K P R G

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

ADDITIONAL WORK PLAN

February 4, 2021

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

VIA US Mail and FedEx

KPRG Project No. 11717

Re: Heale Manufacturing Additional Work Plan
Former Navistar/RMG Foundry
BRRTS # 02-68-098404

Dear Mr. Drews:

On November 4, 2019, KPRG and Associates, Inc. (KPRG) submitted a Data Transmittal, on behalf of Navistar, Inc. (Navistar), for the high purge method sub-slab vapor sampling at the Heale Manufacturing building at 1231 The Strand in Waukesha, WI. The Wisconsin Department of Natural Resources (WDNR) sent an email response on November 7, 2019, outlining several points/questions regarding the data transmittal. KPRG provided a Response Letter dated November 20, 2019 to the WDNR that provided clarification of the issues poised by the WDNR. The WDNR issued another response in a letter dated February 10, 2020, requesting additional sub-slab sample collection from within the office area. KPRG completed the additionally requested work and submitted the data on June 4, 2020. On January 25, 2021, the WDNR issued an email response that did not include the review of the work described in the June 4 submittal. The response stated that more sampling is warranted as the 'data for the pressure field extension ports show very inconsistent response and points to the vapor samples not being representative of the entire slab and in some cases preferentially drawing air from the exterior of the building'. The additional samples should be collected using vapor pins and a 30-minute summa canisters.

The following is a work plan outlining the additionally requested work.

Task 1 – Abandon High Purge Volume Points

Since the WDNR is now requesting the use of individual vapor pins, all five of the high volume sub-slab vapor testing points will be properly abandoned. The hydraulic concrete seal will be broken and the casing will be removed at each of the vapor points. The hole will be filled with bentonite and concrete will be placed to the surface to seal the point.

Task 2 – Install and Sample Vapor Pins – Manufacturing Area

As requested by the WDNR, KPRG will install and sample Cox-Colvin vapor pins within the manufacturing area. A review of Table 5c from RR800 suggests that less than 6 samples are necessary and a review of RR986 one can calculate that 7 (rounded up from 6.5) samples are necessary for Commercial or Industrial buildings. As there are two vapor pins currently in place within the administrative area, KPRG will install an additional 5 vapor probes, resulting in a total of 7 vapor probes through-out the building. The five additional vapor probes will be installed near each of the previous high volume locations. The samples, collected in summa canisters fitted with 30-minute flow regulators, will be analyzed for TCE.

Task 3 – Second Round Sampling – Administrative Area

The two existing vapor pins located in the administrative area will be resampled. In addition, two indoor air and one outdoor air will be collected at the same time. The indoor and outdoor air samples will be collected using 24-hour flow controllers and analyzed for TCE.

Navistar will continue to voluntarily complete the site investigation and appropriate remedial action activities for the site. This work is scheduled to be completed in February 2021. 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.

Patrick Allenstein, P.G.
Senior Geologist

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