

RESPONSE TO 10/15/18 WDNR E-MAIL COMMUNICATION

November 13, 2018

Mr. Mark Drews, P.G.
Wisconsin Department of Natural Resources
141 NW Barstow Street, Room 180
Waukesha, WI 53188

VIA E-MAIL and U.S. MAIL

KPRG Project No. 11717

Re: Response to October 15, 2018 WDNR E-mail Communication
Former Navistar/RMG Foundry - 1401 Perkins Avenue, Waukesha, WI
BRRTS # 02-68-098404

Dear Mr. Drews:

After the project status meeting between Navistar, Inc. (Navistar), KPRG and Associates, Inc. and Wisconsin Department of Natural Resources (WDNR) which was held on October 2, 2018, WDNR sent the attached follow-up e-mail dated October 15, 2018. In this e-mail, WDNR requested either an additional Work Plan for expanding the soil vapor intrusion study to the residences north of the 818 Niagara Street residence, which had an exceedance of the Vapor Risk Screening Level (VRSL) in the sub-slab vapor sample, or to provide justification why additional soil vapor intrusion sampling is not necessary. The e-mail further stated that this response can be included with the response from Navistar for additional vapor sampling to the south and east along The Strand. In order to keep potential issues to the north of the RMG Foundry site separate from those to the south of Perkins Avenue, this response is issued addressing only the residences to the north of 818 Niagara Street. Relative to additional soil vapor intrusion study work south of Perkins Avenue, to date Navistar has agreed to expand the scope of work up to five additional residences (three along Lombardi way and two along Phoenix Drive) as documented in the Project Meeting Follow-up dated October 9, 2018. As requested during the above referenced meeting, Navistar/KPRG is issuing under separate cover a comprehensive discussion regarding groundwater impact issues south of Perkins Avenue and a stated position relative to any additional study in that area.

Residences to the north of 818 Niagara Street are situated along Eales Avenue. Specifically, 813 and 817 Eales Avenue properties back up to the 818 Niagara Street property. In accordance with WDNR guidance titled Addressing Vapor Intrusion at Remediation and Redevelopment Site in Wisconsin (January 2018, Publication RR-800), the following criteria are identified for soil vapor

intrusion screening purposes for sites impacted with chlorinated volatile organic compounds (CVOCs):

- The building is over or within 100 feet of CVOC impacted soil.
- The building overlies groundwater with CVOC concentrations above NR 140 Enforcement Standards (ESs) at the water table.
- Groundwater with concentrations above the NR 140 Preventative Action Limit (PAL) has entered the building or is in contact with the building's foundation.
- Utility lines that transect a CVOC source area providing a preferential vapor migration pathway from the source area to the subject structure.

Each of these criteria will be discussed separately relative to the residences along Eales Avenue.

Distance from CVOC Impacted Soil

CVOC impacted soils are present on the RMG Foundry property as shown on Figure 1. The distance from the nearest defined TCE soil impact area to the south side of the subject residences on Eales Avenue is approximately 480 feet. The distance from the northern RMG property boundary to the south side of the subject residences is approximately 270 feet. These distances well beyond the noted screening criterion. Therefore, this screening criterion is not met.

Building Overlies Groundwater with CVOC Concentrations Exceeding NR 140 ES

The extent of groundwater impacts was provided to WDNR in the Groundwater/Surface Water Sampling Update dated August 30, 2018. CVOC impacts to groundwater are well defined and extend to the west-northwest of the RMG Foundry property. The impacts do not extend north under the residences along Eales Avenue. Therefore, this screening criterion is not met.

Groundwater with CVOC Concentrations Above PALs Entered the Building or is in Contact with the Foundation

Measured depths to groundwater north of the RMG Foundry property are between approximately 16 and 18 feet below ground surface. Water level fluctuations during larger precipitation events in the area measured via transducers placed in wells on RMG property and to the south of RMG property were no more than approximately two feet. The standard basement depth in houses on Niagara Street north of the RMG property which were included in initial soil vapor intrusion study work completed by KPRG is seven to eight feet. Therefore, this screening criterion is not met.

Utility Lines that Transect a CVOC Source Area

All known utility lines/corridors associated with the RMG Foundry study area are included on Figure 1. None of these lines transect or connect the residences along Eales Avenue with the documented CVOC impacts associated with the RMG Foundry site. Therefore, this screening criterion is not met.

Since none of the four screening criteria established by WDNR for evaluating the potential need for completing a soil vapor intrusion study for the residences along Eales Avenue are met, the expansion of the current soil vapor intrusion study program to the residences along Eales Avenue is not warranted.

KPRG and Navistar appreciate the ongoing cooperative effort with WDNR in completing the required site investigation work. If there are any questions please contact Ferdinand Alido of Navistar at 331-332-6364 or Richard Gnat of KPRG at 262-781-0475.

Sincerely,
KPRG and Associates, Inc.

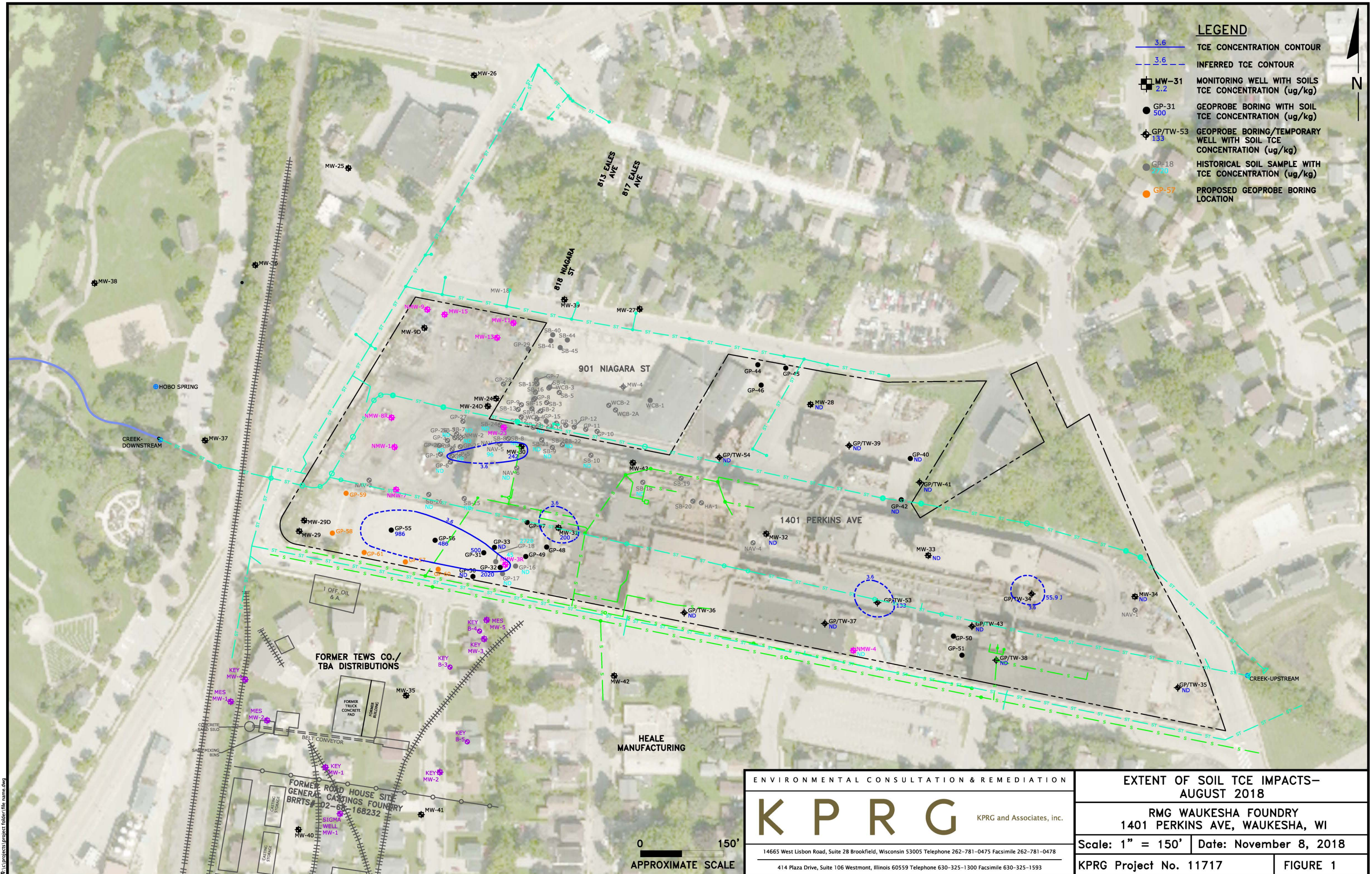


Richard R. Gnat, P.G.
Principal

Attachment

cc: Ferdinand Alido, Navistar, Inc.
Timothy Stohner, P.E., KPRG

FIGURE



LEGEND

- 3.6 TCE CONCENTRATION CONTOUR
- - - 3.6 INFERRED TCE CONTOUR
- MW-31 2.2 MONITORING WELL WITH SOILS TCE CONCENTRATION (ug/kg)
- GP-31 500 GEOPROBE BORING WITH SOIL TCE CONCENTRATION (ug/kg)
- ⊕ GP/TW-53 133 GEOPROBE BORING/TEMPORARY WELL WITH SOIL TCE CONCENTRATION (ug/kg)
- GP-18 2740 HISTORICAL SOIL SAMPLE WITH TCE CONCENTRATION (ug/kg)
- GP-57 PROPOSED GEOPROBE BORING LOCATION



ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, Inc.

14665 West Lisbon Road, Suite 28 Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478
414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

EXTENT OF SOIL TCE IMPACTS— AUGUST 2018	
RMG WAUKESHA FOUNDRY 1401 PERKINS AVE, WAUKESHA, WI	
Scale: 1" = 150'	Date: November 8, 2018
KPRG Project No. 11717	FIGURE 1



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ATTACHMENT
WDNR E-Mail Communication 10-15-18

From: [Drews, Mark D - DNR](#)
To: [Rich Gnat](#)
Cc: [Mylotta, Pamela A - DNR](#); [Alido, Ferdinand](#); [Perzan, Christopher P](#)
Subject: RE: Meeting Summary Letter - Former Navistar/RMG Foundry BRRTS # 02-68-098404
Date: Monday, October 15, 2018 11:40:29 AM

Rich,

Pam and I discussed the issues for the Navistar site and one item we didn't discuss was the homes located north of 818 Niagara Street since TCE was detected in this home above the VSRL. Provide a workplan to complete additional vapor sampling to the north or justification why additional sampling is not necessary. This information can be included with the response from Navistar for additional vapor sampling to the south and east along The Strand. Let me know if you want to discuss further.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Mark Drews, P.G.

Phone: 262-574-2146

Mark.Drews@wisconsin.gov

From: Rich Gnat <RichardG@KPRGINC.COM>
Sent: Tuesday, October 09, 2018 9:59 AM
To: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>
Subject: [WARNING: ATTACHMENT(S) MAY CONTAIN MALWARE]Meeting Summary Letter - Former Navistar/RMG Foundry BRRTS # 02-68-098404

Mark. Attached is an electronic copy of a letter summarizing last week's meeting and what additional work we have agreed to at this point including some additional soil vapor intrusion residences to the south. Hard copy is in the 2-day FedEx. Let me know if your understanding on anything was different. Thanks.

P.S. Will have some suggested/requested edits on the draft WDNR letter to residents that denied access shortly.

Richard R. Gnat, P.G.
KPRG and Associates, Inc.
14665 W. Lisbon Rd., Suite 1A
Brookfield, WI 53005
262-781-0475 (office)
262-781-0478 (fax)
262-227-7755 (cell)