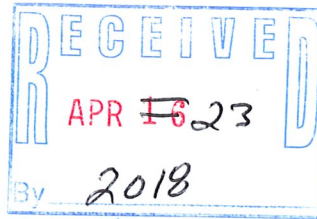


Endpoint Solutions

6871 South Lovers Lane
Franklin, WI 53132
Telephone: (414) 427-1200
Fax: (414) 427-1259
www.endpointcorporation.com



GEMS Data Submittal Contact – WA/3
Bureau of Waste Management
Wisconsin Department of Natural Resources
101 South Webster Street
Madison, WI 53707-7921

April 19, 2018

32213 #: 0246-000707
FIDR: 24004330

Subject: Transmittal of Monitoring Data
Arkema Resin Coatings – Saukville, Wisconsin
License #03082

Enclosed is the Environmental Monitoring Data Certification (Form 4400-231), a Notification of Groundwater Exceedances and a CD containing the electronic data download (EDD) in the file named oct17-03082.txt for the groundwater monitoring data collected from the Arkema Coating Resins facility in Saukville, Wisconsin in October 2017. Also included is the Environmental Monitoring Data Certification (Form 4400-231) and the EDD file named jan18-03082.txt for the January 2018 sampling event. No exceedances were detected during the January 2018 sampling event.

CLOSING

If you have any questions regarding the data submittal or require corrections, please contact Bob Cigale at 414-858-1202 or via email at bob@endpointcorporation.com.

Sincerely,

Endpoint Solutions

A handwritten signature in blue ink, appearing to read "R. Cigale".

Robert A. Cigale, P.G.
Principal

cc: John Feeney – WDNR
Doug Loutzenhiser – RETIA USA

Notice: Personally identifiable information collected will be used for program administration and enforcement purposes. The Department may also provide this information to requesters as required under Wisconsin's Open Records law, ss. 19.31 to 19.39, Wis. Stats. When submitting monitoring data, the owner or operator of the facility, practice or activity is required to notify the Department in writing that a groundwater standard or an explosive gas level has been attained or exceeded, as specified in ss. NR 140.24(1)(a); NR 140.26(1)(a); NR 507.30NR 635.14(9)(a); NR 635.18(20) and NR 507.30, Wis. Adm. Code. Failure to report may result in fines, forfeitures or other penalties resulting from enforcement under ss. 289.97, 291.97 or 299.95, Wis. Stats.

Instructions:

- Prepare one form for each license or monitoring ID.
- Please type or print legibly.
- Attach a notification of any values that attain or exceed groundwater standards (that is, preventive action limits, enforcement standards or alternative concentration limits). The notification must include a preliminary analysis of the cause and significance of each value.
- Attach a notification of any gas values that attain or exceed explosive gas levels.
- Send the original signed form, any notification, and Electronic Data Deliverable [EDD] to: GEMS Data Submittal Contact - WA/3
Bureau of Waste Management
Wisconsin Department of Natural Resources
101 South Webster Street
Madison WI 53707-7921

Monitoring Data Submittal Information

Name of entity submitting data (laboratory, consultant, facility owner):
Endpoint Solutions Corp.

Contact for questions about data formatting. Include data preparer's name, telephone number and E-mail address:
Name: Robert Cigale Phone: (414) 858-1202
E-mail: bob@endpointcorporation.com

Facility name:	License # / Monitoring ID	Facility ID [FID]	Actual sampling dates (e.g., July 2-6, 2003)
Arkema Resin Coatings - Saukville, Wisconsin	03082	246004330	October 24-31, 2017

The enclosed results are for sampling required in the month(s) of: (e.g., June 2003)
October 2017

Type of Data Submitted (Check all that apply)

<input checked="" type="checkbox"/> Groundwater monitoring data from monitoring wells	<input type="checkbox"/> Gas monitoring data
<input type="checkbox"/> Groundwater monitoring data from private water supply wells	<input type="checkbox"/> Air monitoring data
<input type="checkbox"/> Leachate monitoring data	<input type="checkbox"/> Other (specify) _____

Notification attached?

No. No groundwater standards or explosive gas limits were exceeded.


Yes, a notification of values exceeding a groundwater standard is attached. It includes a list of monitoring points, dates, sample values, groundwater standard and preliminary analysis of the cause and significance of any concentration.

Yes, a notification of values exceeding an explosive gas limit is attached. It includes the monitoring points, dates, sample values and explosive gas limits.

Certification

To the best of my knowledge, the information reported and statements made on this data submittal and attachments are true and correct. Furthermore, I have attached complete notification of any sampling values meeting or exceeding groundwater standards or explosive gas levels, and a preliminary analysis of the cause and significance of concentrations exceeding groundwater standards.

Robert Cigale Principal (414) 858-1202
Facility Representative Name (Print) Title (Area Code) Telephone No.

 Signature 3/28/18 Date

FOR DNR USE ONLY. Check action taken, and record date and your initials. Describe on back side if necessary.

Found uploading problems on _____ Initials _____

Notified contact of problems on _____ Uploaded data successfully on _____

EDD format(s): Diskette CD (initial submittal and follow-up) E-mail (follow-up only) Other _____

GROUNDWATER STANDARD EXCEEDENCES

<u>License No.</u>	<u>Facility ID No.</u>	<u>Facility Name</u>	<u>Sample Results for Month(s) of:</u>
03082	246004330	Arkema Coating Resins Saukville, Wisconsin	October 2017

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
260/W-27	Trichloroethene	111 µg/L	ES (5 µg/L)
	cis-1,2-Dichloroethene	12.7 µg/L	PAL (7 µg/L)

Monitoring Well W-27 is glacial drift perimeter monitoring point located to the west and hydrogeologically upgradient of the Facility on the former Northern Signal property. Historical evidence indicates that a chlorinated solvent vapor degreaser was formerly operated on the Northern Signal site. Groundwater impacts at this well are not believed to be due to past or present activities on the Facility. Chlorinated solvents are not currently and have not historically been used at the Facility.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
279/W-52	Benzene	10.9 µg/L	ES (5 µg/L)
	Vinyl Chloride	11.3 µg/L	ES (0.2 µg/L)
	cis-1,2-Dichloroethene	18.3 µg/L	PAL (7 µg/L)

Monitoring Well W-51 is a glacial drift perimeter monitoring point located on the southern boundary of the Facility downgradient of the former Northern Signal property. Historical evidence indicates that a chlorinated solvent vapor degreaser was formerly operated on the Northern Signal site. Groundwater impacts at this well are not believed to be due to past or present activities on the Facility. Chlorinated solvents are not currently and have not historically been used at the Facility.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
253/W-06A	Arsenic	30.2 µg/L	ES (10 µg/L)
	Ethylbenzene	19,200 µg/L	ES (700 µg/L)
	Toluene	29,900 µg/L	ES (800 µg/L)
	Total Xylenes	84,000 µg/L	ES (2,000 µg/L)

Monitoring Well W-06A is a glacial drift remediation progress monitoring point located within AOC No. 2 on the Facility in the vicinity of the former dry well.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
258/W-19A	Trichloroethene	15.5 µg/L	ES (5 µg/L)
	Vinyl Chloride	1.34 µg/L	ES (0.2 µg/L)
	cis-1,2-Dichloroethene	12.4 µg/L	PAL (7 µg/L)

Monitoring Well W-19A is glacial drift perimeter monitoring point located to the west and hydrogeologically upgradient of the Facility on the former Northern Signal property. Historical evidence indicates that a chlorinated solvent vapor degreaser was formerly operated on the Northern Signal site. Groundwater impacts at this well are not believed to be due to past or present activities on the Facility. Chlorinated solvents are not currently and have not historically been used at the Facility.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
216/W-24A	bis(2-ethylhexyl)phthalate	3.14 µg/L	PAL (0.6 µg/L)
	cis-1,2-Dichloroethene	63 µg/L	PAL (7 µg/L)
	1,4-Dioxane	85 µg/L	ES (3 µg/L)
	Trichloroethene	0.73 µg/L	PAL (0.5 µg/L)
	Vinyl Chloride	16.7 µg/L	ES (0.2 µg/L)

Well W-24A is an active extraction well and shallow dolomite remediation progress monitoring point located in the southwest corner of the Facility, downgradient of the former Northern Signal site. The presence of chlorinated VOCs at this location is believed to be due to the chlorinated solvent degreaser formerly located on the Northern Signal site. Chlorinated solvents are not currently and have not historically been used at the Facility.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
213/W-21A	Benzene	8.1 µg/L	ES (5 µg/L)
	bis(2-ethylhexyl)phthalate	2.52 µg/L	PAL (0.6 µg/L)
	cis-1,2-Dichloroethene	41 µg/L	PAL (7 µg/L)
	1,4-Dioxane	75 µg/L	ES (3 µg/L)
	Vinyl Chloride	1.08 µg/L	ES (0.2 µg/L)
	Trichloroethene	0.67 µg/L	PAL (0.5 µg/L)

Well W-21A is an active extraction well and shallow dolomite remediation progress monitoring point located in the central portion of the Facility, south of AOC 1 and north of AOC 3. The presence of chlorinated VOCs at this location is believed to be due to the chlorinated solvent degreaser formerly located on the Northern Signal site. Chlorinated solvents are not currently and have not historically been used at the Facility.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
219/W-29	1,4-Dioxane	72 µg/L	ES (3 µg/L)
	cis-1,2-Dichloroethene	49 µg/L	PAL (7 µg/L)
	Trichloroethene	0.60 µg/L	PAL (0.5 µg/L)
	Vinyl Chloride	2.22 µg/L	ES (0.2 µg/L)

Well W-29 is an active extraction well and shallow dolomite remediation progress monitoring point, located west and hydrogeologically downgradient from AOC No. 2 (former dry well), and AOC No. 3 (former tank farm). The concentration of vinyl chloride detected at this location is believed to be attributed to the degradation of trichloroethene entering the shallow dolomite at the former Northern Signal site, undergoing partial dechlorination in the subsurface environment, and being actively extracted at W-29. We believe the high concentration of vinyl chloride detected at W-29 indicates the onsite groundwater extraction from the glacial drift and shallow dolomite aquifers is effectively containing the contaminants on the property and drawing the chlorinated compounds from the upgradient site into the extraction system. Chlorinated solvents are not currently and have not historically been used at the Facility.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
206/W-30	Arsenic	7.16 µg/L	PAL (1 µg/L)
	Benzene	2.25 µg/L	PAL (0.5 µg/L)

Monitoring Well W-30 is an active pumping well that pumps groundwater continuously from the deep dolomite aquifer at approximately 350 gpm producing non-contact cooling water for use at the facility. The pumping of W-30 creates a cone of depression in the deep dolomite aquifer, and dewateres the shallow dolomite and glacial drift aquifers in the immediate vicinity.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
220/W-38	Benzene	1,350 µg/L	ES (5 µg/L)

Monitoring Well W-38 is a shallow dolomite remediation progress monitoring point located at the center of the Facility within AOC No. 3 (former tank farm). Concentrations of VOCs at this location have been steadily decreasing indicating that the extraction system is effectively reducing the concentration of contaminants in the subsurface.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
262/W-42	Benzene	17 µg/L	ES (5 µg/L)
	Ethylbenzene	1,010 µg/L	PAL (140 µg/L)
	Total Xylenes	10,238 µg/L	ES (2,000 µg/L)

Monitoring Well W-42 is a glacial drift remediation progress monitoring point located in the west-central portion of the Facility between AOC No. 1 (former liquids incinerator) and AOC No. 2 (former dry well). Concentrations of total VOCs at this location have been steady or decreasing indicating that the extraction system is effectively containing the contaminants within the footprint of the Facility.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
263/W-43	Arsenic	21.9 µg/L	ES (10 µg/L)
	Benzene	7.1 µg/L	ES (5 µg/L)
	bis(2-ethylhexyl)phthalate	31.3 µg/L	ES (6 µg/L)
	Naphthalene	12.3 µg/L	PAL (10 µg/L)

Monitoring Well W-43 is a glacial drift remediation progress monitoring point located in the central portion of the Facility within AOC No. 3 (former tank farm). The concentration of VOCs and SVOCs detected in glacial drift remediation monitoring point W-43 is significantly greater in 2008 than the concentrations detected during the October 2007 sampling event. This sample point has exhibited a large variance in concentrations over time. This variance was first observed during the 1995 RFI Additional Studies Report and is most likely due to slow recharge rates and turbidity.

Well ID (WDNR/Arkema)	Compound	Concentration	Standard Exceeded
267/W-47	Benzene	38 µg/L	ES (5 µg/L)
	Ethylbenzene	239 µg/L	PAL (140 µg/L)
	Total Xylenes	21,000 µg/L	ES (2,000 µg/L)
	Naphthalene	21.3 µg/L	PAL (8 µg/L)

Monitoring Well W-47 is a glacial drift remediation progress monitoring point located in the northeastern portion of the Facility within AOC No. 1 (former incinerator). The concentration of VOCs and SVOCs detected in glacial drift remediation monitoring point W-47 is consistent with concentrations detected in the past.

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Instructions:

- Prepare one form for each license or monitoring ID.
- Please type or print legibly.
- Attach a notification of any values that attain or exceed groundwater standards (that is, preventive action limits, enforcement standards or alternative concentration limits). The notification must include a preliminary analysis of the cause and significance of each value.
- Attach a notification of any gas values that attain or exceed explosive gas levels.
- Send the original signed form, any notification, and Electronic Data Deliverable [EDD] to: GEMS Data Submittal Contact - WA/3
Bureau of Waste Management
Wisconsin Department of Natural Resources
101 South Webster Street
Madison WI 53707-7921

Monitoring Data Submittal Information

Name of entity submitting data (laboratory, consultant, facility owner):

Endpoint Solutions Corp.

Contact for questions about data formatting. Include data preparer's name, telephone number and E-mail address:

Name: Robert Cigale

Phone: (414) 858-1202

E-mail: bob@endpointcorporation.com

Facility name:	License # / Monitoring ID	Facility ID [FID]	Actual sampling dates (e.g., July 2-6, 2003)
Arkema Resin Coatings - Saukville, Wisconsin	03082	246004330	January 23, 2018

The enclosed results are for sampling required in the month(s) of: (e.g., June 2003)

January 2018

Type of Data Submitted (Check all that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> Groundwater monitoring data from monitoring wells | <input type="checkbox"/> Gas monitoring data |
| <input type="checkbox"/> Groundwater monitoring data from private water supply wells | <input type="checkbox"/> Air monitoring data |
| <input type="checkbox"/> Leachate monitoring data | <input type="checkbox"/> Other (specify) _____ |

Notification attached?

- No. No groundwater standards or explosive gas limits were exceeded.
- Yes, a notification of values exceeding a groundwater standard is attached. It includes a list of monitoring points, dates, sample values, groundwater standard and preliminary analysis of the cause and significance of any concentration.
- Yes, a notification of values exceeding an explosive gas limit is attached. It includes the monitoring points, dates, sample values and explosive gas limits.

Certification

To the best of my knowledge, the information reported and statements made on this data submittal and attachments are true and correct. Furthermore, I have attached complete notification of any sampling values meeting or exceeding groundwater standards or explosive gas levels, and a preliminary analysis of the cause and significance of concentrations exceeding groundwater standards.

Robert Cigale

Principal

(414) 858-1202

Facility Representative Name (Print)

Title

(Area Code) Telephone No.

Signature

Date

FOR DNR USE ONLY. Check action taken, and record date and your initials. Describe on back side if necessary.

- Found uploading problems on _____ Initials _____
- Notified contact of problems on _____ Uploaded data successfully on _____

EDD format(s): Diskette CD (initial submittal and follow-up) E-mail (follow-up only) Other _____