



June 10, 2020

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

Subject: Addendum to Remedial Action Options Report (RAOR) and
Pre-Design Sampling Work Plan - Connell Aluminum Properties, LLC

Former Koppers Tar Plant and Wabash Alloys Site
9100 South 5th Avenue, Oak Creek, WI 53154
FID #: 241379050; BRRTS #: 02-41-553761
VPLE BRRTS #: 06-41-560068

City of Oak Creek Utility Corridor Lot 1
9170 South 5th Avenue, Oak Creek, WI 53154
FID #: 341074470; BRRTS #: 02-41-561425
VPLE BRRTS #: 06-41-561426

Dear Mr. Kellogg:

The Wisconsin Department of Natural Resources (DNR) has reviewed the submittal, *Addendum to Remedial Action Options Report (RAOR) and Pre-Design Sampling Work Plan - Connell Aluminum Properties, LLC* (Addendum), dated March 13, 2020 and prepared by Ramboll US Corporation (Ramboll).

The Addendum submittal was prepared to address the DNR's letter addressed to Connell Aluminum Properties, LLC (Connell), dated October 25, 2017, *Review of Site Investigation and Remedial Action Options Reports, Former Koppers Tar Plant and Wabash Alloys Facility*.

The original RAOR was submitted jointly by NRT (on behalf of Connell) and TetraTech (on behalf of Beazer East, Inc.), dated December 30, 2014. Ramboll (formerly NRT) is requesting approval of Connell's portion of the RAOR and the Pre-Design Sampling Work Plan contained in the Addendum.

Based on the information presented in the Addendum, the DNR provides the following comments:

1. The Addendum includes proposed sampling in the general areas identified in the October 25, 2017, letter, however, the goal is to better define areas that exceed 10 ppm for PCBs.
 - i) More detail is needed to confidently define the extent of soil that exceeds 10 ppm to better delineate the limits of the excavations.
 - ii) Discuss how each of the borings will address DNR's specific comments.
 - Identify specific boring locations and sampling depths (e.g. is the proposal for 1-5 samples in all C8 areas total or in each C8 area, and where will they be located?).
 - Consider providing specific figures for each sampling areas.

2. Separate and clarify Pre-Design Sampling from the other planned sampling, including
 - i) Pre-Remedial Implementation Sampling
 - ii) Excavation Confirmation Sampling
 - iii) Pre-Cap Installation Extent Sampling
3. Interpretation of all sampling results should be used to determine both excavation and cap extents in the Remedial Design Plan.
4. Discrete samples must be collected to comply with Wis. Admin. Code Chs. NR 700-799:
 - i) Wis. Adm. Code ch. NR 716 requires that all soil samples obtained during field investigation activities be discrete, not composite, samples. Unless otherwise approved by the DNR, all samples collected for verification that cleanup standards have been achieved under 40 CFR 761.61(a) and Wis. Adm. Code ch. NR 716 must be discrete samples.
 - ii) Provide a detailed sampling plan for excavation confirmation samples.

Future Submittals

The DNR requests that you incorporate the above comments into your proposed remedial actions and submit the following for our review:

1. Updated Pre-design sampling workplan
2. Updated RAOR
3. A Remedial Design Plan

The DNR 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, Eric Amadi, at 414.263.8639 or at eric.amadi@wisconsin.gov.

Sincerely,



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

cc: Mike Slenska - Beazer East, Inc. (electronic)
Mike Noel - TetraTech (electronic)
Julie Zimdars - Ramboll (electronic)
Larry Haskin - City of Oak Creek (electronic)
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