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# Summary of Environmental Cleanup Activities 2014 - 2016

#### 2014

# PCB Interior Investigation

- Advanced and sampled 27 soil borings within the building to complete delineation of VOCs and PCBs
- Excavation of center aisle to four feet

#### Rain Garden/Bike Path

- excavation, disposal and backfill of rain garden soils and
- adjacent parking lot soils

# Groundwater

- Groundwater sampling in April, July and October
- In-Situ chemical oxidation (ISCO) injection of 5% sodium permanganate
- step test, permits secured and initiated construction of GETS

### Vapor

- SVE operation
- · vapor probe sampling

#### 2015

## PCB Interior Investigation

- wipe sampling
- indoor air sampling
- implementation of a PCB awareness program
- floor remediation activities
- groundwater investigation

### Rain Garden/Bike Path

Excavation, disposal and backfill of soils in rain garden and along capital city bike path

## Groundwater

- Quarterly groundwater monitoring in accordance with groundwater monitoring program
- GETS operating as of July 2015

### Vapor

- annual sampling of soil vapor probes
- operation of SVE

WINKS20 FA Mechanisms. Hyook, then #200kpr, r. \$1.2M -xipp. established overtime, 2017 Hyook, then #200kpr, r.

#### 2016

#### Groundwater

- Quarterly groundwater monitoring in accordance with groundwater monitoring program
- GETS operation

### Vapor

- · annual sampling of soil vapor probes
- operation of SVE

### Rain Garden/Bike Path

- Excavation, disposal and backfill of soils along capital city bike path
- Closure of rain/garden bike path activities in July 2016

# PCB Interior Investigation

· Completion of winter air sampling for PCBs

- Cleanupleul: Open to Keg. Hortrogo (Dove). Used 50 given remaining under rope externelly.

- Filteredus, untitleed GW for final remaining.

Triggers for cleanup:



PCBs Beneath the Madison-Kipp Facility

PCBs have been present in the soils beneath the Madison-Kipp facility for nearly 50 years. The State and Madison-Kipp are discussing an iterative process to monitor and, if necessary, remediate soil beneath the facility if it is confirmed that PCBs have dissolved into and impacted groundwater. The parties have discussed the following concept:

- Annual sampling of two shallow wells within the facility's footprint;
- If successive rounds of shallow sampling indicate that PCBs have dissolved into and impacted groundwater, Madison-Kipp will conduct quarterly sampling of the deeper zone of the two wells within the facility's footprint and two additional wells to confirm whether PCBs have impacted groundwater;
- If there are successive rounds of sampling that confirm PCB impacts in these four wells, then Madison-Kipp would prepare a remedial action options analysis that would evaluate various remedial actions, including excavation of soil beneath the facility; and,
- Implementation of the selected remedy to address PCB-impacted soil beneath the facility.

In addition to this iterative process, Madison-Kipp would remove accessible impacted soil beneath the facility if:

- production operations cease or are altered such that contaminated soils can be reasonably accessed in any area of the manufacturing building; or
- the facility is sold or transferred, except to the extent that the facility is transferred as a going concern and the transferree continues the operation of the die casting machines.

Importantly, none of Madison-Kipp's obligations under the settlement are altered by a sale or transfer, including the financial assurance mechanism remains in place. In the event of a sale or transfer, Madison-Kipp would provide the State with evidence that it has secured from the transferee the right of the DNR to access the facility and evidence of the transferee's agreement to notify Madison-Kipp if production operations cease or are altered such that contaminated soils are reasonably accessible to allow Madison-Kipp to remove soil.

#### Financial Assurance Mechanism

To guarantee the performance of the above, the State and Madison-Kipp have discussed the following:

- Financial assurances in favor of the State in the amount of \$1.2M will be established;
- The form of financial assurance to be established will be consistent with the financial assurance options available in Wis. Admin. Code NR 520 and;
- Madison-Kipp would initially fund the financial assurances in the amount of \$400,000 by 2017, and then annual installments thereafter of \$200,000, such that the financial assurance would be fully funded by December 31, 2021.

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