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November 21, 2024

Alloy Products Corporation
Betsy Bear Hoff
1045 Perkins Ave.
Waukesha, WI 53186
Via Electronic Mail Only to bbhoff@alloyproducts.com

Subject: Review of *Site Investigation Work Plan*
Alloy Products Corporation, 1045 Perkins Ave.., Waukesha, WI
DNR BRRTS # 02-68-000601, FID # 268016760

Dear Ms. Hoff:

On July 9, 2024, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Work Plan* (Report) that was prepared by United Engineering Consultants, Inc. (UEC) for the above property (Site). A fee was submitted with the Report for review and response by the DNR. Additional data tables were received on September 12, 2024.

The Report proposes:

- Collection of soil samples for analysis of specific chlorinated volatile organic compounds (CVOCs) from six proposed boring locations beneath and immediately adjacent to the northern on-site building (Plant 2);
- Collection of three indoor air samples using a seven-day passive sampling method and one ambient air sample for analysis of specific CVOCs from the Plant 2 building;
- Collection of pressure field extension (PFE) measurements in the Plant 2 building.
- Continued monitoring of the existing monitoring well network for select CVOCs, except for MW-3, MW-6S, MW-9, MW-10 and MW-7.
- Collection of unspecified indoor air samples from the southern on-site building (Plant 1) following installation of subslab depressurization systems in this building;
- Continuation of the vapor investigation at off-site buildings.

Although the DNR concurs that source investigation is needed and that the off-site vapor investigation should continue, additional work is needed to complete the site investigation. The following comments provide review details and guidance for completing the site investigation.

<u>Proposed source investigation at Plant 2</u>

1. DNR agrees that additional source investigation through soil sampling is needed in Plant 2, but the specific proposed soil boring locations cannot be approved by DNR without additional information evaluated and shown on the map of proposed borings, including:
    a. soil and vapor data;

b. potential sources that are or were present in the building, such as pits, solvent storage/usage areas, former tank locations;
c. current and historical utility layout – sanitary and storm sewers, floor and roof drains.

2. Based on the information provided, the DNR recommends installing a monitoring well or wells in the soil borings planned for Plant 2. The DNR also recommends ensuring that soil borings are placed in the area of sub-slab vapor sample locations VP-11 and VP-12 which contained elevated TCE vapor concentrations.

Additional source investigation needed

3. There are other potential source areas on the Alloy property that should be further evaluated and investigated, based on site history and data collected to date:
   a. The subslab vapor data collected previous under Plant 1 indicate there are potential source areas beneath this building as well. The DNR recommends additional sub-slab vapor samples be collected to help identify potential source areas, which should then be investigated in a manner similar to the Plant 2 building.
   b. The groundwater data collected to date indicate another potential source area in the vicinity of the smaller metal buildings and former chip hoppers (MW-2, MW-4B), or migration along the sanitary sewer.
   c. There were two "acid pits" historically operated on the property, as indicated in the Report and in DNR file information for the Site, which should be investigated as potential source areas.

Additional investigation of contamination extent

4. Groundwater data collected to date indicate that the extent of groundwater contamination is not fully defined to the south, east and possibly north/northeast. Additional piezometers may also be needed to fully define the vertical movement of contamination. However, a complete assessment of site sources and topography, stratigraphy and sewer impact on contaminant migration and groundwater flow should be evaluated before additional well locations are selected.
5. After obtaining results from the source investigations, it will be necessary to evaluate what additional sampling is needed to determine the extent of soil, vapor and/or groundwater contamination on and off the Alloy property. The evaluation should include several cross sections to show topographic and stratigraphic changes, well screen elevations, utilities, and soil/groundwater sampling results, both on and off the Alloy property. The DNR recommends that data from the adjoining Navistar and Spancrete (BRRTS# 02-68-591768) sites be incorporated into maps and cross sections to support the evaluation. A review of the soil and groundwater data in the DNR Spancrete site (south of Alloy) file is recommended.
6. Additional sanitary sewer vapor sampling may be necessary as part of the site investigation. The DNR recommends an evaluation of all available sewer and groundwater information to determine next steps for this part of the investigation.

Proposed groundwater monitoring changes

7. The DNR does not currently disagree with the proposal to exclude the specified monitoring wells from the groundwater monitoring schedule, as indicated in the Report, but recommends that all the monitoring wells that are in good shape be maintained, whether included in monitoring events or not, for potential water level measurement and future contaminant monitoring, based on information obtained from the rest of the network. Wells that are damaged beyond repair should be properly abandoned in accordance with Wis. Admin. Code ch. NR 141.

Vapor Intrusion Pathway Assessment and Mitigation

8. Some of the proposed off-site work has been completed. Provide updates to DNR as additional activities are completed.
9. Provide commissioning reports for all the properties where vapor mitigation systems (VMS) were installed.
10. Provide a design plan for the proposed Plant 1 building VMS. Wisconsin Admin. Code § NR 708.11(4)(b) requires DNR approval of the design prior to installation of the VMS. If the VMS is already in place, submit construction documentation and the commissioning plan for DNR approval.
11. Additional pressure field extension (PFE) measurements and indoor air samples are needed in the conference room area of Plant 2. If the pressure field does not extend across the entire building, additional drop points may be needed.

Future Report Requirements

12. Provide a detailed history of site operations and chemicals used including additional potential source areas on the Site. Include the locations of the former acid pits on a map. Modify future sampling plans based on this information. If a recent Phase I report has been prepared for the property, submit it for review. Site history evaluation is needed when developing a site investigation work plan or evaluating site investigation results.
13. The DNR also recommends completing a review of our files for the site including the Waste and Materials Management Program files. The DNR is including a map found in our files which shows possible source areas for Plant 1. Refer to Figure 2, *Solvent Management Plan Location Map* dated October 6, 1992.
14. All previous and future soil, groundwater and vapor data should be tabulated on tables and included on isoconcentration maps and cross-sections. This data should be evaluated to determine future sampling locations.
15. Provide an analysis regarding the potential impacts to the adjacent drainage ditch to the east. If sampling is warranted, provide a site investigation workplan.
16. New data collected should be reviewed to evaluate remedial actions options of source areas to meet Wis. Admin. Code § NR 726.05(8). Remediation activities will be required to reduce contaminant concentrations.
17. Provide all field documentation information including soil boring logs, monitoring well construction and development forms and boring abandonments forms.
18. Per Wis. Admin. Code §§ NR 716.07 and 716.09, site investigation scoping, and work plans should include an evaluation of potential PFAS compounds and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the site. The evaluation should include any available information on whether any products containing PFAS were used in

any process services, the duration of PFAS-containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded. This information should be submitted in a separate submittal. Provide a site investigation workplan for the emerging contaminates if used on site.

Provide additional site investigation workplan(s) as necessary to complete the additional information requested above. Site investigation work plans should also include a sampling and analysis strategy to be used during field investigation that considers all information in the evaluation conducted under Wis. Admin. Code § NR 716.07. This evaluation should be completed in conjunction with development of a new site investigation work plan. Include a review fee if DNR comments are needed.

The site investigation can be an iterative process and additional data results may indicate further assessment is needed to define the degree and extent of contamination. The results of the additional investigation events should be evaluated to determine if additional investigation is needed to fully define the degree and extent of contamination in all affected media. Until requirements are met, your site will remain "open", and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11.

If you have any questions regarding this letter, please contact me at (414) 207-2133, or by e-mail at mark.drews@wisconsin.gov.

Sincerely,

Mark Drews
Remediation & Redevelopment Program

Attachment:
Figure 2, Solvent Management Plan Location Map, 10/6/92

cc: United Engineering Consultants, Inc., Timothy Anderson, (email only)