



August 27, 2019

Mr. Daniel Joseph Burns III, Member
Oliver Fiontar, LLC
N105 W7585 Chatham St.
Cedarburg, WI 53012-3255

SUBJECT: Review of Site Investigation Workplan
Former Amcast Facility, Cedarburg, WI
WDNR FID# 246003780 and 246175820
BRRTS# 02-46-583162, 02-46-583163, 02-46-583164

Dear Mr. Burns,

On April 19, 2019, the Wisconsin Department of Natural Resources (DNR) received the *Work Plan for Additional Brownfield Redevelopment Related Soil, Groundwater and Vapor Assessment Activities at the Former Amcast Facility* (Plan) prepared for Oliver Fiontar, LLC by Drake Consulting Group, LLC. The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. ch. 292 and *Negotiated Agreement #1*, a Wis. Stat. § 75.106 Agreement between the DNR and Oliver Fiontar, LLC signed August 2, 2018 (Agreement).

The Plan is not an adequate site investigation work plan. The Plan proposes "...drilling and sampling of several hand auger borings and/or soil borings..." on the former Amcast parcels. It is unclear whether the proposed scope of work will result in a complete site investigation since the Plan does not describe how the proposed sampling relates to the current investigation results. A revised work plan must be provided that will propose specific field investigation activities intended to complete the site investigation as defined by Wis. Admin. Code ch. NR 716. The plan must be based on an assessment of all the available sampling data.

1. As required by Wis. Admin. Code § NR 716.09 (2) (f) .8, the work plan must include discussion of how the proposed sampling activities will relate to the results of the previous investigations. Explain how the newly obtained sampling data will be used to define the degree and extent of contamination on-site and choose remedial actions.
2. The DNR cannot determine the adequacy of proposed field investigation activities if it is not clear how available data was assessed to develop the scope of work. It is recommended that all available data, including newly collected groundwater sampling data, is displayed on maps and that iso-concentration maps are included in the revised work plan to document known site conditions and to justify proposed sampling activities. These figures will be required as part of the site investigation report as outlined in Wis. Admin. Code § NR 716.15 (4).

3. Wis. Admin. Code § NR 716.09 (2) (f) .2 requires that if sample locations cannot be specified in advance within a work plan, that a description of the strategy that will be used to determine these locations in the field be provided.

Additionally, the Final Remedial Investigation report (RI) prepared for the Amcast Superfund site was approved by the Environmental Protection Agency (EPA), and not the DNR, since the larger footprint addressing the environmental conditions of the former Amcast facility is an EPA-lead site. It is unhelpful to re-state the text from the RI to the extent presented in the Plan since it is available in the DNR and EPA files. This also leads to confusion since there are references in the Plan to tables and figures that are not included in the Plan. It is also not appropriate to refer to the areas of the Superfund site not included in the current Plan. References to the human health and ecological risk assessments should also be excluded since they are not part of the NR 700 site investigation process.

On April 11, 2019, you submitted a request to modify the requirement for monthly updates to quarterly. At this time the DNR requests that monthly updates continue to be submitted.

The DNR directs you to provide a revised workplan that proposes activities intended to define the degree and extent of contamination, identify necessary remedial actions, and otherwise address the above comments within 45 days of this response. If you have any questions regarding any of the above items, please contact me at (414) 559-8621 or michele.norman@wisconsin.gov.

Sincerely,



Michele R. Norman, Supervisor
Remediation and Redevelopment Program
Southeast Region

cc: Krista McKim – U.S. EPA Region 5