



April 24, 2024

Navistar, Inc.  
c/o: Ferdinand Alido  
2701 Navistar Dr.  
Lisle, IL 60532  
*Via Email Only to Ferdinand.Alido@Navistar.com*

**Subject:** Review of "Southwest Parking Lot Remedial Action Completion Documentation"  
Former Navistar\RMG Foundry  
1401 Perkins Avenue, Waukesha, WI  
DNR BRRTS Activity # 02-68-098404, DNR FID # 268005430

Dear Mr. Alido:

The Wisconsin Department of Natural Resources (DNR) received the above "Southwest Parking Lot Remedial Action Completion Documentation" report (Report), dated December 12, 2023, from KPRG and Associates, Inc. (KPRG). The DNR reviews environmental investigation and remediation cases for compliance with state statutes and rules to maintain consistency. The Report documents interim actions that were taken at the site, after reviewing the DNR provides the following comments:

#### Soil Removal

During November 2021, a total of 2,320 tons of trichloroethene (TCE) impacted soil was removed from the southwest area of the site in three separate excavations. Confirmation soil samples were collected from the excavation areas and the results were below applicable Wis. Admin. Code ch. NR 720 residual contaminant levels (RCLs). The soil excavations appear to have achieved the remedial goal to remove a portion of the contaminated soils in the southwest area of the site. Soil isoconcentration maps that show the confirmation soil sample data alongside the previously collected soil data should be submitted to DNR.

#### Storm Sewer

Provide additional details on how the on-site storm sewer was abandoned and whether the applicable laterals were also abandoned. Provide additional information regarding the storm sewer plug construction and placement. Indicate whether the plug was installed on both the outside and the inside of the sewer. Indicate whether the City of Waukesha was involved with this activity. Discuss whether the storm sewer is still operational under the subject property.

#### Sanitary Sewer

The Report states that the sanitary sewer could not be located. Previously submitted documents show a sanitary sewer line extending from the site to a manhole in Perkins Avenue. Indicate whether the Perkins Avenue manhole was assessed to determine if a line is present from the site. Indicate whether the sanitary sewer line was previously televised. The condensate tank for the on-site soil vapor extraction (SVE) system discharges to the sanitary sewer. Indicate the discharge location to the sanitary sewer line and what the sampling schedule is for this sewer line. Provide all of the associated sampling results to the DNR.

### SVE System

The SVE system, which generally includes slotted PVC piping within a gravel-filled trench, a blower, an activated carbon absorber vessel, and a condensate tank, has a goal to remove TCE vapors from the contaminated soil to try to prevent migration off-site. KPRG has provided a remedial objective of achieving a TCE concentration of 290 ug/m<sup>3</sup> within the SVE exhaust. This objective should be evaluated as the system operates based on the future site usage and effectiveness of the SVE system. Standard operating objectives for an SVE system typically include obtaining a significant reduction in vapor concentrations with a relatively unchanging concentration of contaminants in the SVE exhaust. Using only the objective exhaust level of 290 ug/m<sup>3</sup> will not assure that no further investigation, remediation, or mitigation will be needed on- or off-site. Provide SVE system updates on a semi-annual basis until the interim remedial objectives are obtained, per Wis. Admin. Code § NR 724.13(3). The DNR recommends quarterly exhaust sampling to evaluate data and exhaust TCE level reductions. If the DNR's Air Management Program requires more frequent sampling under the Wis. Admin. Code NR 400 series, then follow their requirements.

### Groundwater Investigation

Additional groundwater assessment is required. A stable or reducing groundwater contamination plume is required before site closure can be granted, per Wis. Admin. Code § NR 726.05(6)(c). The DNR understands that the previously proposed groundwater injection remediation events will continue on-site.

The documentation and information requested in this letter should be submitted in future submittals, where appropriate. Site investigation is an iterative process and the Wis. Admin. Code ch. NR 716 site investigation is not yet complete. Until the site investigation, remediation 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 Wis. Admin. Code § NR 700.11.

If you have any questions regarding this letter, please contact me at 262-574-2146 or by e-mail at [mark.drews@wisconsin.gov](mailto:mark.drews@wisconsin.gov).

Sincerely,



Mark Drews  
Remediation & Redevelopment Program

cc: KPRG, Rich Gnat, Richardg@KPRG.com