



November 16, 2011

Mr. Michael Slenska
Beazer East, Inc.
c/o Three Rivers Management, Inc.
One Oxford Centre, Suite 3000
Pittsburg, PA 15219-6401

Subject: Site Investigation Work Plan - Former Wabash Alloys Property
9100 South 5th Avenue, Oak Creek, WI 53154
FID#: 241379050
BRRTS#: 02-41-553761

Dear Mr. Slenska:

The Wisconsin Department of Natural Resources (the Department) has reviewed the submittal, *Site Investigation Work Plan, Former Wabash Alloys Property, Oak Creek, Wisconsin* (dated September 22, 2011), prepared by Tetra Tech Geo.

The objective of the work plan is to collect soil and ground water samples to determine the nature and extent of soil and groundwater contamination associated with the site's historical operations of the coal tar distillation plant and aluminum smelter and recycling plant. Data from previous site investigations and remedial activities indicate that soil and ground water contamination from historic manufacturing operations still remain at the site.

The scope of work for the site investigation consists of a total of 77 soil samples to be collected (i.e. 43 soil samples from 0 - 2' bgs; 17 soil samples from 4 - 6' bgs; and 17 soil samples from 8 -10' bgs). Fifteen water table monitoring wells will be installed to document the hydrogeologic conditions and groundwater quality at the site. The monitoring wells will be installed to a depth of 15 - 20' bgs depending on depth to water. Groundwater depth is reported to occur at a depth of 1 - 7' bgs at the site; thus, a variance to the sealing requirement specified in NR 141.13 Wisconsin Administrative Code, is being requested in order to place the well screen as close to the top of the water table as practical. Three piezometers will also be installed. Each piezometer will be nested with a monitoring well. The depth of each piezometer will be 30' deeper than the water table monitoring well it is nested with. Soil and groundwater samples will be analyzed for VOCs, SVOCs and/or PAHs, RCRA metals and PCBs as indicated on Figure 7 (attached).

Based on the information in the referenced submittal and those in the case file, the Department provides the following general comment to help you complete the site investigation work:

All proposed borings are to be completed to the water table depth. A shallow soil sample 0 - 4', and a deep soil sample at the water table, are to be collected from each soil boring.

The Department also requests the following additional information to complete the well variance review:

1. Number of wells for which the variance is being requested (you may conduct field geo-probe screening to determine the specific water depth at each of the proposed "variance" well location prior to installation of the permanent monitoring well);

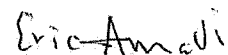
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2. Well construction details of each of the proposed "variance" well.

Please modify the site investigation work plan and include the requested information outlined in this letter and submit the report/information to us at your earliest convenience.

The Department appreciates the actions you are taking to put this property back into productive use. If you have any questions regarding this letter, please contact me at (414) 263-8639

Sincerely,



Eric Amadi - Hydrogeologist
Remediation & Redevelopment Program
Southeast Region - Milwaukee Service Center

Attachment: Figure 7: Connell LLC Property - Proposed Sampling Parameters; Soil Borings and Monitoring Well Locations, Oak Creek, Wisconsin.

cc: Jim Schmidt - SER
Michael Noel - Tetra Tech Geo, Inc.
Darsi Foss - RR/5;
Shelly Fox - RR/5
Kathleen Strasbaugh - LS/8
Michael Kellogg - Connell Limited Partnership
Larry Haskins - City of Oak Creek
SER Case File #: 02-41-553761

OAK CREEK STORAGE AND HANDLING PROPERTY
(FORMER COOPERS)

5TH AVE LLC PROPERTY
(FORMER HYNITE)

FORMER DUPONT PROPERTY

FORMER PROPANE STORAGE TANK AREA

EXCAVATION LIMITS

FORMER DIESEL AND GASOLINE USTs (1K GAL EACH)

FORMER DIESEL UST (10K GAL)

WELL PUMP HOUSE

WATER TANK

OIL TANKS

FUEL OIL TANK

500K GAL

500K GAL

500K GAL

150K GAL

NAPHTHALENE BUILDING

FACTORY

FACTORY

8" PRIVATE WATER PIPE

GATE

GENERAL STORAGE

BARRIER PLATFORM 3 TAR TANKS

MACHINE SHOP

COOLING BASIN

PITCH PAN

FUEL PITCH WOPPER

PITCH PAN

PITCH PAN

PITCH PAN

PITCH PAN

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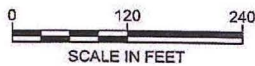
EXPLANATION

- FORMER TAR PLANT STRUCTURES
- PAST REMEDIAL ACTIVITIES

- B-04 EXISTING SOIL BORING
- ⊕ MW-01/B-01 TEMPORARY GROUNDWATER MONITORING WELL
- ⊕ SB1/MW23 PERMANENT GROUNDWATER MONITORING WELL
- ⊕ PROPOSED WATER TABLE WELL
- ⊕ PROPOSED NESTED PIEZOMETER

- PROPOSED SOIL BORING - SAMPLING INTERVAL 0-2' ONLY VOCs, PAHs, PCBs, METALS
- ⊗ PROPOSED SOIL BORING - SAMPLING INTERVALS 0-2', 4-6' & 8-10' VOCs, PAHs, PCBs, METALS
- APPROXIMATE PROPERTY BOUNDARY

- GROUNDWATER SAMPLES FOR SVOC ANALYSIS (INSTEAD OF PAH)
- SOIL SAMPLES FOR SVOC ANALYSIS (INSTEAD OF PAH)



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|---|----------------------|---------|
| TITLE: CONNELL LLC PROPERTY PROPOSED SOIL BORINGS AND MONITORING WELLS | | |
| LOCATION: OAK CREEK, WISCONSIN | | |
| | CHECKED: MRN | FIGURE: |
| | DRAFTED: HJW | 7 |
| | PROJECT: 117-2201220 | |
| DATE: 9/22/11 | | |

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