

November 24, 2020

Ms. Candace Sykora
Wisconsin Department of Natural Resources
890 Spruce Street
Baldwin, WI 54002
Via email: candace.sykora@wisconsin.gov

Re: Nor-Lake Site Closure Response
BRRTS # 02-56-000089

Dear Candace:

On behalf of Nor-Lake, Inc. this responds to the items requested in the Wisconsin Department of Natural Resources' (WDNR) September 29, 2020, Case Closure Response Letter. This letter sets forth a scope of work to satisfy the conditions of that letter, as follows:

- 1) Provide additional vapor assessment information
- 2) Evaluation of 1,4-Dioxane Potential
- 3) Submit interim progress report
- 4) Continue routine residential carbon systems maintenance activities

VAPOR INVESTIGATION

- Provide supplemental vapor assessment information that includes updating the December 2019 Sub-Slab Vapor Investigation Report to address the items mentioned in the WDNR letter including: (1) expanded discussion of all vapor risk screening levels (VRSLs) and rationale for which VRSLs are selected as applicable, (2) assessment of receptor demographics, (3) explanation of assessment of areas identified in the WDNR letter; (4) updating of figures, and (5) justification for not investigating vapors off-site (if applicable based on investigation of potential utility corridors in the vapor source area).
- Locate and map public and private utilities that intersect the vapor source area using Diggers Hotline and a private utility locating service. The data will be used to determine if there are utility corridors that may act as conduits for vapor migration to off-site receptors.

EVALUATION OF 1,4-DIOXANE POTENTIAL

- Conduct a records review with Nor-Lake to assess the potential for the introduction of 1,4-dioxane in the groundwater to have sourced from the Nor-Lake facility, given the commingled nature of the groundwater contaminant plumes. If necessary, following this records review, a work plan for sampling both on-site and the upgradient MW-13 well will be developed for review.

SUBMIT INTERIM PROGRESS REPORT

- Submit an interim progress report to the WDNR that summarizes the results of the work performed pursuant to this letter.

CONTINUE ROUTINE MAINTENANCE ACTIVITIES ON RESIDENTIAL CARBON UNITS

- Continue sampling and maintenance of active carbon filter systems in the residential and commercial neighborhood. This includes coordinating with Culligan to have the carbon filter systems changed out on 15 residential and commercial properties that were due to be changed out in 2020, as well as sampling of these properties' water supply after the filter change-out has occurred. This will be continued during the pendency of reconsideration of the Nor-Lake closure request.

If you have any questions regarding this scope of work, please contact me.

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