

From: Delcore, Lee R - DNR
Sent: Tuesday, October 27, 2020 9:17 AM
To: 'jasonp@metcofs.com'; rona@metcofs.com
Subject: FW: Additional Information required letter for Herriges Bulk Plant - BRRTS 02-67-111819
Attachments: 20201008_198_Additional_Info_Req.pdf; 4413_001.pdf

Ron & Jason,

The analytical results from the samples that were collected in the upper 4 feet indicated exceedances of industrial direct contact values on-site and non-industrial direct contact values on the identified affected off-site property for multiple PAHs. Both properties have what is comparable to non-industrial zoning and therefore the capping material is subject to consideration of protectiveness based on non-industrial direct contact values. In the closure request, the off-site affected property is incorrectly identified as having an industrial zoning, when it is actually zoned institutional, which is a designation sometimes used for public spaces, etc. In this case, the use is a church and school.

Publication RR-709, titled *Guidance for Cover Systems as Soil Performance Standard Remedies*, provides information about covers that can be used to address the direct contact pathway. The general standard for non-paved areas is a 2-foot thickness of clean soil or the equivalent (see page 5). If the existing surface material is to be used as the proposed cap, then it would need to be demonstrated that it is protective. Collection of a representative number of shallow soil samples could provide the support needed to demonstrate that 2 feet of "clean" material exists. In many cases similar to this, if "clean" material is not present, the impacted material is excavated, landfilled and replaced by clean fill or more protective cap is put in place (pavement).

As far as the proposed locations of the off-site samples, they appear appropriate to help define degree and extent of near surface impacts related to the bulk plant operations. Again, shallow samples demonstrating that 2 feet of clean material would be appropriate to demonstrate protectiveness of a cap. Deeper samples are appropriate for demonstrating vertical extent and/or migration via groundwater.

As far as drawing of the lines, that can be tricky in cases involving heterogenous fill. As fill material does not represent a point source, just because you have a clean sample in one area, it is very difficult to say that one foot over the fill material is not impacted. In this case, you have multiple, significant direct contact exceedances of PAHs at different locations across the site. If the conceptual model is that the PAH impacts are primarily from a contaminated fill source, then the cap/line should include the entire area of fill material or up to the property boundaries if the fill material is determined to extend across the boundaries.

So all that being said, shallow samples showing the degree and extent of the PAH impacts on-site and off-site are warranted. In order to close the site, the continuing obligation of a surface cap that is protective from direct contact exposure would need to be demonstrated. This can be accomplished through demonstrating a "clean" layer above the impacts and demonstrating how that layer will be maintained, installing a clean layer above the impacts, or installing a protective barrier above impacts (i.e. pavement).

Thank you for your continued efforts to move this site to closure,

Lee

Lee Delcore

Hydrogeologist - Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
Phone: 262-202-3838 (note new phone number)
Lee.Delcore@wisconsin.gov

From: Ron Anderson <rona@metcofs.com>
Sent: Tuesday, October 20, 2020 3:04 PM
To: Delcore, Lee R - DNR <Lee.Delcore@wisconsin.gov>
Cc: Jason Powell <jasonp@metcofs.com>
Subject: RE: Additional Information required letter for Herriges Bulk Plant - BRRTS 02-67-111819

Good afternoon Lee....Thanks for calling me back today.

Jason and I have reviewed your letter (which is attached) and have a couple of questions.

- 1) For "Degree and Extent of Soil Impacts"I have attached a map with proposed boring locations to the North and West. Are these locations satisfactory?
- 2) For "Proposed Continuing Obligations" ...How are we supposed to "show that the cap is protective"? This is something we have never been asked before. Do you want us to collect some shallow soil samples?
- 3) For "Documentation"...We are not sure how you want this plume extent to be drawn as two other nearby sampling locations (G-4 and G-15) did not have direct contact exceedences. Thus, can you put a line on a map so we can get this the way you want it.

Ron Anderson PG

METCO - Senior Hydrogeologist
rona@metcofs.com / 608.781.8879
709 Gillette Street - Suite 3, La Crosse WI 54603
www.metcofs.com

From: Delcore, Lee R - DNR <Lee.Delcore@wisconsin.gov>
Sent: Friday, October 9, 2020 11:13 AM
To: Jason Powell <jasonp@metcofs.com>
Cc: Ron Anderson <rona@metcofs.com>
Subject: Additional Information required letter for Herriges Bulk Plant - BRRTS 02-67-111819

Attached is a copy of the official additional information required letter for Herriges Bulk Plant in Kewaskum.

Regards,

Lee

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Lee Delcore

Hydrogeologist - Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

1155 Pilgrim Road, Plymouth, WI 53073

Phone: (262) 202-3838

Lee.Delcore@wisconsin.gov



dnr.wi.gov





October 8, 2020

Ann Polzean
Herriges Oil, Inc.
1245 Fond du Lac Ave.
Kewaskum, WI 53040

Subject: Site Investigation Not Approved - Additional Info. Needed for Case Closure
consideration under Wis. Adm. Code chs. NR 700-754
Herriges Oil Bulk Plant South, 215 Railroad St., Kewaskum, WI, 53040
DNR BRRTS Activity # 02-67-111819 FID # 267158760

Dear Mrs. Polzean:

On June 11, 2020, the Department of Natural Resources (DNR) received a Site Investigation Report and a Request for Closure for the case referenced above. Shortly after receiving the request, the consultant for the off-site affected property asked for additional time to evaluate the information and the proposed continuing obligations that would potentially be their client's responsibility. A 30-day review extension (until August 10, 2020) was requested and allowed. Recognizing the upcoming sunset of the PECFA program, the case file and information submitted were preliminarily reviewed on June 18, 2020. It was determined that the existing groundwater monitoring well network was no longer needed and that the wells could be scheduled for abandonment. That determination facilitated PECFA reimbursement eligibility for the monitoring well abandonment work.

On August 10, 2020, the off-site affected party indicated that they were satisfied with their review and would not submit any formal comments contesting the closure request. The Site Investigation and Closure Request review were performed, and some additional information requirements were identified and relayed to your consultant, METCO, via email on August 19, 2020. This letter serves as the official response to review of the site investigation and closure request. Additional information regarding the degree and extent of the Polycyclic Aromatic Hydrocarbons (PAHs) PAH soil impacts is necessary to consider this case for closure. The DNR is going to pause the closure review, pending the response and timeframe required to collect the additional information needed.

Degree and Extent of Soil Impacts

Elevated concentrations of PAHs were found in near-surface samples, including at some off-site locations. The concentrations were at levels that exceed both industrial and non-industrial residual direct contact levels. It is unclear, based on the submittals, whether there is a distinction between the petroleum contamination from the historic bulk plant operations at the site and any imported soil fill material. In either case, more soil sampling is warranted to define the degree and extent, including off-site to the north and the west.

Please discuss if there is a difference between the petroleum contamination from the AST's and possible PAH, fill-related contamination? While a structural impediment is not needed, the proposed cap of grass and 2-3 inches of gravel is not necessarily adequate, based on the concentrations of the impact.

Proposed Continuing Obligations

While a structural impediment does not appear to be warranted based on samples that were able to be collected beneath the pole barn, the proposed cap of grass and 2-3 inches of gravel on other areas of the site is not necessarily adequate. The adequacy of the cap, both on and off-site, must be evaluated and shown to be protective.

Documentation

Documentation-wise, the soil delineation should include the area below the pole barn and G-10 should not be isolated. In addition, discussion regarding the difference between the petroleum contamination from the bulk plant operations and possible PAH fill should be addressed.

Within 30 day, please submit a plan to address the issues identified and provide the additional information requested. We appreciate your efforts to investigate the environment at this site. If you have any questions regarding this letter, please contact me at 262-202-3838 or lee.delcore@wisconsin.gov.

Sincerely,


A handwritten signature in cursive script that reads "Lee R. Delcore".

Lee R. Delcore
Hydrogeologist
Remediation & Redevelopment Program

cc: Jason Powell, METCO (via email)

D.2 LOCATION MAP


HERRIGES OIL
BULK PLANT SOUTH



709 Giffels St. Suite 2
La Crosse, WI 54601
Tel: (608) 781-8879
Fax: (608) 781-8883

KEWASKUM,
WISCONSIN

DRAWN BY: ED
DATE: 06/14/2010

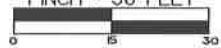


NOTE: INFORMATION BASED ON AVAILABLE DATA. ACTUAL CONDITIONS MAY DIFFER.

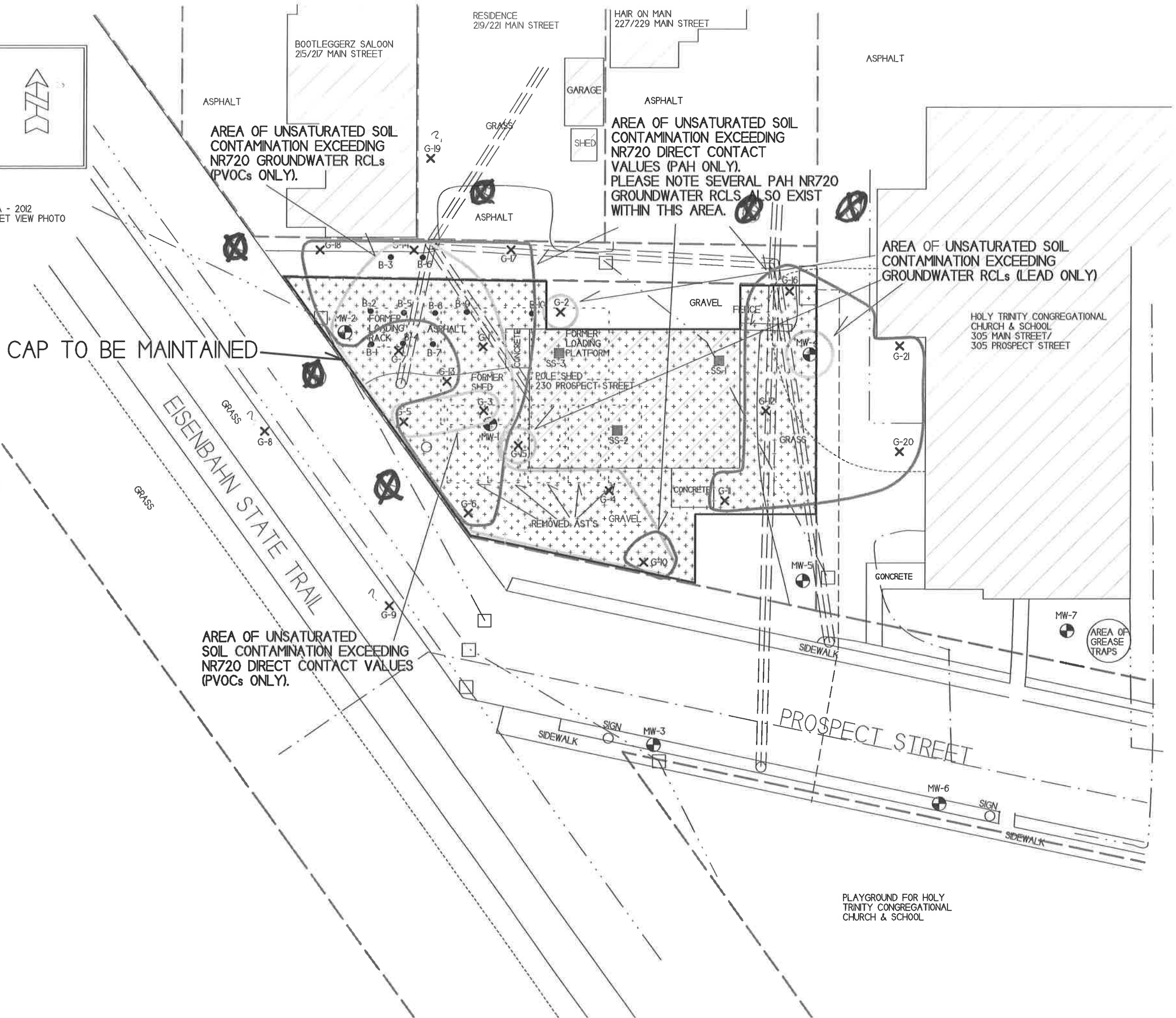
- HAND AUGER BORING LOCATION - ALPHA TERRA - 2012
LOCATIONS ARE APPROXIMATE, BASED ON STREET VIEW PHOTO
- ✕ - GEOPROBE BORING LOCATION
- ⊕ - MONITORING WELL LOCATION
- - SUB SLAB VAPOR SAMPLE LOCATION
- - POLE
- - STORM SEWER COVER

- PROPERTY BOUNDARY
- WATER LINE
- SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- ==== OVERHEAD UTILITIES
- TELEPHONE/FIBER OPTIC

SCALE:
1 INCH = 30 FEET



CAP TO BE MAINTAINED



PLAYGROUND FOR HOLY TRINITY CONGREGATIONAL CHURCH & SCHOOL