

Endpoint Solutions

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Mr. John Feeney
Hydrogeologist
Wisconsin Department of Natural Resources
1155 Pilgrim Parkway
Plymouth, WI 53073

December 21, 2021

Subject: Request to Modify the Groundwater Monitoring Plan
Cook Composite/Former Freeman Chemical
340 South Railroad Street, Saukville, Wisconsin
BRRTS: 02-46-000767 / FID: 246004330

Dear John:

Endpoint Solutions Corp. (Endpoint) on behalf of RETIA USA LLC has prepared this request to modify the groundwater monitoring plan (GWMP) in effect for the open environmental repair program (ERP) case at the Cook Composite/Former Freeman Chemical site located at 340 South Railroad Street in the Village of Saukville, Ozaukee County, Wisconsin (the "Site"). In compliance with the 1987 Corrective Action Order on Consent (Docket #V-W-88-R-002), October 19, 1987, 3008(h) order for RCRA, groundwater monitoring has been performed on a quarterly basis. In 2005, a request was made to the Wisconsin Department of Natural Resources (WDNR) to modify the sampling schedule as follows:

- Collect and analyze samples from Municipal Well No. 1 (MW-1) on a quarterly basis;
- Collect and analyze samples from the receptor monitoring points and perimeter monitoring points semi-annually in April and October; and,
- Collect and analyze samples from the remediation progress monitoring points on an annual basis on October.

On July 11, 2005, the WDNR approved the modified GWM Plan as requested.

MODIFICATION REQUEST

Since groundwater sampling was initiated in 1987, written reports have been prepared following every quarterly sampling event for submission to the WDNR. Since 1988, groundwater results have also been uploaded on a quarterly basis to the WDNR's Waste & Materials Management Groundwater Environmental Monitoring System (GEMS) online database under License No.: 03082. The GEMS on the Web (GOTW) application (<https://dnr.wi.gov/wastemgmt/gotw/webpages/default.aspx>) provides public access to the results of the groundwater samples collected as part of the GWMP.

Based on the long history of groundwater monitoring at the Site and the uploading of analytical results to the GOTW database on a quarterly basis, we are requesting the approval to forego

preparing and submitting written reports on a quarterly basis, focusing rather on preparing and submitting an Annual Report after each calendar year of groundwater monitoring. Results will continue to be uploaded to the GOTW database on a quarterly basis, with copies of the Environmental Monitoring Data Certification (Form 4400-231) and Groundwater Standard Exceedance Notification forwarded to your attention on a quarterly basis.

CLOSING

We trust this request is agreeable to the WDNR. If acceptable, please provide a letter indicating your acceptance of the proposed revision in reporting frequency. As always, if you have any questions, please do not hesitate to contact me at 414-858-1202 or via email at bob@endpointcorporation.com.

Sincerely,

Endpoint Solutions



Robert A. Cigale, P.G.
Principal

cc: Keith Linton – RETIA USA LLC