



March 22, 2019

Tony Koblinski  
Madison Kipp Corporation  
201 Waubesa Street  
Madison, WI 53704

Subject: March 21, 2019 Bike Path Investigation and Excavation Workplan

Dear Mr. Koblinski:

The department has reviewed the Bike Path Investigation and Excavation Work Plan prepared by TRC Environmental Corporation. The Department conditionally approves the workplan with the two following modifications:

The work plan calls for excavation step outs to the east and west to address soil PCB concentrations exceeding the 10-ppm site specific clean up criteria. However, the workplan does not provide for the same step out procedure for soil contamination exceeding 10 ppm to the north. In our discussions regarding the bike path the department stated it was Madison Kipp's responsibility to follow PCB soil contamination to the north, and if necessary under and across the bike path, if the data showed the contamination was related to past Madison Kipp activities. Consequently, the workplan must include an excavation step out protocol to the north unless the soil contamination is determined not be related to Madison Kipp based on the criteria agreed to in the workplan.

The workplan does not provide for contaminated soil excavation below four feet. As presented PCB soil concentrations exceeding 10 ppm would be allowed to remain in place. The workplan must be modified to allow step wise soil excavation below four feet until compliance with the 10 ppm criteria.

With these two modifications the department conditionally approves the workplan including:

- Sample number and location
- Sample depth
- Sample collection (including the compositing of confirmation sample)
- Parameter selection
- Cleanup criteria
- Excavation procedures
- Excavation step out procedures to the east, west and south only

Madison Kipp can implement the workplan as soon as desired. If you have questions about this review, please contact me directly.

Sincerely,

R. Michael Schmoller  
Hydrogeologist