State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1027 W. Saint Paul Avenue
Milwaukee WI 53233

Tony Evers, Governor
Preston D. Cole, Secretary
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September 20, 2021

Navistar Inc. (E-mail only)
Ferdinand Alido
2701 Navistar Dr.
Lisle, IL 60532

SUBJECT: Review of Hazardous Waste Determination
Former Navistar/RMG Foundry, 1401 Perkins Ave., Waukesha, WI
DNR BRRTS # 02-68-098404 FID # 268005430

Dear Mr. Alido:

The Wisconsin Department of Natural Resources (DNR) has received a request for concurrence of the hazardous waste determination related to soil proposed for remedial excavation at the above-referenced site. The September 9, 2021 *Contained Out Determination Request* was submitted on behalf of Navistar Inc. (Navistar) by KPRG Environmental Consulting (KPRG). KPRG has made a hazardous waste determination for soil proposed for excavations on the South Parking Lot and Southwest parking Lot that are contaminated with trichloroethene (TCE).

Soil that exhibits a characteristic of hazardous waste, i.e., toxicity, would be considered a hazardous waste upon excavation. The toxicity characteristic leaching procedure (TCLP) was used to test whether contaminated soil exceeds regulatory limits, and the levels were below standards. Because the source of TCE contamination and the date of the discharge to soil and groundwater are not known, KPRG has concluded that excavated soil contaminated with TCE would not be considered a listed hazardous waste. DNR concurs that this is a reasonable conclusion

The Department's concurrence with this waste determination does not negate the generator's responsibility for correctly classifying a solid waste under Wis. Admin. Code § NR 662.11 and properly managing excavated soils. If you have any questions, please contact me in writing at the letterhead address or by telephone at (414) 207-2133.

Sincerely,

Mark Drews
Remediation and Redevelopment Program

cc: KPRG and Associates, Inc., Rich Gnat, (E-mail only)