

September 30, 2021

Ms. Jennifer Dorman  
Environmental Program Associate  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
2300 N. Dr. Martin Luther King Jr. Drive  
Milwaukee, WI 53212-3128

**Subject: Response to WDNR's August 6, 2021 Review of Supplemental Site Investigation Report and Additional Groundwater Investigation Work Plan and Groundwater Monitoring Plan**  
Milwaukee Die Casting Company Site  
4132 North Holton Street, Milwaukee, Wisconsin  
WDNR BRRTS # 02-41-000023  
WDNR FID # 241228240

Dear Ms. Dorman,

We are providing this letter to the Wisconsin Department of Natural Resources (WDNR) as a response to WDNR's August 6, 2021 "Review of Supplemental Site Investigation Report and Additional Groundwater Investigation Work Plan and Groundwater Monitoring Plan" for the Milwaukee Die Casting Company Site ("Site"). This letter is being submitted on behalf of Pharmacia LLC (Pharmacia), which is acting on behalf of Fisher Controls International, Inc. (Fisher) in this matter.<sup>1</sup>

### **Supplemental Site Investigation Report**

The WDNR requested additional information regarding the potential use of perfluoroalkyl and polyfluoroalkyl substances (PFAS) and 1,4-dioxane at the Site. The following paragraphs provide WDNR's information requests followed by Pharmacia's responses.

**WDNR Additional PFAS Information Request.** "Additional information should provide more details about whether die casting was the only manufacturing operation at the Site and whether PFAS may have been used in die casting operations such as the reported use of a liquid sprayed on dies prior to injection of molten aluminum and zinc alloys."

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<sup>1</sup> By submitting this letter, neither Pharmacia nor Fisher is waiving any of its rights under federal or state law. Additionally, nothing in this letter should be deemed an admission of fact or law, or a waiver of any defense or right to contest Pharmacia's or Fisher's liability under any state or federal law.

**Response.** Available historical information documents that die casting was the only former manufacturing operation at the Site. Salient information regarding the former die casting operations at the Site is summarized below:

- A 1991 *Environmental Assessment Report*<sup>2</sup> documents that “Building permits were issued in the early 1950’s with the occupancy permit for Milwaukee Die Casting Company issued in June of 1952.” The report also documents that “There are three re-melt furnaces, 15 aluminum die cast machines, 5 zinc die cast machines, several machine operations which include grinding, drilling, trimming, buffing, deburring, milling, etc., degreasing, limited heat treating and miscellaneous repair and maintenance equipment.”
- A 2004 *Phase I Environmental Site Assessment* (ESA) report<sup>3</sup> documents that the Site “was used as a foundry/die casting facility from the 1950s through the late 1990s” and “Milwaukee Die Casting produced and machined aluminum and zinc cast parts.” The report also documents that “At the time of the Phase I ESA, portions of the building were used for storage by Turner Box Company and the rest of the facility was vacant.”
- 1950 and 1967 historical Sanborn<sup>®</sup> maps depict the “Milwaukee Die Casting Co” building. The 1927 Sanborn<sup>®</sup> map does not depict any structures on the Site.<sup>4</sup> Further, a 1937 aerial photograph<sup>5</sup> does not depict any structures on the Site.

Available Site information does not reference PFAS use at the Site. The 2004 Phase I ESA report documents the observation of remnant drums labeled “lubricant and die slick” in the building. DIE SLICK<sup>®</sup> is a die release polymeric lubricant.<sup>6</sup>

The Interstate Technology and Regulatory Council (ITRC)<sup>7</sup> does not reference the use of PFAS for die-casting operations or PFAS associated with polymeric lubricants. ITRC further documents that “most polymer PFAS are considered to pose relatively less risk to human health and the environment than some nonpolymer PFAS.”

Based on this additional information, together with the information provided in Section 6 of the May 11, 2021 *Supplemental Site Investigation Report*, further PFAS assessment is not warranted.

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<sup>2</sup> Fox Environmental Services, Inc., September 1991.

<sup>3</sup> Braun Intertec Corporation, October 21, 2004.

<sup>4</sup> EDR<sup>®</sup> *Certified Sanborn<sup>®</sup> Map Report*, MDCC, 4132 N Holton St, Milwaukee WI 53212, February 24, 2021.

<sup>5</sup> <https://lio.milwaukeecountywi.gov/Html5Viewer/index.html?viewer=MCLIO-Map>.

<sup>6</sup> <https://quakerhoughtonconnect.com/die-casting>.

<sup>7</sup> <https://pfas-1.itreweb.org/2-5-pfas-uses/>.

**WDNR Additional 1,4-Dioxane Information Request.** “Additional information should also be provided on how trichloroethylene (TCE), and possibly 1,1,1-trichloroethane (1,1,1-TCA), were used in manufacturing processes and whether 1,4-dioxane may have been used to stabilize TCE if used with reactive metals such as aluminum.”

**Response.** Available information regarding the former use of TCE, 1,1,1-TCA and 1,4-dioxane at the Site is summarized below:

- The 2004 Phase I ESA report documents that “A vapor degreaser that used trichloroethylene (TCE) was located in the southwest corner of the building. Until 1989, unused TCE was stored in a UST located outside the southwest corner of the building. After removal of the TCE UST, unused TCE was stored within the building in an AST until 1994 when its use was discontinued.”
- Available Site information does not reference the use of 1,1,1-TCA at the Site nor the use of 1,4-dioxane to stabilize 1,1,1-TCA (or TCE).

The WDNR-approved monitoring program for the Site includes 1,4-dioxane.

### **Additional Groundwater Investigation Work Plan and Groundwater Monitoring Plan**

WDNR requested modification to the planned groundwater monitoring well network and data compilation/evaluation. The following paragraphs provide WDNR’s requests followed by Pharmacia’s responses.

**WDNR Groundwater Monitoring Well Network Request.** “The DNR requests continued groundwater sampling at piezometer PZ-2 to monitor possible deeper CVOC-impacted groundwater in the area of MW-2, and at piezometer PZ-10 to monitor possible deeper CVOC-impacted groundwater downgradient of monitoring wells MW-2, MW-4 and MW-5.”

**Response.** PZ-2 and PZ-10 will be added to the monitoring well network.

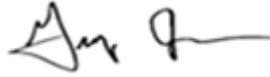
**WDNR Data Compilation/Evaluation Request.** “DO, ORP and the other field measurements should be added to the tabulated groundwater sampling results to aid in determining groundwater conditions.”

**Response.** These field measurement data will be included in the tabulated groundwater sampling results.

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Please contact us if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Johnson", is centered below the word "Sincerely,".

Greg Johnson, P.H., P.G., P.E.  
Senior Engineer  
(licensed P.E. in WI, P.H. in WI, P.G. in IL, WI)

cc: Mr. John (Greg) Moll, WDNR  
Mr. Christopher Clark, Pharmacia LLC  
Ms. Mary Jo Anzia, BSI