



May 17, 2016

Mr. Michael Kellogg
Connell Limited Partnership
900 Haddon Hall Drive
Apex, NC 27502

Subject: Request for Approval of 5th Avenue Soil Borrow Source Material Use and Soil Sampling Plan
Former Wabash Alloys Facility
9100 South 5th Avenue, Oak Creek, WI 53154
FID #: 241379050; BRRTS #: 02-41-553761
Connell VPLE BRRTS #: 06-41-560068

Dear Mr. Kellogg:

The Wisconsin Department of Natural Resources (Department), has completed the review of the submittal, *Request for Approval of 5th Avenue Soil Borrow Source Material Use and Soil Sampling Plan, Former Wabash Alloys Site, 9100 South 5th Avenue, Oak Creek, WI*, (dated April 29, 2016), prepared by NRT, Inc. (NRT). On your behalf, NRT is requesting approval of the soil borrow source for use as capping material at the subject site.

The borrow source soil area was formerly occupied by two residential lots (i.e. the Lemke Property and the Kaster Property). The Wisconsin Department of Transportation purchased both properties for road expansion. About 25,000 cubic yards of material will be excavated and stockpiled on the Former Wabash Alloys site for use as capping material to cover residual soils impacts as proposed in the Remedial Action Options Report. In addition to soil quality testing, geotechnical testing will be performed to determine if the soil meets the requirements in 40 CFR 761.61(a) (7) for capping of polychlorinated biphenyls (PCBs).

Proposed Soil Sampling Plan:

Soil samples will be collected using conventional drilling methods of continuous intervals. Discreet samples will be collected for analysis from each of the five boring locations and classified in the field. The soil borings will be located approximately as shown on the attached **Figure 2: Proposed Boring Locations, Former Wabash Alloys Site, 9100 South 5th Avenue, Oak Creek, WI, Approved Date: 5/11/2016**. Samples will be collected from each borings at depths of approximately 3-7 feet below ground surface (bgs), below the top soil layer, and approximately 8-12 feet bgs, just above the water table elevation. A total of ten soil samples, five shallow and five deep samples are proposed. Additional two to three shallow soil borings will be conducted in the area of fill material above the clay previously identified at B-12 to define the extent of fill materials. If the fill material is found to be of sufficient quantity, two samples are proposed to be collected for laboratory analysis to determine the suitability of the fill to be used as rooting zone material or excavation backfill, depending on the sample results. The soil sampling parameter list will include VOCs, SVOCs, PCBs (nine Aroclors, including 1262 and 1268) and eight RCRA metals plus aluminum, nickel, and zinc. Due to soil homogeneity, geochemical data will be collected from three samples to determine permeability, grain size, liquid limit and plasticity index of clay in accordance with cap requirements in 40 CFR 761.16(a) (7) and 761.75 (TSCA rules)

Based on the information provided, the Department approves the sampling plan on the condition that you incorporate the **additional soil borings/information** listed below into the sampling plan. We need the **additional soil borings** to be placed as follows (also see attached Figure 2 - Proposed Boring Locations, Former Wabash Alloys Site, 9100 South 5th Avenue, Oak Creek, WI, Approved Date: 5/11/2016):

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- Two soil borings in the triangle borrow area (near B-7).
- One soil boring on the west side of B-2 and close to the "Shed with miscellaneous refuse and empty drums (Shed)".
- One soil boring along the property line between B4 and the Shed and west of B-3.
- One soil boring on the east side of the "Miscellaneous storage and debris" and also east of B-5.
- One soil boring on east side of the large building south of geotechnical boring B-11.
- Collect the shallow soil samples immediately below the topsoil layer.

Stockpiling Activities:

Prior to bringing the soil onto the subject site for stockpiling (depending on the soil sampling results), additional information (Soil Management Plan, including how the soils will be stored; height; duration of storage; maintenance; and what the final disposition of the soils will be at the destination site) will be required to be submitted for our review, input and/or approval.

The Department appreciates the efforts you are taking to investigate and to restore the environment at the subject 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

Enclosure:

NRT, Inc., 2016: Figure 2: Proposed Boring Locations, Former Wabash Alloys Site,
9100 S. 5th Avenue, Oak Creek, WI 53154, (Approved Date: 5/11/2016).

cc: Julie Zimdars - NRT (electronic)
Kristina Betzold - WDNR (electronic)
Bob Serak - Daar Corporation (electronic)
SER Case File #: 02-41-553761 / 06-41-560068

