

August 1, 2019

Mr. Binyoti Amungwafor, DNR Project Manager Remediation and Redevelopment Program Wisconsin Department of Natural Resources 2300 N. Dr. Martin Luther King Jr. Drive Milwaukee, WI 53212

> Re: Work Scope OHM-Wauwatosa 6737 Milwaukee Avenue Wauwatosa, Wisconsin 53213 BRRTS # 03-41-581019 FID # 241287640

Dear Mr. Amungwafor:

EnviroForensics, LLC (EnviroForensics) has prepared this simple work scope on behalf of OHM Holdings, Inc. to satisfy requests of the Wisconsin Department of Natural Resources contained in their *closure not recommended* letter dated May 8, 2019.

Discussions

During my past meeting with you and Pam Mylotta, we determined that two (2) additional soil borings were needed to better determine the extent and magnitude of petroleum impacts. The concern is that there may be isolated pockets of petroleum impacts at much higher concentrations than previously detected due to historical aerial photographs which indicate there may have been fuel dispenser islands in areas not previously sampled.

Work Scope

Utility Clearance

In accordance with safe work practices and as required by state law, EnviroForensics will contact Digger's Hotline subsurface utility protection service at least 72 hours prior to the anticipated onset of subsurface work at the Site. As a result, subsurface utilities and structures owned or managed by member companies and municipalities will be located by an independent contractor service. EnviroForensics will also contract with a private underground utility locating service to provide additional confidence regarding the position of potential underground hazards at the Site.



The private locating service will use geophysical and electromagnetic equipment to locate underground utilities across the Site. Utility information will be added to the Site plan and used to better position investigative borings and depths of samples to be collected.

Soil Sampling

As discussed in our meeting, EnviroForensics will direct the drilling of two (2) additional soil borings to a preliminary depth of ten feet below ground surface at the locations designated "A" and "B" in red color shown on attached **Figure 1**. Soil samples will be collected using direct-push technology and continuous samples will be retrieved in acetate core barrels having a length of five (5) feet. Soil will be continuously logged during the soil boring activities. Field screening at each 2-foot interval will be conducted using a photo-ionization detector (PID). If PID readings indicate significant petroleum contamination may extend deeper, then additional soil samples will be collected from deeper zones. Soil lithology will be described in accordance with the Unified Soil Classification System (USCS) and recorded on soil boring logs along with PID readings.

Up to three (3) soil samples will be collected from each boring location, the depths of which will be based on several criteria including: relative PID readings, visual coloration, olfactory observations, and/or soil lithology. Soil samples for laboratory analysis will be labeled, logged on a chain-of-custody form and placed into a cooler containing ice pending delivery to a state-certified laboratory. The soil samples will be submitted for analysis of total volatile organic compounds (VOCs) according to EPA Test Method 8260B.

The soil borings will be abandoned with bentonite chips following sample collection activities, and the asphalt surface will be repaired.

Investigation-derived Media

Investigation-derived media (IDM) generated during SI activities, including soil cuttings, and decontamination fluids will be placed in 55-gallon steel drum(s) and stored on Site pending characterization for disposal purposes. EnviroForensics anticipates that all IDM will be characterized as non-hazardous for disposal.



Data Evaluation and Reporting

EnviroForensics will evaluate the data collected during the SI to identify if additional vapor intrusion sampling is warranted or if other significant data gaps exist. If additional activities are warranted, EnviroForensics will prepare a brief work scope. The data collected during this SI will be incorporated into the previously submitted case closure documents.

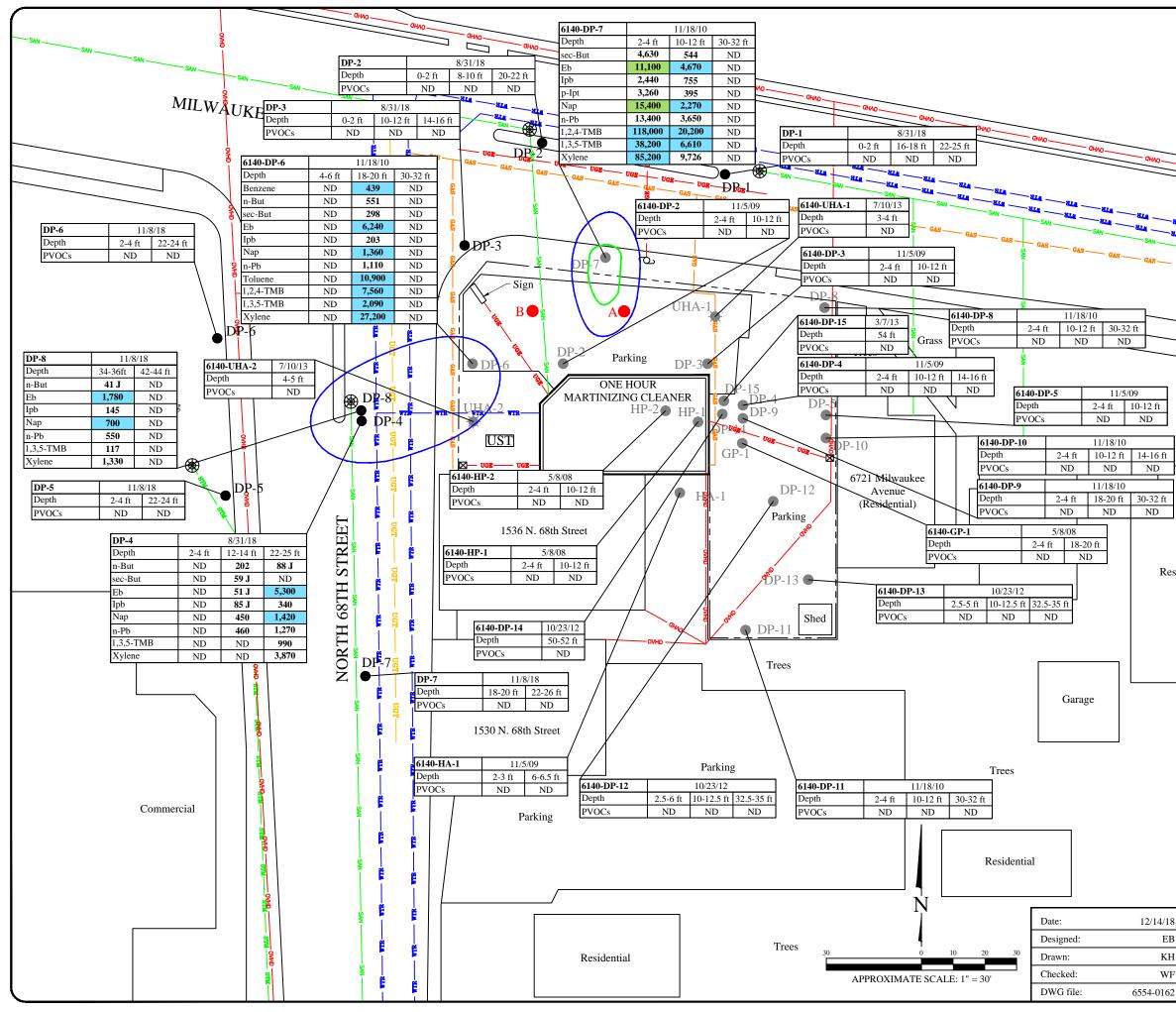
If you have any questions regarding this work scope, please contact me directly at (414) 982-3988, or by email at <u>wfassbender@enviroforensics.com</u>.

Sincerely, EnviroForensics, LLC

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Wayne Fassbender, PG Senior Project Manager

cc: Brian Cass, OHM Holdings, Inc. Pamela Mylotta, WDNR



Legend

Property boundary Underground electric line utility Overhead electric line utility Gas line utility Sanitary line utility Sanitary line utility STM — Water line utility WTR - \boxtimes Old light location New soil sample location Previous soil sample location Extent of residual soil contamination exceeding soil to groundwater pathway **RCLs** Extent of residual soil contamination exceeding non-industrial RCLs



Removed 550 gallon underground fuel oil tank location Proposed soil sample location

	Soil Residual Contaminant Level			
Analytes	Soil to Groundwater	Non-Industrial Direct Contact	Industrial Direct Contact	
Benzene	5.1	1,600	7,070	
n-But	NE	NE	NE	
sec-But	NE	NE	NE	
Eb	1,570	8,020	35,400	
Ipb	NE	NE	NE	
p-Ipt	NE	NE	NE	
Nap	658.2	5,520	24,100	
n-Pb	NE	NE	NE	
Toluene	1,107.2	818,000	818,000	
1,2,4-TMB	1,378.7	219,000	219,000	
1,3,5-TMB	1,378.7	182,000	182,000	
Xylenes (total)	190	260,000	260,000	

Reside

Notes:

- Bolded and green shaded values are above WDNR Non-Industrial Direct Contact Residual Contaminant Levels
- Bolded and blue shaded values are above WDNR Soil to Groundwater Residual Contaminant Levels
- Results reported in micrograms per kilogram (ug/kg)
- n-But = n-Butylbenzene
- sec-But = sec-Butylbenzene
- Eb = Ethylbenzene
- Ipb = Isopropylbenzene
- p-Ipt = p-Isopropyltoluene
- Nap = Naphthalene
- 10. n-Pb = n-Propylbenzene
- 11. 1,2,4-TMB = 1,2,4-Trimethylbenzene
- 12. 1,3,5-TMB = 1,2,3-Trimethylbenzene
- 13. NE = Not Established
- 14. ND = Not Detected above laboratory detection limits
- 15. PVOCs = Petroleum Volatile Organic Compounds

	PROPOSED SOIL BORING LOCATION AND SOIL ANALYTICAL RESULTS MAP				
	6	One Hour Martinizing 6737 West Milwaukee Avenue Wauwatosa, WI			
4/18		Figure			
EB	ENVIRO erensics	1			
KH	/	Project			
WF	825 N. Capitol Avenue • Indianapolis, IN 46204 EnviroForensics.com	6554			