



March 2, 2018

Andrew Schiesl
Vice President & General Counsel
Gardner Denver Inc.
222 East Erie Street
Milwaukee, Wisconsin 53202

Subject: "Work Plan for Conducting Environmental Services for the DB Oak Property (former Thomas Industries) Located at 700-710 Oak Street in Fort Atkinson, Wisconsin" DNR#02-28-176509

Dear Mr. Schiesl:

Freiss Environmental Consulting's (FEC) "Work Plan for Conducting Environmental Services for the DB Oak Property (former Thomas Industries) Located at 700-710 Oak Street in Fort Atkinson, Wisconsin – FEC Project NO. 170503" (workplan) does not satisfy the code requirements in the Wisc. Admin. Code NR 700 series.

The workplan is mostly conceptual and does not describe methodology or quality control procedures. Other key information is also missing. The three components of the workplan are addressed separately as follows:

- The proposed soil removal is a remedial action, as defined by Wisc. Admin. Code § NR 700.03 (48). Remedial actions must follow the Wisc. Admin. Code ch. NR 724 rules, which require preparation of a code-compliant work plan. The remediation work plan should include the professional certification required under Wisc. Admin. Code ch. NR 712.
- The proposed vapor evaluation is site investigation, and therefore regulated under Wisc. Admin. Code ch. NR 716. The vapor evaluation must meet the Wisc. Admin. Code ch. NR 716 requirements, which include preparation of a code-compliant work plan. Site investigation work plans must include the certification(s) required under Wisc. Admin. Code ch. NR 712.
- Groundwater investigation is proposed in the workplan. Wisc. Admin. Code § NR712.07(4), states, "Hydrogeologists shall prepare or supervise the preparation of submittals involving the assessment of groundwater conditions at a site or facility, when prepared to satisfy the requirements of Wisc. Admin. Code ch. NR 716." A scope of work and/or work plan for additional groundwater investigation must follow the oversight and hydrogeologist certification requirements in Wisc. Admin. Code ch. NR 712.

Please feel free to contact me if you have questions.

Sincerely,

Jeff Ackerman
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cc: Richard Friesseke, FEC