August 8, 2017 Project Reference #16153

Mr. John Hnat
Wisconsin Department of Natural Resources
2300 N. Martin Luther King Jr. Drive
Milwaukee, WI 53212

**Subject: Addendum to the Site Investigation Status Report, Proposed Additional Sampling and Analysis Plan & WDNR Technical Assistance Request (Revised July 2017)**
**Solenis, LLC, 5228 N. Hopkins Street, Milwaukee, WI 53209**
**WDNR BRRTS No. 02-41-577350**
**WDNR FID No. 241041900**

Dear Mr. Hnat:

On behalf of Solenis LLC (Solenis), The Sigma Group, Inc. (Sigma) has prepared this addendum letter to the *Site Investigation Status Report, Proposed Additional Sampling and Analysis Plan & WDNR Technical Assistance Request (Revised July 2017)*[1] submitted July 11, 2017. This addendum includes an update to the proposed scope of work provided in the "Additional Sampling and Analysis Plan" section of the *Site Investigation Status Report*, which is based on the discussions between Sigma / Solenis and WDNR during the technical assistance meeting on July 27, 2017 and the subsequent WDNR response email dated July 28, 2017 (attached). Revisions and additions to the proposed scope of work are presented below:

- Over-drill and abandon existing monitoring wells MW-1 and MW-2. The replacement of these wells will be postponed until further investigation and analysis of the extent of the apparent free product plume is completed. Sigma will attempt to recover free product from these wells prior to abandoning and sealing.

- Advance additional soil borings in the following areas to further define the degree and extent of volatile organic compound (VOC) and triethylamine (TEA) impacts to soil and groundwater, as well as collect additional data to fill existing spatial data gaps:

    - *East of SB-7*: one soil boring, convert to WDNR Ch. NR 141 monitoring well;
    - *South / west of SB-10 and SB/TP-3*: two soil borings;
    - *North of SB-1 and SB-3, toward SB-4 and SB-9*: four soil borings;
    - *North of SB-9*: one soil boring; and,
    - *South of SB-6*: one soil boring, convert to NR 141 monitoring well.

  Soil samples (up to three) will be collected from all soil boring locations (one sample will be collected from an interval within 0 to 4 feet below ground surface (bgs), the interval(s) displaying the greatest PID readings and / or the interval just above the shallow groundwater table interface), and submitted for laboratory analysis of VOCs.

[1] *Site Investigation Status Report, Proposed Additional Sampling and Analysis Plan & WDNR Technical Assistance Request (Revised 2017), Solenis LLC, 5228 N. Hopkins Street, Milwaukee, WI 53209, WDNR BRRTS No. 02-41-577350, WDNR FID No. 241041900* by Sigma (dated July 11, 2017).

A select number of soil samples will also be submitted for analysis of TEA, generally from the outermost soil borings for purposes of delineating the extent of TEA impacts.

Groundwater samples will be collected from all monitoring wells on site, including newly installed wells. Samples will be submitted for laboratory analysis of VOCs (all wells) and TEA (down-gradient, shallow groundwater monitoring wells only).

Please note, given the expanded soil boring and sampling program with respect to the overall site investigation (described above), the number of soil borings proposed within the footprint of the new boiler house building has been revised.

The attached **Figure 9** depicts the locations of the additional soil borings / monitoring wells proposed for further defining the degree and extent of VOC and TEA impacts at the site, as well as the soil borings within the free product area and new building footprint.

- Conduct an appropriate investigation into the use / presence of 1,4-dichlorobenzene on site, given that the compound was detected at concentrations greater than applicable standards within soil samples collected from soil borings SB-6 and SB-12.

Sigma will complete the other components of the proposed Additional Sampling and Analysis Plan as indicated in the *Site Investigation Status Report* and following completion of the proposed activities evaluate the need for additional investigation and / or monitoring prior to consideration of remedial options, and consider potential implications for construction of the new boiler house building (e.g. vapor mitigation). Sigma will forward construction plans for the new boiler house building as soon as they are available.

**CLOSING**

We look forward to receiving formal written response from the WDNR with respect to the status of the site investigation and proposed additional investigation activities. Please contact us at 414-643-4200 with any questions or concerns.

Sincerely,

**THE SIGMA GROUP, INC.**

Cory Katzban, E.I.T.
Staff Engineer II

Mafizul Islam, P.E.
Senior Engineer

Timothy E. Wimmer, P.G
Senior Project Manager

cc: Roger Ladewig – Solenis (electronic copy via RLADEWIG@SOLENIS.COM)
James Faulstich – Solenis (electronic copy via JFFAULSTICH@SOLENIS.COM)
Pam Mylotta – WDNR (electronic copy via Pamela.Mylotta@wisconsin.gov)

## Cory Katzban

**From:** Hnat, John J - DNR <John.Hnat@wisconsin.gov>
**Sent:** Friday, July 28, 2017 10:54 AM
**To:** Tim Wimmer; Mafizul Islam; Cory Katzban; James Faulstich (JFFAULSTICH@SOLENIS.COM); rladewig@solenis.com
**Cc:** Mylotta, Pamela A - DNR
**Subject:** Solenis July 27th, 2017 Meeting
**Attachments:** Solenis Fig 8.pdf

Everyone,

From our meeting on July 27th, I've listed the DNR's comments and recommendations. If I forgot anything or you would like to add anything I've missed, please reply. Generally, your proposal is the next step in the site investigation. Hopefully, this list will add or help you achieve your site investigation goals. Minor adjustments to your proposal are forthcoming and at that time we will review and respond with a letter on the final proposal as requested.

- See attached map Figure 8 for references below.
- The DNR agrees that the free product should be bailed out of groundwater monitoring wells MW-1 and MW-2 prior to abandoning the wells.
- We recommend that over drilling and replacing MW-1 and MW-2 should be delayed until the additional soil sampling and defining the extent of free product over the area of the former ASTs be completed first. This would generally provide information where additional wells may be placed in order to recover free product. It would also present a clearer understanding on how free product decreases in concentration values towards the other monitoring wells.
- We discussed the possibility that the "deep" free product found in MW-1 and MW-2 may have been the result of communication from CVOCs at a shallower depth that migrated down to the lower depth during drilling activities. The silty clays for this site may prevent the CVOCs from migrating to deeper depths. Defining the free product area may result in "shallower" monitoring wells with shorter screens across the CVOC plume.
- 1,4-dichlorobenzene (1,4-DCB) was analyzed in soil borings SB-6 (1.23 ppm at 1-3 ft.) and SB-12 (38 ppm at 2.5 – 5 feet). This compound doesn't show up in any other soil sample. Sigma will research this compound and try to explain the presence in these soil borings. Solenis stated that the facility didn't use the compound. An online search indicated that the uses of 1,4-DCB included control of moths, molds, mildew, as a pesticide, and disinfectant.
- We recommend additional investigation downgradient from soil boring location SB-7. SB-7 indicates 1,2-DCP increasing in concentration from 0.156 ppm at 3-5 feet to 213 ppm at 12.5-15 feet. The groundwater table varies from 12 feet (MW-8) to 3.3 feet at MW-12. The groundwater contamination plume may be migrating east of SB-7. Therefore, we recommend additional soil/groundwater sampling in this area and possibly a NR 141 groundwater monitoring well to continue defining the GW plume.
- Depending on the results of investigation east of SB-7, we discussed the possibility of extending the investigation east of the railroad right-of-way for degree and extent in the future.
- The area between the former AST and where the new building foundation is proposed has limited soil sampling. Triethylamine (TEA) is above the groundwater pathway RCL in SB-8, SB-9, SB-10, SB-3, and TP-3. Additionally, there are some petroleum compounds above their groundwater pathway RCLs in TP-3, SB-3, SB-9 ("J" flag for toluene), and SB-6. We recommend additional soil sampling in the areas south of SB-10 and west of SB-3/TP-3; north of SB-3 and SB-1 towards SB-4 and SB-9 for VOCs for degree and extent.
- For the proposed building site, the use of soil gas results prior to the foundation construction doesn't establish site conditions after being built. The effect a future building will have on any migration of vapors or accumulation beneath the foundation cannot be determined until the building is in-place. Soil gas samples alone can't rule out the vapor pathway when other vapor screening criteria are exceeded, i.e., CVOC contamination greater than the enforcement standard (ES) in groundwater. For instance, MW-10 has 1,2-DCP at 92 ppb (ES = 5 ppb) at ~9 feet. There is a potential that vapors may accumulate beneath the future building foundation. If you can't rule out a vapor migration potential, then your possible options would be to wait and

install sampling points during construction of the foundation for future testing, install vapor access points for testing after foundation installation, or install a vapor mitigation system during construction.

- Completing the site investigation may result in a remedial action prior to construction of the building.
- Please forward the construction plans for the building when available.

If you have any questions, please call or email me. Thank you and have a great weekend.

*J. Hnat, C.P.G, P.G..*
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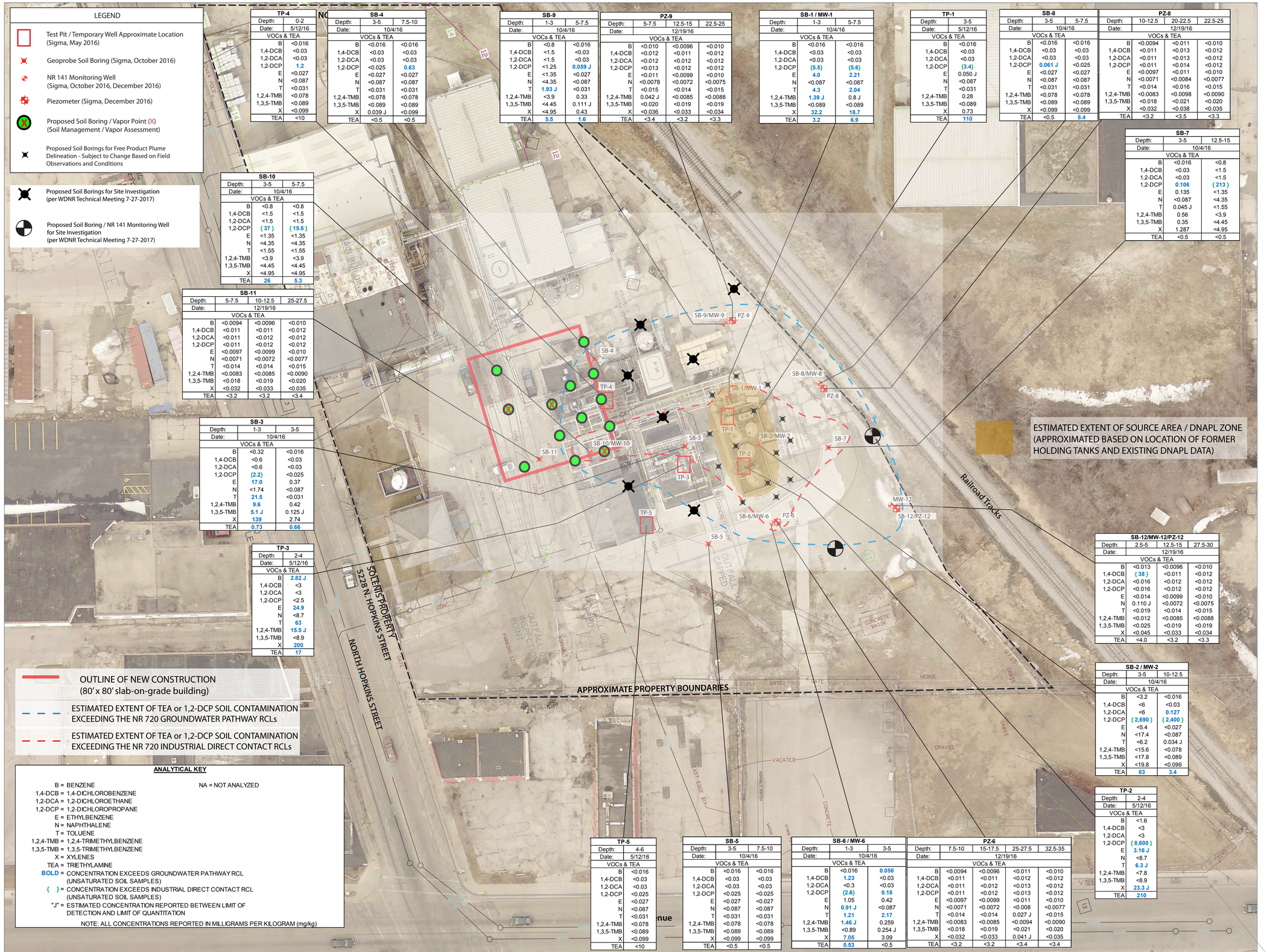


| TP-4 | |
|---|---|
| Depth: | 0-2 |
| Date: | 5/12/16 |
| VOCs & TEA | |
| B | <0.016 |
| 1,4-DCB | <0.03 |
| 1,2-DCA | <0.03 |
| 1,2-DCP | 1.2 |
| E | <0.027 |
| N | <0.087 |
| T | <0.031 |
| 1,2,4-TMB | <0.078 |
| 1,3,5-TMB | <0.089 |
| X | <0.099 |
| TEA | <10 |

| SB-4 | | |
|---|---|---|
| Depth: | 3-5 | 7.5-10 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.016 | <0.016 |
| 1,4-DCB | <0.03 | <0.03 |
| 1,2-DCA | <0.03 | <0.03 |
| 1,2-DCP | <0.025 | 0.63 |
| E | <0.027 | <0.027 |
| N | <0.087 | <0.087 |
| T | <0.031 | <0.031 |
| 1,2,4-TMB | <0.078 | <0.078 |
| 1,3,5-TMB | <0.089 | <0.089 |
| X | 0.039 J | <0.099 |
| TEA | <0.5 | <0.5 |

| SB-9 | | |
|---|---|---|
| Depth: | 1-3 | 5-7.5 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.8 | <0.016 |
| 1,4-DCB | <1.5 | <0.03 |
| 1,2-DCA | <1.5 | <0.03 |
| 1,2-DCP | <1.25 | 0.059 J |
| E | <1.35 | <0.027 |
| N | <4.35 | <0.087 |
| T | 1.93 J | <0.031 |
| 1,2,4-TMB | <3.9 | 0.33 |
| 1,3,5-TMB | <4.45 | 0.111 J |
| X | <4.95 | 0.43 |
| TEA | 5.5 | 1.6 |

| PZ-9 | | | |
|---|---|---|---|
| Depth: | 5-7.5 | 12.5-15 | 22.5-25 |
| Date: | 12/19/16 | | |
| VOCs & TEA | | | |
| B | <0.010 | <0.0096 | <0.010 |
| 1,4-DCB | <0.012 | <0.011 | <0.012 |
| 1,2-DCA | <0.012 | <0.012 | <0.012 |
| 1,2-DCP | <0.013 | <0.012 | <0.012 |
| E | <0.011 | <0.0099 | <0.010 |
| N | <0.0078 | <0.0072 | <0.0075 |
| T | <0.015 | <0.014 | <0.015 |
| 1,2,4-TMB | 0.042 J | <0.0085 | <0.0088 |
| 1,3,5-TMB | <0.020 | <0.019 | <0.019 |
| X | <0.036 | <0.033 | <0.034 |
| TEA | <3.4 | <3.2 | <3.3 |

| SB-1 / MW-1 | | |
|---|---|---|
| Depth: | 1-3 | 5-7.5 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.016 | <0.016 |
| 1,4-DCB | <0.03 | <0.03 |
| 1,2-DCA | <0.03 | <0.03 |
| 1,2-DCP | {5.5} | {5.6} |
| E | 4.0 | 2.21 |
| N | <0.087 | <0.087 |
| T | 4.3 | 2.04 |
| 1,2,4-TMB | 1.39 J | 0.8 J |
| 1,3,5-TMB | <0.089 | <0.089 |
| X | 32.2 | 18.7 |
| TEA | 3.2 | 6.9 |

| TP-1 | |
|---|---|
| Depth: | 3-5 |
| Date: | 5/12/16 |
| VOCs & TEA | |
| B | <0.016 |
| 1,4-DCB | <0.03 |
| 1,2-DCA | <0.03 |
| 1,2-DCP | {3.4} |
| E | 0.050 J |
| N | <0.087 |
| T | <0.031 |
| 1,2,4-TMB | 0.28 |
| 1,3,5-TMB | <0.089 |
| X | 0.73 |
| TEA | 110 |

| SB-8 | | |
|---|---|---|
| Depth: | 3-5 | 5-7.5 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.016 | <0.016 |
| 1,4-DCB | <0.03 | <0.03 |
| 1,2-DCA | <0.03 | <0.03 |
| 1,2-DCP | 0.061 J | <0.025 |
| E | <0.027 | <0.027 |
| N | <0.087 | <0.087 |
| T | <0.031 | <0.031 |
| 1,2,4-TMB | <0.078 | <0.078 |
| 1,3,5-TMB | <0.089 | <0.089 |
| X | <0.099 | <0.099 |
| TEA | <0.5 | 8.4 |

| PZ-8 | | | |
|---|---|---|---|
| Depth: | 10-12.5 | 20-22.5 | 22.5-25 |
| Date: | 12/19/16 | | |
| VOCs & TEA | | | |
| B | <0.0094 | <0.011 | <0.010 |
| 1,4-DCB | <0.011 | <0.013 | <0.012 |
| 1,2-DCA | <0.011 | <0.013 | <0.012 |
| 1,2-DCP | <0.011 | <0.014 | <0.012 |
| E | <0.0097 | <0.011 | <0.010 |
| N | <0.0071 | <0.0084 | <0.0077 |
| T | <0.014 | <0.016 | <0.015 |
| 1,2,4-TMB | <0.0083 | <0.0098 | <0.0090 |
| 1,3,5-TMB | <0.018 | <0.021 | <0.020 |
| X | <0.032 | <0.038 | <0.035 |
| TEA | <3.2 | <3.5 | <3.3 |

| SB-7 | | |
|---|---|---|
| Depth: | 3-5 | 12.5-15 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.016 | <0.8 |
| 1,4-DCB | <0.03 | <1.5 |
| 1,2-DCA | <0.03 | <1.5 |
| 1,2-DCP | 0.106 | {213} |
| E | 0.135 | <1.35 |
| N | <0.087 | <4.35 |
| T | 0.045 J | <1.55 |
| 1,2,4-TMB | 0.56 | <3.9 |
| 1,3,5-TMB | 0.35 | <4.45 |
| X | 1.287 | <4.95 |
| TEA | <0.5 | <0.5 |

| SB-10 | | |
|---|---|---|
| Depth: | 3-5 | 5-7.5 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.8 | <0.8 |
| 1,4-DCB | <1.5 | <1.5 |
| 1,2-DCA | <1.5 | <1.5 |
| 1,2-DCP | {37} | {15.6} |
| E | <1.35 | <1.35 |
| N | <4.35 | <4.35 |
| T | <1.55 | <1.55 |
| 1,2,4-TMB | <3.9 | <3.9 |
| 1,3,5-TMB | <4.45 | <4.45 |
| X | <4.95 | <4.95 |
| TEA | 26 | 5.3 |

| SB-11 | | | |
|---|---|---|---|
| Depth: | 5-7.5 | 10-12.5 | 25-27.5 |
| Date: | 12/19/16 | | |
| VOCs & TEA | | | |
| B | <0.0094 | <0.0096 | <0.010 |
| 1,4-DCB | <0.011 | <0.011 | <0.012 |
| 1,2-DCA | <0.011 | <0.012 | <0.012 |
| 1,2-DCP | <0.011 | <0.012 | <0.012 |
| E | <0.0097 | <0.0099 | <0.010 |
| N | <0.0071 | <0.0072 | <0.0077 |
| T | <0.014 | <0.014 | <0.015 |
| 1,2,4-TMB | <0.0083 | <0.0085 | <0.0090 |
| 1,3,5-TMB | <0.018 | <0.019 | <0.020 |
| X | <0.032 | <0.033 | <0.035 |
| TEA | <3.2 | <3.2 | <3.4 |

| SB-3 | | |
|---|---|---|
| Depth: | 1-3 | 3-5 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.32 | <0.016 |
| 1,4-DCB | <0.6 | <0.03 |
| 1,2-DCA | <0.6 | <0.03 |
| 1,2-DCP | {2.2} | <0.025 |
| E | 17.0 | 0.37 |
| N | <1.74 | <0.087 |
| T | 21.5 | <0.031 |
| 1,2,4-TMB | 9.6 | 0.42 |
| 1,3,5-TMB | 5.1 J | 0.125 J |
| X | 139 | 2.74 |
| TEA | 0.73 | 0.66 |

| TP-3 | |
|---|---|
| Depth: | 2-4 |
| Date: | 5/12/16 |
| VOCs & TEA | |
| B | 2.82 J |
| 1,4-DCB | <3 |
| 1,2-DCA | <3 |
| 1,2-DCP | <2.5 |
| E | 24.9 |
| N | <8.7 |
| T | 63 |
| 1,2,4-TMB | 15.5 J |
| 1,3,5-TMB | <8.9 |
| X | 200 |
| TEA | 17 |

| SB-12/MW-12/PZ-12 | | | |
|---|---|---|---|
| Depth: | 2.5-5 | 12.5-15 | 27.5-30 |
| Date: | 12/19/16 | | |
| VOCs & TEA | | | |
| B | <0.013 | <0.0096 | <0.010 |
| 1,4-DCB | {38} | <0.011 | <0.012 |
| 1,2-DCA | <0.016 | <0.012 | <0.012 |
| 1,2-DCP | <0.016 | <0.012 | <0.012 |
| E | <0.014 | <0.0099 | <0.010 |
| N | 0.110 J | <0.0072 | <0.0075 |
| T | <0.019 | <0.014 | <0.015 |
| 1,2,4-TMB | <0.012 | <0.0085 | <0.0088 |
| 1,3,5-TMB | <0.025 | <0.019 | <0.019 |
| X | <0.045 | <0.033 | <0.034 |
| TEA | <4.0 | <3.2 | <3.3 |

| SB-2 / MW-2 | | |
|---|---|---|
| Depth: | 3-5 | 10-12.5 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <3.2 | <0.016 |
| 1,4-DCB | <6 | <0.03 |
| 1,2-DCA | <6 | 0.127 |
| 1,2-DCP | {2,690} | {2,400} |
| E | <5.4 | <0.027 |
| N | <17.4 | <0.087 |
| T | <6.2 | 0.034 J |
| 1,2,4-TMB | <15.6 | <0.078 |
| 1,3,5-TMB | <17.8 | <0.089 |
| X | <19.8 | <0.099 |
| TEA | 83 | 3.4 |

| TP-2 | |
|---|---|
| Depth: | 2-4 |
| Date: | 5/12/16 |
| VOCs & TEA | |
| B | <1.6 |
| 1,4-DCB | <3 |
| 1,2-DCA | <3 |
| 1,2-DCP | {8,600} |
| E | 3.16 J |
| N | <8.7 |
| T | 6.3 J |
| 1,2,4-TMB | <7.8 |
| 1,3,5-TMB | <8.9 |
| X | 23.3 J |
| TEA | 210 |

| TP-5 | |
|---|---|
| Depth: | 4-6 |
| Date: | 5/12/16 |
| VOCs & TEA | |
| B | <0.016 |
| 1,4-DCB | <0.03 |
| 1,2-DCA | <0.03 |
| 1,2-DCP | <0.025 |
| E | <0.027 |
| N | <0.087 |
| T | <0.031 |
| 1,2,4-TMB | <0.078 |
| 1,3,5-TMB | <0.089 |
| X | <0.099 |
| TEA | <10 |

| SB-5 | | |
|---|---|---|
| Depth: | 3-5 | 7.5-10 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.016 | <0.016 |
| 1,4-DCB | <0.03 | <0.03 |
| 1,2-DCA | <0.03 | <0.03 |
| 1,2-DCP | <0.025 | <0.025 |
| E | <0.027 | <0.027 |
| N | <0.087 | <0.087 |
| T | <0.031 | <0.031 |
| 1,2,4-TMB | <0.078 | <0.078 |
| 1,3,5-TMB | <0.089 | <0.089 |
| X | <0.099 | <0.099 |
| TEA | <0.5 | <0.5 |

| SB-6 / MW-6 | | |
|---|---|---|
| Depth: | 1-3 | 3-5 |
| Date: | 10/4/16 | |
| VOCs & TEA | | |
| B | <0.016 | 0.056 |
| 1,4-DCB | 1.23 | <0.03 |
| 1,2-DCA | <0.3 | <0.03 |
| 1,2-DCP | {2.6} | 0.18 |
| E | 1.05 | 0.42 |
| N | 0.91 J | <0.087 |
| T | 1.21 | 2.17 |
| 1,2,4-TMB | 1.46 J | 0.259 |
| 1,3,5-TMB | <0.89 | 0.254 J |
| X | 7.05 | 3.09 |
| TEA | 0.53 | <0.5 |

| PZ-6 | | | | |
|---|---|---|---|---|
| Depth: | 7.5-10 | 15-17.5 | 25-27.5 | 32.5-35 |
| Date: | 12/19/16 | | | |
| VOCs & TEA | | | | |
| B | <0.0094 | <0.0096 | <0.011 | <0.010 |
| 1,4-DCB | <0.011 | <0.011 | <0.012 | <0.012 |
| 1,2-DCA | <0.011 | <0.012 | <0.013 | <0.012 |
| 1,2-DCP | <0.011 | <0.012 | <0.013 | <0.012 |
| E | <0.0097 | <0.0099 | <0.011 | <0.010 |
| N | <0.0071 | <0.0072 | <0.008 | <0.0077 |
| T | <0.014 | <0.014 | 0.027 J | <0.015 |
| 1,2,4-TMB | <0.0083 | <0.0085 | <0.0094 | <0.0090 |
| 1,3,5-TMB | <0.018 | <0.019 | <0.021 | <0.020 |
| X | <0.032 | <0.033 | 0.041 J | <0.035 |
| TEA | <3.2 | <3.2 | <3.4 | <3.4 |

**ANALYTICAL KEY**

B = BENZENE
1,4-DCB = 1,4-DICHLOROBENZENE
1,2-DCA = 1,2-DICHLOROETHANE
1,2-DCP = 1,2-DICHLOROPROPANE
E = ETHYLBENZENE
N = NAPHTHALENE
T = TOLUENE
1,2,4-TMB = 1,2,4-TRIMETHYLBENZENE
1,3,5-TMB = 1,3,5-TRIMETHYLBENZENE
X = XYLENES
TEA = TRIETHYLAMINE
**BOLD** = CONCENTRATION EXCEEDS GROUNDWATER PATHWAY RCL (UNSATURATED SOIL SAMPLES)
{ } = CONCENTRATION EXCEEDS INDUSTRIAL DIRECT CONTACT RCL (UNSATURATED SOIL SAMPLES)
"J" = ESTIMATED CONCENTRATION REPORTED BETWEEN LIMIT OF DETECTION AND LIMIT OF QUANTITATION

NA = NOT ANALYZED

NOTE: ALL CONCENTRATIONS REPORTED IN MILLIGRAMS PER KILOGRAM (mg/kg)

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Phone: 414-643-4200
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GRAPHIC SCALE
0 30' 60'

SOLENIS
5228 N. HOPKINS ST.
MILWAUKEE, WISCONSIN

ADDITIONAL SAMPLING PLAN - ADDENDUM
PROPOSED SOIL BORING / MONITORING WELL LOCATION MAP

| NO. | REVISION | DATE | BY |
|---|---|---|---|

| | |
|---|---|
| DRAWING NO. | 16153-Site Area Map.dwg |
| DRAWN BY: | CCK / VMS --- |
| DATE: | 1/11/17 |
| PROJECT NO: | 16153 |
| CHECKED BY: | - - - |
| APPROVED BY: | |

FIGURE
9

File: I:\Solenis\16153 - Contaminated soil_water\060 CADIE - Environmental\AI Graphics\16153-Site Area Map.dwg 1/11/2017 9:54 AM