



June 28, 2018

Mr. Binyoti Amungwafor
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53212

**Re: Response to WDNR Conditions of SIR Approval
OHM-Wauwatosa
6737 Milwaukee Avenue
Wauwatosa, Wisconsin 53213
BRRTS# 02-41-551923**

Dear Mr. Amungwafor:

On behalf of OHM Holdings, Inc. (OHM), EnviroForensics, LLC (EnviroForensics) is responding to the conditions provided in your approval of the Site Investigation Report (SIR) dated February 27, 2018. The conditions require that further soil sampling be performed at off-site property boundaries to the south and east.

During our meeting with you and Pam Mylotta on May 17, 2018, we discussed these conditions. Since we are proposing soil remediation using a soil vapor extraction (SVE) system, we feel that the investigations at the off-site property boundaries may be premature since it is likely that any off-site impacts are very limited and not a threat to human health based on reduced contaminant trends away from the source area at the dry cleaner building. However, we understand the need to determine whether contaminants have spread to beyond property boundaries for owner notification purposes.

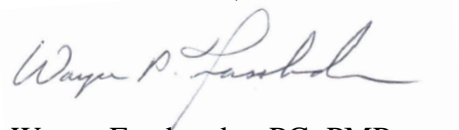
We feel that investigations at or beyond the Site property boundaries are better performed after soil remediation has been completed to the extent practicable. We would perform these investigations as part of an overall soil sampling plan to address the effectiveness of remedial actions, to determine the amount of reduction in contaminant mass achieved, and to identify institutional controls needed to address any remaining residual impacts, both on and off site. This approach was largely approved by you and Pam during our meeting.

The post-remedial sampling plan will be described in detail in a forthcoming remedial action plan and SVE design report. However, we have attached **Figure 1** showing the anticipated

locations for collection of post-remedial soil samples. We would anticipate screening soil samples in the field using a photoionization detector (PID) to depths of up to 40 feet, and then selecting samples for laboratory analysis based on the PID readings. The samples will be analyzed for total volatile organic compounds (VOCs). We would also anticipate repeating paired sub-slab vapor sampling and indoor air sampling at the dry cleaner building and the commercial building directly adjacent to the south. These air samples will also be analyzed for total VOCs.

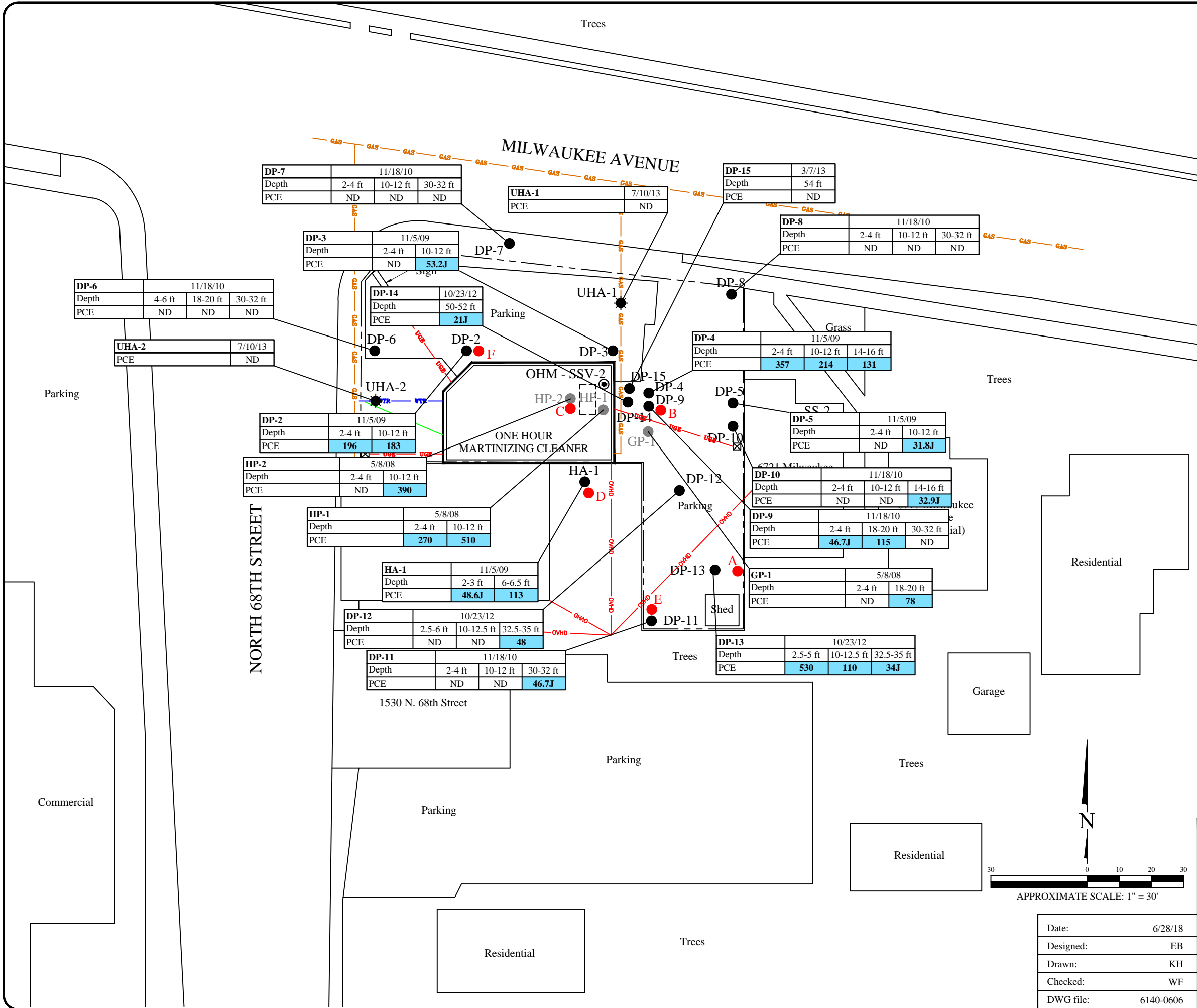
If you have further questions regarding this approach to satisfy the SIR conditions, please contact me at (414) 982-3988, or by email at wfassbender@enviroforensics.com.

Sincerely,
EnviroForensics, LLC

A handwritten signature in black ink that reads "Wayne P. Fassbender".

Wayne Fassbender, PG, PMP
Senior Project Manager

cc: Brian Cass, OHM Holdings, Inc. (via email)
Pam Mylotta (via email)



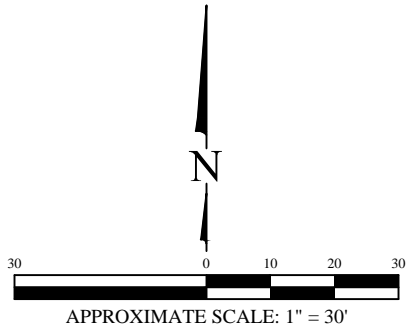
Legend

- Property boundary
- UGB Underground electric line utility
- OVHD Overhead electric line utility
- GAS Gas line utility
- SAN Sanitary line utility
- WTR Water line utility
- ☒ Old light location
- DP-2 ● Direct push soil boring location
- HA-1 ● Hand auger boring location
- UHA-1 ★ Utility corridor soil and soil gas sample location
- HP-1/GP-1 ● Previous consultant boring location
- A ● Proposed direct push soil boring location

Analytes	Soil Residual Contaminant Level		
	Soil to Groundwater	Residential Direct Contact	Industrial Direct Contact
PCE	4.4	22,000	110,000

Notes:

1. Bolded and blue shaded values are above WDNR generic Soil to Groundwater Residual Contaminant Levels
2. Results reported in micrograms per kilogram (ug/kg)
3. PCE = Tetrachloroethene
4. J = Analyte concentration detected between the laboratory Reporting Limit and the laboratory Method Detection Limit
5. VOCs = Volatile Organic Compounds
6. ND = Not detected above laboratory detection limits



DISTRIBUTION OF PCE IN SOIL AND PROPOSED POST REMEDIATION SAMPLE LOCATIONS

One Hour Martinizing
6737 West Milwaukee Avenue
Wauwatosa, WI

Date:	6/28/18
Designed:	EB
Drawn:	KH
Checked:	WF
DWG file:	6140-0606

Figure	1
Project	6140

AGENT AGREEMENT

WHEREAS Charles Cass, individually, Brian Cass as a shareholder in OHM Holdings, Inc. and David Cass as a shareholder in OHM Holdings, Inc. (collectively, "OHM") are actively participating in the Wisconsin Department of Natural Resources' Dry Cleaner Environmental Response Fund to address chlorinated solvent impacts upon soil and groundwater at, under, and around the OHM facility located at 6737 Milwaukee Avenue, Wauwatosa, WI 53213-2303;

WHEREAS NR 169.07 (2) authorizes participants in the DERF to enter into a written agreement with another person to act as agent to conduct the activities under NR 292.65(4) parts (e) to (j) (the "Activities");

WHEREAS Gabbroic Management, LLC, an Indiana limited liability company desires to act as agent for OHM in conducting the Activities and OHM desires to name Gabbroic Management, LLC its agent;

NOW THEREFORE, the parties hereto, intending to be legally bound, do hereby agree as follows:

Gabbroic Management, LLC shall serve as agent of OHM as defined by NR 169.05 in conducting the activities required under s. NR 169.09, including the submission of the application for an award from the DERF.

IN WITNESS WHEREOF, the parties hereto have executed this Contract as of the 30 day of June, 2014

CHARLES CASS

By: Charles Cass
Printed: Charles Cass

OHM HOLDINGS, INC.

By: David Cass
Printed: David Cass
Title: officer

OHM HOLDINGS, INC.

By: Brian Cass
Printed: Brian Cass
Title: officer / shareholder

GABBROIC MANAGEMENT, LLC

By: Wendy
Printed: Wendy
Title: Manager