

VIA EMAIL: DOUGLAS.CIESLAK@WISCONSIN.GOV

March 8, 2018

Mr. Douglas Cieslak
Hydrogeologist
Remediation & Redevelopment Program
Wisconsin Department of Natural Resources
141 NW Barstow Street, Room 180
Waukesha, WI 53188

SMA Project No. 15-15011

**Subject: Addendum to May 15, 2017 Revised Site Investigation Work Plan
DNR BRRTS Activity #02-41-532649 FID 241780880
Superior Health Linens
5005 S. Packard Avenue
Cudahy, Wisconsin**

Dear Mr. Cieslak:

On behalf of D&C Partners, LLC (D&C Partners) St. John – Mittelhauser & Associates, Inc. (SMA) is submitting the following Addendum to the May 15, 2017 Site Revised Investigation Work Plan (Work Plan Addendum) for the Superior Health Linens facility located at 5005 South Packard Avenue, Cudahy, Wisconsin (Site). This Work Plan Addendum outlines the proposed scope of work to complete one (1) offsite soil boring at an angle, commencing on property owned by Patrick Cudahy and terminating on property owned by Union Pacific Railroad. The purpose of the soil boring is to:

- Allow the collection of soil and groundwater sample(s) on Union Pacific property to determine the lateral extent of chlorinated volatile organic compounds (CVOCs) west of the area of contamination; and
- Verify that the shallow groundwater (e.g. first encountered saturated unit) meets the Enforcement Standards under NR 140 for groundwater and therefore, accordance with Wisconsin DNR RR-800, an offsite vapor intrusion investigation is not required.

The scope of work outlined in this Work Plan is based on telephone conversations with Mr. Doug Cieslak, Wisconsin Department of Natural Resources (WDNR), Mr. Carter Hanson, Environmental Health & Safety Manager for Patrick Cudahy, and Ms. Kelly Gearhart, Environmental Site Remediation Manager for Union Pacific Railroad.

1.0 BACKGROUND

On February 3, 2017, SMA submitted a Site Investigation Work Plan (Work Plan) to the WDNR to define the nature and extent of chlorinated volatile organic compounds (CVOCs) in soil and groundwater at the Site. The proposed scope of work included the completion of a monitoring well upgradient of the known CVOC source area on property owned by Union Pacific Railroad¹.

On April 21, 2017, Ms. Kelly Gearhart with Union Pacific Railroad notified SMA that the Application for a Right of Entry Agreement for the installation of a permanent monitoring well on their property (and upgradient of the source area) was being denied due to safety concerns. SMA spoke with Ms. Gearhart May 9, 2017 to determine if the Right of Entry Agreement could be amended to allow the collection of a groundwater grab sample (via a Geoprobe[®]) instead of installing a permanent monitoring well. On May 11, 2017, Ms. Gearhart notified SMA that the request to collect a groundwater grab sample was again being denied due to safety concerns related to having a drill rig and non-railroad people working directly adjacent to an active railroad line.

SMA spoke with Mr. Doug Cieslak on December 13, 2017 regarding the possibility of the Wisconsin DNR assisting Superior Health Linens with obtaining offsite access to the Patrick Cudahy property directly west of Union Pacific Railroad. On December 18, 2017, Mr. Cieslak notified SMA that the Wisconsin DNR had contacted Patrick Cudahy on behalf of Superior Health Linens and explained the need to complete a soil boring along Patrick Cudahy's eastern property boundary.

On January 8, 2018 SMA spoke with Mr. Carter Hanson of Patrick Cudahy to discuss the possibility of obtaining access. Mr. Hanson indicated Patrick Cudahy would be open to allowing access to commence an angled soil boring onto Union Pacific Property. However, the collection of field screening (e.g. PID readings) or soil/groundwater samples would not be allowed. Laboratory analysis of soil and groundwater samples is limited to those compounds previously identified within the area of concern on Superior Health Linens property and within the ditch on Union Pacific property. Finally, Patrick Cudahy would not grant permission to complete the soil boring as a permanent monitoring well at this time.

On January 9, 2018, SMA spoke with Ms. Kelly Gearhart of Union Pacific Railroad. According to Ms. Gearhart, Union Pacific would allow access for the collection of soil and groundwater samples as long as the equipment and personnel remain offsite. However, the angled soil boring cannot extend below the railroad tracks without prior approval from Union Pacific's engineering department.

Based on this, SMA and Superior Health Linens have developed the following scope of work.

¹ An Application for Right of Entry Agreement was submitted to Union Pacific Railroad on April 11, 2017 to allow the completion of the upgradient soil boring/monitoring well.

2.0 SCOPE OF WORK

This Work Plan Addendum includes the completion of one (1) soil boring west of the known source area on property owned by Patrick Cudahy. The purpose of the soil boring to facilitate the collection of soil and groundwater grab samples to define the western extent of chlorinated volatile organic compounds (CVOCs) and verify that, based on the analytical results of the groundwater samples, an offsite vapor intrusion investigation is not required.

The proposed soil boring will be located on Patrick Cudahy at the property line between Patrick Cudahy and Union Pacific Railroad. The soil boring will be completed at an angle of approximately 10° to the east and terminate at a depth of approximately 40 feet below ground surface or upon reaching the base of the "30-foot sand seam". At a 10° angle, the termination of the soil boring will be approximately 7.5 feet onto Union Pacific property.

The soil boring will be completed with a Geoprobe® utilizing Dual Tube sampling methodology. Dual Tube sampling methodology permits continuous sampling of both saturated and unsaturated lithologies while the outer casing prevents cross contamination. Previous investigations completed at the Site indicated the geology is conducive to the use of dual tube sampling methodology. If the geology prevents the completion of the soil boring using dual tube methodology, SMA will be prepared to complete the soil boring using hollow stem augers. The location of the proposed soil boring is shown on Figure 1. A cross section depicting the angled soil boring is shown on Figure 2.

All soil cuttings and purge/decontamination water generated during the subsurface investigation will be placed into properly labeled 55-gallon drums and transported back to the Superior Health Linens property for subsequent characterization and disposal.

2.1.1 Soil Sample Collection

The soil boring lithology will be continuously logged. Field screening of the soil samples will commence once the soil boring crosses onto Union Pacific property. The soil samples collected on Union Pacific property will be continuously field screened using a photoionization detector (PID). Soil samples will be split into two portions; one portion will be placed in a sealed plastic bag for headspace analysis with the PID and geologic classification, and the other portion will be field preserved according to U.S. EPA Method 5035 for potential laboratory chemical analysis. SMA field personnel will describe the soil samples, and the descriptions will be recorded on boring logs along with the field screening results.

One soil sample from each 10-foot interval on the Union Pacific parcel will be collected from the soil boring. This includes the vadose zone above the saturated lithologies. Soil sample selection will be based on the highest PID reading, visual/olfactory evidence of impacts, and/or changes in geologic lithology. The soil samples will be field preserved in accordance with Method 5035/8260B submitted in an ice-filled cooler to Pace Analytical Laboratories, Inc. (Pace) in Green Bay, Wisconsin for laboratory analysis. Laboratory analysis of the soil sample(s) will be limited to the CVOCs historically identified on the Superior Health Linens property. The CVOCs include:

- 1,1,1-Trichloroethane
- 1,1,2-Trichloroethane

- 1,1-Dichloroethane
- 1,1-Dichloroethene
- Cis-1,2-Dichloroethene
- Trans-1,2-Dichloroethene
- Tetrachloroethene
- Trichloroethene
- Vinyl Chloride

Chain of custody protocol will be maintained at all times.

2.1.2 Groundwater Grab Sample Collection

The use of dual tube sampling methodology permits the sampling of saturated lithologies while preventing cross contamination. Based on this ability, SMA will collect groundwater grab samples from coarse-grained lithologies (greater than 2-feet in thickness) encountered during the completion of the soil boring. The groundwater grab sample(s) will be collected through the use of a discrete screen point groundwater sampler and either a peristaltic pump or a ¾" disposable bailer.

Up to three (3) groundwater grab samples, including the first saturated unit encountered, will be collected from the soil boring and submitted in an ice-filled cooler to Pace for laboratory analysis. Laboratory analysis of the groundwater sample(s) will be limited to the following VOCs by Method 8260B:

- 1,1,1-Trichloroethane
- 1,1,2-Trichloroethane
- 1,1-Dichloroethane
- 1,1-Dichloroethene
- Cis-1,2-Dichloroethene
- Trans-1,2-Dichloroethene
- Tetrachloroethene
- Trichloroethene
- Vinyl Chloride

Chain of custody protocol will be maintained at all times.

2.1.3 Soil Boring Abandonment

Upon completion, the soil boring will be abandoned by filling the annular space with bentonite grout via a tremie pipe while pulling the outer drilling casing, and patched to match the existing surface conditions.

2.2 Submission of Analytical Data

Within 10 days of receipt of the analytical data, SMA will provide Patrick Cudahy and Union Pacific Railroad copies of the soil boring logs, soil boring location map, and analytical results as required by ch. NR 716.14(2).

3.0 Reporting

Upon completion of the scope of work outlined in this Work Plan, SMA will provide the Wisconsin DNR an updated Site Investigation Completion Report for review. The report will document the site investigation work, including analytical tables, figures, field data, laboratory reports, and include recommendations to achieve closure of the Site.

Should you have any questions, please feel free to contact me at (815) 289-0400.

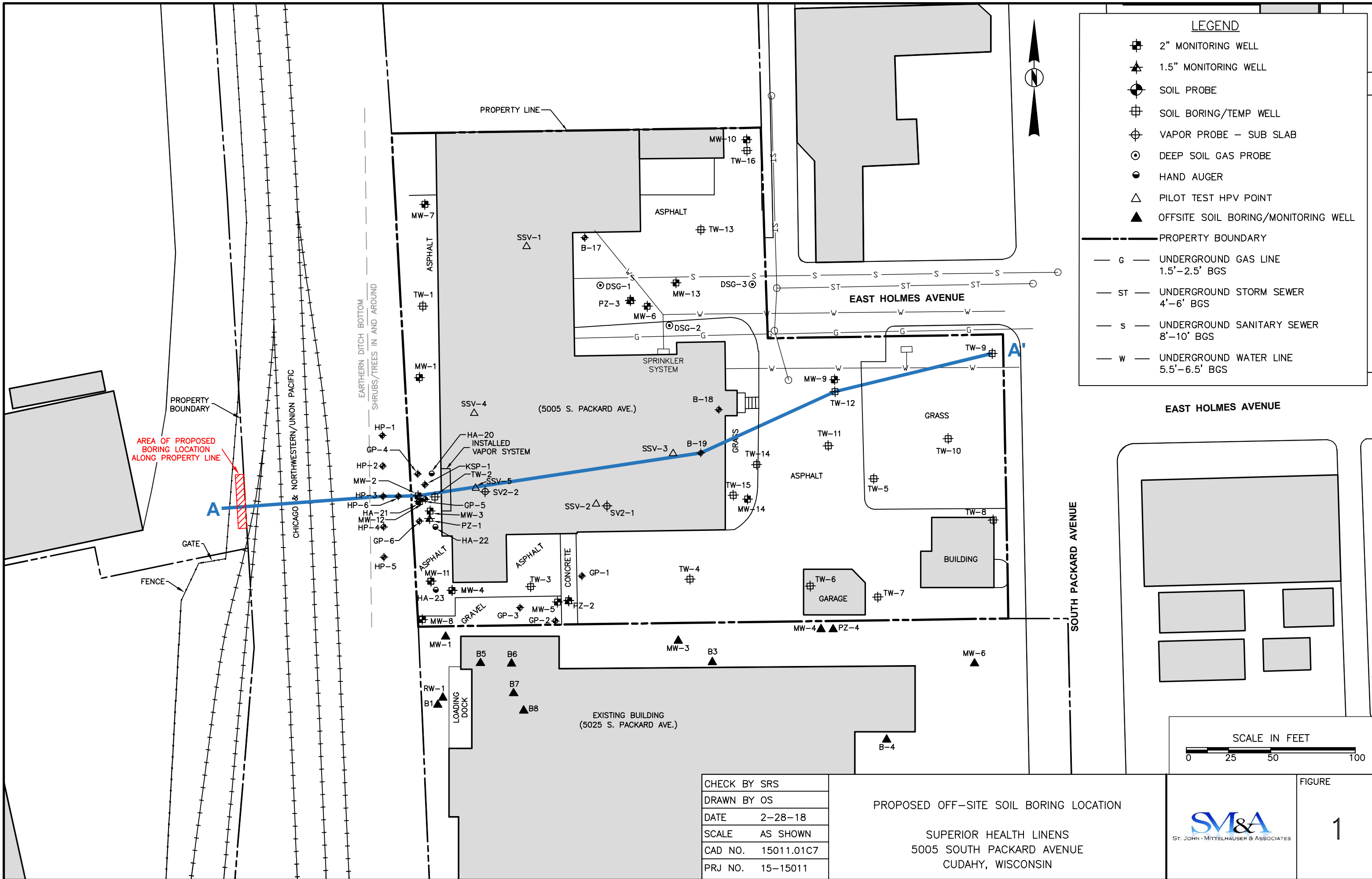
Sincerely,



Steven R. Swenson, P.G., CHMM
Senior Geologist
St. John – Mittelhauser & Associates, Inc.

Attachments: Figure 1: Proposed Soil Boring
Figure 2: Cross Section

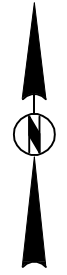
cc: Ms. Kelly Gearhart, Union Pacific Railroad
Mr. Carter Hanson, Patrick Cudahy



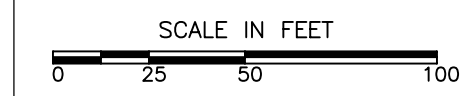
LEGEND

- ⊕ 2" MONITORING WELL
- ▲ 1.5" MONITORING WELL
- ⊙ SOIL PROBE
- ⊕ SOIL BORING/TEMP WELL
- ⊕ VAPOR PROBE - SUB SLAB
- ⊙ DEEP SOIL GAS PROBE
- HAND AUGER
- △ PILOT TEST HPV POINT
- ▲ OFFSITE SOIL BORING/MONITORING WELL

- — — — — PROPERTY BOUNDARY
- G — UNDERGROUND GAS LINE
1.5'-2.5' BGS
- ST — UNDERGROUND STORM SEWER
4'-6' BGS
- S — UNDERGROUND SANITARY SEWER
8'-10' BGS
- W — UNDERGROUND WATER LINE
5.5'-6.5' BGS



EAST HOLMES AVENUE



CHECK BY	SRS
DRAWN BY	OS
DATE	2-28-18
SCALE	AS SHOWN
CAD NO.	15011.01C7
PRJ NO.	15-15011

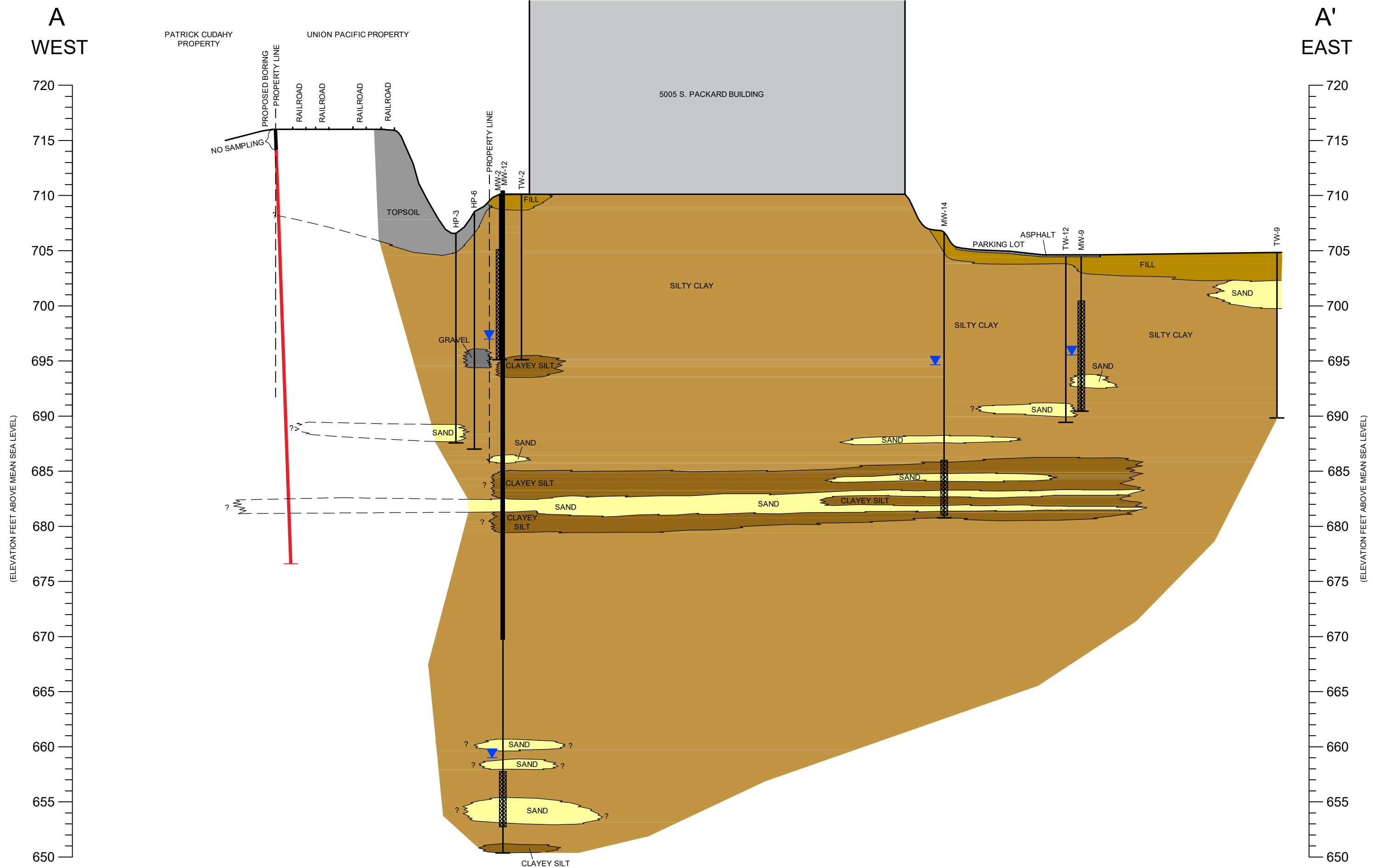
PROPOSED OFF-SITE SOIL BORING LOCATION

SUPERIOR HEALTH LINENS
5005 SOUTH PACKARD AVENUE
CUDAHY, WISCONSIN



FIGURE

1

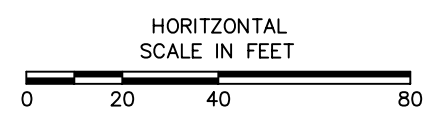


(ELEVATION FEET ABOVE MEAN SEA LEVEL)

(ELEVATION FEET ABOVE MEAN SEA LEVEL)

- LEGEND**
- WATER LEVEL (9/29/17)
 - WELL SCREEN
 - FILL
 - CLAY AND CLAYEY SILT
 - SILTY CLAY
 - SAND
 - GRAVEL
 - SILT
 - CONCRETE
 - SAND, SILT, GRAVEL FILL
 - SANDY SILT
 - ASPHALT
 - SILTY SAND
 - SANDY CLAY

NOTES:
 1. CROSS SECTION IS BASED ON BEST PROFESSIONAL JUDGMENT USING DATA AVAILABLE AT THE TIME OF CONSTRUCTION. THE GEOLOGY PRESENTED IN THE CROSS SECTION WAS GENERALIZED TO ILLUSTRATE THE MAJOR LITHOLOGIC UNITS. THE THICKNESS AND EXTENT OF THE LITHOLOGIC UNITS ARE APPROXIMATED AND GEOLOGIC CONTACTS BETWEEN LOCATIONS ARE INFERRED.
 2. NOT TO BE USED FOR ENGINEERING PURPOSES.



VERTICAL SCALE: 1" = 8'

CHECK BY: SRS
DRAWN BY: OS
DATE: 3-8-18
SCALE: AS SHOWN
CAD NO.: 15011.01D[3]
PRJ NO.: 15-15011



CROSS SECTION A-A'
 SUPERIOR HEALTH LINENS
 5005 SOUTH PACKARD AVENUE
 CUDAHY, WISCONSIN

FIGURE
 2