

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



April 23, 2013

Mr. Michael Kellogg
Connell Aluminum Properties
One International Place
Boston, MA 02110

Mark Thimke, Esq.
Foley & Lardner, LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202

Subject: Phase II ESA, VPLE Work Plan - PCBs and Metals
Connell Aluminum Properties, LLC (a.k.a. Former Wabash Alloys Facility)
9100 South 5th Avenue, Oak Creek, WI 53154
FID #: 241379050; BRRTS #: 06-41-560068 & 02-41-553761

Dear Messrs. Kellogg and Thimke:

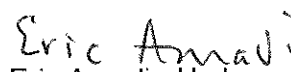
The Department of Natural Resources (Department) has reviewed the submittal, *Phase II ESA, VPLE Work Plan - PCBs and Metals, Wabash Alloys, Oak Creek, WI*, dated February 4, 2013, prepared by Natural Resource Technology (NRT). The submittal proposes sampling locations to be implemented during the Phase II Environmental Site Assessment (ESA) of the subject Property. The objective of the work plan is to complete a Phase II ESA to obtain a partial Certificate of Completion (CoC) for compounds related to aluminum smelting operation namely polychlorinated biphenyls (PCBs) and metals. Site investigation and remedial action of volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) including polynuclear aromatic hydrocarbons (PAHs), related to the former coal tar distillation plant operation are being addressed by Beazer East and not included in the referenced work plan.

The Department would like to let you know that a full Phase II ESA and site investigation for all compounds of concern (VOCs, SVOCs, PCBs and metals) on the entire Property, is required prior to issuing the requested partial CoC (per s. 292.25(2)(am), Wis. Stats.). At this time, the site investigation of all VOCs, SVOCs including PAHs, has not been completed.

The Department will also contact NRT regarding the specifics of the work plan requirements (sampling rationale, maps, data presentation, etc.), to be provided in order to meet the VPLE program criteria.

The Department appreciates the efforts you are taking to restore the environment at this site. If you have any questions regarding this letter, please contact me at 414.263.8639.

Sincerely,


Eric Amadi - Hydrogeologist
Remediation & Redevelopment Program
SER - Milwaukee Service Center

cc: Julie Zimdars - NRT (electronic) / SER Case File #: 06-41-560068 & 02-41-553761