Scope of Work – Supplemental Site Investigation Former GM Assembly Plant Janesville, WI

Mr. Jason Lowery

August 9, 2019

Wisconsin Department of Natural Resources 101 S. Webster St. / PO Box 7921 Madison, WI 53707-7921

Re: BRRTS# 02-54-560205 - Upcoming investigative fieldwork Former General Motors Assembly Plant Janesville / Rock County

Dear Mr. Lowry

EnviroAnalytics Group, LLC is providing notice of upcoming fieldwork on behalf of the current owner of the former General Motors Assembly Plant, Jaines, LLC.

The initial fieldwork was conducted at accessible soil boring locations during week of January 21st, 2019. The purpose of the upcoming work is to complete the additional soil/groundwater sampling and analyses that remain to address data gaps for delineating contaminants of concern. Some additional "step-out" borings are proposed at two locations (see attached). Groundwater samples will be collected from existing monitoring wells in the near future. The information collected will be utilized to evaluate potential environmental risks to future land uses post-redevelopment, and design appropriate remedial measures that mitigate those risks.

Please feel free to contact the undersigned at <u>ddunn@enviroanalyticsgroup.com</u> or (314)835-2814 if you have any questions or need additional information.

Best Regards,

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Riley Underwood, EIT Project Engineer

Daniel M. Dunn, PE, PG VP - Director of Remediation

Attachments Scope of Work Figure 1- Site Location Figure 2- Site Plan Figure 3- Soil Investigation Sampling Locations Figure 4- Groundwater Monitoring Wells To Be Sampled Scope of Work – Supplemental Site Investigation Former GM Assembly Plant Janesville, WI Summary

Multiple on-site investigations have been conducted to identify potential residual impacts located within the former assembly plant area where demolition activities have taken place.

The initial phase of this investigation fieldwork was completed by EAG from January 21st through January 25th, 2019 and included accessible locations for sampling 53 boreholes logged to depths of 10-15 ft below ground surface (bgs). Select sample depth intervals were retained for laboratory analyses for COC delineation purposes. Analytical results of samples were compared to default WDNR screening levels for Poly-Chlorinated Biphenyls (PCBs), Volatile Organic Carbons (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), and RCRA Metals. A site location map and site plan are provided as Figures 1 and 2.

The follow-up sampling work at previously inaccessible locations (due to demolition activities) are scheduled for the week of August 19th as a continuation of the site-wide investigation. The results of the investigation are meant to satisfy DNR requirements for characterization of the entire site, collect data needed to complete a risk assessment, and address the remediation risks that will identify remedial measures necessary to support future property development.

Scope of Work

The upcoming supplemental site investigation will target soil in locations within the former plant itself; including, approximately twelve locations proposed for step-out (4 corners, 30-ft radius) sampling to delineate the horizontal and vertical extents of previously identified contaminants of concern. Soil samples will be analyzed for parameters based upon historical exceedances in the 2016 Phase 2 investigation done by GHD for GM. Work is expected to be done on the week of August 19th through 23rd. Locations of the anticipated soil sampling locations are shown in Figure 3.

Groundwater on the site will be sampled at selected existing (and locatable) monitoring wells after the soil investigation activities to obtain confirmatory data in support of historical water quality data provided by GM. Locations on the site that previously exceeded May 2017 WDNR Public GWQS Enforcement Standards and Preventative Action Limits for selected constituents are to be sampled to obtain current COC concentrations. Locations of the wells to be sampled for this investigation are shown on Figure 4. Due to the demolition that has occurred on-site, it is anticipated that some wells may be unable to be located or destroyed. Should a well be inaccessible, a supplemental well will be sampled within the same vicinity whenever possible.

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Scope of Work Additions

Based on initial analytical results, two locations indicated exceedances of the Industrial Direct Contact RCL and will be further investigated in this upcoming work. The area surrounding NP-7 and SB-137SW contained PAHs and Lead concentrations above RCLs in the shallow surface soil. Both locations will be further investigated by sampling four "step-out" sampling location at similar depths and analyzed exclusively for the COCs with gross exceedances. Step-out sampling of NP-7 will be and analyzed for exclusively PAHs and Step-out sampling of SB-137SW will be analyzed for RCRA metals. These locations can be seen in Figure 3.

Analyses

A total of 14 soil sample locations (12 + 2 Additions) will have analyses submitted to Pace Analytical of Green Bay Wisconsin for laboratory analysis in accordance with NR 716.13 to be analyzed for Volatile Organic Carbons (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs), and a select range of metals based upon historical concentrations in those individual areas. Soil samples will be compared to Soil-to-groundwater RCLs, Non-Industrial and Industrial Direct Contact RCLs. Each location will have four "Step-Out" samples taken at up to two depth intervals,

The remaining soil sampling efforts is anticipated to generate approximately:

- 80 Samples analyzed for VOCs through EPA method 7471
- 96 Samples analyzed for PAHs through EPA method 8270
- 96 Samples analyzed for RCRA metals through EPA method 6010
- 60 Samples analyzed for PCBs through EPA method 8082

Further Actions

The data from EAG's supplemental site investigation will be compiled and evaluated to prepare the Remedial Action Options Report (RAOR) and implement remedial measures necessary for redevelopment of the site.







