

Endpoint Solutions

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

July 10, 2023

Subject: Groundwater Monitoring Plan Modification Request
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 Resource Conservation and Recovery Act (RCRA), groundwater monitoring has been performed on a quarterly basis since circa 1992. 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 in October.

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

In December 2021, a request was also made to the WDNR to forego preparing quarterly written reports of results, and in January 2022, the WDNR approved reducing the reporting frequency to annually.

MODIFICATION REQUEST

Since groundwater sampling activities were initiated, several monitoring points located upgradient to the west of the Site have been included in the GWMP. Specifically, glacial drift aquifer monitoring wells W-19A and W-27 and deep dolomite aquifer monitoring well PW-08, located on the upgradient Northern Signal/Laubenstein Property have been included in the Site GWMP. The locations of these monitoring points are depicted on **Figure B.1.b**, attached. The Northern Signal/Laubenstein Property is the location of an open ERP case (BRRTS #: 02-46-535604). The

ERP case on the Northern Signal/Laubenstein Property was opened in June 1988 due to the discovery of trichloroethene (TCE) contamination in the soil and groundwater. In 2005, the WDNR sent a responsible party letter to the Northern Signal/Laubenstein Property owner, and in 2011, active site investigation activities commenced.

Historical analytical results for the samples collected from glacial drift monitoring wells W-19A and W-27 located on the Northern Signal/Laubenstein Property have reported elevated concentrations of TCE, 1,2-dichloroethene (1,2-DCE) and vinyl chloride (VC). Chlorinated compounds such as TCE were never manufactured or utilized at the Saukville facility, and the contaminants of concern at the Site consist primarily of benzene, ethylbenzene, toluene and xylene (BETX). Furthermore, since Freeman Chemicals, a precursor of Cook Composites & Polymers repaired the annual seal for deep dolomite monitoring well PW-08 located within the Northern Signal/Laubenstein Property building, historical analytical results are typically non-detect. Recently, TRC, the environmental consultant for the Northern Signal/Laubenstein Property, has installed three (3) small diameter casings and screens with packers in the PW-08 casing to create shallow, intermediate and deep sample intervals.

In February 2023, TRC collected groundwater samples from the three (3) depth intervals at the PW-08 location with the following detected concentrations.

Parameter	NR 140		Results (µg/L)		
	PAL	ES	PW-08S	PW-08I	PW-08D
Dissolved Iron	150	300	1,640	ND	1,080
1,4-Dioxane	0.3	3	408	1.7	0.68
Benzene	0.5	5	1.2	ND	0.35 "J"
cis-1,2-Dichloroethene	7	70	6.2	ND	1.6
Toluene	160	800	ND	0.56 "J"	ND
Vinyl Chloride	0.02	0.2	15.3	ND	ND

µg/L – micrograms per liter

PAL – Preventive Action Limit

ES – Enforcement Standard

ND – Not Detected

"J" – Estimated concentration between the limit of detection and the limit of quantitation

With the exception of the PAL exceedance for benzene detected in the PW-08S sample, the remainder of the PAL and/or ES exceedances reported in the samples collected from PW-08 consist of TCE degradation products (cis-1,2-dichloroethene and VC) or 1,4-dioxane which was used in TCE as a stabilizer.

GWMP MODIFICATION REQUEST

Based on the historical analytical data associated with the monitoring points located on the Northern Signal/Laubenstein Property including the significant chlorinated solvent impacts and the lack of significant BETX constituents and the fact that the Northern Signal/Laubenstein Property ERP case is being actively investigated by another environmental consultant, Retia USA LLC is

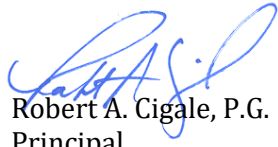
requesting the WDNR consider removing the semi-annual sampling of W-27 and PW-08 and the annual sampling of W-19A from the Cook Composite/Former Freeman Chemical GWMP.

CLOSING

We trust this request is agreeable to the WDNR. If acceptable, please provide a letter indicating your acceptance of the proposed revision in sampling. 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

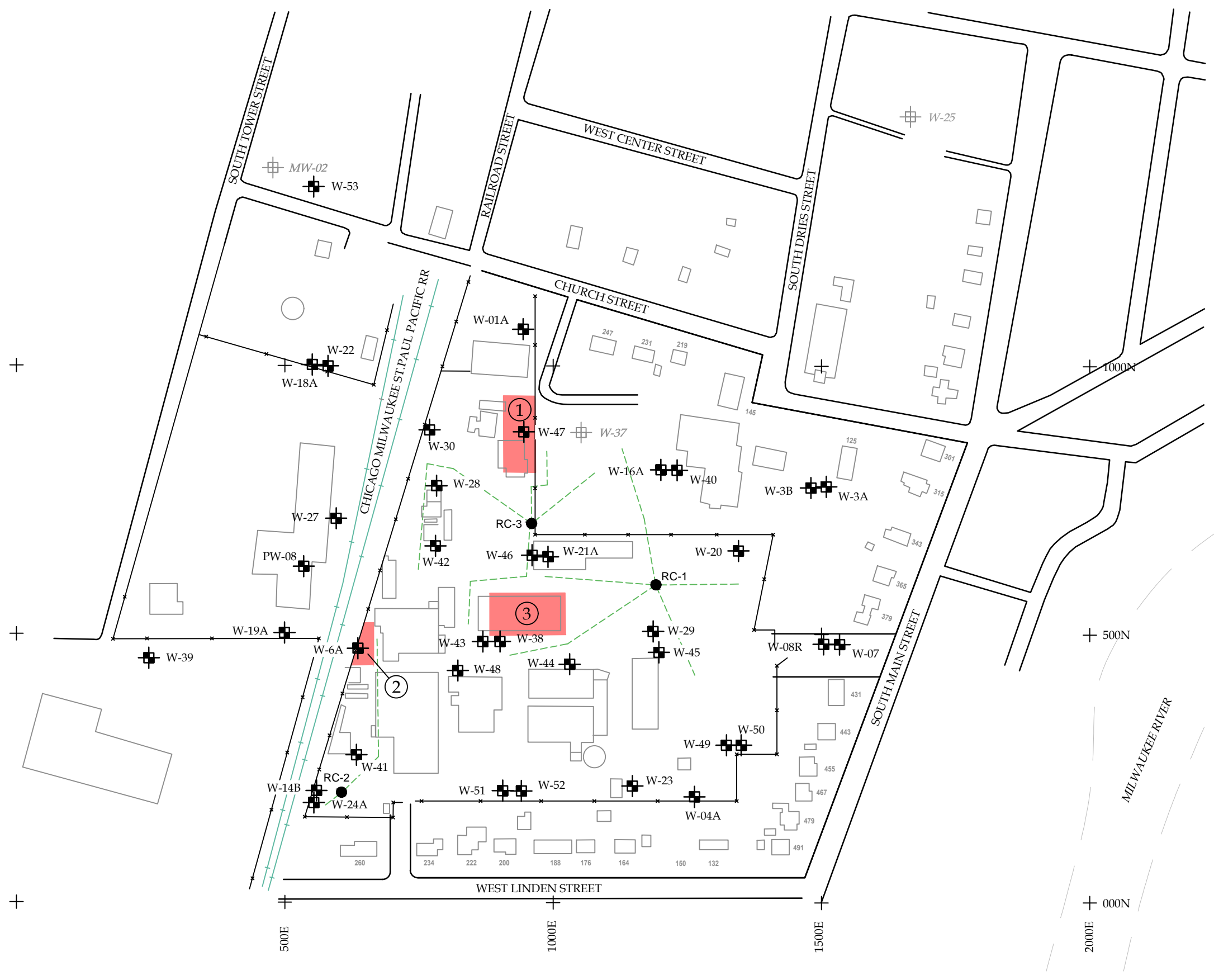


Robert A. Cigale, P.G.
Principal

cc: Keith Linton – Retia USA LLC

Attachments Figure B.1.b

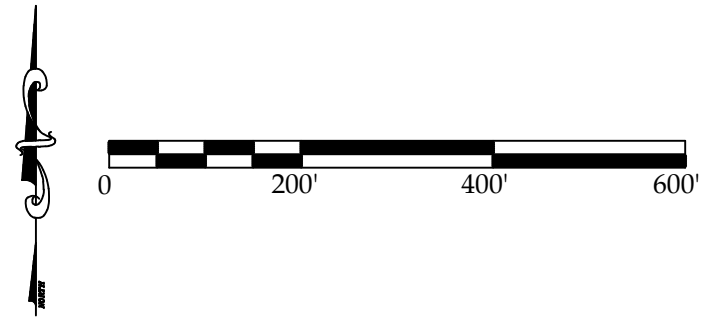
P:\Retia - 341\2022 Saukville\009 - Site Investigation\2021 Work Plan\CAD\021-001\Fig B.1.b_341-021-001_Site layout.dwg



LEGEND

- BUILDING
- ROAD
- FENCE
- RAILROAD
- MONITORING WELL LOCATION AND NUMBER
- ABANDONED WELL LOCATION AND NUMBER
- RANNEY COLLECTOR
- AREA OF CONCERN

- NOTES**
1. BASE MAP WAS DEVELOPED FROM DRAWINGS PROVIDED BY RMT, INC.
 2. W-37 WAS ABANDONED AUGUST 2, 1996.
 3. W-25 WAS ABANDONED JULY 29, 1997.
 4. MW-02 WAS ABANDONED NOVEMBER 2004.



DETAILED SITE MAP	
340 S. RAILROAD STREET SAUKVILLE, WISCONSIN 53080	
Endpoint Solutions	
6871 S. Lovers Lane Franklin, WI 53132	
Phone: (414) 427-1200	Fax: (414) 427-1259
DRAWN BY: NWD	DATE: 01/25/2021
REVIEWED BY: RAC	PROJECT NO: 341-021-001

Figure B.1.b