



June 20, 2018

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

Subject: Partial approval of the “Revised 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) submitted a “Revised 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 N0. 170503” (workplan). The plan does not meet the code requirements, but we are granting partial approval, for the vapor evaluation.

We are issuing a partial approval to proceed with the vapor testing and evaluation portion of the workplan. No review fee, per chapter NR 749 Wis. Adm. Code was submitted, so this partial approval is per Wis. Adm. Code section 716.09 (3) (a). We view the vapor intrusion pathway as the most likely exposure route for human health issues at this site. For this reason, we are granting a partial exemption from the workplan requirements, so that FEC may conduct the testing and evaluation. FEC should proceed with the “Sub-Slab and Sewer Vapor Evaluation” as soon as practical.

The remainder of this letter describes concerns noted during a cursory read of the workplan:

We will not approve a work plan or report for groundwater evaluation that is not properly certified and overseen by a hydrogeologist. Groundwater investigation is proposed. Wisc. Admin. Code section 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.” This case has significant groundwater contamination that requires oversight by a Wisc. Admin. Code chapter NR 712 hydrogeologist. FEC appears to have no staff meeting this qualification. We have raised this a concern multiple times:

- In a November 10, 2017 email to Rick Frieseke.
- At a November 17, 2017 meeting between FEC and DNR.
- In our March 2, 2018 letter to you.

The interim action plan is missing many of the required elements in section NR 724.05, Wis. Adm. Code, “General submittal requirements”. Your consultant should review ch. NR 724 to assure the next plan is fully compliant with the code.

The plan for additional investigation is missing many of the required elements in section NR 716.09, Wis. Adm. Code, "Site investigation work plan". Your consultant should review ch. NR 716 to assure the next plan is fully compliant with the code.

Plans and reports must be submitted in both electronic and paper copy, per section NR 700.11 (3g) Wis. Adm. Code. FEC needs to submit the workplan and future workplans and reports electronically, as well as in hard copy.

The final page of the workplan is the left half of an 11" by 17" sheet and it is partly illegible.

Please feel free to contact me if you have questions.

Sincerely,



Jeff Ackerman
Hydrogeologist
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cc: Richard Frieseke, FEC

RICHARD FRIESEKE
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