RJR

March 30, 2016

Mr. Michael Schmoller
Wisconsin Department of Natural Resources (WDNR)
3911 Fish Hatchery Road
Fitchburg, WI 53711

RE: Former Trent Tube Facility Plant 1, East Troy Wisconsin Consent Order 2013-SEEE-044;
Proposed Schedule for the Area of Containment (AOC) Remedial Options Action Report (ROAR)

Dear Mr. Schmoller:

As required by WDNR's letter dated February 29, 2016, RJRudyLLC (RJR) has prepared this response letter on behalf of Coltec Industries Inc to propose a schedule for preparing and submitting a ROAR for the AOC. The timeline provided below integrates well with the upcoming summer 2016 effort that Coltec is implementing including Operation and Maintenance (O&M) of the recovery well and treatment system as well as initiating and developing the Group A closure sampling and associated application as explained in our March 19, 2016 response.

Based on recent soil and groundwater sampling results from the AOC, it appears that the phytoremediation system within the AOC is working and functioning as designed. However, as you have indicated, the Department would like to see more data demonstrating that groundwater and associated contaminants are being consumed by the trees. In addition, you indicated that we would likely need a few more years of monitoring the AOC. During that time, we understand that we would need to further document the effectiveness of the phytoremediation system. These activities will be completed prior to submitting a closure request.

As part of updating the site operation and maintenance O&M manuals, the Phytoremediation O&M Plan will provide details of a more tree-focused sampling strategy. RJR plans to obtain additional tissue data to demonstrate that the trees are adsorbing/absorbing and volatilizing contaminants from the AOC and to further demonstrate effectiveness of the phytoremediation system. These additional data will focus on root, bark, trunk, and/or leaf samples. The types and numbers of samples will be outlined in the updated Phytoremediation O&M Manual. This plan will be submitted to WDNR prior to initiating fieldwork. Tree sampling will be scheduled at an optimum time when the trees are growing and consuming water. The annual phytoremediation O&M data results will be presented in a brief report to WDNR and will provide further insight for development of the ROAR.

Coltec proposes the following schedule:

- April, 2016: Submit Phytoremediation O&M Plan Addendum to WDNR;
- June, 2016: Conduct Tree Sampling Fieldwork;
- September, 2016: Submit Phytoremediation Data Results Report;
- November, 2016: Submit ROAR for the AOC.

As you know, the dense network of recovery wells downgradient of the AOC will continue to extract impacted groundwater in the area and provide a hydraulic barrier between the AOC and Honey Creek. These wells provide for an additional level of protection while the AOC Phytoremediation System is being evaluated.

Please feel free to contact me with any comments.

Sincerely,
RJR

Richard J. Rudy PG
Project Director