State of Wisconsin Department of Natural Resources PO Box 7921, Madison WI 53707-7921 dnr.wi.gov

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 9/15)

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Notice: Use this form to request a written response (on agency letterhead) from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

#### **Definitions**

- "Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.
- "Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55. Wis. Stats.
- "Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.
- "Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

#### Select the Correct Form

This from should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

#### Do not use this form if one of the following applies:

- Request for an off-site liability exemption or clarification for Property that has been or is perceived to be contaminated by one
  or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site
  Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the Lender Liability Exemption, s 292.21, Wis. Stats., if no response or review by DNR is requested. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an exemption to develop on a historic fill site or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- Request for closure for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: <a href="mailto:dnr.wi.gov/topic/Brownfields/Pubs.html">dnr.wi.gov/topic/Brownfields/Pubs.html</a>.

#### Instructions

- 1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
- 2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
- 3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program and the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form
- 4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <a href="http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf">http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf</a>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

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Section 1. Contact and Re	cipient information	A TOTAL MARKET			The World of	
Requester Information						
This is the person requesting a specialized agreement and is	echnical assistance or a pidentified as the requester	ost-closure in Section 7	modification review 7. DNR will address	v, that his or her liability b s its response letter to this	e clarifi s persor	ed or a า.
Last Name	First	MI	Organization/ Business Name			
Kellogg	Michael	E.	Connell Limited Partnership			
Mailing Address	-		City		State	ZIP Code
900 Haddon Hall Drive			Apex		NC	27502
Phone # (include area code)	Fax # (include area co	de)	Email			
(919) 303-1914			mkellogg@conn	ell-lp.com		
The requester listed above: (s	elect all that apply)					
Is currently the owner			Is considering s	elling the Property		
Is renting or leasing the	Property		Is considering a	cquiring the Property		
Is a lender with a mortg	agee interest in the Proper	rty				
Other. Explain the statu	s of the Property with resp	ect to the a	pplicant:			
Contact Information (to b	e contacted with question	ons about t	this request)	Sele	ct if san	ne as requester
Contact Last Name	First	MI	Organization/ Bus	iness Name		
Zimdars	Julie	A.	Natural Resourc	e Technology, Inc.		
Mailing Address			City		State	ZIP Code
234 W. Florida Street, 5th	Floor		Milwaukee		WI	53204
Phone # (include area code)	Fax # (include area co	ode)	Email			
(414) 837-3564			jzimdars@natura	alrt.com		
Environmental Consult Contact Last Name		I NAI	Opposite tion / Bus	innen Nama		
	First	MI	Organization/ Bus			
Zimdars Mailing Address	Julie	A	City	e Technology, Inc.	State	ZIP Code
The contract of the contract o	El		Milwaukee		WI	53204
234 W. Florida Street, 5th Phone # (include area code)	Fax # (include area co	nde)	Email		I WI	33204
	Tax # (Illollude alea co	ode)		alet aam		
(414) 837-3564			jzimdars@natur	airt.com		
Section 2. Property Inform	ation	de grape V	and the second second	enieroda krajekowa	是自然是	The second of
Property Name				FID No. (	•	n)
Former Wabash Alloys Fa	cility/Connell Aluminus	m Propertion		2413790	)50	
BRRTS No. (if known)			Parcel Identification	on Number		
02-41-553761 & 06-41-56	0068		O't		Totala	Tzin Cada
Street Address		City State ZIP Code				
9100 S. 5th Avenue  County Municipality where the Property is loca		Oak Creek	Dronorty is compassed of	WI	53154 operty Size Acres	
	And the state of t		54400 55	Property is composed of Single tax Multiple	tax	perty Size Acres
Milwaukee	Oity ○ Town ○ Villa	ige of Oak	Creek	parcel parcels	20	

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plan accord	se needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please lingly.
○ No ④	Yes
	Date requested by: 05/16/2016
	Reason: Approval needed of Sampling Plan for Soil Borrow Source, soil to be available from WDOT project in early June
2. Is the "Requ	uester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?
_	lude the fee that is required for your request in Section 3, 4 or 5.
Yes. Do	not include a separate fee. This request will be billed separately through the VPLE Program.
Section :	information in Section 3, 4 or 5 which corresponds with the type of request: 3. Technical Assistance or Post-Closure Modifications; 4. Liability Clarification; or Section 5. Specialized Agreement.
Section 3. R	equest for Technical Assistance or Post-Closure Modification
Select the type	e of technical assistance requested: [Numbers in brackets are for WI DNR Use]
to a	Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response in immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event. iew of Site Investigation Work Plan - NR 716.09, [135] - Include a fee of \$700. iew of Site Investigation Report - NR 716.15, [137] - Include a fee of \$1050.
П Аррі	roval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - Include a fee of \$1050.
Revi	iew of a Remedial Action Options Report - NR 722.13, [143] - Include a fee of \$1050.
Revi	ew of a Remedial Action Design Report - NR 724.09, [148] - Include a fee of \$1050.
Revi	ew of a Remedial Action Documentation Report - NR 724.15, [152] - Include a fee of \$350
=	ew of a Long-term Monitoring Plan - NR 724.17, [25] - Include a fee of \$425.
	ew of an Operation and Maintenance Plan - NR 724.13, [192] - Include a fee of \$425.
Other Tech	nnical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)
Sche	edule a Technical Assistance Meeting - Include a fee of \$700.
The second secon	ardous Waste Determination - Include a fee of \$700.
⊠ Othe	er Technical Assistance - Include a fee of \$700. Explain your request in an attachment.
Post-Closu	re Modifications - NR 727, [181]
☐ sites	t-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; s may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. <b>Include a fee of</b> <b>50, and:</b>
Ir	nclude a fee of \$300 for sites with residual soil contamination; and
	nclude a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.
to a l may	ch a description of the changes you are proposing, and documentation as to why the changes are needed (if the change Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents be submitted later in the approval process, on a case-by-case basis).

form.

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Section 4. Request for Liability Clarification

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	ct the type of liability clarification requested. Use the available space given or attach information, explanations, or specific stions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. [Numbers in brackets are for DNR Use]
,	"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]
	<ul> <li>♣ Include a fee of \$700.</li> </ul>
	Provide the following documentation:
	(1) ownership status of the real Property, and/or the personal Property and fixtures;
	(2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
	(3) the date the environmental assessment was conducted by the lender;
	(4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
	(5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
	(6) a copy of the Property deed with the correct legal description; and,
	(7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
	(8) If no sampling was done, please provide reasoning as to why it was <b>not</b> conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292. 21(1)(c)2.,hi., Wis. Stats.:
	h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
	i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.
	"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]
	❖ Include a fee of \$700.
	Provide the following documentation:
	(1) ownership status of the Property;
	(2) the date of Property acquisition by the representative;
	(3) the means by which the Property was acquired;
	<ul><li>(4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;</li><li>(5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and</li><li>(6) a copy of the Property deed with the correct legal description.</li></ul>
	Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)
	hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
	Perceived environmental contamination - [649];
	hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
	solid waste - s. 292.23 (2), Wis. Stats. [649].
	❖ Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:
	<ol><li>clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).</li></ol>
	(2) current and proposed ownership status of the Property;
	(3) date and means by which the Property was acquired by the LGU, where applicable;
	(4) a map and the ¼, ¼ section location of the Property;
	(5) summary of current uses of the Property;
	(6) intended or potential use(s) of the Property;
	(7) descriptions of other investigations that have taken place on the Property; and
	(8) (for solid waste clarifications) a summary of the license history of the facility.

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Section 4	. Request for Liability Clarification (cont.)
Lea	se liability clarification - s. 292.55, Wis. Stats. [646]
*	Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:
(1)	a copy of the proposed lease;
(2)	the name of the current owner of the Property and the person who will lease the Property;
(3)	a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
(4)	map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
(5)	a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
(6)	all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.
Genera	al or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.
*	Include a fee of \$700 and an adequate summary of relevant environmental work to date.
	Action Required (NAR) - NR 716.05, [682] Include a fee of \$700.
ass	where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further essment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has in conducted; the assessment reports should be submitted with this form. This is not a closure letter.
Cla	rify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]
*	Include a fee of \$700.
- Includ	e a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

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Continue Degreest for a Considired Assessment
Section 5. Request for a Specialized Agreement
Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: <a href="mailto:dnr.wi.gov/topic/Brownfields/lgu.html#tabx4">dnr.wi.gov/topic/Brownfields/lgu.html#tabx4</a> .
Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]
Include a fee of \$700, and the information listed below:
(1) Phase I and II Environmental Site Assessment Reports,
<ul><li>(2) a copy of the Property deed with the correct legal description; and,</li><li>(3) a draft 75.105 agreement based on the DNR's model (<a href="mailto:dnr.wi.gov/topic/brownfields/documents/mod75-105agrmt.pdf">dnr.wi.gov/topic/brownfields/documents/mod75-105agrmt.pdf</a>).</li></ul>
Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]
Include a fee of \$700, and the information listed below:
(1) Phase I and II Environmental Site Assessment Reports,
(2) a copy of the Property deed with the correct legal description; and, (3) a draft 75.105 agreement based on the DNR's model (dnr.wi.gov/topic/brownfields/documents/mod75-106agrmt.pdf).
Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]
Include a fee of \$1400, and the information listed below:
(1) a draft schedule for remediation; and,
(2) the name, mailing address, phone and email for each party to the agreement.
Section 6. Other Information Submitted
Identify all materials that are included with this request.
Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.
Phase I Environmental Site Assessment Report - Date: 07/15/2015
Phase II Environmental Site Assessment Report - Date:
Legal Description of Property (required for all liability requests and specialized agreements)
Map of the Property (required for all liability requests and specialized agreements)
Analytical results of the following sampled media: Select all that apply and include date of collection.
Groundwater Soil Sediment Other medium - Describe:
Date of Collection:
A copy of the closure letter and submittal materials
Draft tax cancellation agreement
☐ Draft agreement for assignment of tax foreclosure judgment
Other report(s) or information - Describe: Geotech. Report, PSI March 29, 2013, Erosion Control Plan April 2016
For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at: <a href="https://dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf">dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf</a>.

O Yes - Date (if known):

O No

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Section 7. Certification by the Person who completed this form	
I am the person submitting this request (requester)	
I prepared this request for: Michael Kellogg	
Requester Name	_
I certify that I am familiar with the information submitted on this request, and true, accurate and complete to the best of my knowledge. I also certify I have	
this request.  July 1 Delins	4/29/16
Signature	Date Signed
Principal Engineer NRT	(414) 837-3564
Title	Telephone Number (include area code)

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### Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a <u>DNR regional brownfields specialist</u> with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <a href="http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf">http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf</a>.

#### **DNR NORTHERN REGION**

Attn: RR Program Assistant Department of Natural Resources 223 E Steinfest Rd Antigo, WI 54409

#### **DNR NORTHEAST REGION**

Attn: RR Program Assistant Department of Natural Resources 2984 Shawano Avenue Green Bay WI 54313

#### **DNR SOUTH CENTRAL REGION**

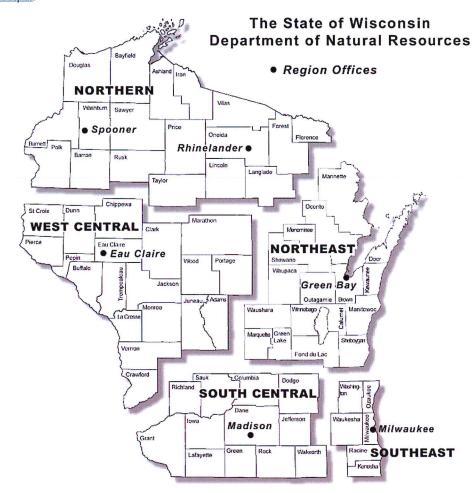
Attn: RR Program Assistant Department of Natural Resources 3911 Fish Hatchery Road Fitchburg WI 53711

#### **DNR SOUTHEAST REGION**

Attn: RR Program Assistant Department of Natural Resources 2300 North Martin Luther King Drive Milwaukee WI 53212

#### **DNR WEST CENTRAL REGION**

Attn: RR Program Assistant
Department of Natural Resources
1300 Clairemont Ave.
Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only					
Date Received	Date Assigned		BRRTS Activity Code	BRRTS No. (if used)	
DNR Reviewer		Comme	ents		
Fee Enclosed?	Fee Amount		Date Additional Information Requested	Date Requested for DNR Response Letter	
◯ Yes ◯ No	\$				
Date Approved	Final Determination				



234 FLORIDA STREET, 5<sup>TH</sup> FLOOR
MILWAUKEE, WI 53204
(P) 414.837.3607
(F) 414.837.3608

Mr. Eric Amadi Wisconsin Department of Natural Resources 2300 North Martin Luther King Drive Milwaukee, WI 53212 April 29, 2016 (2095)

RE: Request for Approval of 5<sup>th</sup> Avenue Soil Borrow Source Material Use and Soil Sampling Plan

Former Wabash Alloys Facility 9100 South Fifth Avenue, Oak Creek, Wisconsin 53154 WDNR BRRTS Activity # 02-41-553761 & # 06-41-560068

#### Dear Eric:

On behalf of Connell Limited Partnership, we are requesting approval of a soil borrow source for use as capping material at the Former Wabash Alloys facility in Oak Creek, Wisconsin. The material proposed for use consists of excess native clay soil to be removed for construction of the 5<sup>th</sup> Avenue Relocation from South Chicago Road to East Ryan Road, specifically the north end, located one-half mile south of the Wabash Alloys site. The borrow source location relative to the Former Wabash Alloys site is shown in Figure 1.

In preparing this plan, NRT followed the guidance document (RR-401, January 2016) which addresses bringing soil or fill to a VPLE site. Your timely review of this information and response to the proposed sampling plan is greatly appreciated as the soil will become available in early June.

## **Background and Objectives**

The borrow source area was formerly occupied by two residential lots identified as the Lemke Property and Kaster Property in the attached Phase I Hazardous Material Assessment report prepared by Strand Associates, dated July 15, 2015. The Wisconsin Department of Transportation (WDOT) purchased both of these properties for road expansion, and the WDOT contractor for this project, SuperWestern Excavating, estimates that approximately 25,000 excess cubic yards of material will become available for our use in early June 2016. Our intent is to obtain and stockpile the clay soil generated from this project at the Former Wabash Alloys facility for future use as capping material to cover residual soil impacts as proposed in the Remedial Action Options Report (RAOR), which is pending approval by the WDNR. In addition to soil quality testing, geotechnical testing will be performed to determine if the clay meets the soil requirements in 40 CFR 761.61(a)(7) for capping of polychlorinated biphenyls (PCBs). Other rooting zone fill material is needed above the clay cap layer, so if material other than clay is identified, it can be used as well if appropriately sampled as described below. Topsoil will not be obtained, as it will be retained by WDOT and SuperWestern for the road project restoration. As stated in the RAOR, the future use of the Wabash Alloys site is non-residential.

#### Phase I Findings and Past Soil Borings – Borrow Site

The Phase I Hazardous Material Assessment report concluded that no additional investigation was warranted at the Lemke and Kaster Properties given that there were no reported spills or tanks at the properties, the properties had history of residential use dating back to at least 1937, and the observed site conditions did not warrant completion of a soil and groundwater investigation.

In addition to the Phase I Hazardous Material Assessment, 15 geotechnical soil borings were completed as part of the project's geotechnical investigation. A report by PSI, Inc., dated March 29, 2013, summarized the results of the investigation. A copy of this report is also attached for reference. The 15 soil boring logs indicate that soil typically

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Mr. Eric Amadi April 29, 2016 Page 2



consists of 2 to 3 feet of topsoil underlain by lean clay. A few isolated seams of silt to sandy silt were recorded at some borings, but lean clay was the dominant soil reported. Groundwater levels were recorded during drilling and depths to groundwater are reported as ranging from approximately 14 to 19 feet near East Ryan Road. Soil borings B-11 and B-12 were completed in the soil borrow area. The proposed cut depth in some areas will be as deep as 17 ft below ground surface (bgs). The report indicates that one of the geotechnical borings encountered approximately 5 ½ feet of sandy clay fill material in PSI soil boring B-12, located on the Lemke Property. PSI did not indicate the presence deleterious materials or odors in this or any of the other borrow source area boring logs.

## **Proposed Soil Sampling Plan**

NRT plans to complete environmental and geotechnical sampling at the borrow site location pending your approval of this sampling plan with our subcontractor, GESTRA Engineering, in May. Samples will be collected using conventional drilling methods at continuous intervals. Discrete soil samples will be collected for analysis from each of five boring locations and classified in the field. The soil borings will be located in the approximate locations as shown on Figure 2. Samples will be collected from each boring at depths of approximately 3-7 feet bgs, below the topsoil layer, and from approximately 8-12 feet bgs, just above the probable water table elevation. We propose to collect a total of ten samples, five shallow and five deep samples. We will also conduct approximately two to three additional shallow soil borings in the area of the fill material above the clay previously identified at B-12 to define the extent of the fill. If found to be of sufficient quantity, we will collect two samples of the fill material for chemical analysis to determine the quality of this material for use as rooting zone material or excavation backfill, depending on the results.

The soil sampling parameter list will include VOCs, SVOCs, PCBs (nine Aroclors, including Aroclors 1262 and 1268) and the eight RCRA metals plus aluminum, copper, nickel and zinc. Given the soil homogeneity, we plan to collect geotechnical data from just three sample locations to determine permeability, grain size, liquid limit and plasticity index of the clay in accordance with the cap requirements in 40 CFR 761.61(a)(7) and 761.75 (TSCA rules).

Subcontracted analytical services will be expedited such that the chemical analysis results will be available in approximately one week after sampling. The geotechnical lab results may take longer. If the chemical results support use of the material for capping, we will prepare a brief letter summarizing the chemical results, a boring location map, and a discussion of subsurface conditions encountered for your review and approval of the borrow source soil quality. A follow-up letter will be sent with the geotechnical testing results and conclusions on whether the clay meets the cap requirements.

### **Receiving Site Stockpiling Activities**

SuperWestern will transport the material to Wabash Alloys in a controlled manner, grading the stockpile as needed to prevent excess runoff and erosion. The stockpile will be constructed with all necessary erosion control measures, and the pile will be seeded in late summer 2016. NRT will provide periodic oversight of the stockpile work. A copy of our Erosion Control Plan (ECP) for the Wabash stockpile has been incorporated into SuperWestern's erosion control plan for the roadwork, including details of the stockpile management, and is attached for reference. The proposed stockpile locations are shown on the map in the ECP, and in general, are located on the far western side of the site, where no source area removal is planned and furthest from the lake and the wetlands. The soil will be placed on the existing asphalt surface for a marker layer to the lower site soils. The 5th Avenue project is currently underway, and SuperWestern Excavating has indicated that they can begin transporting soil to Wabash Alloys in early June.



We appreciate your response to this request in a timely fashion. If you have any issues/concerns with the borrow source or this sampling plan, please let me know as soon as possible as we are coordinating the drilling and sampling. Please do not hesitate to contact me at 414.837.3564 should you have any questions.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

Julie A. Zimdars, PE Principal Engineer

late a. Zmain

Attachments: Figure 1 - Property Location Map

Figure 2 - Proposed Soil Boring Locations

Phase I Hazardous Materials Assessment (Strand Associates, July 15, 2015)

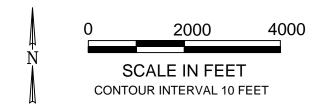
Geotechnical Engineering Services Report (PSI, March 29, 2013)

Erosion Control Plan - Receiving Site Soil Stockpiling

C: Mr. Mike Kellogg, Connell Limited Partnership (email)

Ms. Margaret Brunette, WDNR-SER (w/att.)

[Connell-Wabash Borrow Source Sampling Plan 160429]



SOURCE: USA Topo Maps. Copyright:© 2011 National Geographic Society, i-cubed

# PROPERTY LOCATION MAP

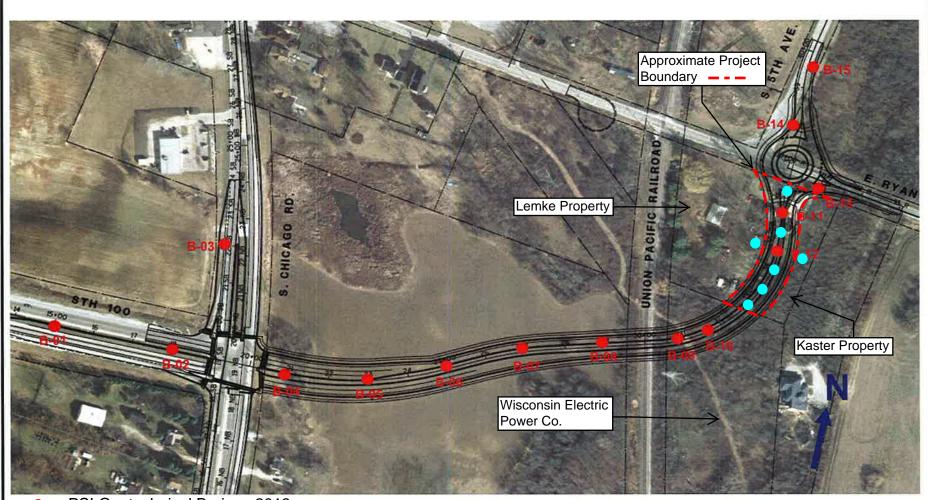


CLEANUP COMPLETION REPORT FORMER WABASH ALLOYS 9100 SOUTH 5TH AVENUE OAK CREEK, WISCONSIN PROJECT NO. 2095/6.1A

DRAWING NO. 2095-61a-A02C

FIGURE NO.

1



- PSI Geotechnical Borings 2013
- Proposed Soil Boring Location
- Approximate Project Boundary



**Engineering • Consulting • Testing** 

W237 N2878 Woodgate Road, Suite 2 Pewaukee, Wisconsin 53072 Project Name:

Proposed South 5th Avenue Extension

**Project Location:** 

East Ryan Road to STH 100

Oak Creek, Wisconsin

PSI Project #:

0052589

Proposed Soil Boring Locations

Figure 2