



January 29, 2019

Navistar, Inc.
Ferdinand Alido
2701 Navistar Dr.
Lisle, IL 60532

Subject: Review of "Groundwater Impacts South of Perkins Avenue", "Interim Soil Vapor Intrusion Study Data Summary" and "Project Meeting Follow-Up" Former Navistar International Corp./RMG Foundry
1401 Perkins Avenue, Waukesha, WI
WDNR BRRTS Activity # 02-68-098404, WDNR FID # 268005430

Dear Mr. Alido:

The Wisconsin Department of Natural Resources (DNR) received the above "Interim Soil Vapor Intrusion Study Data Summary", dated September 20, 2018 and the above "Project Meeting Follow-Up" dated October 9, 2018 from KPRG. In addition, DNR received the above "Groundwater Impacts South of Perkins Avenue" dated November 15, 2018 from KPRG. The DNR reviews environmental investigation and remediation cases for compliance with state statutes and rules to maintain consistency in the investigation and remediation of these cases.

After review of the above reports, the DNR is providing the following comments:

1. The information provided by KPRG does not support the conclusions from KPRG that Navistar is not the source of the TCE contamination south of the Navistar property boundary. Additional investigation is needed to demonstrate that Navistar is not the source of the contamination. Navistar has multiple source locations on its facility including the sanitary sewer which extends into Perkins Avenue immediately adjacent to the south. In addition, Navistar parking lots are located south of the main property. What was the former use of these properties? Continue the groundwater and vapor investigations to the west and south of the Navistar facility.
2. The information submitted also does not support the conclusion that additional vapor intrusion is not needed to the North of Niagara Street. Additional investigation is needed to demonstrate that Navistar is not the source of the contamination. Continue the vapor investigation north of Niagara Street.
3. Continue to collect groundwater samples from the existing and proposed monitoring wells to document contaminant levels on and off site.
4. Continue to provide the DNR with contact information for adjacent property owners that denied access to collect vapor intrusion samples. DNR will submit letters to the property owners and ask them for access.
5. Tabulate soil, vapor and groundwater data from previous and current site investigations together.

Until the site investigation and closure requirements have been met, your site will remain "open" and you also will need to continue to submit the semi-annual progress reports, as required by s. NR 711(1), Wis. Adm. Code.

Next Steps and Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following tasks. Follow the timeframes established in the NR 700 Wis. Adm. Code rule series (see publication "NR 700 Site Investigation Process and Timeline flowchart, RR-967, for timeframes).

- Continue to conduct immediate actions to minimize the harmful effects of the hazardous substance discharge, per Wis. Admin. Code § NR708.05.
- Submit a Site Investigation Work Plan in accordance with Wis. Admin. Code § NR 716.09.
- Per Wis. Admin. § NR 716.11(2g), the additional site investigation activities must begin within 90 days of submittal of the work plan.
- Sampling results must be reported to the DNR within 10 days of receiving the data, per Wis. Admin. § NR 716.14(2).
- Per Wis. Admin. Code § NR 716.15(1), a supplemental site investigation report shall be submitted within 60 days after completion of the field investigation.
- NR 700 semi-annual progress reports will be required until the case is closed.

Please provide a written response within 10 days identifying whether Navistar will continue with the above investigations. If Navistar does not proceed with the vapor and groundwater investigations, then DNR will move forward with other plans to continue the site investigation. This may include use of state or federal funds to complete the needed investigation. Be aware that the DNR may seek to recover costs incurred by the DNR to complete investigation or remediation activities. We will notify you prior to incurring costs with more information about specific work to be conducted.

The DNR appreciates the cooperation with the investigation of this site. If you have any questions regarding this letter, please contact me at 414-374-2423 or Mark Drews at 262-574-2146 or by e-mail at mark.drews@wisconsin.gov.

Sincerely,

Pamela Mylotta
Southeast Region Team Supervisor
Remediation & Redevelopment Program

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