



July 9, 2021

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

Subject: Review of the Addendum (Revision 1) to the 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 (Revision "R1") to the Remedial Action Options Report (RAOR) and Pre-Design Sampling Work Plan - Connell Aluminum Properties, LLC* (Addendum, R1), dated January 11, 2021 and prepared by Ramboll US Corporation (Ramboll).

The Addendum, R1 submittal was prepared to address the DNR's letters dated October 25, 2017 and June 10, 2020.

The original Remedial Action Options Report (2014 RAOR), dated December 30, 2014 was submitted jointly by NRT (now Ramboll) on behalf of Connell Aluminum Properties, LLC (Connell) and TetraTech (on behalf of Beazer East, Inc.). The Addendum, R1 is intended to replace the March 13, 2020 Addendum. Ramboll is requesting approval of Connell's portion of the 2014 RAOR and the Pre-Design Sampling Work Plan contained in the Addendum, R1.

Based on the additional information presented in the Addendum, R1, the DNR provides the following comments:

A. Defining Excavation Limits of PCBs above 10 mg/kg:

- The DNR's comments (1- 10) in the October 25, 2017 letter have been addressed on Table 1 and figures included in the Addendum, R1 submittal dated January 11, 2021. However, additional borings/samples will be required if the proposed sampling is inadequate.
- Describe the plan for the inaccessible areas.
- Discuss the plan for material around the sewer if it cannot be removed.

B. Extending and Defining the Cap Extent for PCBs and arsenic over RCLs (Western Area):

- The DNR can approve capping of the entire Western Area if the RCL lines are extended to the property boundaries. Any future management of soils would need to follow the requirements of Wis. Admin. Code ch. NR 718.
- The statement, "...because of cap extension, the locations of additional samples that the DNR suggested were needed for defining the cap extent for PCBs are no longer required to be addressed". should be replaced with the following: "based on widespread/sitewide contamination, the entire area will be capped".

C. Extending and Defining the Cap Extent for PCBs, arsenic and mercury over RCLs (Eastern Area):

- Need to further define the extent of contamination southeast of soil borings B-52 and B-53.
- Collect additional soil samples east of soil boring SB744, south of soil boring SB745, and between soil borings SB-53 and SB745.

Future Submittals

The DNR requests that you incorporate the above comments into your proposed remedial actions options report and pre-design sampling. The following should be submitted for DNR review:

1. Updated Pre-Design Sampling Workplan
2. Updated RAOR
3. A Remedial Design Plan

The site is considered a type C site under the One Cleanup Program Memorandum of Agreement (MOA) between the DNR and the U.S. EPA Region 5 (EPA). Your request for a coordinated approval from the EPA is under review. The EPA will provide an expedited review of the updated RAOR once the DNR has reviewed it and determined that it is complete. The DNR will forward the complete RAOR with any comments to the EPA for review.

The DNR appreciates the efforts you are taking to investigate and to restore the environment at this site. If you have any questions regarding this letter, please contact me at 414.405.0752 or at eric.amadi@wisconsin.gov.

Sincerely,



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

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