

KPRG and Associates, Inc.

ADDENDUM TO REMEDIAL ACTION EXEMPTION REQUEST

September 7, 2010

Mr. Binyoti F. Amungwafor
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212

Re: Addendum to Remedial Action Exemption Request

VIA E-MAIL & US MAIL

KPRG Project No. 15807.4

Dear Mr. Amungwafor:

On behalf of K&W Manufacturing, Inc. (K&W), KPRG and Associates, Inc. (KPRG) is submitting an addendum to the previously submitted temporary exemption request utilizing injection for remedial action of groundwater that was submitted on July 13, 2010. Pursuant to s. NR 140.28(5), a temporary exemption is required for the injection of a remedial material as part of a remedial action for groundwater. This letter is serving as an addendum to our exemption request under NR 140.28(5) and addresses the requirements of the underground injection approval request checklist that was provided to KPRG by the WDNR on August 25, 2010. In addition, a request for a WPDES general permit for groundwater remedial operations was submitted and approved on August 18, 2010. The following outlines the underground injection approval request checklist and the responses addressing each checklist requirement.

Site Investigation Report Summary

KPRG completed and submitted a supplemental site investigation (SI) report to the WDNR on April 5, 2010. The supplemental SI Report identified the main contaminant of concern as tetrachloroethene (PCE) and its degradation products. Free product was not identified during the supplemental SI investigation. PCE was identified in the vadose zone as well as the saturated soil beneath the K&W facility.

Geology

The regional geology consists of unconsolidated glacial overburden which overlies Silurian age dolomite bedrock and Ordovician age Maquoketa Shale. Depth to bedrock in the vicinity of the site is between 40 and 140 feet bgs (SEWRPC, Tech Rpt. 37, June, 2002). Beneath the Maquoketa Shale are the Galena Dolomite and Ordovician St. Peter Sandstone units which form the primary groundwater aquifers for large municipal and industrial uses in the area.

- The proposed source of water used as part of the injection process is water from the K&W facility.
- The total volume of material to be injected is approximately 5,200 gallons.

Monitoring Proposal Specifications

The Remedial Action Exemption Request submitted to the WDNR on July 13, 2010 identifies the vapor and groundwater monitoring well network and the groundwater monitoring plan. The following information is supplemental to the information that was presented in the Remedial Action Exemption Request.

- The injection for treatment of PCE is not expected to create a vapor concern within the facility.
- Currently the K&W facility has a robust air exchange system which currently exchanges 5 room volumes of air every hour, reducing the likelihood of any vapor concerns within the facility.

Inventory of Injection Wells

The inventory of injection wells form, 3300-253, is enclosed.

If you have any questions, please call me at 262-781-0475.

Sincerely,
KPRG and Associates, Inc.



Joshua D. Davenport, P.E.
Project Engineer

Cc: Mr. Greg Krieger

Enclosure

This information is collected under the authority of the Safe Drinking Water Act.

Notice: Code of Federal Regulations (40 CFR 144.26 Inventory Requirements): owners or operators of all injection wells authorized by rule shall submit inventory information to an approved State Underground Injection Control Program. Personal information collected on this form will be used for inventory purposes. Information will be made accessible to requesters under Wisconsin's Open Records laws (s. 19.32 to 19.39, Wis. Stats.) and requirements.

Date Prepared (Year, Month, Day) 2010, SEPTEMBER, 3	Facility ID Number 241813770	Transaction Type (Please check one of the following) <input type="checkbox"/> Deletion <input type="checkbox"/> Entry Change <input checked="" type="checkbox"/> First Time Entry <input type="checkbox"/> Replacement
---	--	---

Facility Name and Location

Last Name K+W MANUFACTURING, INC.	First	MI	Latitude: DEG MIN SEC 43 7 45.8 N	Longitude: DEG MIN SEC 08 1 8.7 W
Street Address / Route Number 8619 WEST LYNX AVENUE			Township 8 N	Range 21 E
City / Town MILWAUKEE			State WI	ZIP Code
County MILWAUKEE			Tribal Land <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Legal Contact

Type <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator	Last Name KRIEGER	First GREG	MI	Telephone Number (incl. area code) 414-353-7910
---	-----------------------------	----------------------	----	---

Organization	Ownership
Street / P.O. Box 15155 CARPENTER ROAD	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County / Local Government
City / Town BROOKFIELD	<input type="checkbox"/> State <input type="checkbox"/> Federal
State WI	<input type="checkbox"/> Specify Other _____
ZIP Code 53005	

Well Information

WELL CLASS	WELL TYPE	TOTAL NUMBER OF WELLS	WELL OPERATION STATUS					
			UC	AC	TA	PA	AN	
V	REMEDIATION	29	X					

KEY:
 DEG = Degree
 MIN = Minute
 SEC = Seconds
 SECT = Section
 ¼ SECT = Quarter Section
 AC = Active
 UC = Under Construction
 PA = Permanently Abandoned and Approved by State
 AN = Permanently Abandoned and Not Approved by State
 TA = Temporarily Abandoned and Not Approved by State

Comments (Optional):