



August 9, 2021

Mr. Kai Hansen  
Scot Industries, Inc.  
810 E. Nebraska St.  
Muscodia, WI 53573

Subject: Review of NR 716 Site Investigation Work Plan  
Scot Industries, Inc.  
1532 W. Galena St., Milwaukee, WI  
BRRTS #: 02-41-587342

Dear Mr. Hansen:

On June 28, 2021, the Wisconsin Department of Natural Resources (DNR) received the “NR 716 Site Investigation Work Plan” (Work Plan), dated June 17, 2021, prepared for Scot Industries, Inc. (Scot Industries) by Ramboll US Consulting, Inc. (Ramboll) for the property located at 1532 W. Galena St., Milwaukee, WI (the Property). The Work Plan was submitted with a fee for DNR review and response. The submittal of a Work Plan is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. ch. 292.

### **Work Plan Review**

The DNR reviewed the Work Plan on July 15, 2021 with the understanding that Scot Industries may be participating in the Voluntary Party Liability Exemption (VPLE) program, based on communication with Scot Industries representative Mark Thimke of Foley & Lardner, LLC. With this understanding, a thorough evaluation of the Property should be conducted as if the Property were in the VPLE program. The VPLE program requires evaluation of all areas of known or potential environmental concern including those described in the Phase I Environmental Site Assessment (Phase I ESA), dated October 20, 2020, prepared for Scot Industries by Ramboll, areas of potential or known environmental concern described in previous reports prepared for the Property, as well as other areas previously requested by the DNR based the information reviewed. A revised Phase II ESA work plan should be prepared to evaluate all areas of potential environmental concern to verify whether discharges have occurred in these areas.

After the Phase II ESA work has been completed and approved by the DNR, a site investigation should be conducted to define the nature, degree and extent, both areal and vertical, of the hazardous substance discharges or environmental pollution identified in all affected media, per Wis. Admin. Code § NR 716.11(3)(a). The DNR is not able to approve the proposed Wis. Admin. Code ch. NR 716 site investigation described in the Work Plan prior to completing an approved Phase II ESA for the Property. Additional areas of potential environmental concern that need to be evaluated are described in the following section.

### Phase II ESA Sampling

As discussed in our December 18, 2020 meeting, limited information was provided in the Phase I ESA and the Proposed VPLE Investigation Strategy document, dated October 22, 2020, prepared for Scot Industries by Ramboll, regarding manufacturing operations that occurred inside and outside of the building. Plans or schematics need to be provided to show the layout and use of the inside and outside of the building during manufacturing operations, as well as the current layout and use of the building. A plan or schematic should also be provided to show the relationship of subsurface utility corridors to sumps, drains and catch basins inside the building and on the Property to aid in the evaluation of preferential pathways for contaminant migration. The DNR requests that this information be included in a revised Phase II ESA work plan.

Also discussed in our meeting were areas of potential environmental concern identified for sampling by Ramboll and additional areas identified by the DNR. Some of the DNR requested areas to be sampled were included in the Updated VPLE Investigation document, dated January 14, 2021, prepared for Scot Industries by Ramboll, however others were not.

Areas that have not been sampled were described as sub-grade machine pits containing oil, sumps, trenches, catch basins, and floor staining in the building, as well as an area of patched concrete associated with a former machine pit and/or trench floor drain. Specific locations for these areas were not provided in the documents reviewed. Several other areas that have not been sampled were described in a Geraghty & Miller, Inc. letter, dated March 24, 1989 included in the Phase I ESA as a below-grade 3,500-gallon honing oil tank in the part of the building originally constructed in 1924, and three above-grade cutting oil tanks in the building addition constructed in 1956. The former tank locations were not noted in the Phase I ESA. The DNR considers the former tanks as areas of potential environmental concern, especially with the detection of free product beneath the 1956 portion of the building where cutting oil tanks had been located. In addition, the Phase I ESA described the possible presence of electrical equipment inside the building containing polychlorinated biphenyls and the possible presence of asbestos containing materials and lead-based paint based on the age of the building. The DNR requests a sampling plan to address all areas and potential contaminants described above in a revised Phase II ESA work plan.

### **Other Evaluation Before Site Investigation**

Consideration should be given to the following items to complete the evaluation of the Property prior to starting the proposed Wis. Admin. Code ch. NR 716 investigation work shown on the attached Figure 02 of the Work Plan.

### Groundwater Evaluation

The Work Plan describes installing monitoring wells for the purposes of defining the extent of groundwater contamination southwest of the Property, the extent of free product south of monitoring well MW-12, and a potential PFAS source northwest of the Property. Groundwater elevations were measured during January, February and March of 2021. Groundwater elevations measured on March 11, 2021 show a groundwater flow direction primarily to the south (attached Figure 03). A DNR evaluation of the January 2021 and February 2021 groundwater elevation data show groundwater flow primarily to the southwest in January and groundwater flow radially from the center of the Property in February. Additional groundwater evaluation is requested in a revised Phase II ESA sampling plan to better understand the direction of groundwater flow before installing the proposed monitoring wells.

Free Product Evaluation

Approximately 3.6-inches of free product, described as honing oil, was encountered on the groundwater surface beneath the building at monitoring well MW-12. A plan to contain and remove the free product is required per Wis. Admin. Code § NR 708.13. One additional monitoring well was proposed in the Work Plan to define the extent of the free product. The DNR does not concur that the proposed well will define the extent of free product before a source has been identified and preferential pathways have been evaluated. The composition of the oil needs to be evaluated to aid in determining a source(s) of the release and an evaluation of utility corridor preferential pathways beneath and adjacent to the building needs to be completed to aid in determining additional sampling locations. The DNR requests an interim action work plan for free product recovery and composition determination.

Vapor Intrusion Evaluation

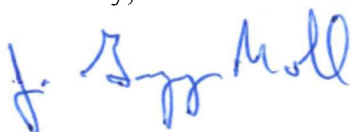
Additional evaluation of utility corridor preferential pathways beneath and adjacent to the building, and an evaluation of soil and groundwater conditions beneath the north portion of the original building and the north portions of the 1956 and 1965 additions is needed before installing vapor points as proposed in the Work Plan. Areas of potential environmental concern, such as the vertical honing machine pits, former sub-grade honing oil tank, sumps, drains, etc. need to be evaluated to determine whether additional vapor probes are needed in parts of the building that have not been evaluated. The DNR requests additional work to evaluate areas of potential environmental concern in the northern portions of the building and preferential pathways beneath the building in a revised Phase II ESA.

Next Steps

A revised Phase II ESA work plan should be submitted within 30-days of the date of this letter to address additional areas of potential environmental concern based on the understanding that the Property may be entered into the VPLE program. An interim action work plan for free product recovery should also be submitted within 30-days of the date of this letter.

The DNR appreciates the efforts you are taking to address potential contamination at this site. If you have questions regarding anything outlined in this letter, please contact Greg Moll at (262) 202-3921, by writing to the address at the top of this letter, or by email at [gregory.moll@wisconsin.gov](mailto:gregory.moll@wisconsin.gov).

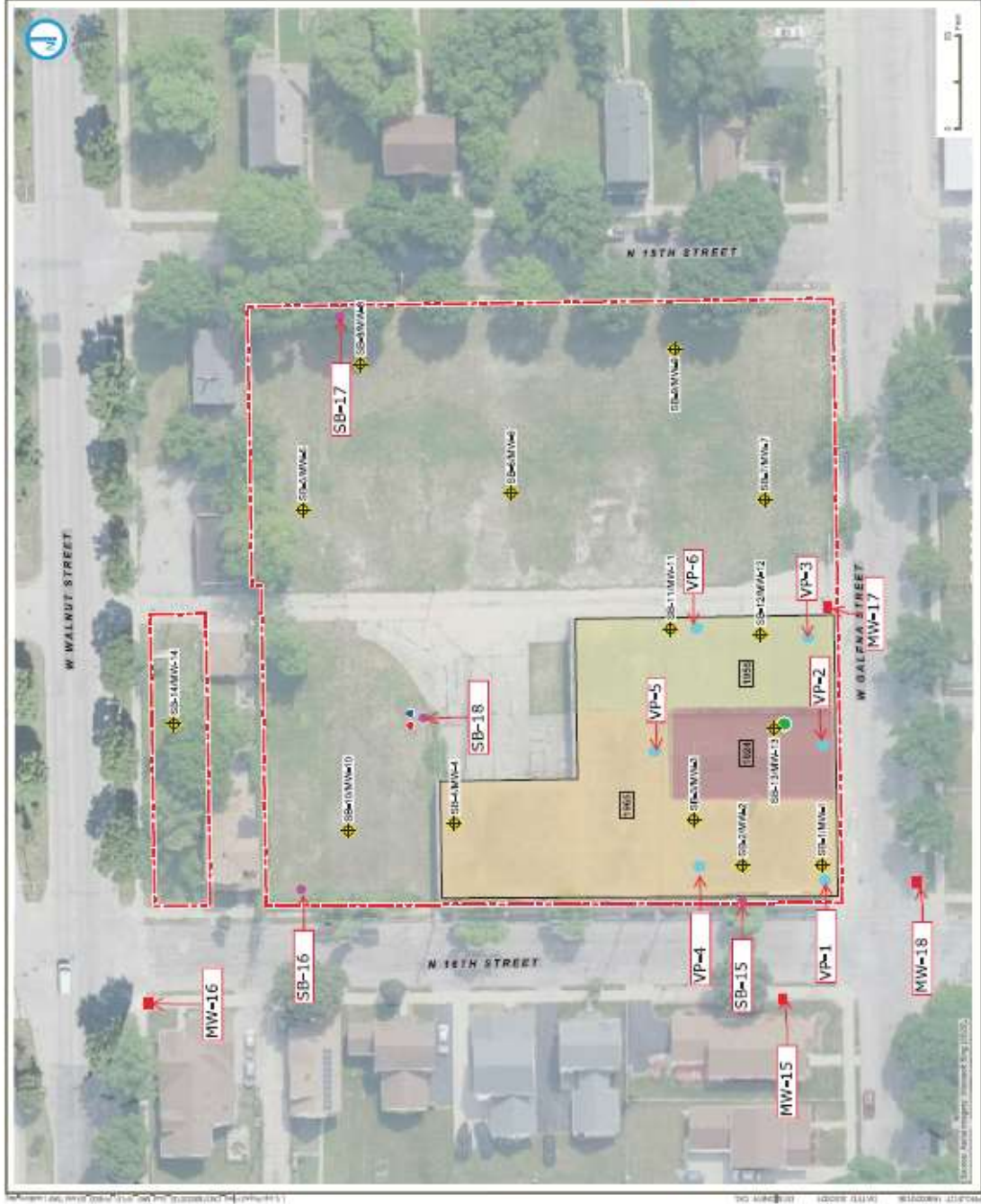
Sincerely,

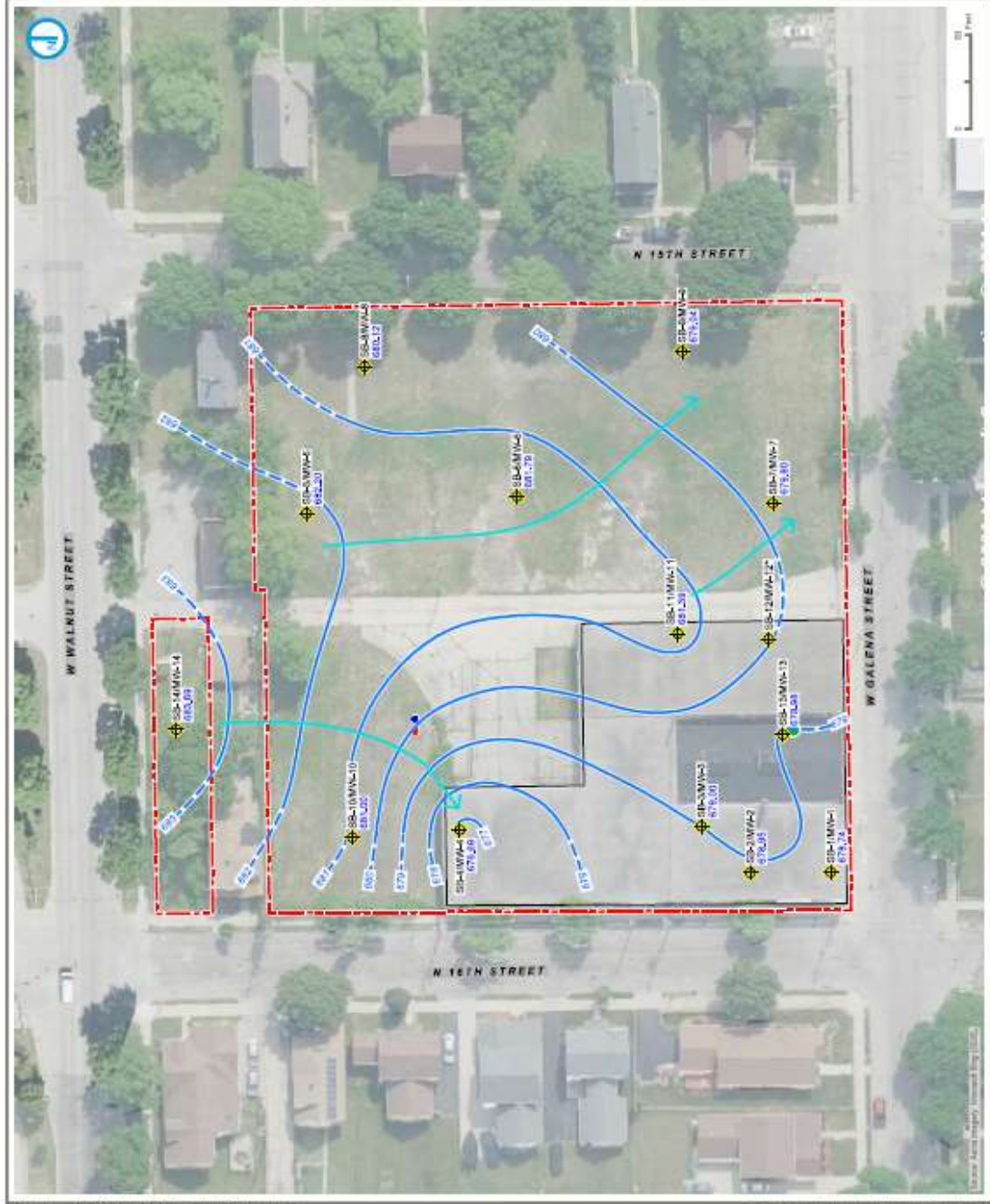


J. Gregory Moll, P.G.  
Hydrogeologist  
Remediation and Redevelopment Program

Attachments: Figure 02, Proposed soil Boring, Monitoring Well and Vapor Point Locations  
Figure 03, Groundwater Elevations, March 11, 2021

cc: Snejana Karakis, Ramboll US Consulting, Inc.  
Jeanne M. Tarvin, Ramboll US Consulting, Inc.  
Mark Thimke, Foley & Lardner, LLP





- LEGEND**
- PROPERTY BOUNDARY (APPROXIMATE)
  - FORMER 300-GALLON GASOLINE LUST
  - FORMER 300-GALLON DIESEL LUST
  - FORMER 8 000-GALLON DIESEL LUST
  - ⊕ SOIL MONITORING WELL
  - GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)
  - ↘ GROUNDWATER FLOW DIRECTION (FEET ABOVE MEAN SEA LEVEL)

**Note**  
 \* Free product present in monitoring well MW-12.

**GROUNDWATER ELEVATIONS  
 MARCH 11, 2021**

**SCOT INDUSTRIES**  
 1537 WEST GALENA STREET  
 MILWAUKEE, WISCONSIN

**FIGURE 03**

RAMBOLL US CONSULTING INC.  
 A RAMBOLL COMPANY

