



ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

SCHEDULE MODIFICATION UPDATE

October 10, 2019

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: Schedule Modification Update
Former Navistar/RMG Foundry
BRRTS # 02-68-098404

Dear Mr. Drews:

As we discussed last week on the telephone, the project schedule for the above referenced site is being modified/updated based on the current expanded soil vapor intrusion (SVI) study work being completed as well as the results of pilot testing work completed to date for the interim actions being considered for the southwest parking lot soils and the core room groundwater source treatment. The modified schedule is attached as Figure 1 with the main modifications discussed below.

Comprehensive Site Investigation Report Addendum (Schedule Task 9d)

Significantly expanded SVI study work is ongoing as a result of the combined outreach efforts of Navistar/KPRG and Wisconsin Department of Natural Resources (WDNR) personnel. This expanded work includes 14 new properties added to the study area, a concerted effort to engage non-responsive property owners and pre-emptive sub-slab depressurization system (SSDS) installations within a group of properties identified as a “core area” of potential impacts. In addition, follow-up groundwater sampling has been completed which includes the additional monitoring wells installed in June 2019. Based on this additional ongoing work, the schedule for submittal of the Comprehensive Site Investigation (SI) Report Addendum has been revised for no later than mid-January 2020.

Remedial Action Options Report (Schedule Task 9e)

The modification of the SI Addendum submittal date also results in modification of the subsequent Remedial Action Options Report (RAOR) submittal to mid-March 2020. It is noted that portions of the RAOR work is ongoing as part of Interim Action work being performed as discussed below.

Interim Action – SW Parking Lot TCE Soils (Schedule Task 7)

The initial concept for an interim action associated with the trichloroethene (TCE) impacted soils beneath the southwest parking lot area was to design and install a soil vapor extraction (SVE) system. SVE pilot testing was completed within two areas of the southwest parking lot in June and July of 2019. Subsequent engineering evaluation of the data indicates that due to substantial heterogeneities within the subsurface fill materials beneath the southwest parking lot, the initially proposed SVE approach, although feasible, will not be efficient in addressing the TCE impacts with an estimated operational period in excess of five years. Based on these results, other alternatives are in the process of being evaluated including in-situ chemical oxidation via mechanical mixing, direct soil removal with off-site landfill disposal and/or a combination of the various options. Once Navistar decides on an appropriate interim action, the WDNR will be provided a firm implementation plan and schedule. Implementation of the plan is anticipated to begin either by mid-December 2019 or the first part of April 2020, after the winter thaw.

Interim Action On-Site Core Room Groundwater Source Area Treatment (Schedule Task 8)

During August 2019 an injection test well was installed along with a multiport observation well in the vicinity of existing well MW-23. During installation of the injection test well, short-term pumping tests were performed on four discrete, packed 10-foot intervals with water level measurements being recorded in seven monitoring wells in the area (including the newly installed multiport well). This data is currently being evaluated relative to injection permeability and connectivity. In addition, a groundwater sample was collected from monitoring well MW-30 (located within the core room displaying the highest TCE concentrations) and provided to Orin Remediation Technologies (Orin) for treatability study testing. Based on review of the treatability study results, sodium persulfate will be used for the upcoming injection pilot test. Submittal of an injection exemption request to WDNR is anticipated by October 18th with the pilot test anticipated to occur in mid-December 2019 assuming receipt of WDNR approval of the exemption request. Post-injection sampling will occur for one month after initial test injection. The resulting data will be evaluated over the winter with a proposed full-scale injection design anticipated to be ready for implementation by May 2020.

The attached project schedule reflects the updates/modifications discussed above. Navistar will continue to voluntarily complete the site investigation and appropriate remedial action activities for the site. 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

cc: Ferdinand Alido, Navistar (e-mail only)
Beata Rodriguez, Navistar (e-mail only)

