

KPRG and Associates, Inc.

TRANSMITTAL LETTER

February 20, 2019

Mr. David Hanson Wisconsin Department of Natural Resources 2300 N. Dr. Martin Luther King Drive Milwaukee, WI 53212

VIA FEDEX

KPRG Project No. 11717

Re: Additional Site Investigation Work Plan Former Navistar/RMG Foundry 1401 Perkins Avenue, Waukesha, WI BRRTS # 02-68-098404

Dear Mr. Hanson:

On behalf of our client, Navistar, Inc., enclosed please find the following:

- Additional Site Investigation Work Plan
- A check for \$700 to cover the required review fee.

If there are any questions, please call us at 262-781-0475.

Sincerely, KPRG and Associates, Inc.

Richard R grat

Richard R. Gnat, P.G. Principal

cc: Ferdinand Alido, Navistar, Inc.



KPRG and Associates, Inc.

ADDITIONAL SITE INVESTIGATION WORK PLAN

February 20, 2019

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

Via E-Mail and FedEx

KPRG Project No. 11717

Re: Additional Site Investigation Work Plan Former Navistar/RMG Foundry - 1401 Perkins Avenue, Waukesha, WI BRRTS # 02-68-098404

Dear Mr. Drews:

KPRG and Associates, Inc. (KPRG), on behalf of our client Navistar, Inc. (Navistar), submitted the following two documents for Wisconsin Department of Natural Resources (WDNR) review:

- Response to 10/15/18 WDNR E-mail Communication, November 13, 2018.
- Groundwater Impacts South of Perkins Avenue, November 15, 2018.

On January 29, 2019 (received February 4, 2019) WDNR issued a review letter that requested the following general additional site investigation work to be completed:

- Continue groundwater and vapor investigations to the west and south of the Navistar facility.
- Continue the vapor investigation north of Niagara Street.
- Continue to collect groundwater samples from existing and proposed monitoring wells to document contamination levels on and off-site.
- Continue to provide WDNR with contact information for adjacent property owners that denied access to collect vapor intrusion samples.
- Tabulate soil, vapor and groundwater data from previous and current site investigations together.

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

A full copy of the WDNR review letter is provided in Attachment 1. On February 7, 2019, KPRG, on behalf of Navistar formally responded to the requests for additional study provided in the WDNR letter and stated that a Work Plan addressing the additional work will be provided with 14 days. This Work Plan is written to address these additional site investigation requests. Each item is discussed below along with specific proposed investigative tasks as appropriate. This Work Plan also addresses the continued intent to conduct immediate actions as necessary, and provides a revised project schedule based on the proposed additional work.

Please note that this proposal does not indicate that necessarily Navistar agrees with the conclusions in the WDNR review letter. Navistar continues to believe that our conclusions in the communications addressed by the review letter are valid. We also note the WDNR's letter did not provide much in the way of a substantive response to the extensive data and analysis provided in the Navistar submittals, but merely concludes that the information "does not support" the conclusions and asks for further study. Despite this, we are proposing the work outlined in this letter in the spirit of cooperation and to move this project forward hopefully ultimately toward an agreeable resolution.

1.0 Continue Groundwater and Vapor Investigations to the West and South of the Navistar Facility

This WDNR request/comment included additional specifics regarding a better understanding of the sanitary sewer which extends into Perkins Avenue from the facility and additional investigation of the Navistar/RMG Foundry parking lots to the south of Perkins Avenue (see WDNR letter in Attachment 1). To address this comment, the following additional site investigation work is proposed:

- Task 1 Sewer Line Camera Study and Sampling
- Task 2 South Parking Lots Soil Sampling
- Task 3 Additional Soil Vapor Intrusion Study South of Perkins Avenue

The scope of each task is discussed separately below.

1.1 Task 1 – Sewer Line Camera Study and Sampling

Figure 1 provides a site map with an overlay of the sewer lines (storm and sanitary sewer) beneath and around the Navistar facility. Gaining a better understanding of the current condition of the sewer lines will help evaluate the potential distribution of impacts and provide the necessary information to support the Remedial Alternatives Options Report (RAOR) evaluations.

Relative to the storm sewer lines, there are two main storm sewers that traverse the foundry property from east to west, one along the northern third (72-inch diameter) and one along the southern third (48-inch diameter) of the site as shown on Figure 1. The storm sewers tie together at the west side of the property and eventually discharge/daylight as the creek in Frame Park. It is proposed to engage a sewer specialty contractor, Visu-Sewer, to run an automated camera through each line to allow for visual inspection on the condition of each

storm sewer line. Visu-Sewer will provide a video of the work along with an interpretive report highlighting any notable observations such as cracks or unknown tie-ins. It is noted that during this work, some cleaning/removal of accumulated sediment may need to occur to facilitate camera passage. Any removed sediment will be temporarily stockpiled on visqueen within the outside storage area on the northwest side of the foundry property (fenced and access controlled area). Any staged sediment will be sampled and profiled for proper subsequent off-site disposal. This data will also be useful in evaluating potential impacts within the storm sewer system. The stockpile will also be covered with visqueen until proper disposal is arranged.

Relative to the sanitary sewer line(s), the discharge sampling point(s) to the main sanitary sewer will be identified and a sample of the discharge water will be collected for VOC analysis. If VOCs are detected that are also being detected in groundwater beneath the facility, a similar camera study will be completed for the sanitary sewer lines on foundry property. This can only be completed for portions of the sanitary sewer laterals that are at least 6-inches in diameter. Based on available information at this time, the lateral connections to the main sanitary sewer are noted in City of Waukesha records to be 6-inch diameter. It is not known at this time, however, if these laterals may narrow as they extend onto the subject property.

Once the Visu-Sewer camera studies are completed and evaluated, this information will be used in determining whether any repairs or re-linings may be necessary as part of overall site remedy.

1.2 <u>Task 2 – South Parking Lots Soil Sampling</u>

There are two asphalt paved parking lots used by RMG Foundry located on the south side of Perkins Avenue (see Figure 2). Based on historical aerial photograph information, the eastern most parking lot was used for parking since at least 1941 (unpaved). The eastern half of the west parking lot was used for parking since sometime between 1941 and 1950 with prior land use being vacant/undeveloped. Paving of these two areas occurred sometime between 1963 and 1970. The western half of the western parking lot was residential until sometime between 1970 and 1980 during which time the residence was razed and the west parking lot extended (and paved) to its current size. There is no indication of any materials storage in these areas.

To further address these two areas, it is proposed to drill three borings per parking lot (borings GP-62 through GP-67) at approximate locations shown on Figure 2. The borings will extend to approximately eight feet below ground surface (bgs) and soil samples will be collected at two-foot intervals, if possible, for analysis of volatile organic compounds (VOCs). Drilling, sampling and handling procedures will be followed in accordance with the existing approved Work Plans dated May 2017 and October 2018.

1.3 Task 3 – Additional Soil Vapor Intrusion Study South of Perkins Avenue

Figure 3 provides the current soil vapor intrusion (SVI) study locations agreed upon between Navistar and WDNR along with the following additional proposed locations to the south of Perkins Avenue:

- 1230 Lombardi Way
- 1221 Lombardi Way
- 1218 Phoenix Drive
- 1219 Phoenix Drive

Initial access request letters are being prepared for mailing to the noted residents. Once access is granted for a specific property, the sampling will be completed in accordance with the existing approved Work Plan. If a resident is non-responsive to several access requests or access is denied, the WDNR will be provided with documentation of access attempts and/or access denial along with a request for assistance to gain property access. The work will be completed in accordance with field procedures specified in the approved Work Plan dated May 2017.

2.0 Continue Vapor Investigation to the North of Niagara Street

For Work Plan discussion purposes, this item is broken into the following tasks:

- Task 4 Vacant Properties Being Considered for Redevelopment
- Task 5 Additional Vapor Study Along Eales Street

The scope of each task is discussed separately below.

2.1 Task 4 - Vacant Properties Being Considered for Redevelopment

During implementation of the existing SVI study work, it was brought to the attention of Navistar that the City of Waukesha has established a Tax Incremental Funding (TIF) district along White Rock Avenue with potential plans for having a portion of the area redeveloped with multi-family housing. One multi-family housing structure would be located on the west side of White Rock, just south of Moreland Blvd., where the former bowling alley was located. This currently vacant piece of land (0.69 acres) is owned by Hansen Brothers, LLC. One to two additional structures would be located east of White Rock and south of Moreland Blvd. and Eales Street. This area currently consists of three vacant lots, two owned by Hansen Brothers, LLC (0.52 acres and 0.18 acres) and one owned by Ms. Maria Sigala (0.43 acres; see Figure 3).

Based on this information, Navistar voluntarily contacted the subject property owners with a request to access the vacant parcels to allow installation of soil vapor probes (to approximately 8 feet in depth) for VOC sampling utilizing Summa Canisters with 60-minute regulators. All appropriate tightness testing would be performed prior to sampling.

Two soil vapor probes were proposed for each of the three larger parcels and one soil vapor probe was proposed for the smaller parcel. There has been no response from the property owners to date (see Section 4.0).

2.2 Task 5 – Additional Vapor Study Along Eales Street

On November 13, 2018, Navistar provided a submittal using established WDNR guidance criteria for determining whether SVI should be considered or ruled out for residential properties along Eales Street, north of Niagara Street. Since none of the five WDNR guidance criteria were met for considering SVI as a potential concern, it was concluded that expanding the existing study north of Niagara Street was not necessary. The WDNR did not agree with this conclusion as noted in the January 29, 2019 letter. Subsequent discussions with WDNR for clarification of this disagreement indicated that since the 818 Niagara Street property had detections of trichloroethene (TCE) above both indoor air vapor action levels (VALs) and sub-slab vapor risk screening levels (VRSLs) requiring the installation of a sub-slab depressurization system (SSDS), the policy is to expand the SVI study to the neighboring residents, in this case including the residence to the north along Eales Street.

Based on this discussion, it is proposed to include the 813 Eales Street property, which borders the north side of the 818 Niagara Street property, into the current SVI study. An initial access request letter is in the process of being prepared for mailing to the noted resident. Once access is granted, the sampling will be completed in accordance with the existing approved Work Plan dated May 2017. If a resident is non-responsive to several access requests or access is denied, the WDNR will be provided with documentation of access attempts and/or access denial along with a request for assistance to gain property access.

3.0 <u>Continue to Collect Groundwater Samples from Existing and Proposed Monitoring Wells to</u> <u>Document Contamination Levels On and Off-site</u>

Navistar will continue quarterly groundwater monitoring of the two newly installed monitoring wells (MW-44 and MW-45) along with the previously sampled monitoring wells both on and offsite. The groundwater sampling will be completed in accordance with the existing approved Work Plan procedures dated May 2017. All samples will be analyzed for VOCs.

4.0 <u>Continue to Provide WDNR with Contact Information for Adjacent Property Owners that</u> Denied Access to Collect Vapor Intrusion Samples

Tables 1 and 2 provide a summary of the status of residential and commercial, respectively, property access attempts completed to date along with summaries of any work completed at those properties. Figure 3 includes a color coded summary of status.

4.1 Update on Initial WDNR Letters

Based on the initial Interim Soil Vapor Intrusion Data Summary dated September 20, 2018 submitted to WDNR, final access request letters were sent by WDNR to the following residences or commercial properties which had either denied access or were unresponsive to several attempts by Navistar:

Residential Properties

- 834 Niagara Street
- 830 Niagara Street
- 820 Niagara Street
- 816 Niagara Street
- 1412 White Rock Avenue
- 1354 White Rock Avenue
- 1242 Lombardi Way
- 1226 Phoenix Drive
- 1231 Phoenix Drive
- 1227 Phoenix Drive

Commercial Property

• 1344 White Rock Avenue

The addresses in bold indicate that Navistar did not receive any response from the residents after receipt of the WDNR letter. The remaining residents and the commercial facility did respond and subsequently provided access. It is noted that the initial sampling at the 1412 White Rock Avenue residence resulted in a recommendation to install a SSDS, however, after leaving several messages to schedule the installation, there has been no response by the owners. Also, the 1354 White Rock resident, after signing the access agreement, has not been responsive in returning phone calls or e-mails to set up a sampling schedule.

The commercial facility at 1344 White Rock Avenue has allowed access and a site meeting was held to discuss performing high purge volume testing. The owner requested that we work with him to schedule the sampling in February or March 2019 as they prepare to vacate the building (moving to a larger facility).

4.2 Additional Property Owner Requests

Since the October 2, 2018 project status meeting with WDNR, some additional properties were added to the SVI study scope. The following residences or commercial properties have not responded to several attempts to contact the owners for access:

Residential Properties

- 1236 Lombardi Way
- 1225 Lombardi Way
- 1223 Phoenix Drive

Commercial Property

• 1324 White Rock Avenue

Copies of the letters sent are provided in Attachment 2 (excluding copies of attached WDNR Fact Sheets) and additional notes are included in Tables 1 and 2. It was also discussed in Section 2.1 above that the two vacant property owners for which access was requested for vapor probe installation have not responded to two letter requests. Copies of these letters are also included in Attachment 2.

5.0 <u>Tabulate Soil, Vapor and Groundwater Data from Previous and Current Site Investigation</u> <u>Together</u>

This work has been ongoing and will be included in data tables with the next round of groundwater sampling data. The next groundwater sampling event is scheduled for March 2019.

6.0 Continue Immediate Actions as Necessary and Evaluate Additional Action

Navistar will continue to implement immediate actions in the form of SSDS installations at residences or commercial properties depending on the results of ongoing SVI sampling. Navistar is also contemplating the design and construction of a soil vapor extraction line along the southern border of the southwest parking lot area where the presence of elevated TCE concentrations have been documented in unsaturated zone soils allegedly associated with historical materials handling. The intent of the vapor extraction line would be to preclude potential VOC vapor migration from this area to the south and would be intended to be incorporated into the eventual overall site remedy to be developed as part of engineering evaluations upon completion of the site investigation. Any such proposed immediate action design will be provided to WDNR for review/approval prior to construction.

7.0 <u>Revised Project Schedule</u>

A revised project schedule based on the additional proposed site investigation work is provided on Figure 4.

To date, Navistar has agreed to all WDNR requests for additional site investigation work above that defined in the original agreed upon scope of investigation activities and/or proposed by Navistar based on the new data that was generated. In addition, Navistar has voluntarily agreed to continue with additional SVI work beyond that which has been requested by WDNR. KPRG and Navistar appreciate the ongoing cooperative effort with WDNR in completing the required site investigation work. If there are any questions, or if this letter does not capture the agreed upon additional scope of work at this time, please contact Ferdinand Alido of Navistar at 331-332-6364 or Richard Gnat of KPRG at 262-781-0475.

Sincerely, KPRG and Associates, Inc.

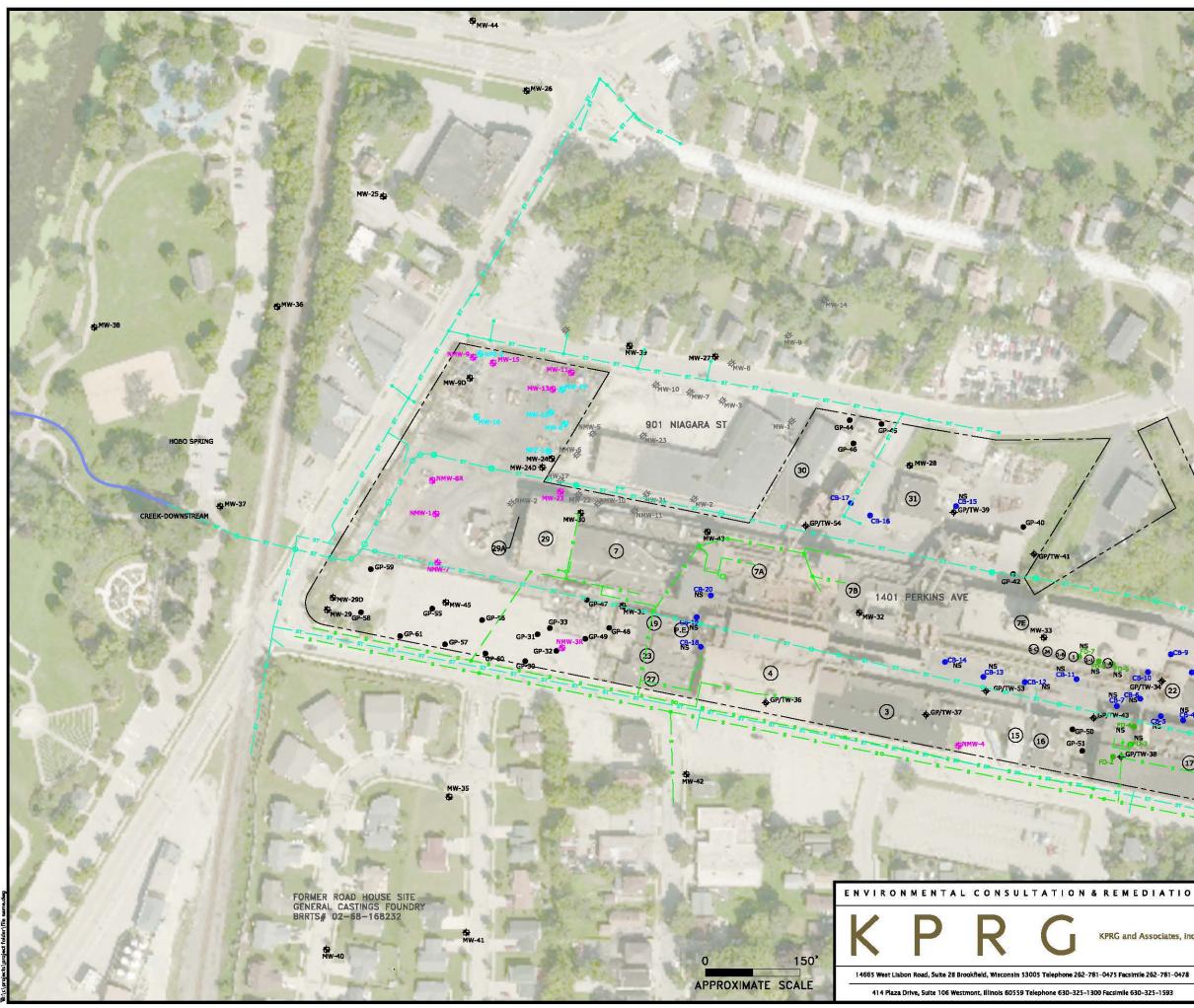
Richard R grat

Richard R. Gnat, P.G. Principal

Attachments

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

FIGURES

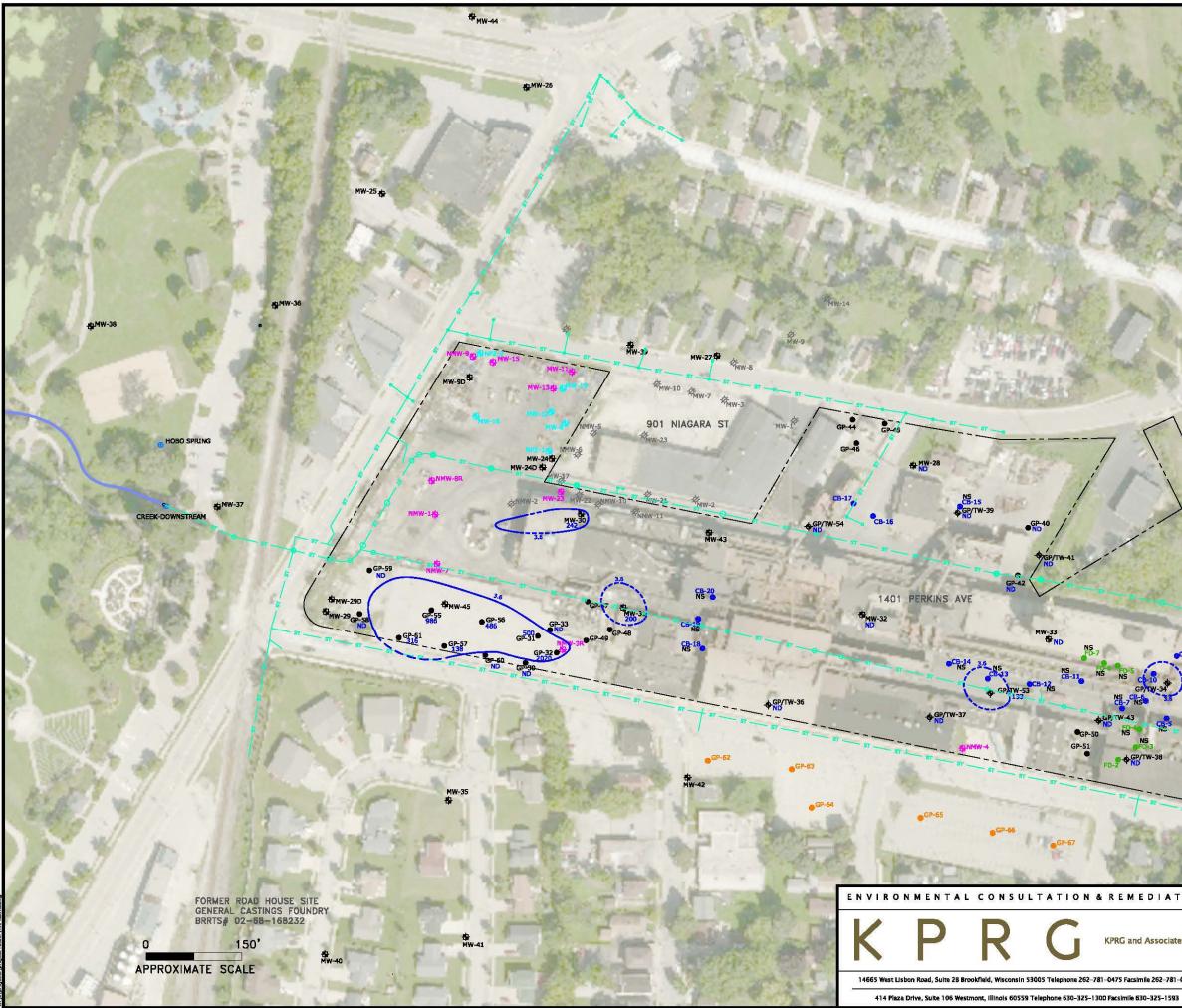


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KPRG Project No. 11717

FIGURE 1



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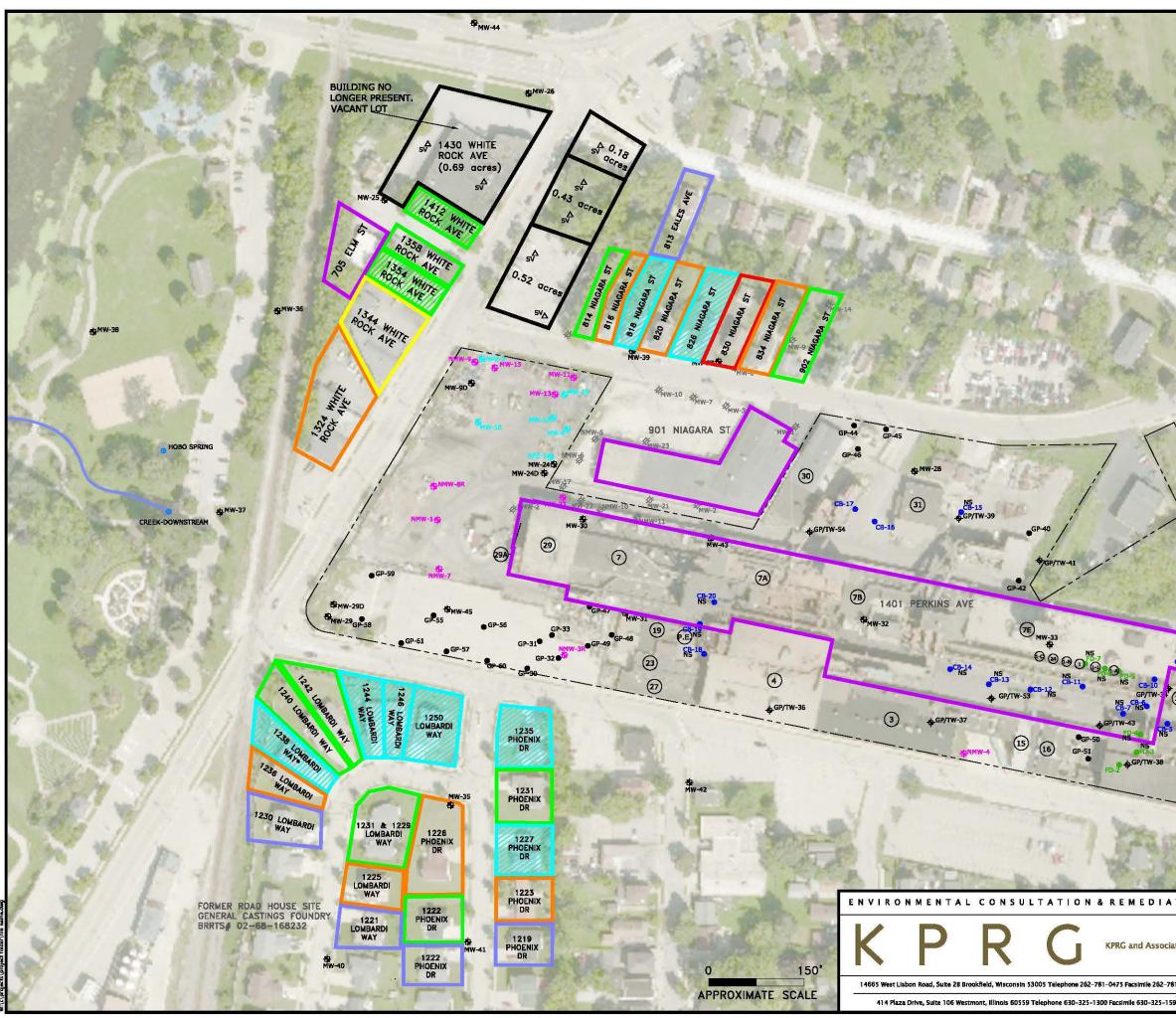
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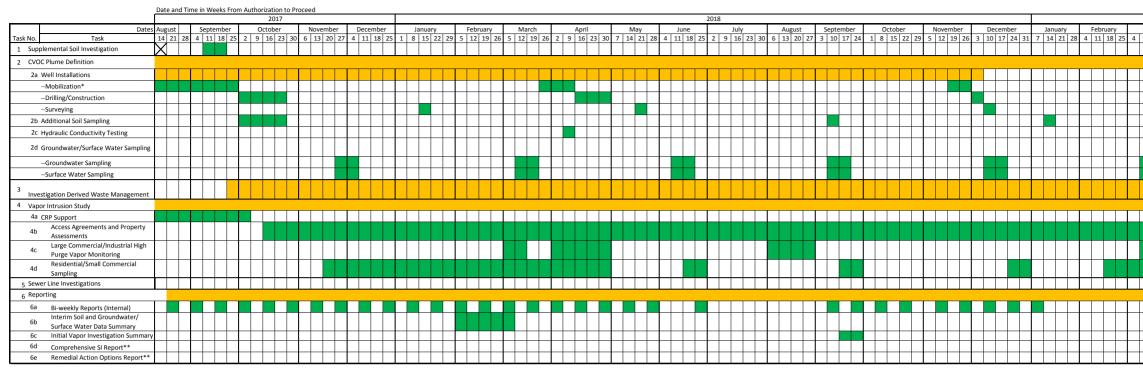
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25-1593	KPRG Project No. 11717	FIGURE 3

Figure 4. Modified Project Schedule Navistar - RMG Foundry Supplemental SI





Time required to execute entire task

Time required to execute individual tasks

Mobilization includes obtaining City of Waukesha permits for 6 off-site locations and subcontracting/scheduling
Timing of these deliverables is dependant on results of tasks 6b and 6c

- Project Kickoff Meeting

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TABLES

ADDRESS	OWNER	PHONE CONTACT	KNOCK ON DOOR	LETTER SENT	ACCESS SIGNED	Ambient Air Sampling	Sub-Slab Sampling	Indoor Air Exceedances	Sub-slab Vapor Exceedances	SSDS Installed	Follow-up PFET	WDNR Copied on Resident Data Transmittal(s)	Est. No. of Residents	
902 Niagara Street	Gerald and Debra Hughes (Owner renting to tenants)	Yes	No	10/17/2017	Yes	11/22/2017	1/3/2018 4/18/18 8/3/18 11/30/18	No	No	NA	NA	Yes	4	Very c
834 Niagara Street	Michael Miller	No	Yes	10/19/2017 11/22/2017	No	NA	NA	NA	NA	NA	NA	NA	U	Disable that he
830 Niagara Street	Luis Lopez	Yes	Yes	No. Meet at residence.	Denied	NA	NA	NA	NA	NA	NA	NA	2	Origina decide
826 Niagara Street	Paula Acosta, Nancy Mojica, Luis Colon	Yes	Yes	10/19/2017	Yes	11/22/2017	12/20/2017	Yes*	No	Yes** 12/29/2017	4/13/2018	Yes	1	Sold to
820 Niagara Street	Melody Pauer	No	Yes (3)	10/18/2017 11/22/2017 5/2/2018	No	NA	NA	NA	NA	NA	NA	NA	U	Twice
818 Niagara Street	Demitrio and Maximina Aquilera (Owner renting to tenants)	via e-mail	No	10/19/2017	Yes	11/22/2017	12/28/2017	Yes	Yes	Yes 2/8/2018	6/11/2018 9/21/18 12/5/18	Yes	3	Very co
816 Niagara Street	Robert Danielson	No	Yes (3)	10/19/2017 11/22/2017 5/2/2018	No	NA	NA	NA	NA	NA	NA	NA	U	No ans
814 Niagara Street	Jack Herrmann	Yes	Yes (3)	10/19/2017 11/22/2017 5/2/2018	Yes	9/5/2018	9/6/2018 sch 3/19	Yes (diff than SS)	Yes (diff than IA)	NA	NA	NA	3	No ans send ir extend messag provide
1412 White Rock Avenue	Simon and Paula Monreal	Yes	No	10/18/2017 10/27/2018	Yes	11/12/2018	11/13/2018	Yes	Yes	Contacting for sched to install	NA	Yes	2	Initial d sent. F particip Street : signed 2/12/19
1358 White Rock Avenue	Gary Burant	Yes	Yes	10/19/2017	Yes	11/22/2017	1/4/2018 4/10/18 8/3/18 12/6/18	Yes*	No	No	NA	Yes	2	Very co
1354 White Rock Avenue	Tony Pawlick (Owner renting to tenants)	Yes	No	Yes (e-mail) 10/18/17, 11/22/17 8/2/2018 11/30/18	Yes	NA	NA	NA	NA	NA	NA	NA	U	Was or resider 8/2/18. mail 12
1244 Lombardi Way	Clarence Caproon	Yes	Yes	1/18/2018	Yes	2/9/2018	2/15/2018	Yes	Yes	Yes 4/13/2018	7/31/2018 1/25/19	Yes	3	Very co schedu resche
1246 Lombardi Way	Tracey Shimek	Yes	Yes	No. Meet at residence.	Yes	11/22/2017	12/21/2018	Yes	Yes	Yes 1/11/2018	4/12/2018 7/24/18 12/5/18	Yes	3	Very co
1250 Lombardi Way	Jason and Amy Lemm	Yes	Yes	10/19/2017 11/22/2017	Yes	1/27/2018	2/2/2018	Yes	Yes	Yes 4/4/2018	7/24/2018 12/5/18	Yes	4	Very co
1235 Phoenix Drive	Paul and Elizabeth Hernandez	Yes	Yes	10/18/2017	Yes	11/22/2017	12/28/17 4/10/18 9/14/18	Yes	Yes - Round 3 TCE	Yes 11/13/2018	NA	Yes	4	Very co and 8/2
1242 Lombardi Way	J. Guadelupe and Maria Sida	Yes	Yes 5-15-18 7-24-18 7-26-18	4/18/2018 6/5/18	Yes	1/21/2019	1/22/2019	Yes	No	NA	NA	Yes	4	Maria o Tried tw and ge week o 11/28/1 Back ir signed

Notes

cooperative. Gerald works at the foundry.

bled veteran transferred to VA hospital. Was told by neighbors (Hughes and Lopez) he is probably not returning at this point. House may be going for sale.

inall signed agreement but after discussion with his partner, called me and said they ded against approval. I went to meet with him again but he signed denial.

to Habitat for Humanity July 2018. Working on new access agreement.

ce spoke w/ daughter at door. Left card. No return call.

cooperative. Working through niece (Maria Diaz).

nswer each time. Looks empty.

answer each time. Car in drive twice. J R Hermann called and said he will sign and d in mail 7/30/18. Called to sched 8/8, 8/16 and 8/23/18 a got voice mail about nded trip. 8/29/18 - JR returned call. Set schedule for sampling. Left voice sages 1/9/19, 1/16/19 for sampling scheduling. Talked 2/12/19. Won't be able to ide us access until mid-March. Am to call back in March to schedule.

al discussion 10/17/17 was positive and Paula asked for more information. Letter t. Follow-up call on 11/15/17, Paula informed that they are not interested in icipating and requested no further contact. Was informed during 8/3/18 705 Elm tet sampling that this property may have been sold to City of Waukesha. Access ed after WDNR letter sent. Left messges for system install 12/19/18, 1/8/19, 2/19.

cooperative and responsive to requests and scheduling.

s originally responsive and provicded e-mail. Said he would sign after telling dents. After initial discussions he has not responded. Sent another follow-up e-mail 18. Access signed after WDNR letter sent. Not calling back to coord sampling. E-12/20/18. Left another message 2/12/19.

v cooperative and responsive to requests and scheduling. Had follow-up FET eduled for end of November then moved to 12/5/18. Called and cancelled. Asked to hedule after holidays. Left message 1/8/19.

cooperative and responsive to requests and scheduling.

cooperative and responsive to requests and scheduling.

r cooperative and responsive to requests and scheduling. Left messages 8/3, 8/16 8/23/18 for 3rd round scheduling. Called back 8/29/18 and scheduled sampling.

ia does not speak English. Daughter translated. Said husband will call me. Left card. d two more visits. No answer. Met with Mr. Sida 8/5/18. Said he would think about it get back to me. Did not provide phone. Have an interpreter lined up for next visit. k of 9/17/18. Older daughter (Mariana) called 11/26/18. Left message w/ Mairiana 28/18, 11/29/18, 11/30/18. 12/13/18 mariana calls back. Family leaving for holidays. k in January. Set up meeting at 5:00 pm 1/10/19 w/ interpreture. Met on 1/10/19 and ed access agreement. Set schedule for sampling.

_	_					_						_	-	-
1240 Lombardi Way	Kierrin Viall	Yes	Yes 5-15-18 7-24-18 7-26-18	4/18/2018 6/5/2018	Yes	8/27/2018	8/28/2018 11/27/18	Yes	No	NA	NA	Yes	3	No ans call. Ca Will sig
1238 Lombardi Way	Stanley and Pamela Dolata	Yes	No	11/7/2018	Yes	NA (see notes)	1/2/2019	NA	Yes	Already existing system.	Sch 2/28/19	NA	2	Pam ca system to WDI be requ 12/20/ Recom going co round o additio
1236 Lombardi Way	Federico and Arlene Gerasmo	No	No	11/7/2018 2/1/2019	No	NA	NA	NA	NA	NA	NA	NA	U	No res
1231/1229 Lombardi Way	Martin Larson (Duplex shared w/ Mother)	Yes	Yes 5-15-18	4/18/2018	Yes	6/12/2018	6/13/2018 9/27/18 sch 12/27/18	Yes	No	NA	NA	Yes	2	Letter i lives in
1225 Lombardi way	Benjamin and Jacalyn Friske	No	No	11/7/2018 2/1/2019	No	NA	NA	NA	NA	NA	NA	NA	U	No res
1226 Phoenix Drive	Hilda Santiago Lazu (Owner renting to tenants)	No	No	4/18/2018 6/5/2018	No	NA	NA	NA	NA	NA	NA	NA	U	Did not
1231 Phoenix Drive	Raul Melendez	Yes	Yes 5-15-18	4/18/2018	Yes	11/27/2018	11/28/2018	Yes	No	NA	NA	Yes	4	Answei against refusal Sampli
1227 Phoenix Drive	John A. Melendez	Yes	Yes 5-15-18	4/18/2018 10/23/2018	Yes	11/19/2018	11/20/2018	Yes	Yes	1/16/2019	Sch 4/19	Yes	2	Brothe him for refusal severa messag
1222 Phoenix Drive	Matthew and Jennifer Heiden	Yes	No	12/3/2018	Yes	1/3/2019 2/6/19	1/4/2019 2/7/19	Yes (see notes)	Yes (see notes)	NA	NA	Yes	4	Receiv 12/16/1 me to c 12/20/1 resamp
1223 Phoenix Drive	Senthil Vijayakumar and Kiran Makhija	No	No	12/3/2018 2/1/2019	No	NA	NA	NA	NA	NA	NA	NA	U	No res
3 Vacant Parcels - White Rock Avenue	Hansen Brothers, LLC	No	NA - Vacant	12/20/2018 2/1/2019	NA	NA - Vacant	NA	NA-Vacant	NA	NA-Vacant	NA-Vacant	NA	NA-Vacant	No res
1 Vacant Parcel - White Rock Avenue	Maria Sigala - One vacant parcel	No	NA - Vacant	12/20/2018 2/1/2019	NA	NA - Vacant	NA	NA-Vacant	NA	NA-Vacant	NA-Vacant	NA	NA-Vacant	No res

NA - Not Applicable. No access yet or denied or not required at this time.

* - Slight naphthalene indoor, no exceedances sub-slab.

- **- Installed at request of resident.
- SSDS Sub-slab Depressurization System
 - U Unknown

PFET - Pressure Field Extension Testing

DNYA - Data not yet available

answer. Garage open w/ car. Met boyfriend on 7-26-18. Provided phone number to Called 8/2/18 3:35 pm and 5:05 pm. Left detailed message. Got return call 8/11/18. sign and return.

n called 11-12-18 1500 hrs. Just moved into house in June 2018 and had a radon tem installed prior to move in. Is that sufficient? Got her informastion and submitted VDNR 11/15/18. Response e-mail on 11-28-18 indicates sub-slab sampling will still equired to determine need, if any, for continuing obligations. Met with residents 20/18 to discuss and obtained signed agreement. Testing showed TCE. somended PFET. Talked with resident 2-1-19 about PFET testing. Said they are ng on vacation and will get back to me within a couple weeks. 2-13-19 agreed to one nd of PFET after which point they are finishing basement and don't want any itional holes. Working on schedule.

esponse to date.

er response. Called upon receipt of contact information. Very cooperative. Mother s in one half of duplex and him in other. Sampling and probe install scheduled.

response to date.

not knock. Renters. Have no active phone for contact. No response to two letters.

wered. Signed on 5/15/18. Called on 5/16/18 at 1630 hours and said he decided inst this based on discussions with his wife. Will fill out Access Agreement with sal signed and mail to me. Signed access received 11-16-18 after WDNR letter sent. npling scheduled

ther of Raul. There was no answer at door but cars in drive and garage. Raul called for me. His brother said he is not interested and would not sign anything including sal of agreement. Access signed after WDNR letter sent. Talked 12/19/18 (after eral attempts) regarding install schedule. He asked for after first of the year. Left sage 1/8/19. Returned call. Scheduled for install.

eived signed access 12/12/18. Called 12/12/18, left message. Received e-mail 6/18 asking for date and time for sampling. Returned -email 12/17/18 asking to call to discuss scheduling needs. Also left voice mails 12/17/18 and 12/19/18. E-mail 20/18. Initial sampling showed TCE above VAL in outdoor air as well as indoor. Set to ample indoor/outdoor air 2/6/19. Data not yet available.

esponse to date.

response to date.

esponse to date.

Table 2. SVI Study Commercial Access/Sampling Status 2-13-19

ADDRESS	OWNER	PHONE CONTACT	MEETING	LETTER SENT	ACCESS SIGNED	Sub-Slab Sampling	Exceedances	Data Provided to WDNR
1401 Perkins Avenue	Navistar (Owner) RMG (Operator)	Yes	Yes	No. Meet at facility.	Yes	High Purge 3/18 and 8/18	None*	Yes
901 Niagara Street	IPT, Lee Krmpotich	Yes	Yes	No. Meet at facility.	Yes	High Purge 8/18	None	Yes
1344 White Rock Avenue	Mackie Commercial Properties, LLC	Left Messages 1/26/2018, 2/5/2018	Yes 10/30/18	2/5/2018 4/2/2018	Yes	sch 2-19 or 3-19	NA	NA
1324 White Rock Avenue	Whiterock Building, LLC	Yes	Yes 10/30/18	11/7/2018 12/3/2018	No	NA	NA	NA
705 Elm Street	Theresa Otto	Yes	Yes 2/26/2018	2/12/2018	Yes	Vapor Pins 4/10/2018 8/3/18 11/30/18	None	Yes

NA- Not Applicable. No access yet or denied.

* - Above WDNR default VRSL but below site specific VRSL.

<u>ATTACHMENT 1</u> WDNR Letter Dated January 29, 2019

State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 2300 N. Dr. Martin Luther King, Jr. Drive Milwaukee WI 53212-3128

Tony Evers, Governor Preston D. Cole, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



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 KRPG 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.



Navistar International Corp./RMG Foundry BRRTS# 02-68-098404

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.

<u>Please provide a written response within 10 days identifying whether Navistar will continue with the above investigations.</u> 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

 KPRG, Rich Gnat, 14665 W. Lisbon Rd., Suite 1A, Brookfield, WI 53005 Renaissance Manufacturing Group, 1401 Perkins Ave., Waukesha, WI 53186 SER File <u>ATTACHMENT 2</u> Copies of Access Request Submittals with No Response

KPRG

KPRG and Associates, Inc.

November 11, 2018

Federico and Arlene Gerasmo 1236 Lombardi Way Waukesha, WI 53186

SUBJECT: Request for access to your property (1236 Lombardi Way) for vapor sampling

Dear Federico and Arlene,

KPRG and Associates, Inc. (KPRG) is an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you. The work is being performed voluntarily under the direction and oversight of the Wisconsin Department of Natural Resources (WDNR). As part of the ongoing study, KPRG is requesting permission to test your property located at 1236 Lombardi Way for potential vapor intrusion. Vapor intrusion is the movement of chemical vapors through the soil or groundwater and potentially into the indoor air similar to the way that naturally occurring radon gas can move into a structure.

KPRG would like to discuss with you potential access to your property to collect an air sample from the soil beneath your foundation and from within the basement of your home to determine whether vapors from chemicals formerly used at the foundry or other nearby industrial operations may be present in your home and, if so, at what levels. This is part of the WDNR required investigation and all work and testing will be at no cost to you. A copy of the results will also be provided to you.

In order to complete this investigation, we will need your permission to access your property. Attached is an Access Agreement for this work. Please review the document and if acceptable, please sign and return the signed agreement to me in the enclosed self addressed stamped envelope. I will then contact you to discuss and schedule the work. Alternatively, if you do not agree to provide access, please note so on the agreement, sign and return to me in the self addressed stamped envelope. Also please feel free to fax the completed form to me at 262-781-0478 or e-mail a scanned copy to me at <u>richardg@kprginc.com</u>.

Thank you for taking the time to consider this issue and request. If you have any questions, or would like to set up a meeting to discuss this request, please call me at 262-781-0475. You can also contact the WDNR Project Manager, Mark Drews, with any questions at 262-574-2146.

Sincerely, KPRG and Associates, Inc. Richard R Smot

Richard R. Gnat, P.G. Principal

Enclosures: Property Access Request Agreement Form Self Addressed Stamped Envelope WDNR Fact Sheets

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

K P R G

KPRG and Associates, Inc.

PROPERTY ACCESS REQUEST

KPRG and Associates, Inc. ("KPRG") is requesting permission from Federico and Arlene Gerasmo ("Owner") to access your property located at 1236 Lombardi Way, Waukesha, WI ("Subject Property") for the purposes of completing a vapor intrusion study being requested by the Wisconsin Department of Natural Resources ("WDNR") as part of environmental site work being performed at the Renaissance Manufacturing Group foundry associated with former operations. The scope of the work will include:

- The installation of one sub-slab vapor sampling port (approximately 1.5 inches in diameter) within the basement floor. The port will be completed with a cover plate flush with the floor surface. The work area will be thoroughly cleaned after installation of the sample port.
- The collection of up to four rounds of sub-slab vapor samples over the course of one year using the installed sampling port. The vapor samples will be analyzed for volatile organic compounds (VOCs).
- The collection of up to four indoor ambient air samples over the course of one year within the basement. The ambient air samples will be analyzed for VOCs.
- If necessary, based on the results of the vapor intrusion study, the installation of a sub-slab depressurization system (i.e., same as radon venting system) and up to four property visits to verify the proper operation of the system.

Upon completion of vapor intrusion study work, the vapor sampling ports will be removed from the basement floor and sealed.

There will be no cost to the owner or tenant for this work.

1. <u>Limited Right of Access</u> - Owner hereby grants to KPRG a Limited Right of Access to enter the Subject Property periodically to conduct the activities described above. This Limited Right of Access shall commence on the effective date of this Agreement.

2. <u>Liens</u> – KPRG will not permit any mechanics', material men's or other similar liens or claims to stand against the Subject Property for labor or material furnished in connection with any work performed by KPRG under this Agreement.

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¹⁴⁶⁶⁵ West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

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6. <u>Notification</u> - KPRG will notify Owner (via email, telephone or mail) in advance of entry onto Subject Property.

Yes. ______ is providing KPRG with permission to access the Subject Property for the above stated purposes.

No. ______ is denying access to the Subject Property.

Owner's Signature

Owner's e-mail and Phone

Date

Site contact information (if different from above):

Tenant/Lessee (Please print)

Tenant's/Lessee's e-mail

Date

KPRG

KPRG and Associates, Inc.

February 1, 2019

Federico and Arlene Gerasmo 1236 Lombardi Way Waukesha, WI 53186

SUBJECT: Request for access to your property (1236 Lombardi Way) for vapor sampling

Dear Federico and Arlene,

A letter was sent to your attention on November 7, 2018 requesting access to your property at 1236 Lombardi Way for vapor sampling. The purpose of this letter is to remind you that KPRG and Associates, Inc. (KPRG), an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you, needs to sample your property at 1236 Lombardi Way. The work is being performed voluntarily under the direction and oversight of the Wisconsin Department of Natural Resources (WDNR). As part of the ongoing study, KPRG is requesting permission to test your property located at 1236 Lombardi Way for potential vapor intrusion. Vapor intrusion is the movement of chemical vapors through the soil or groundwater and potentially into the indoor air similar to the way that naturally occurring radon gas can move into a structure.

KPRG would like to discuss with you potential access to your property to collect an air sample from the soil beneath your foundation and from within the basement of your home to determine whether vapors from chemicals formerly used at the foundry or other nearby industrial operations may be present in your home and, if so, at what levels. This is part of the WDNR required investigation and all work and testing will be at no cost to you. A copy of the results will also be provided to you.

In order to complete this investigation, we will need your permission to access your property. Attached is an Access Agreement for this work. Please review the document and if acceptable, please sign and return the signed agreement to me in the enclosed self addressed stamped envelope. I will then contact you to discuss and schedule the work. Alternatively, if you do not agree to provide access, please note so on the agreement, sign and return to me in the self addressed stamped envelope. Also please feel free to fax the completed form to me at 262-781-0478 or e-mail a scanned copy to me at richardg@kprginc.com.

Thank you for taking the time to consider this issue and request. If you have any questions, or would like to set up a meeting to discuss this request, please call me at 262-781-0475. You can also contact the WDNR Project Manager, Mark Drews, with any questions at 262-574-2146.

Sincerely, KPRG and Associates, Inc.

Richard R Smat

Richard R. Gnat, P.G. Principal

Enclosures: Property Access Request Agreement Form Self Addressed Stamped Envelope WDNR Fact Sheets

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

K P R G

KPRG and Associates, Inc.

PROPERTY ACCESS REQUEST

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Yes. ______ is providing KPRG with permission to access the Subject Property for the above stated purposes.

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Owner's Signature

Owner's e-mail and Phone

Date

Site contact information (if different from above):

Tenant/Lessee (Please print)

Tenant's/Lessee's e-mail

Date

KPRG

KPRG and Associates, Inc.

November 11, 2018

Benjamin and Jacalyn Friske 1225 Lombardi Way Waukesha, WI 53186

SUBJECT: Request for access to your property (1225 Lombardi Way) for vapor sampling

Dear Benjamin and Jacalyn,

KPRG and Associates, Inc. (KPRG) is an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you. The work is being performed voluntarily under the direction and oversight of the Wisconsin Department of Natural Resources (WDNR). As part of the ongoing study, KPRG is requesting permission to test your property located at 1225 Lombardi Way for potential vapor intrusion. Vapor intrusion is the movement of chemical vapors through the soil or groundwater and potentially into the indoor air similar to the way that naturally occurring radon gas can move into a structure.

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Richard R. Gnat, P.G. Principal

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Tenant's/Lessee's e-mail

Date

KPRG

KPRG and Associates, Inc.

February 1, 2019

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Sincerely, KPRG and Associates, Inc.

Richard R Smat

Richard R. Gnat, P.G. Principal

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14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

K P R G

KPRG and Associates, Inc.

PROPERTY ACCESS REQUEST

KPRG and Associates, Inc. ("KPRG") is requesting permission from Benjamin and Jacalyn Friske ("Owner") to access your property located at 1225 Lombardi Way, Waukesha, WI ("Subject Property") for the purposes of completing a vapor intrusion study being requested by the Wisconsin Department of Natural Resources ("WDNR") as part of environmental site work being performed at the Renaissance Manufacturing Group foundry associated with former operations. The scope of the work will include:

- The installation of one sub-slab vapor sampling port (approximately 1.5 inches in diameter) within the basement floor. The port will be completed with a cover plate flush with the floor surface. The work area will be thoroughly cleaned after installation of the sample port.
- The collection of up to four rounds of sub-slab vapor samples over the course of one year using the installed sampling port. The vapor samples will be analyzed for volatile organic compounds (VOCs).
- The collection of up to four indoor ambient air samples over the course of one year within the basement. The ambient air samples will be analyzed for VOCs.
- If necessary, based on the results of the vapor intrusion study, the installation of a sub-slab depressurization system (i.e., same as radon venting system) and up to four property visits to verify the proper operation of the system.

Upon completion of vapor intrusion study work, the vapor sampling ports will be removed from the basement floor and sealed.

There will be no cost to the owner or tenant for this work.

1. <u>Limited Right of Access</u> - Owner hereby grants to KPRG a Limited Right of Access to enter the Subject Property periodically to conduct the activities described above. This Limited Right of Access shall commence on the effective date of this Agreement.

2. <u>Liens</u> – KPRG will not permit any mechanics', material men's or other similar liens or claims to stand against the Subject Property for labor or material furnished in connection with any work performed by KPRG under this Agreement.

3. <u>Termination</u> - Owner shall have the right, with or without notice, to rescind its approval with respect to any entry in the event KPRG, its employees or contractors entering upon the Subject Property fails to comply with any term, condition or covenant of this Agreement.

¹⁴⁶⁶⁵ West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

4. <u>Insurance</u> - KPRG will maintain insurance coverage for General Liability, Professional Liability, Automobile Liability, Bodily Injury, Property Damage, and Worker's Compensation.

5. <u>Sample Results</u> - KPRG will provide sample results to Owner within 10 business days of receipt as required. Owner acknowledges that KPRG will use and share, including with WDNR, the results for purposes reasonably related to the vapor intrusion study.

6. <u>Notification</u> - KPRG will notify Owner (via email, telephone or mail) in advance of entry onto Subject Property.

Yes. ______ is providing KPRG with permission to access the Subject Property for the above stated purposes.

No. ______ is denying access to the Subject Property.

Owner's Signature

Owner's e-mail and Phone

Date

Site contact information (if different from above):

Tenant/Lessee (Please print)

Tenant's/Lessee's e-mail

Date

KPRG

KPRG and Associates, Inc.

December 5, 2018

Senthil Vijayakumar and Kiran Makhija 1223 Phoenix Drive Waukesha, WI 53186

SUBJECT: Request for access to your property (1223 Phoenix Drive) for vapor sampling

Dear Residents,

KPRG and Associates, Inc. (KPRG) is an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you. The work is being performed voluntarily under the direction and oversight of the Wisconsin Department of Natural Resources (WDNR). As part of the ongoing study, KPRG is requesting permission to test your property located at 1223 Phoenix Drive for potential vapor intrusion. Vapor intrusion is the movement of chemical vapors through the soil or groundwater and potentially into the indoor air similar to the way that naturally occurring radon gas can move into a structure.

KPRG would like to discuss with you potential access to your property to collect an air sample from the soil beneath your foundation and from within the basement of your home to determine whether vapors from chemicals formerly used at the foundry or other nearby industrial operations may be present in your home and, if so, at what levels. This is part of the WDNR required investigation and all work and testing will be at no cost to you. A copy of the results will also be provided to you.

In order to complete this investigation, we will need your permission to access your property. Attached is an Access Agreement for this work. Please review the document and if acceptable, please sign and return the signed agreement to me in the enclosed self addressed stamped envelope. I will then contact you to discuss and schedule the work. Alternatively, if you do not agree to provide access, please note so on the agreement, sign and return to me in the self addressed stamped envelope. Also please feel free to fax the completed form to me at 262-781-0478 or e-mail a scanned copy to me at <u>richardg@kprginc.com</u>.

Thank you for taking the time to consider this issue and request. If you have any questions, or would like to set up a meeting to discuss this request, please call me at 262-781-0475. You can also contact the WDNR Project Manager, Mark Drews, with any questions at 262-574-2146.

Sincerely, KPRG and Associates, Inc. Richard R Inct

Richard R. Gnat, P.G. Principal

Enclosures: Property Access Request Agreement Form Self Addressed Stamped Envelope WDNR Fact Sheets

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

KPRG

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

PROPERTY ACCESS REQUEST

KPRG and Associates, Inc. ("KPRG") is requesting permission from Senthil Vijayakumar and Kiran Makhija ("Owner") to access your property located at 1223 Phoenix Drive, Waukesha, WI ("Subject Property") for the purposes of completing a vapor intrusion study being requested by the Wisconsin Department of Natural Resources ("WDNR") as part of environmental site work being performed at the Renaissance Manufacturing Group foundry associated with former operations. The scope of the work will include:

- The installation of one sub-slab vapor sampling port (approximately 1.5 inches in diameter) within the basement floor. The port will be completed with a cover plate flush with the floor surface. The work area will be thoroughly cleaned after installation of the sample port.
- The collection of up to four rounds of sub-slab vapor samples over the course of one year using the installed sampling port. The vapor samples will be analyzed for volatile organic compounds (VOCs).
- The collection of up to four indoor ambient air samples over the course of one year within the basement. The ambient air samples will be analyzed for VOCs.
- If necessary, based on the results of the vapor intrusion study, the installation of a sub-slab depressurization system (i.e., same as radon venting system) and up to four property visits to verify the proper operation of the system.

Upon completion of vapor intrusion study work, the vapor sampling ports will be removed from the basement floor and sealed.

There will be no cost to the owner or tenant for this work.

1. <u>Limited Right of Access</u> - Owner hereby grants to KPRG a Limited Right of Access to enter the Subject Property periodically to conduct the activities described above. This Limited Right of Access shall commence on the effective date of this Agreement.

2. <u>Liens</u> – KPRG will not permit any mechanics', material men's or other similar liens or claims to stand against the Subject Property for labor or material furnished in connection with any work performed by KPRG under this Agreement.

3. <u>Termination</u> - Owner shall have the right, with or without notice, to rescind its approval with respect to any entry in the event KPRG, its employees or contractors entering upon the Subject Property fails to comply with any term, condition or covenant of this Agreement.

¹⁴⁶⁶⁵ West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

5. <u>Sample Results</u> - KPRG will provide sample results to Owner within 10 business days of receipt as required. Owner acknowledges that KPRG will use and share, including with WDNR, the results for purposes reasonably related to the vapor intrusion study.

6. <u>Notification</u> - KPRG will notify Owner (via email, telephone or mail) in advance of entry onto Subject Property.

Yes. _______ is providing KPRG with permission to access the Subject Property for the above stated purposes.

No. ______ is denying access to the Subject Property.

Owner's Signature

Owner's e-mail and Phone

Date

Site contact information (if different from above):

Tenant/Lessee (Please print) Tenant's/Lessee's e-mail

KPRG and Associates, Inc.

February 1, 2019

Senthil Vijayakumar and Kiran Makhija 1223 Phoenix Drive Waukesha, WI 53186

SUBJECT: Request for access to your property (1223 Phoenix Drive) for vapor sampling

Dear Residents,

A letter was sent to your attention on December 5, 2018 requesting access to your property at 1223 Phoenix Drive for vapor sampling. The purpose of this letter is to remind you that KPRG and Associates, Inc. (KPRG), an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you, needs to sample your property at 1223 Phoenix Drive for potential soil vapor intrusion. KPRG is an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you, needs to sample your property at 1223 Phoenix Drive for potential environmental impacts associated with historical operations at the RMG foundry near you. The work is being performed voluntarily under the direction and oversight of the Wisconsin Department of Natural Resources (WDNR). As part of the ongoing study, KPRG is requesting permission to test your property located at 1223 Phoenix Drive for potential vapor intrusion. Vapor intrusion is the movement of chemical vapors through the soil or groundwater and potentially into the indoor air similar to the way that naturally occurring radon gas can move into a structure.

KPRG would like to discuss with you potential access to your property to collect an air sample from the soil beneath your foundation and from within the basement of your home to determine whether vapors from chemicals formerly used at the foundry or other nearby industrial operations may be present in your home and, if so, at what levels. This is part of the WDNR required investigation and all work and testing will be at no cost to you. A copy of the results will also be provided to you.

In order to complete this investigation, we will need your permission to access your property. Attached is an Access Agreement for this work. Please review the document and if acceptable, please sign and return the signed agreement to me in the enclosed self addressed stamped envelope. I will then contact you to discuss and schedule the work. Alternatively, if you do not agree to provide access, please note so on the agreement, sign and return to me in the self addressed stamped envelope. Also please feel free to fax the completed form to me at 262-781-0478 or e-mail a scanned copy to me at richardg@kprginc.com.

Thank you for taking the time to consider this issue and request. If you have any questions, or would like to set up a meeting to discuss this request, please call me at 262-781-0475. You can also contact the WDNR Project Manager, Mark Drews, with any questions at 262-574-2146.

Sincerely, KPRG and Associates, Inc. Kichard R Inst

Richard R. Gnat, P.G. Principal

Enclosures: Property Access Request Agreement Form Self Addressed Stamped Envelope WDNR Fact Sheets

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

PROPERTY ACCESS REQUEST

KPRG and Associates, Inc. ("KPRG") is requesting permission from Senthil Vijayakumar and Kiran Makhija ("Owner") to access your property located at 1223 Phoenix Drive, Waukesha, WI ("Subject Property") for the purposes of completing a vapor intrusion study being requested by the Wisconsin Department of Natural Resources ("WDNR") as part of environmental site work being performed at the Renaissance Manufacturing Group foundry associated with former operations. The scope of the work will include:

- The installation of one sub-slab vapor sampling port (approximately 1.5 inches in diameter) within the basement floor. The port will be completed with a cover plate flush with the floor surface. The work area will be thoroughly cleaned after installation of the sample port.
- The collection of up to four rounds of sub-slab vapor samples over the course of one year using the installed sampling port. The vapor samples will be analyzed for volatile organic compounds (VOCs).
- The collection of up to four indoor ambient air samples over the course of one year within the basement. The ambient air samples will be analyzed for VOCs.
- If necessary, based on the results of the vapor intrusion study, the installation of a sub-slab depressurization system (i.e., same as radon venting system) and up to four property visits to verify the proper operation of the system.

Upon completion of vapor intrusion study work, the vapor sampling ports will be removed from the basement floor and sealed.

There will be no cost to the owner or tenant for this work.

1. <u>Limited Right of Access</u> - Owner hereby grants to KPRG a Limited Right of Access to enter the Subject Property periodically to conduct the activities described above. This Limited Right of Access shall commence on the effective date of this Agreement.

2. <u>Liens</u> – KPRG will not permit any mechanics', material men's or other similar liens or claims to stand against the Subject Property for labor or material furnished in connection with any work performed by KPRG under this Agreement.

3. <u>Termination</u> - Owner shall have the right, with or without notice, to rescind its approval with respect to any entry in the event KPRG, its employees or contractors entering upon the Subject Property fails to comply with any term, condition or covenant of this Agreement.

¹⁴⁶⁶⁵ West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

5. <u>Sample Results</u> - KPRG will provide sample results to Owner within 10 business days of receipt as required. Owner acknowledges that KPRG will use and share, including with WDNR, the results for purposes reasonably related to the vapor intrusion study.

6. <u>Notification</u> - KPRG will notify Owner (via email, telephone or mail) in advance of entry onto Subject Property.

Yes. _______ is providing KPRG with permission to access the Subject Property for the above stated purposes.

No. ______ is denying access to the Subject Property.

Owner's Signature

Owner's e-mail and Phone

Date

Site contact information (if different from above):

Tenant/Lessee (Please print) Tenant's/Lessee's e-mail

KPRG and Associates, Inc.

November 11, 2018

Mr. Thomas Higbee Whiterock Building, LLC Amport Auto Service 1324 White Rock Avenue Waukesha, WI 53189

SUBJECT: Request for access to your commercial property (1324 White Rock Ave.) for vapor sampling

Dear Mr. Higbee,

It was a pleasure meeting with you last week. KPRG and Associates, Inc. (KPRG) is an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you. The work is being performed voluntarily under the direction and oversight of the Wisconsin Department of Natural Resources (WDNR). As part of the ongoing study, KPRG is requesting permission to test your commercial property located at 1324 White Rock Avenue for potential vapor intrusion. Vapor intrusion is the movement of chemical vapors through the soil or groundwater and potentially into the indoor air similar to the way that naturally occurring radon gas can move into a structure.

KPRG would like to discuss with you potential access to your property to collect an air sample from the soil beneath your foundation to determine whether vapors from chemicals formerly used at the foundry or other nearby industrial operations may be present in your facility and, if so, at what levels. This is part of the WDNR required investigation and all work and testing will be at no cost to you. A copy of the results will also be provided to you.

In order to complete this investigation, we will need your permission to access your property. Attached is an Access Agreement for this work. Please review the document and if acceptable, please sign and return the signed agreement to me in the enclosed self-addressed stamped envelope or call me to set up a meeting to discuss this request. Alternatively, if you do not agree to provide access, please note so on the agreement, sign and return to me in the self-addressed stamped envelope. Also please feel free to fax the completed form to me at 262-781-0478 or email a scanned copy to me at richardg@kprginc.com.

Thank you for taking the time to consider this issue and request. If you have any questions, or would like to set up a meeting to discuss this request, please call me at 262-781-0475. You can also contact the WDNR Project Manager, Mark Drews, with any questions at 262-574-2146.

¹⁴⁶⁶⁵ West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

Sincerely, KPRG and Associates, Inc.

Richard R grat

Richard R. Gnat, P.G. Principal

Enclosures: Property Access Request Agreement Form Self Addressed Stamped Envelope (not included with this e-mail) WDNR Fact Sheets

K P R G

KPRG and Associates, Inc.

PROPERTY ACCESS REQUEST

KPRG and Associates, Inc. ("KPRG") is requesting permission from Whiterock Building, LLC ("Owner") to access your commercial property located at 1324 White Rock Avenue, Waukesha, WI ("Subject Property") for the purposes of completing a vapor intrusion study being requested by the Wisconsin Department of Natural Resources ("WDNR") as part of environmental site work being performed at the Renaissance Manufacturing Group foundry associated with former operations. The scope of the work will include:

- The installation of sub-slab vapor sampling ports (approximately 1.5 inches in diameter) within the foundation floor (the number and location of probes will depend on facility layout and will be determined in the field with the approval of Owner). The ports will be completed with a cover plate flush with the floor surface, if possible. The work area will be thoroughly cleaned after installation of the sample port. Alternately install several high-purge points for a single sampling round per our previous discussions.
- The collection of up to four rounds of sub-slab vapor samples over the course of one year using the installed sampling port. The vapor samples will be analyzed for chlorinated volatile organic compounds (CVOCs).
- If necessary, based on the results of the vapor intrusion study, the installation of a sub-slab depressurization system (i.e., same as radon venting system) and up to four property visits to verify the proper operation of the system.

Upon completion of vapor intrusion study work, the vapor sampling ports will be removed from the basement floor and sealed.

There will be no cost to the owner or tenant for this work.

1. <u>Limited Right of Access</u> - Owner hereby grants to KPRG a Limited Right of Access to enter the Subject Property periodically to conduct the activities described above. This Limited Right of Access shall commence on the effective date of this Agreement.

2. <u>Liens</u> – KPRG will not permit any mechanics', material men's or other similar liens or claims to stand against the Subject Property for labor or material furnished in connection with any work performed by KPRG under this Agreement.

3. <u>Termination</u> - Owner shall have the right, with or without notice, to rescind its approval with respect to any entry in the event KPRG, its employees or contractors entering upon the Subject Property fails to comply with any term, condition or covenant of this Agreement.

¹⁴⁶⁶⁵ West Lisbon Road, Suite 2B Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

5. <u>Sample Results</u> - KPRG will provide sample results to owner within 10 business days of receipt as required. Owner acknowledges that KPRG will use and share, including with WDNR, the results for purposes reasonably related to the vapor intrusion study.

6. <u>Notification</u> - KPRG will notify Owner (via email, telephone or mail) in advance of entry onto Subject Property.

Yes. ______ is providing KPRG with permission to access the Subject Property for the above stated purposes.

No. ______ is denying access to the Subject Property.

Owner's Signature

Owner's Phone and e-mail

Date

Site contact information (if different from above):

Tenant/Lessee (Please print)

Tenant's/Lessee's e-mail

KPRG and Associates, Inc.

December 5, 2018

Mr. Thomas Higbee Whiterock Building, LLC Amport Auto Service 1324 White Rock Avenue Waukesha, WI 53189

SUBJECT: Second request for access to your commercial property (1324 White Rock Ave.) for vapor sampling

Dear Mr. Higbee,

This is the second request letter. KPRG and Associates, Inc. (KPRG) is an environmental consulting firm which has been contracted to implement an assessment of potential environmental impacts associated with historical operations at the RMG foundry near you. The work is being performed voluntarily under the direction and oversight of the Wisconsin Department of Natural Resources (WDNR). As part of the ongoing study, KPRG is requesting permission to test your commercial property located at 1324 White Rock Avenue for potential vapor intrusion. Vapor intrusion is the movement of chemical vapors through the soil or groundwater and potentially into the indoor air similar to the way that naturally occurring radon gas can move into a structure.

KPRG would like to discuss with you potential access to your property to collect an air sample from the soil beneath your foundation to determine whether vapors from chemicals formerly used at the foundry or other nearby industrial operations may be present in your facility and, if so, at what levels. This is part of the WDNR required investigation and all work and testing will be at no cost to you. A copy of the results will also be provided to you.

In order to complete this investigation, we will need your permission to access your property. Attached is an Access Agreement for this work. Please review the document and if acceptable, please sign and return the signed agreement to me in the enclosed self-addressed stamped envelope or call me to set up a meeting to discuss this request. Alternatively, if you do not agree to provide access, please note so on the agreement, sign and return to me in the self-addressed stamped envelope. Also please feel free to fax the completed form to me at 262-781-0478 or e-mail a scanned copy to me at richardg@kprginc.com.

Thank you for taking the time to consider this issue and request. If you have any questions, or would like to set up a meeting to discuss this request, please call me at 262-781-0475. You can also contact the WDNR Project Manager, Mark Drews, with any questions at 262-574-2146.

Sincerely,

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

KPRG and Associates, Inc.

Richard R Inct

Richard R. Gnat, P.G. Principal

Enclosures: Property Access Request Agreement Form Self Addressed Stamped Envelope WDNR Fact Sheets

K P R G

KPRG and Associates, Inc.

PROPERTY ACCESS REQUEST

KPRG and Associates, Inc. ("KPRG") is requesting permission from Whiterock Building, LLC ("Owner") to access your commercial property located at 1324 White Rock Avenue, Waukesha, WI ("Subject Property") for the purposes of completing a vapor intrusion study being requested by the Wisconsin Department of Natural Resources ("WDNR") as part of environmental site work being performed at the Renaissance Manufacturing Group foundry associated with former operations. The scope of the work will include:

- The installation of sub-slab vapor sampling ports (approximately 1.5 inches in diameter) within the foundation floor (the number and location of probes will depend on facility layout and will be determined in the field with the approval of Owner). The ports will be completed with a cover plate flush with the floor surface, if possible. The work area will be thoroughly cleaned after installation of the sample port. Alternately install several high-purge points for a single sampling round per our previous discussions.
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- If necessary, based on the results of the vapor intrusion study, the installation of a sub-slab depressurization system (i.e., same as radon venting system) and up to four property visits to verify the proper operation of the system.

Upon completion of vapor intrusion study work, the vapor sampling ports will be removed from the basement floor and sealed.

There will be no cost to the owner or tenant for this work.

1. <u>Limited Right of Access</u> - Owner hereby grants to KPRG a Limited Right of Access to enter the Subject Property periodically to conduct the activities described above. This Limited Right of Access shall commence on the effective date of this Agreement.

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5. <u>Sample Results</u> - KPRG will provide sample results to owner within 10 business days of receipt as required. Owner acknowledges that KPRG will use and share, including with WDNR, the results for purposes reasonably related to the vapor intrusion study.

6. <u>Notification</u> - KPRG will notify Owner (via email, telephone or mail) in advance of entry onto Subject Property.

Yes. ______ is providing KPRG with permission to access the Subject Property for the above stated purposes.

No. ______ is denying access to the Subject Property.

Owner's Signature

Owner's Phone and e-mail

Date

Site contact information (if different from above):

Tenant/Lessee (Please print)

Tenant's/Lessee's e-mail