

OLIVER FIONTAR, LLC

April 25, 2019

Michele R. Norman
Team Supervisor – Remediation & Redevelopment Program – Southeast
Wisconsin Department of Natural Resources
2300 N. Martin Luther King Jr. Dr.
Milwaukee, WI 53212

RE: August 2, 2018 Negotiated Agreement between the WDNR and Oliver Fiontar, LLC as regards DNR BRRTS Numbers: 02-46-583164, 02-46-583162 & 02-46-583163 Located in Cedarburg, Wisconsin

Dear Ms. Norman:

In response to your correspondence dated March 26, 2019, in which you allege that Oliver Fiontar, LLC has purportedly “failed to take the necessary actions specified in the Agreement and required by Wisconsin law to investigate and remediate the contamination at the Properties,” specifically as it relates to the following compliance issues summarized below:

- Immediately mitigate all continuing discharges of hazardous substances migrating from the Properties.
- Immediately mitigate the migration of PCB contamination beyond the boundaries of the Properties.
- Submit a site investigation work plan for the Properties that meets Wis. Adm. Code ch. NR 716 requirements.
- Provide to DNR paper and electronic versions of any reports, plans, notices, or other documentation consistent with the Wis. Admin. Code chs. NR 700 through NR 754 rules, specifically NR 700.11(3g).

Oliver Fiontar, LLC is providing the following information to make you aware of certain facts and circumstances which we believe the Department should consider as it relates to the August 2, 2018 Negotiated Agreement and Oliver Fiontar, LLC’s obligations, as well as the Department’s obligations.

As the Department is aware, on September 21, 2018, Drake Consulting Group, LLC (Drake) notified the WDNR that its client, Oliver Fiontar, LLC, had voluntarily acquired title to the three parcels of real estate in Cedarburg, Wisconsin. The notification also included a request that the Department assign two separate BRRTS numbers for parcels: the "Amcast North" property (TIN: 13051010500 located at N37W5684 Hamilton Road) and the "Amcast South" property (to be comprised of two parcels TIN: 130502109000 & 130502108000 located at N39W5789 Hamilton Road).

Oliver Fiontar, LLC is of the opinion and belief that it has, since acquiring ownership of the Properties, met its ongoing obligations to take the actions necessary to restore the environment to the extent practicable and minimize the potentially harmful effects from the discharge to the air, lands or waters of this state regardless of whether or not the state directed them to do so, or impeded or otherwise hampered its efforts.

As regards the Department's assertions and/or allegations contained within its March 26, 2019 letter, Oliver Fiontar, LLC notes that within the Negotiated Agreement between the Department and Oliver Fiontar, LLC, Section X contains the following requirement:

Section X. Dispute Resolution

A. Any dispute regarding this agreement shall in the first instance be the subject of informal negotiations between the parties to the dispute. The period for informal negotiations shall not exceed twenty (20) days from the time the dispute arises, unless it is extended by written agreement of the parties to the dispute. The dispute shall be considered to have arisen when one party sends the other parties a written Notice of Dispute.

Neither Oliver Fiontar, LLC, nor its consultant, Drake Consulting Group, LLC (Drake) is aware of the initiation of "informal negotiations" by the Department (or any other party) to resolve any purported dispute(s) as required in the first sentence of Section X, and neither Oliver Fiontar, LLC nor Drake is aware of any written agreement extending the period for such informal negotiations as would be permitted under the terms of the Agreement. As such, Oliver Fiontar, LLC and Drake would seek an explanation from the Department as to the exact date of the initiation of the required "informal negotiations" and precisely what those consisted of.

Your correspondence dated March 26, 2019 states that, "The DNR considers the March 6, 2019 Notice of Non-Compliance as a Notice of Dispute (herein the "Notice"), as described in Section X.A. of the Agreement."

We would note that the Negotiated Agreement makes clear that a “dispute shall be considered to have arisen when one party sends the other parties a written Notice of Dispute.” Oliver Fiontar, LLC’s review of the Department’s March 6, 2019 did not yield any indication that the March 6, 2019 letter contained any language stating that it was to be considered a written “Notice of Dispute” as per the requirements contained in Section X of the Negotiated Agreement (in fact, the first appearance of the phrase “Notice of Dispute” appeared in your March 26, 2019 letter which was entitled, “Notice of Expiration of Informal Dispute Resolution Period”).

We’d also note that the March 6, 2019 letter contained no request or demand for action within 20 days, nor did it reference the provision that stated the 20 day deadline could be extended by mutual agreement of the parties, as might be typical in such a “Notice of Dispute” letter one would expect to receive from the Department.

As you may be aware, on March 6, 2019 the Department issued several different letters to Oliver Fiontar, LLC (which were received several days after their issuance).

One of the letters from the Department was signed by Stephen M. Ales, P.G., Acting Bureau Director of the Remediation & Redevelopment program. That letter was entitled, “Notice of Proposed Amendment to Amcast Negotiated Agreement #1” and generally dealt with a proposed amendment to include certain newly created “DNR BRRTS Numbers” within the Negotiated Agreement. Oliver Fiontar, LLC noted that within this letter, the Department’s Acting Bureau Director incorrectly asserted/alleged that its September 17, 2018 request to the Department involved a “consolidation” of BRRTS cases when in fact the request was to have several new BRRTS numbers established (not “consolidated” as the Acting Bureau Director improperly asserted/alleged). In order to rectify the Department’s mistake and prevent any future misunderstandings, we would request that Acting Bureau Director correct his March 6, 2019 correspondence to indicate that Oliver Fiontar, LLC never requested a “consolidation” of BRRTS cases in conjunction with its September 17, 2018 request to the Department. We would respectfully request that such Departmental correspondence retracting this incorrect allegation be provided within 10 business days.

In addition to the letter Oliver Fiontar, LLC received from the Department’s Acting Bureau Director on March 6, 2019, Oliver Fiontar, LLC received a letter entitled, “Reported Contamination at the Amcast Industrial and Amcast Automotive Sites” which was signed by you. You wrote in the first paragraph that on September 21, 2018, D.J. Burns “notified the Department of Natural Resources (DNR) that Oliver Fiontar, LLC, had obtained title to real estate in Cedarburg, Wisconsin comprised of the parcels tracked as the DNR Remediation and Redevelopment Tracking System (BRRTS) sites listed above.”

Your March 6, 2019 response provided Oliver Fiontar, LLC with the expected Responsible Party letter (“RP letter”) it had sought through its September 21, 2018 notification to the DNR. We’d note that the request for this letter was made in fulfillment of requirements contained within Wisconsin Administrative Code chs. NR 700-754, and specifically NR 706.

In the third paragraph of your letter, you explained that this letter (the “RP letter” which was received nearly 6 months after Oliver Fiontar, LLC and/or its consultant repeatedly requested such a letter from the Department – a timeframe which we understand took approximately 5.5 months longer than the typical Departmental timeframe for the issuance of an RP letter), explains how to “initiate the investigation and cleanup of contamination of the site and how to access further information and assistance from the DNR.” In the section entitled, “Legal Responsibilities,” you stated that, “in addition to all terms and conditions contained in the attached Agreement, between DNR and Oliver Fiontar, LLC, which was executed on August 2, 2018, persons meeting the definition of “responsible party” under Wis. Admin. Code State Statutes NR 700.03(51) must follow applicable law to address the discharge of hazardous substance to the environment or other environmental pollution.” Your letter then states, “Wisconsin Statutes (“Wis. Stats.”) ch. 292 and Wis. Admin Code chs. NR 700 through NR 754 provide specific requirements for undertaking appropriate response actions to address contamination , including requirements for emergency and interim actions, public information, site investigations, remedy selection, design and operation of remedial action systems, and case closure.

On Page 2 of your March 6, 2019 letter in the section entitled, “General Recommendations for Responsible Parties” you recommend that Oliver Fiontar, LLC:

- Review Regulatory Deadlines and Environmental Consultant Qualifications
- Properly Submit Reports on Time with Required Information Included
- Consider the Benefits of a Fee-based Technical Review of your Submittals

In the first paragraph within that section, the Department acknowledged that it was aware (as of September 21, 2018) that Oliver Fiontar, LLC retained Drake Consulting Group, LLC to be its environmental consultant. We would note that your March 6, 2019 letter contains an incorrect assertion (i.e. that Oliver Fiontar, LLC “have hired yourself, Drake Consulting Group, LLC”) that should be corrected. In order to rectify the Department’s mistake within this section of the letter and prevent any future misunderstandings, we would request that you correct this March 6, 2019 correspondence and indicated that Oliver Fiontar, LLC hired Drake Consulting Group, LLC to act as its consultant and that Oliver Fiontar, LLC is known to the Department to be a

separate entity apart from Drake Consulting Group, LLC. We would respectfully request that such Departmental correspondence retracting this incorrect allegation be provided within 10 business days.

As to Item 2, your letter states that “Wisconsin law includes timeframes for submitting technical documents and conducting work, as well as specifications for what should be included in those submittals. This letter provides a general overview of the timeframes and first steps to take for site investigation and cleanup. For an overview of timing requirements, please refer to the NR 700 Process and Timeline Overview, RR-967, enclosed.”

As the Department is aware, Oliver Fiontar, LLC complied with its obligations under NR 706 (Notification to the Department) in September 2018 and by September 21, 2018 complied with its obligation to inform the Department of its selection of an environmental consultant.

As regards the Department’s interpretation and presentation of the NR 700 Process & Timeline Overview illustration (provided in Publication RR-967) referenced in your March 6, 2019 letter, the process laid out in Publication RR-967 shows that following the Department’s receipt of a NR 706 Notification to the Department, the WDNR sends an “RP letter” to the responsible party and the DNR recommends hiring a consultant within 30 days of receipt of the RP letter. The NR 700 Process & Timeline Overview contained within Publication RR-967 also explicitly states that, “RP shall submit SI work plan to DNR within 60 days of notification (via RP letter) that a SI work plan is required (NR 700.11(bm)).”

The Department’s website page entitled indicates the following in the section entitled, “An introduction to cleaning up contamination:”

“When you encounter contaminated soil or groundwater, the first step is to report the contamination to the DNR in accordance with the Spills Law, ch. 292 Wis. Stats. Property owners or the person who caused the discharge are responsible for reporting contamination, although an environmental consultant may make this report on behalf of the responsible person. The Spills law applies equally to a recent spill and to old contamination that has been discovered. If the DNR determines that further investigation is needed, the responsible person will receive a letter from the DNR outlining the requirements.”

The information contained within your March 26, 2019 letter made clear that the NR 700 Process Publication RR-967 and Wisconsin law include detailed and specific timeframes for submitting technical documents and conducting work, especially as regards the 60 day deadline for submittal of a work plan following receipt of an RP letter as indicated in NR 700.11(bm). Oliver

Fiontar, LLC's review of Publication RR-967 and NR 700-754 regulations, along with the information contained in the Department's BRRTS database make it clear that the 60 day work plan submittal deadline from receipt of an RP letter has been met.

As to the third letter which was received on March 6, 2019 we are of the belief that the information either previously provided to the Department, or contained within this letter provides a sufficient response to the Department's assertions of non-compliance contained within that letter and the submittal of this letter shall in no way limit or restrict our rights to contest any such allegations.

As the Department is aware, following Oliver Fiontar, LLC's acquisition of the 8^{+/-} acres within the Amcast Superfund NPL site in September 2018, Oliver Fiontar, LLC has conducted the following activities (summarized below) and which have previously been presented to the Department in more detail in the Monthly Status Reports (October 2018 through April 2019) submitted by Drake and which are included for your reference in Attachment A.

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North, Amcast Central and Amcast South sites as a planned "non-industrial" usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC's acquisition of a portion of the Amcast Industrial NPL site.
- Conducted efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the land's it owns, especially as regards the Department's concern with potential releases from the on-site sewer system. These efforts are ongoing.
- Undertook continuing efforts to further secure the premises via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings. These efforts are ongoing.
- Has conducted no soil penetration activities, earth-moving work or site grading, nor is it intended to be conducted until after proper notice is provided to DNR and EPA.
- Continued efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the lands it owns, especially as regards the Department's concern with potential releases from the on-site sewer system by performing such tasks as re-routing downspouts away from areas of concern, checking on previously placed open manhole cover barrier materials (3.5 mil plastic sheeting which was emplaced in an effort to prevent or reduce the amount of water entering the on-site sewer system) and completing

visual checks of observable site features to assess any potential threats of contaminant intrusion.

- In addition, Oliver Fiontar, LLC directed Drake Consulting Group, LLC (Drake) to conduct a groundwater sampling event in 2018 as permitted by the Negotiated Agreement and has reported the analytical results to the DNR and EPA.
- Directed Drake to prepare and submit its Work Plan For Additional Brownfield Redevelopment Related Soil, Groundwater and Vapor Assessment Activities at the Former Amcast Facility and confirmed the Department's receipt of the work plan (with review fee) on April 19, 2019, within the 60 day timeframe provided under NR 700.11(bm).

It is Oliver Fiontar, LLC's hope that the information contained within this submittal is sufficient to further inform the Department that it has (and/or will, as regards requirements contained in NR 700.11(3g)), addressed any and all of the Purported Compliance Issues Identified by the Department which included requirements to:

Via the submittal of this letter, Oliver Fiontar, LLC is kindly requesting the following:

- that the Department issue correspondence retracting the incorrect language in Mr. Ales March 6, 2019 letter,
- that you issue correspondence retracting the incorrect allegation that Oliver Fiontar , LLC "hired yourself" and
- provide the exact date of the initiation of the required "informal negotiations" and precisely what that consisted of.

If you have any questions regarding this submittal, please contact D.J. Burns - Member, Oliver Fiontar, LLC. His telephone number is (414) 881-0003.

Sincerely,



D.J. Burns - Member
Oliver Fiontar, LLC

cc: Margaret Brunette, Hydrogeologist, Program Coordinator, WDNR
Krista McKim, P.E. Remedial Project Manager, U.S. EPA
Stephen M. Ales, P.G. Acting Bureau Director of the Remediation & Redevelopment, WDNR

Attachment A



DRAKE Consulting Group, LLC

October 17, 2018

**Monthly Update for the Former Meta Mold/Amcast North & Amcast South
Brownfield Redevelopment Sites - City of Cedarburg, Ozaukee County, Wisconsin
U.S. EPA Superfund Site ID: WIN 000510210 (Amcast Industrial Site)
DNR BRRTS Numbers: 02-46-000795, 04-46-243223, 04-46-243336 & 07-46-581557**

This monthly update is being provided to the DNR & EPA in fulfillment of Oliver Fiontar, LLC's obligations under the Wis. Stat. 75.106 Agreement between the DNR and Oliver Fiontar, LLC dated August 2, 2018.

Oliver Fiontar, LLC was provided with notice from the City of Cedarburg's attorney on September 20, 2018 at approximately 4:00 pm CST that its acquisition of certain lands formerly owned by Amcast had been finalized. The lands that were transferred to Oliver Fiontar, LLC's ownership included the following:

- Tax Parcel ID Number 13-051-01-05-000 consisting of 4.02 acres with a site address of "N37 W5684 Hamilton Road"
- Tax Parcel ID Number 13-050-21-09-000 consisting of 2.40 acres with a site address of "N39 W5789 Hamilton Road"
- Tax Parcel ID Number 13-050-21-08-000 consisting of 2.0040 acres with a site address of "Hamilton Road" (no other address is known to exist)

The EPA's May 2015 updated "Site Description" for the Amcast NPL site indicated that, "the Amcast Industrial site includes the Amcast property and surrounding areas that include residential properties, the storm water retention areas (Wilshire Pond), Zeunert Park Quarry Pond, and storm sewers" which Oliver Fiontar, LLC understands comprises approximately 15-20

additional acres beyond those +/-8 acres which were acquired by Oliver Fiontar, LLC in September 2018.

Prior to Oliver Fiontar, LLC's acquisition of the parcels comprising the Amcast North and Amcast South sites, the City of Cedarburg - Tax Incremental District No. 4 (the "TID" or "District") was created to serve as a source of future funds for certain brownfield redevelopment related work at the site. The District was created as a blighted area district comprising approximately 8 acres. The District includes the +/- 4 acre Amcast "North" and the +/- 4 acre Amcast "South" Brownfield Redevelopment Sites located along Hamilton Road, Johnson Avenue and the terminus of Burr Lane.

For ease of reference, the District was further divided into the "North" Brownfield Redevelopment Site and the "South" Brownfield Redevelopment Site with the "North" site being comprised primarily of Tax Parcel ID Number 13-051-01-05-000 (where historical industrial and manufacturing operations were generally conducted by Amcast) and the "South" site being comprised primarily of Tax Parcel ID Number 13-050-21-09-000 & 13-050-21-08-000 (where historical industrial and manufacturing operations were conducted by MetaMold and Amcast) with Hamilton Road being the primary line of division between the North and South sites.

On behalf of Oliver Fiontar, LLC, Drake Consulting Group, LLC had previously requested that the DNR issue separate BRRTS numbers for the Amcast North and Amcast South sites for easier tracking purposes. Once the DNR has assigned the requested Amcast North and Amcast South BRRTS numbers, the north and south site BRRTS numbers will be utilized by Drake to provide better clarity as to which of these areas is the subject of any future reporting or discussion.

Following its acquisition of the +/- 8 acres within the NPL site, Oliver Fiontar, LLC has conducted the following activities:

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North and Amcast South sites as a

planned “non-industrial” usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC’s acquisition of a portion of the Amcast Industrial NPL site.

- Identified, inventoried and field-located and/or repaired existing and historic sampling locations/monitoring wells.
- Undertook efforts to further secure the premises (and some monitoring wells) via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings.
- Inventoried existing utilities and ascertained their approximate locations.
- Initiated preliminary hazardous waste/non-hazardous waste characterization activities.
- Performed pre-demolition asbestos containing building materials (ACBM) and lead-based paint testing of the buildings located on the Amcast South site.
- Conducted a pre-bid ACBM walkthrough of the Amcast South buildings so as to permit licensed abatement contractors to prepare bids for ACBM abatement activities.
- Conducted preliminary site clearance activities (consisting of non-disruptive activities to remove trees, brush, woody vegetation and other vegetation) at the Amcast North and Amcast South sites (Note: no soil penetration activities, earth-moving work or site grading work has been conducted, nor is it intended to be until after proper notice is provided to DNR and EPA).
- Additional activities conducted during the month included routine project management, financial project administration, attendance at various City and Community Development Authority meetings and other communications with regard to project related activities.

If you have any questions regarding this monthly update, please contact D.J. Burns, President/Project Director of Drake. His office telephone number is (262) 241-0005 and his cellphone number is (414) 881-0003.

Sincerely,

Drake Consulting Group, LLC



D.J. Burns
President/Project Director



DRAKE Consulting Group, LLC

November 21, 2018

**Monthly Update for the Former Meta Mold/Amcast North & Amcast South
Brownfield Redevelopment Sites - City of Cedarburg, Ozaukee County, Wisconsin
U.S. EPA Superfund Site ID: WIN 000510210 (Amcast Industrial Site)
DNR BRRTS Numbers: 02-46-000795, 04-46-243223, 04-46-243336 & 07-46-581557**

This monthly update is being provided to the DNR & EPA in fulfillment of Oliver Fiontar, LLC's obligations under the Wis. Stat. 75.106 Agreement between the DNR and Oliver Fiontar, LLC dated August 2, 2018.

Oliver Fiontar, LLC acquired certain lands formerly owned by Amcast that included the following:

- Tax Parcel ID Number 13-051-01-05-000 consisting of 4.02 acres with a site address of "N37 W5684 Hamilton Road"
- Tax Parcel ID Number 13-050-21-09-000 consisting of 2.40 acres with a site address of "N39 W5789 Hamilton Road"
- Tax Parcel ID Number 13-050-21-08-000 consisting of 2.0040 acres with a site address of "Hamilton Road" (no other address is known to exist)

The EPA's May 2015 updated "Site Description" for the Amcast NPL site indicated that, "the Amcast Industrial site includes the Amcast property and surrounding areas that include residential properties, the storm water retention areas (Wilshire Pond), Zeunert Park Quarry Pond, and storm sewers" which Oliver Fiontar, LLC understands comprises approximately 15-20 additional acres beyond those +/-8 acres which were acquired by Oliver Fiontar, LLC in September 2018.

For ease of reference, the lands acquired by Oliver Fiontar, LLC are divided into the “North” Brownfield Redevelopment Site and the “South” Brownfield Redevelopment Site with the “North” site being comprised primarily of Tax Parcel ID Number 13-051-01-05-000 (where historical industrial and manufacturing operations were generally conducted by Amcast) and the “South” site being comprised primarily of Tax Parcel ID Number 13-050-21-09-000 & 13-050-21-08-000 (where historical industrial and manufacturing operations were conducted by MetaMold and Amcast) with Hamilton Road being the primary line of division between the North and South sites.

On behalf of Oliver Fiontar, LLC, Drake Consulting Group, LLC had previously requested that the DNR issue separate BRRTS numbers for the Amcast North and Amcast South sites for easier tracking purposes. Once the DNR has assigned the requested Amcast North and Amcast South BRRTS numbers, the north and south site BRRTS numbers will be utilized by Drake to provide better clarity as to which of these areas is the subject of any future reporting or discussion.

Following its acquisition of the +/- 8 acres within the NPL site, Oliver Fiontar, LLC has conducted the following activities:

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North and Amcast South sites as a planned “non-industrial” usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC’s acquisition of a portion of the Amcast Industrial NPL site.
- Conducted efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the land’s it owns, especially as regards the Department’s concern with potential releases from the on-site sewer system.

Since the October 2018 monthly update, Oliver Fiontar has:

- Scheduled an on-site visit on November 28, 2018 to meet with the new EPA Regional Project Manager (Krista McKim) and former EPA RPM Scott Hansen to further discuss the current status of the site, redevelopment plans and obtain EPA input as well as the DNR's to what activities they would like to see included in Drake's forthcoming Site Investigation Work Plan (as you are aware, due to the unexpected assignment of a new EPA RPM for the Amcast site, Drake has requested an extension of the deadline within which to finalize its Site Investigation Work Plan).
- Further repaired or made accessible existing and historic sampling locations/monitoring wells.
- Undertook efforts to further secure the premises via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings.
- Inventoried existing utilities and ascertained their approximate locations via Digger's Hotline on-property locating and review of utility location maps provided through Digger's Hotline.
- Initiated new and continued prior preliminary hazardous waste/non-hazardous waste characterization activities and abandoned container contents assessments.
- Initiated and completed asbestos containing building materials (ACBM) abatement activities at all Amcast South buildings.
- Performed pre-demolition asbestos containing building materials (ACBM) and lead-based paint testing of all the buildings located on the Amcast North site.
- Met on-site with DNR Asbestos Program Supervisor Mark Davis to conduct post-abatement walk-through of Amcast South site buildings and post-testing pre-abatement walk-through of Amcast North site buildings.
- Informed contractors of a planned December pre-bid ACBM walkthrough of the Amcast North buildings so as to permit licensed abatement contractors to prepare bids for ACBM abatement activities.
- Continued preliminary site clearance activities (consisting of non-disruptive activities to remove trees, brush, woody vegetation and other vegetation) at the Amcast North and Amcast South sites (Note: no soil penetration activities, earth-moving work or site grading work has been conducted, nor is it intended to be until after proper notice is provided to DNR and EPA).

- Continued efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the lands it owns, especially as regards the Department's concern with potential releases from the on-site sewer system by performing such tasks as re-routing downspouts away from areas of concern, checking on previously placed open manhole cover barrier materials (3.5 mil plastic sheeting which was emplaced in an effort to prevent or reduce the amount of water entering the on-site sewer system) and completing visual checks of observable site features to assess any potential threats of contaminant intrusion.
- Obtained and posted the required City of Cedarburg razing permits for buildings located on the Amcast South and Amcast North sites.
- Initiated groundwater elevation assessment and groundwater sampling activities at existing on-site monitoring wells (an activity which is permitted under Addendum D(4)(b)(ii)).
- Additional activities conducted during the month included routine project management, financial project administration, attendance at various City and Community Development Authority meetings and other communications with regard to project related activities.

If you have any questions regarding this monthly update, please contact D.J. Burns, President/Project Director of Drake. His office telephone number is (262) 241-0005 and his cellphone number is (414) 881-0003.

Sincerely,

Drake Consulting Group, LLC



D.J. Burns
President/Project Director



DRAKE Consulting Group, LLC

December 21, 2018

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The EPA's May 2015 updated "Site Description" for the Amcast NPL site indicated that, "the Amcast Industrial site includes the Amcast property and surrounding areas that include residential properties, the storm water retention areas (Wilshire Pond), Zeunert Park Quarry Pond, and storm sewers" which Oliver Fiontar, LLC understands comprises approximately 15-20 additional acres beyond those +/-8 acres which were acquired by Oliver Fiontar, LLC in September 2018.

For ease of reference, the lands acquired by Oliver Fiontar, LLC are divided into the “North” Brownfield Redevelopment Site and the “South” Brownfield Redevelopment Site with the “North” site being comprised primarily of Tax Parcel ID Number 13-051-01-05-000 (where historical industrial and manufacturing operations were generally conducted by Amcast) and the “South” site being comprised primarily of Tax Parcel ID Number 13-050-21-09-000 & 13-050-21-08-000 (where historical industrial and manufacturing operations were conducted by MetaMold and Amcast) with Hamilton Road being the primary line of division between the North and South sites.

Following its acquisition of the +/-8 acres within the NPL site, Oliver Fiontar, LLC has conducted the following activities:

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North and Amcast South sites as a planned “non-industrial” usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC’s acquisition of a portion of the Amcast Industrial NPL site.
- Conducted efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the land’s it owns, especially as regards the Department’s concern with potential releases from the on-site sewer system.

Since the November 2018 monthly update, Oliver Fiontar has:

- Scheduled and participated in an on-site meeting and visit on November 28, 2018 to meet with the new EPA Regional Project Manager (Krista McKim) and former EPA RPM Scott Hansen to further discuss the current status of the site, redevelopment plans and obtain EPA input as to what activities they would like to see included in Drake’s forthcoming Site Investigation Work Plan (as you are aware, due to the unexpected assignment of a new EPA RPM for the Amcast site, Drake has requested an extension of

the deadline within which to finalize its Site Investigation Work Plan and we understand the new deadline for the submittal of the Site Investigation Work Plan is mid-January 2019).

- Commenced preparation of the DNR-requested Site Investigation Work Plan.
- Conducted a groundwater sampling event at accessible/functional wells located at Amcast North and Amcast South and performed an initial review of the available laboratory analytical results.
- Further repaired or made more accessible existing and historic sampling locations/monitoring wells (brush clearance).
- Undertook continuing efforts to further secure the premises via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings.
- Continued to inventory existing utilities and ascertained and recorded their approximate locations via Digger's Hotline on-property locating and review of utility location maps provided through Digger's Hotline.
- Initiated new (and continued prior) preliminary hazardous waste/non-hazardous waste characterization activities and abandoned container contents assessments.
- Requested and received project closeout documentation from the designated ACBM abatement contractor for all Amcast South buildings.
- Continued pre-demolition asbestos containing building materials (ACBM) and lead-based paint testing of all the buildings located on the Amcast North site.
- Met on-site with DNR Asbestos Program Supervisor Mark Davis to conduct post-abatement walk-through of Amcast South site buildings and post-testing pre-abatement walk-through of Amcast North site buildings.
- Conducted the planned December pre-bid ACBM walkthrough of the Amcast North buildings with contractor representatives so as to permit licensed abatement contractors to prepare bids for ACBM abatement activities.
- Authorized Balistrieri Environmental to initiate permitting activities associated with the planned ACBM abatement activities at the Amcast North buildings and preliminarily scheduled a January 2019 commencement of Amcast North ACBM abatement activities.
- Continued preliminary site clearance activities (consisting of non-disruptive activities to remove trees, brush, woody vegetation and other vegetation) at the Amcast North and Amcast South sites (Note: no soil penetration activities, earth-moving work or site

grading work has been conducted, nor is it intended to be until after proper notice is provided to DNR and EPA).

- Continued efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the lands it owns, especially as regards the Department's concern with potential releases from the on-site sewer system by performing such tasks as re-routing downspouts away from areas of concern, checking on previously placed open manhole cover barrier materials (3.5 mil plastic sheeting which was emplaced in an effort to prevent or reduce the amount of water entering the on-site sewer system) and completing visual checks of observable site features to assess any potential threats of contaminant intrusion.
- Additional activities conducted during the month included routine project management, financial project administration, and other communications with regard to project related activities.

If you have any questions regarding this monthly update, please contact D.J. Burns, President/Project Director of Drake. His office telephone number is (262) 241-0005 and his cellphone number is (414) 881-0003.

Sincerely,

Drake Consulting Group, LLC

A handwritten signature in black ink, appearing to read 'D.J. Burns', with a stylized flourish at the end.

D.J. Burns
President/Project Director



DRAKE Consulting Group, LLC

January 22, 2019

**Monthly Update for the Former Meta Mold/Amcast North & Amcast South
Brownfield Redevelopment Sites - City of Cedarburg, Ozaukee County, Wisconsin
U.S. EPA Superfund Site ID: WIN 000510210 (Amcast Industrial Site)
DNR BRRTS Numbers: 02-46-000795, 04-46-243223, 04-46-243336 & 07-46-581557**

This monthly update is being provided to the DNR & EPA in fulfillment of Oliver Fiontar, LLC's obligations under the Wis. Stat. 75.106 Agreement between the DNR and Oliver Fiontar, LLC dated August 2, 2018.

Oliver Fiontar, LLC acquired certain lands formerly owned by Amcast that included the following:

- Tax Parcel ID Number 13-051-01-05-000 consisting of 4.02 acres with a site address of "N37 W5684 Hamilton Road"
- Tax Parcel ID Number 13-050-21-09-000 consisting of 2.40 acres with a site address of "N39 W5789 Hamilton Road"
- Tax Parcel ID Number 13-050-21-08-000 consisting of 2.0040 acres with a site address of "Hamilton Road" (no other address is known to exist)

The EPA's May 2015 updated "Site Description" for the Amcast NPL site indicated that, "the Amcast Industrial site includes the Amcast property and surrounding areas that include residential properties, the storm water retention areas (Wilshire Pond), Zeunert Park Quarry Pond, and storm sewers" which Oliver Fiontar, LLC understands comprises approximately 15-20 additional acres beyond those +/-8 acres which were acquired by Oliver Fiontar, LLC in September 2018.

For ease of reference, the lands acquired by Oliver Fiontar, LLC are divided into the “North” Brownfield Redevelopment Site and the “South” Brownfield Redevelopment Site with the “North” site being comprised primarily of Tax Parcel ID Number 13-051-01-05-000 (where historical industrial and manufacturing operations were generally conducted by Amcast) and the “South” site being comprised primarily of Tax Parcel ID Number 13-050-21-09-000 & 13-050-21-08-000 (where historical industrial and manufacturing operations were conducted by MetaMold and Amcast) with Hamilton Road being the primary line of division between the North and South sites.

Following its acquisition of the +/-8 acres within the NPL site, Oliver Fiontar, LLC has conducted the following activities:

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North and Amcast South sites as a planned “non-industrial” usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC’s acquisition of a portion of the Amcast Industrial NPL site.
- Conducted efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the land’s it owns, especially as regards the Department’s concern with potential releases from the on-site sewer system.

Since the December 2018 monthly update, Oliver Fiontar has:

- Learned that the partial shutdown of the Federal Government in late December has had a resultant effect of limiting Oliver Fiontar’s ability to communicate with the EPA project manager or EPA Legal Counsel with their messages indicating that once the shutdown ends they will again be able to assist with “non-emergency” matters.
- Continued preparation of the DNR-requested Site Investigation Work Plan.

- Initiated the preparation of a brief summary report containing the results of the groundwater sampling event conducted in 2018 at accessible/functional wells located at Amcast North and Amcast South which will be submitted to the EPA and WDNR upon completion.
- Further repaired or made more accessible existing and historic sampling locations/monitoring wells (brush clearance).
- Undertook continuing efforts to further secure the premises via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings.
- Continued to inventory existing utilities and ascertained and recorded their approximate locations via Digger's Hotline on-property locating and review of utility location maps provided through Digger's Hotline.
- Continued preliminary hazardous waste/non-hazardous waste characterization activities and abandoned container contents assessments.
- Reviewed project closeout documentation from the designated ACBM abatement contractor for all Amcast South buildings.
- Reviewed pre-demolition asbestos containing building materials (ACBM) and lead-based paint testing results of all the buildings located on the Amcast North site.
- Met on-site with DNR Asbestos Program Supervisor Mark Davis during Amcast North ACBM abatement activities.
- Authorized Balistriero Environmental to complete permitting activities associated with the planned ACBM abatement activities at the Amcast North buildings and arranged for the Amcast North ACBM abatement activities to commence in the first week of January 2018 (ACBM abatement activities are on-going at the time of this report)
- Continued preliminary site clearance activities and (consisting of non-disruptive activities to remove trees, brush, woody vegetation and other vegetation) and snow removal activities at the Amcast North and Amcast South sites (Note: no soil penetration activities, earth-moving work or site grading work has been conducted, nor is it intended to be until after proper notice is provided to DNR and EPA).
- Continued efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the lands it owns, especially as regards the Department's concern with potential releases from the on-site sewer system by performing such tasks as re-routing downspouts away from areas of concern, checking on previously placed open manhole

cover barrier materials (3.5 mil plastic sheeting which was emplaced in an effort to prevent or reduce the amount of water entering the on-site sewer system) and completing visual checks of observable site features to assess any potential threats of contaminant intrusion.

- Additional activities conducted during the month included routine project management, financial project administration, and other communications with regard to project related activities.

At this time, Oliver Fiontar, LLC and Drake are still awaiting the notification from the WNDR of the issuance of the previously requested BRRTS numbers for the Amcast North and Amcast South Sites. As previously discussed, we will inform the EPA of the newly designated BRRTS numbers once they are issued by the WDNR.

If you have any questions regarding this monthly update, please contact D.J. Burns, President/Project Director of Drake. His office telephone number is (262) 241-0005 and his cellphone number is (414) 881-0003.

Sincerely,

Drake Consulting Group, LLC

A handwritten signature in black ink, appearing to read 'D.J. Burns', written in a cursive style.

D.J. Burns
President/Project Director



DRAKE Consulting Group, LLC

February 15, 2019

**Monthly Update for the Former Meta Mold/Amcast North & Amcast South
Brownfield Redevelopment Sites - City of Cedarburg, Ozaukee County, Wisconsin
U.S. EPA Superfund Site ID: WIN 000510210 (Amcast Industrial Site)
DNR BRRTS Numbers: 02-46-000795, 04-46-243223, 04-46-243336 & 07-46-581557**

This monthly update is being provided to the DNR & EPA in fulfillment of Oliver Fiontar, LLC's obligations under the Wis. Stat. 75.106 Agreement between the DNR and Oliver Fiontar, LLC dated August 2, 2018.

Oliver Fiontar, LLC acquired certain lands formerly owned by Amcast that included the following:

- Tax Parcel ID Number 13-051-01-05-000 consisting of 4.02 acres with a site address of "N37 W5684 Hamilton Road"
- Tax Parcel ID Number 13-050-21-09-000 consisting of 2.40 acres with a site address of "N39 W5789 Hamilton Road"
- Tax Parcel ID Number 13-050-21-08-000 consisting of 2.0040 acres with a site address of "Hamilton Road" (no other address is known to exist)

The EPA's May 2015 updated "Site Description" for the Amcast NPL site indicated that, "the Amcast Industrial site includes the Amcast property and surrounding areas that include residential properties, the storm water retention areas (Wilshire Pond), Zeunert Park Quarry Pond, and storm sewers" which Oliver Fiontar, LLC understands comprises approximately 15-20 additional acres beyond those +/-8 acres which were acquired by Oliver Fiontar, LLC in September 2018.

For ease of reference, the lands acquired by Oliver Fiontar, LLC are divided into the “North” Brownfield Redevelopment Site and the “South” Brownfield Redevelopment Site with the “North” site being comprised primarily of Tax Parcel ID Number 13-051-01-05-000 (where historical industrial and manufacturing operations were generally conducted by Amcast) and the “South” site being comprised primarily of Tax Parcel ID Number 13-050-21-09-000 & 13-050-21-08-000 (where historical industrial and manufacturing operations were conducted by MetaMold and Amcast) with Hamilton Road being the primary line of division between the North and South sites.

Following its acquisition of the +/-8 acres within the NPL site, Oliver Fiontar, LLC has conducted the following activities:

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North and Amcast South sites as a planned “non-industrial” usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC’s acquisition of a portion of the Amcast Industrial NPL site.
- Conducted efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the land’s it owns, especially as regards the Department’s concern with potential releases from the on-site sewer system. These efforts are ongoing.

Since the January 2019 monthly update, Oliver Fiontar has:

- Continued preparation of the DNR-requested Site Investigation Work Plan.
- Continued with the preparation of a brief summary report containing the results of the groundwater sampling event conducted in 2018 at accessible/functional wells located at Amcast North and Amcast South which will be submitted to the EPA and WDNR upon completion.

- Further repaired or made more accessible existing and historic sampling locations/monitoring wells (brush clearance/debris removal).
- Undertook continuing efforts to further secure the premises via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings.
- Continued to inventory existing utilities and ascertained and recorded their approximate locations via Digger's Hotline on-property locating and review of utility location maps provided through Digger's Hotline.
- Continued preliminary hazardous waste/non-hazardous waste characterization activities and abandoned container contents assessments.
- Reviewed project closeout documentation from the designated ACBM abatement contractor for all Amcast South buildings.
- Reviewed pre-demolition asbestos containing building materials (ACBM) and lead-based paint testing results of all the buildings located on the Amcast North site.
- Met on-site with DNR Asbestos Program Supervisor Mark Davis during Amcast North ACBM abatement activities.
- Arranged for Balistriero Environmental to continue the planned ACBM abatement activities at the Amcast North buildings (weather-permitting).
- Continued preliminary site clearance activities and (consisting of non-disruptive activities to remove trees, brush, woody vegetation and other vegetation) and snow removal activities at the Amcast North and Amcast South sites (Note: no soil penetration activities, earth-moving work or site grading work has been conducted, nor is it intended to be until after proper notice is provided to DNR and EPA).
- Continued efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the lands it owns, especially as regards the Department's concern with potential releases from the on-site sewer system by performing such tasks as re-routing downspouts away from areas of concern, checking on previously placed open manhole cover barrier materials (3.5 mil plastic sheeting which was emplaced in an effort to prevent or reduce the amount of water entering the on-site sewer system) and completing visual checks of observable site features to assess any potential threats of contaminant intrusion.

- Additional activities conducted during the month included routine project management, financial project administration, and other communications with regard to project related activities.

At this time, Oliver Fiontar, LLC and Drake are still awaiting the notification from the WNDR of the issuance of the previously requested BRRTS numbers for the Amcast North and Amcast South Sites. As previously discussed, we will inform the EPA of the newly designated BRRTS numbers once they are issued by the WDNR.

If you have any questions regarding this monthly update, please contact D.J. Burns, President/Project Director of Drake. His office telephone number is (262) 241-0005 and his cellphone number is (414) 881-0003.

Sincerely,

Drake Consulting Group, LLC

A handwritten signature in black ink, appearing to be 'D.J. Burns', written in a cursive style.

D.J. Burns
President/Project Director



DRAKE Consulting Group, LLC

March 16, 2019

**Monthly Update for the Former Meta Mold/Amcast North & Amcast South
Brownfield Redevelopment Sites - City of Cedarburg, Ozaukee County, Wisconsin
U.S. EPA Superfund Site ID: WIN 000510210 (Amcast Industrial Site)
DNR BRRTS Numbers: 02-46-000795, 04-46-243223, 04-46-243336 & 07-46-581557**

This monthly update is being provided to the DNR & EPA in fulfillment of Oliver Fiontar, LLC's obligations under the Wis. Stat. 75.106 Agreement between the DNR and Oliver Fiontar, LLC dated August 2, 2018.

Oliver Fiontar, LLC acquired certain lands formerly owned by Amcast that included the following:

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- Tax Parcel ID Number 13-050-21-09-000 consisting of 2.40 acres with a site address of "N39 W5789 Hamilton Road"
- Tax Parcel ID Number 13-050-21-08-000 consisting of 2.0040 acres with a site address of "Hamilton Road" (no other address is known to exist)

The EPA's May 2015 updated "Site Description" for the Amcast NPL site indicated that, "the Amcast Industrial site includes the Amcast property and surrounding areas that include residential properties, the storm water retention areas (Wilshire Pond), Zeunert Park Quarry Pond, and storm sewers" which Oliver Fiontar, LLC understands comprises approximately 15-20 additional acres beyond those +/-8 acres which were acquired by Oliver Fiontar, LLC in September 2018.

For ease of reference, the lands acquired by Oliver Fiontar, LLC are divided into the “North” Brownfield Redevelopment Site and the “South” Brownfield Redevelopment Site with the “North” site being comprised primarily of Tax Parcel ID Number 13-051-01-05-000 (where historical industrial and manufacturing operations were generally conducted by Amcast) and the “South” site being comprised primarily of Tax Parcel ID Number 13-050-21-09-000 & 13-050-21-08-000 (where historical industrial and manufacturing operations were conducted by MetaMold and Amcast) with Hamilton Road being the primary line of division between the North and South sites.

Following its acquisition of the +/-8 acres within the NPL site, Oliver Fiontar, LLC has conducted the following activities:

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North and Amcast South sites as a planned “non-industrial” usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC’s acquisition of a portion of the Amcast Industrial NPL site.
- Conducted efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the land’s it owns, especially as regards the Department’s concern with potential releases from the on-site sewer system. These efforts are ongoing.

Since the February 2019 monthly update, Oliver Fiontar has:

- Continued preparation of the DNR-requested Site Investigation Work Plan.
- Continued with the preparation of a brief summary report containing the results of the groundwater sampling event conducted in 2018 at accessible/functional wells located at Amcast North and Amcast South which will be submitted to the EPA and WDNR upon completion.
-

- Conducted site-wide snow removal activities.
- Further repaired or made more accessible existing and historic sampling locations/monitoring wells (brush clearance/debris removal).
- Undertook continuing efforts to further secure the premises via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings.
- Continued to inventory existing utilities and ascertained and recorded their approximate locations via Digger's Hotline on-property locating and review of utility location maps provided through Digger's Hotline.
- Continued preliminary hazardous waste/non-hazardous waste characterization activities and abandoned container contents assessments.
- Reviewed pre-demolition asbestos containing building materials (ACBM) and lead-based paint testing results of all the buildings located on the Amcast North site.
- Arranged for Balistriero Environmental to continue the planned ACBM abatement activities at the Amcast North buildings (weather-permitting).
- Continued preliminary site clearance activities and (consisting of non-disruptive activities to remove trees, brush, woody vegetation and other vegetation) and snow removal activities at the Amcast North and Amcast South sites (Note: no soil penetration activities, earth-moving work or site grading work has been conducted, nor is it intended to be until after proper notice is provided to DNR and EPA).
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- Additional activities conducted during the month included routine project management, financial project administration, and other communications with regard to project related activities.

Oliver Fiontar, LLC recently received notification from the WDNR of the issuance of three (3) new BRRTS numbers for the three (3) parcels that comprise the Amcast North and Amcast South Sites. We understand that a copy of the recent WDNR correspondence was sent to the EPA notifying you of the newly designated BRRTS numbers. Having now received notice of the issuance of the BRRTS numbers and the previously requested "Responsible Party" letter from the WDNR, Oliver Fiontar, LLC has requested that Drake work to finalize the WDNR requested Site Investigation Work Plan and submit it to the WDNR (with a copy to the EPA's Regional Project Manager) for review. It is Oliver Fiontar's hope that the workplan can be submitted by Drake by the end of the first week of April 2019.

If you have any questions regarding this monthly update, please contact D.J. Burns, President/Project Director of Drake. His office telephone number is (262) 241-0005 and his cellphone number is (414) 881-0003.

Sincerely,

Drake Consulting Group, LLC

A handwritten signature in black ink, appearing to be 'D.J. Burns', written in a cursive style.

D.J. Burns
President/Project Director



DRAKE Consulting Group, LLC

April 11, 2019

**Monthly Update for the Former Meta Mold/Amcast North & Amcast South
Brownfield Redevelopment Sites - City of Cedarburg, Ozaukee County, Wisconsin
U.S. EPA Superfund Site ID: WIN 000510210 (Amcast Industrial Site)
DNR BRRTS Numbers: 02-46-000795, 04-46-243223, 04-46-243336 & 07-46-581557**

This monthly update is being provided to the DNR & EPA in fulfillment of Oliver Fiontar, LLC's obligations under the Wis. Stat. 75.106 Agreement between the DNR and Oliver Fiontar, LLC dated August 2, 2018.

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Following its acquisition of the +/-8 acres within the NPL site, Oliver Fiontar, LLC has conducted the following activities:

- Provided notification to the DNR and EPA of the finalization of its acquisition of the +/- 8 acres of land within the Amcast Industrial NPL site which Oliver Fiontar, LLC now owns.
- Fulfilled its obligation under the Wis. Stat. 75.106 agreement to notify the DNR (with a copy to EPA) of the intended future use of the Amcast North and Amcast South sites as a planned “non-industrial” usage, as had been contemplated and discussed with both DNR and EPA prior to Oliver Fiontar, LLC’s acquisition of a portion of the Amcast Industrial NPL site.
- Conducted efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the land’s it owns, especially as regards the Department’s concern with potential releases from the on-site sewer system. These efforts are ongoing.

Since the March 2019 monthly update, Oliver Fiontar has:

- Continued preparation of the DNR-requested Site Work Plan.
- Continued with the preparation of a brief summary report containing the results of the groundwater sampling event conducted in 2018 at accessible/functional wells located at Amcast North and Amcast South which will be submitted to the EPA and WDNR upon completion.
- Conducted site-wide snow removal activities to permit site access.

- Further repaired or made more accessible existing and historic sampling locations/monitoring wells (brush clearance/debris removal).
- Undertook continuing efforts to further secure the premises via installation of locks, repair of fencing, securing of gates, and additional boarding-up of a number of windows/doors/openings.
- Continued to inventory existing utilities and ascertained and recorded their approximate locations via Digger's Hotline on-property locating and review of utility location maps provided through Digger's Hotline.
- Continued preliminary hazardous waste/non-hazardous waste characterization activities and abandoned container contents assessments.
- Reviewed pre-demolition asbestos containing building materials (ACBM) and lead-based paint testing results of all the buildings located on the Amcast North and Amcast South sites.
- Continued the planned ACBM abatement activities at the Amcast North buildings (weather-permitting).
- Continued preliminary site clearance activities and (consisting of non-disruptive activities to remove trees, brush, woody vegetation and other vegetation) and snow removal activities at the Amcast North and Amcast South sites (Note: no soil penetration activities, earth-moving work or site grading work has been conducted, nor is it intended to be until after proper notice is provided to DNR and EPA).
- Continued efforts to prevent, mitigate and/or halt the migration of contamination beyond the boundaries of the lands it owns, especially as regards the Department's concern with potential releases from the on-site sewer system by performing such tasks as re-routing downspouts away from areas of concern, checking on previously placed open manhole cover barrier materials (3.5 mil plastic sheeting which was emplaced in an effort to prevent or reduce the amount of water entering the on-site sewer system) and completing visual checks of observable site features to assess any potential threats of contaminant intrusion.
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As previously stated in the March monthly update, Oliver Fiontar, LLC recently received notification from the WDNR of the issuance of three (3) new BRRTS numbers for the three (3) parcels that comprise the Amcast North and Amcast South Sites. We understand that a copy of the recent WDNR correspondence was sent to the EPA notifying you of the newly designated BRRTS numbers. Having now received notice of the issuance of the BRRTS numbers and the previously requested "Responsible Party" letter from the WDNR, Oliver Fiontar, LLC has requested that Drake work to finalize the WDNR requested Site Investigation Work Plan and submit it to the WDNR (with a copy to the EPA's Regional Project Manager) for review upon its completion.

If you have any questions regarding this monthly update, please contact D.J. Burns, President/Project Director of Drake. His office telephone number is (262) 241-0005 and his cellphone number is (414) 881-0003.

Sincerely,

Drake Consulting Group, LLC

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D.J. Burns
President/Project Director