State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Oshkosh Service Center
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WISCONSIN
DEPT. OF NATURAL RESOURCES

November 6, 2024

Oshkosh Defense LLC
Mr. Kevin Tubbs
1917 Four Wheel Drive
Oshkosh WI 54902
VIA Electronic Mail – ktubbs@oshkoshcorp.com

Subject: Site Investigation Report- Not Approved
500 W Waukau Ave, Oshkosh WI
BRRTS# 02-71-587406

Dear Mr. Tubbs,

On October 2, 2024, the Department of Natural Resources (DNR) reviewed the NR 716 Site Investigation Report (SIR) submitted on August 8, 2024, for compliance with Wis. Admin. Code ch. NR 716. A Wis. Admin. Code ch. NR749 review fee of $1050 was included with the SIR. After review, the DNR has determined that the site investigation does not meet the requirements of Wis. Admin. Code ch. NR 716 so is not approved. The degree and extent of contamination identified at the site has not been adequately characterized or documented.

Determination:

The DNR determined that additional investigation is required to define the degree and extent of contamination. Degree and extent verification is needed to confirm receptors, evaluate risk, and determine if continuing obligations are necessary and appropriate. The following items were identified:

- Additional sampling is needed in the vicinity of WP-SB9 and WP-SB10 to define PFAS impacts in these locations.
- Evaluation of why WP- SB9 has elevated PFAS levels greater than the source area should performed. Are other sources of PFAS entering the storm sewer or discharging in this area of the property?
- Additional groundwater investigation is needed to the southwest of MW-3 to evaluate if PFOS is related to the identified release or from another on or off-site source.
- MW-2 and MW-3 should be resampled as part of the additional groundwater investigation. Groundwater elevations should be taken at MW-1 and MW-4 during groundwater sampling events.

Future Actions:

- The DNR recommends that a Wis. Admin. Code ch. NR 716 Site Investigation Work Plan (SIWP) be developed to address the items noted in this letter. Submittal of the Wis. Admin. Code ch. NR749 review fee is recommended for all submittals.

If you have questions, please call me at 920-808-0170 for more information.
Thank you for your cooperation.
Sincerely,

Kevin D. McKnight
Hydrogeologist/Project Manager
Remediation & Redevelopment Program

Cc: GZA GeoEnvironmental, Inc.- (kevin.hedinger@gza.com)
Edward Witte – (nwitte@gklaw.com)