



January 20, 2023

Mr. Gary Andrzejewski
Sun Chemical Corporation
135 W. Lake St.
Northlake, IL 60164

Mr. Martin Komisar
GMK Realty II LLC
5430 W. Layton Ave.
Greenfield, WI 53220

Subject: Review of *NR 716 Site Investigation Work Plan*
DIC Imaging Product – Liquid Compounds Facility, 7335 S. 10th St., Oak Creek, WI
BRRTS #: 02-41-588407, FID #: 341018810

Dear Mr. Andrzejewski and Mr. Komisar:

On October 4, 2022, the Wisconsin Department of Natural Resources (DNR) received the *NR 716 Site Investigation Work Plan* (SIWP) prepared on your behalf by your consultant, Ramboll. The SIWP was submitted with a technical assistance fee for DNR review and a written response.

Background

The site was used for agricultural purposes until a building was constructed in the southeast portion of the site between 1963 and 1969. Various entities occupied the site through approximately 2000, when the property was purchased by DIC Imaging. DIC constructed additions to the original site and used the property for ultraviolet coatings manufacturing until March 2020. The property was sold to GMK Realty II LLC in 2021.

A Phase I Environmental Site Assessment (ESA) identified a past release of approximately 100 gallons of Ansolite 3x3 Low Viscosity, an Aqueous Film Forming Foam (AFFF) product mixed with municipal water, which occurred on September 25, 2005, due to a power failure at the property. The foam and water mixture was released out of the west side of the building, where it flowed into a storm drain in the shipping and receiving dock. The storm drain in this area discharges to the on-site retention pond, which then flows into a stormwater ditch within the 10th Street right-of-way. The stormwater ditch eventually discharges into Oak Creek. Cleanup was conducted on-site by AAA Environmental and consisted of pumping out 5,000 gallons of foam and water mixture from an outside containment area and the retention pond. An additional 15,000 gallons of water was pumped from the retention pond into the sanitary sewer, with permission from Milwaukee Metropolitan Sewerage District.

SIWP Review

The SIWP documents the results of the Phase II ESA sampling conducted at the property and provides recommendations for further work to define degree and extent of the identified per- and polyfluoroalkyl substances (PFAS) contamination. The DNR reviewed the SIWP for compliance with Wis. Admin. Code §§ NR 716.07 and 716.09. Based on the evaluation of the currently available information, the DNR generally concurs with the site investigation activities proposed within the SIWP and provides the following comments:

General:

- The following items should be addressed/included in the future site investigation report:
 - Provide a figure showing the approximate surface flow from the area of the release.
 - Provide a figure showing the path of the impacted storm sewer to the retention pond and information on the integrity/condition of the storm sewer line.
 - The soil sample results on the tables need to indicate if the sample was saturated or unsaturated.
 - Provide any known information on the construction of the retention pond.

Groundwater:

- Provide groundwater elevation data and a groundwater flow direction figure.
- Consider installing an additional monitoring well to the south-southeast of the on-site retention pond and collecting soil samples from the boring in the same manner as the other proposed monitoring wells.
- Further groundwater monitoring will be required beyond what is proposed in the SIWP. Consider collecting additional rounds to define a contaminant trend and establish groundwater elevations and flow direction.

Surface Water:

- The DNR understands that the proposed surface water sampling location is biased towards where the loading dock storm sewer discharges into the retention pond.

The site investigation can be an iterative process. Additional sampling may indicate that further assessment is needed to define the degree and extent of contamination in all affected media.

Schedule

In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.15(1), a site investigation report shall be submitted within 60 days after the completion of the field investigation.
- Per Wis. Admin. Code § NR 716.14, sampling results shall be reported to the DNR and to the property owner, and occupants or off-site properties as appropriate, within 10 business days of receiving the sample results. DNR Form 4400-249 (<https://dnr.wi.gov/files/PDF/forms/4400/4400-249.pdf>) can be used to send in the sampling data.
- NR 700 semi-annual reports are required until the case is closed.

The DNR appreciates your efforts to address the contamination at this site. If you have any questions regarding this letter, please contact me, the DNR Project Manager, at (414) 750-7030 or via email at riley.neumann@wisconsin.gov.

Sincerely,



Riley D. Neumann
Hydrogeologist/Project Manager
Remediation & Redevelopment Program

cc: Staci Goetz, Ramboll (electronic)