCL but were not flagged as exceedences; HP-79 (6-8) and HP-2 (14-18). The table should be updated to show all the appropriate RCLs exceedences and/or include a note qualifying which sample depths are used for comparison with RCLs.

The results of the VOC leaching tests should be presented to add context to the site conceptual model.

### **3. Groundwater contamination and potential data gaps**

The evaluation of potential DNAPL should be conducted prior to finalizing the discussion on the success of CVOC groundwater remediation, including percentage of contaminant mass degraded. If there is a DNAPL present at the Property, the bulk of the contaminant mass may not be in the dissolved phase, as the contaminant mass calculations indicate.

Better definition of vertical CVOC contaminant distribution, mass, and transport is needed. Many of the high soil sample concentrations, discussed above, might be related to transport of contaminants from DNAPL source(s). The definition of extent of contamination at depth is inadequate; there are only two piezometers on the 13-acre Property and neither are in the area of potential DNAPL.

Former monitoring well MW-5, which has historically shown the most elevated TCE concentration at the downgradient portion of the Property, should be replaced.

The nickel groundwater issue is not defined. There is no control down-gradient of MW-20, which has shown consistent ES exceedences. Groundwater flow maps are blank in this area. The most recent sample is from 2007. There is a similar issue at MW-2.

The arsenic and chromium issue is not defined at MW-02. MW-02 has shown elevated chromium, hexavalent chromium, and nickel. MW-2 is southwest of the building and has no downgradient control. The most recent sampling was in 2007. Correct the naming convention of MW-02 and MW-2 in future reports.

Chromium in groundwater needs better evaluation. A map and discussion of hexavalent chrome soil RCL exceedences in soil are needed to better evaluate groundwater contaminant distribution.

The groundwater data for metals are at least 15 years old. More recent groundwater data for metals is needed to evaluate long-term trends and current conditions.

MW-6A contains relatively consistent arsenic exceedences. The Report states, “These concentrations may be related to discharges of spent pickling solutions to the former impoundment, which mobilized naturally occurring arsenic in the soils.” The explanation should include a discussion of why the issue is only showing up at depth. Provide an explanation of what this finding suggests about deeper flow rates and soil type near MW-6A.

Provide concentration trend graphs at wells to highlight contaminant chemistry trends that are not discussed in the narrative. For instance, the spike in concentration at MW-01R or the sudden drop in TCE concentrations at MW-2 that occurred before the injection treatments.

The Report does not appear to have evaluated the duplicate data and the repeatability of the sampling results. For instance, the January 18, 2022 results for OP-14 and the duplicate (reportedly from OP-14 are much different.) The duplicate data compare favorably to MW-40. An evaluation of the duplicate data issue should be performed and explanations of apparent variability in results should be provided.

The groundwater sampling methodology description in Section 3.7 of the Report is unclear. “The groundwater samples at each well were collected *directly from the polyethylene tubing* by disconnecting the tubing between the peristaltic pump and the flow-through cell.” (emphasis added) Explain how water is collected from the polyethylene tubing.

#### **4. Vapor Intrusion evaluation and need for additional work**

The correct vapor screening assumption for evaluation of the Property is a residential use. The argument for commercial vapor screening criteria is not acceptable. The end use is unknown and the site is zoned residential.

The discussion of utilities in Section 5.3 of the Report (and elsewhere) does not account for the potential pathway created by former utilities. Explain the potential for off-site migration of vapors to residential properties to the north.

The uncertainties regarding DNAPL and source areas (discussed above) means the vapor investigation is partially complete. Additional vapor intrusion investigation will be needed. The current data set is not adequate for planning respect to future mitigation of buildings. Some of the additional data may be collected after the source areas are better characterized.

#### **5. Possible effects to Honey Creek**

Section 5.3 of the Report is relatively quiet on sampling of Honey Creek and refers to reports created by others. The available data should be provided. Information on contaminant concentrations, on-going impacts to sediment, and discharge rates should be provided.

Section 5.1 of the report states, “...sand and gravel, sand, and silt mixed with construction debris, coal, cinders, and metal filings, and has its greatest thickness near Honey Creek.” Explain measures that have been taken to assure this material does not erode into, or otherwise effect, Honey Creek.

#### **6. Characterization of the geology and hydrogeology at the Property**

Much of the geology and hydrogeology discussion in the Report occurs in the conceptual site model portion of the report. The actual geology and hydrogeology section is not consistent with conceptual site model portion and does not fully support it.

The main discussion of the geology is overgeneralized and include all possible sediment grain sizes. The Report states, “This lithology beneath the upper fill unit is consistent with regional soil descriptions provided above.” The regional soil description is “...characterized as a stratified deposit consisting of gravel, sand, silt, and clay...” As discussed below, the fill thickness, and geology of the site is critical to understanding contaminant migration.

The presentation of the site geology on the cross sections is similarly overgeneralized. For example, Section 5.1 of the Report discusses a fill unit that is up to 20 feet thick. This unit is not shown on the cross sections. It is difficult to distinguish the fill from the pitted outwash, as no geologic origins are shown on the cross sections. Two cross sections is not enough to fully characterize the many sources on the Property. The boring logs that are the basis for the cross sections need to be included in the Report.

### Presumed Aquitard

The presumed silt aquitard is critical to the understanding of contaminant transport and definition of extent, because is assumed to act as a barrier to contaminant migration. However, the presence, permeability and continuity of the unit is not well documented or supported by the geology presentation included within the Report.

The report refers to a “dense silt that acts as an aquitard to limit vertical groundwater migration” Explain the basis for the ‘dense’ statement.

A tomographic map of the presumed aquitard, and known thickness, with supporting boring logs, would aid in verifying the conceptual model, and would also help evaluate migration pathways for potential DNAPL.

Explain how a continuous fine-grained deposit fits within the local geological framework of pitted outwash.

The statement, “...a native silt that extends to the maximum boring depth of 50 feet bgs.” does not match the cross-section, which shows silt and silty sand. Explain how many borings extended to 50 feet and provide those boring logs.

### Bedrock

The discussion of bedrock geology appears inconsistent and should be corrected or better explained. Compare sections 5.1 with 5.2

- “Based on water well drilling logs reviewed for this area, the Maquoketa Shale has largely been eroded and the bedrock encountered in the area is dolomite.”
- “The Maquoketa Shale, where present, likely serves as an upper confining layer that separates the unconsolidated water table aquifer from the deeper bedrock aquifer.”

### Hydrogeology

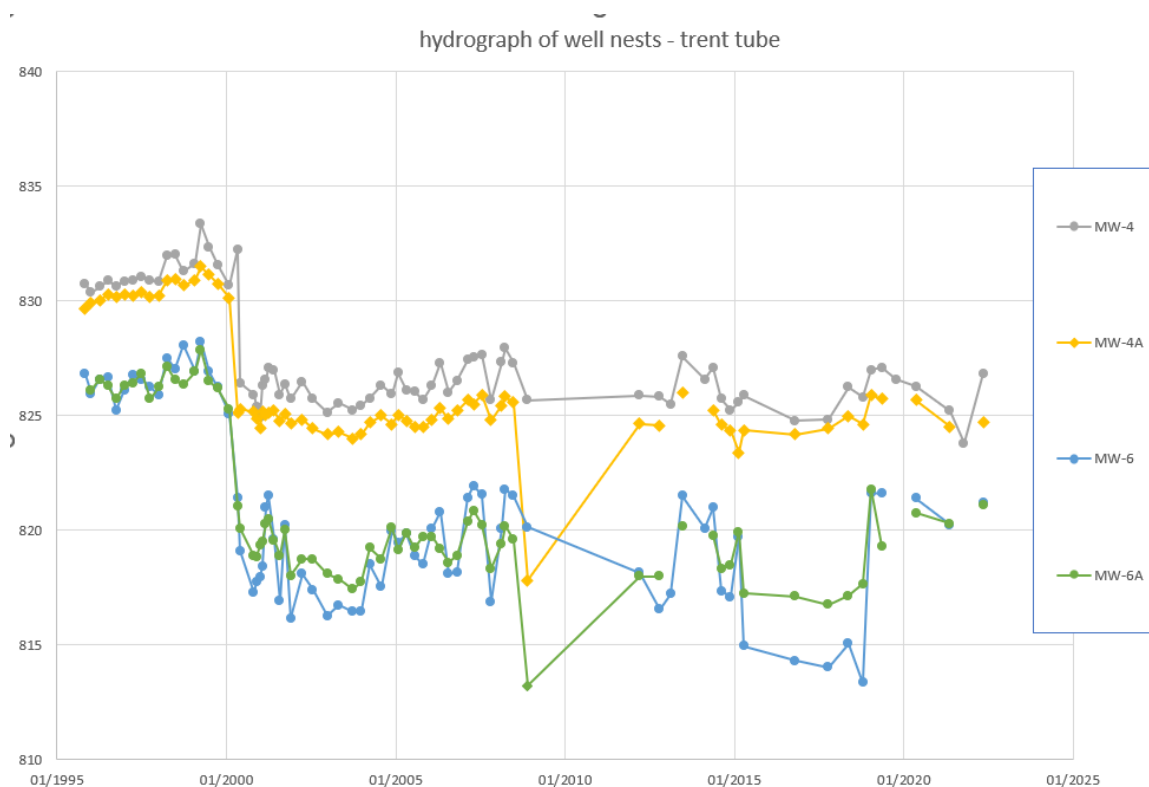
#### *Hydraulic gradients*

The radial flow pattern shown on the water table maps does not mesh with the simplified version of groundwater flow presented in the Geology Section of the Report. The groundwater mound or divide shown near monitoring well MW-17R is suggestive of downward vertical gradients. The potential affects of the groundwater mound or divide on groundwater flow and contaminant transport need to be explained.

The groundwater flow discussion should address the steep drop off in gradient toward Honey Creek and the geologic control (or utility influence) on that configuration. The steep gradient near the creek has been attributed

to topography, but topography alone does not change the water table. Explain the hydraulic control (e.g. springs, change in aquifer transmissivity, or flow rates) responsible for the variation in gradient.

The discussion of vertical gradient on is oversimplified. The discussion should not be limited to the last five events. An analysis of the nearly 30-year record should show that the MW-6 nest has variable gradient direction, whereas the MW-4 well nest has consistent downward gradients.



The downward gradient at the MW-4 nest, which is less than 100 feet from Honey Creek, does not support the conceptual model of an aquitard and complete hydraulic capture of contaminated groundwater by Honey Creek.

The 5-foot drop in water levels in year 2000, presented in Table 1 needs to be explained and/or corrected.

### *Groundwater flow*

Groundwater travel times are integral to evaluating the EVO effectiveness and potential rebound. Groundwater flow rate calculations are needed to support the conceptual model.

Illustrate and explain sewer force mains and their effect on groundwater flow and contaminant transport. Include the force mains on cross sections.

### *Hydraulic conductivity*

Hydraulic conductivity results are specific to the hydraulic unit tested, and the geology at the Property is not homogeneous. Therefore, the geometric averaging of all results appears inappropriate. Additional concerns regarding the hydraulic conductivity testing include:

- The number of tests appears inadequate for a Property with this many source areas and such variable geology.
- The lithological classifications being tested are not presented with the data summary.
- Neither of the piezometers appear to have been tested.
- The hydraulic conductivity testing not documented within the Report.
- The results show the highest hydraulic conductivity results for MW-17R, which is shown as screened in the silt unit which has been invoked as an aquitard.

#### *Request for additional piezometers*

Additional piezometers are needed to fully characterize the Property and complete the site investigations. Reasons, as discussed above, include:

- Better characterization of the presumed aquitard.
- Better evaluation of vertical gradients and contaminant migration at depth.
- Consistent downward gradients at well nest MW-4.
- Potential presence of DNAPL at the site.
- Multiple source areas over a 13+ acre site.

### **7. Proposed and enacted remedial actions**

Proposed remedial actions and the evaluation of residual soil contamination from previous remedial actions should be based on the non-industrial RCLs (as discussed above).

Confirmation of the presence of DNAPL at the site would change the conceptual model of the conditions at the Property and necessitate a re-evaluation of proposed and enacted remedies.

Section 2.5.2 discusses capping of south pickling area, former channel and lagoon. A description of the capping, and associated documents, and Department approvals is needed. A discussion of cap maintenance is also needed.

A lack of access to the Property is not an acceptable remedial strategy. It may be inferred this is a strategy at the Property based on the statement in Section 6.1.5 of the Report, “The soils in the former channel and lagoon are currently covered by grass and trees and are not accessible by the general public.”

The stands of poplar trees planted for phytoremediation should be shown on a map.

### **8. Data presentation and corrections**

The presentation should be broken out into areas of concern (ie. each Site). One example of the problem is the soil data tables, where the volume of data, “NA” entries, and very small font is difficult to interoperate and should instead “clarify and support results and interpretations” outlined in Wis. Adm. Code s. NR 716.15 (4).



## Figures

The site layout map needs to show all relevant features prescribed in NR 716.15 (2) (c) g. All underground utilities should be shown on the site layout map.

The isoconcentration maps should be revised to show source areas and lines of equal contaminant concentrations and not just RCLs. For example, the arsenic distribution map is insufficient for evaluating practical remedies.

A map showing nickel in groundwater should be prepared.

A map showing arsenic in groundwater should be prepared.

The water table maps don't indicate that the data is composited over several days. Water levels should all be measured on the same day, per NR 716.15(4) (b).

The use of five-point font on the figures does not allow for sufficiently clear illustration. Consider using plan sheets or separate maps for each area of concern.

## *Cross sections*

Two cross sections are not enough for a 13.5 acre property with multiple source areas (ie. Sites). Additional cross sections are needed to clarify and support results and interpretations, per s. NR 716.15(4), Wis. Adm. Code. The Department recommends two sections through each area of concern, including:

- Each known release area.
- The area of consolidation and impoundment. These areas need thorough illustration, including the cover design, waste thickness, and water table elevation relative to the waste and/or contaminated media.
- The lagoon area, showing the cap and the arsenic distribution.
- Through all areas of potential DNAPL.
- Through other areas that have been capped.

The existing cross sections are missing many of the required components needed to clarify and support results and interpretations, per s. 716.15(4), Wis. Adm. Code.:

- The cross sections should include soil borings too, and not just wells.
- The fill unit(s) should be shown on the cross section.
- High and low water table should be shown.
- Contaminant concentrations.
- All underground utilities.

## Data Tables

The Report contains 154 pages of data tables and which are difficult to use. .. In addition to breaking out the data by Site, the following concerns should be addressed.

The data tables need data in the same unit of measurement that is used by the Department to express the environmental standard, per s. NR 716.15(4)(e)2, Wis. Adm. Code. Using parts per million instead of parts per billion for arsenic data would significantly reduce the visual clutter on the maps and figures.

The soil data tables should indicate saturated vs unsaturated soil.

The data tables should show which samples have been remediated and are no longer representative of the location from which they were collected.

The tables would be much more useable and better clarify the results if the contaminants of concern occur in the first columns of the data tables, because the tables are so wide the reader must scroll from page to page to fully evaluate the data.

### Appendices

Many of the recent boring logs for work done are not signed and are not complete. For instance, in some cases, the firm name is blank, drilling method is blank, borehole diameter is not listed, the elevation is not shown, and the geologic origin, esp. fill not designated. These forms need to be corrected and re-submitted.

Many of the well development forms are not complete and do not contain the name and certification. These forms need to be corrected and re-submitted.

MW-39 does not appear to have been properly developed. MW-39 well should be re-developed and development of monitoring wells should be re-evaluated for compliance with Ch. NR 141, Wis. Adm. Code.

An up to date Well Information Form is required for all wells on the Property, per s. 716.15 (4) (g).

### Corrections

The Report contains errors and inconsistencies that need to be corrected.

The narrative description of the water table configuration does not match the water table maps. For instance, the highest water table elevation is not at the northwest corner of the Property.

The statement in the Conceptual Site Model section, "The depth to groundwater is 5 to 10 feet bgs depending on location" does not match the statement in Section 5.2, "The shallow groundwater contained in the unconsolidated materials occurs at a depth of approximately 6 to 20 feet bgs."

The units for hydraulic conductivity used in the Conceptual Site Model section appear erroneous. The units are listed as feet per day whereas the correct units appear to be feet per minute, based on the data table and commonly accepted range of hydraulic conductivities, both presented on page 20 of the Report.

The discussion of hydraulic gradient in the Conceptual Site Model section incorrect. "The hydraulic gradient measured ranged from 0.010 feet per foot (ft/ft) to 0.082 ft/ft across the Site." Figure 7 of the report shows a hydraulic gradient of 0.2 ft/ft between monitoring wells OP-9 and OP-8.

The OP-03 groundwater sample from 11-10-2016 (on Table 10) stands out as having the maximum concentration for many VOCs. This appears to be a data entry error that needs correction. Alternatively, explain the significance of this unusual finding.

Much of the May 2015 and November 2016 groundwater data results on Table 10 look spurious. This seems likely to be missing the "<" symbol for many of the entries. Alternatively, explain the significance of this unusual finding.

Section 3.1 references over-drilling with solid stem augers. Well construction forms say hollow-stem auger was used. Similarly, development says surged with block and bailed. The well development forms indicate the wells were surged with bailer and pumped.

MW-38 was installed to 17 feet, per the well form. Section 3.1 states wells were installed 18 to 20 feet bgs.

Section 3.2 presents data on TA-series samples, but documentation is lacking for the TA-1, TA-2, and TA-3 borings; no boring logs, etc.

The former piezometer PZ-1 should be shown on the site map.

The recovery well data is not summarized in the data tables.

The report references a 1955 air photo, but none is included.

Section 6.2.6 discusses MW-7. It seems likely this should actually reference MW-7R.

Correct or explain the Triad reference on Table 1.

Include a note explaining the “M” flag on Table 1.

The Summary of Groundwater Elevations (Table 8) includes several errors. Below are noted during the Department’s review:

- MW-1 water level data from 11/17/1021
- RW-13 water level data from 2/12/20219
- THA-1 water level data from 2/15//2019
- MW-39 water level data from 4/11/022
- MW-4a water level data from 8/14/202
- MW-7R water level data from 6/13/2922
- MW-11 4/30/2001 data showing a water level of 732.89, which seems off by 100 feet

NR 716.14 reporting and NR 700.11 reports do not appear to have been completed for this project. Explain if this is a misunderstanding and confirm that the project will comply with these requirements in the future.

### Summary

The Department attempted a comprehensive summary of errors and inconsistencies, but additional items may not have been captured or noted.

The Department recognizes that this is a large complex project with many years of data and that it is a difficult matter to summarize the findings and complete all needed components of the site investigation. Once you have had time to review and reflect upon the concerns outlined in this letter please contact Jeff Ackerman at 608-219-2302 or at [jeffrey.ackerman@wisconsin.gov](mailto:jeffrey.ackerman@wisconsin.gov) or Issac Ross at (414) 750-7140 or at [issac.ross@wisconsin.gov](mailto:issac.ross@wisconsin.gov) to set up a teleconference. We can discuss a path forward and a schedule for additional activities.

Sincerely,



Issac A. Ross  
South Central Region Team Supervisor  
Remediation & Redevelopment Program  
Fitchburg DNR Service Center – Fitchburg, WI

and on behalf of

Jeff Ackerman, P.G.  
Hydrogeologist  
Remediation & Redevelopment Program  
Fitchburg DNR Service Center – Fitchburg, WI