

From: Ron Anderson <rona@metcofs.com>
Sent: Monday, May 17, 2021 1:42 PM
To: Delcore, Lee R - DNR
Cc: Ann Polzean; Eric Dahl
Subject: RE: Herriges Oil Bulk Plant South - results of the recent Geoprobe soil sampling project - 230 Prospect Street, Kewaskum WI

Good afternoon Lee...

I would recommend paving the area of G-11/G-23. Eric and I figure that an area about 15'x15' should work, but could be a bit larger if you would like. The paved area would be bordered to the north by the building and to the west by the existing concrete pad. Let us know if this will be sufficient and we will discuss it with Ann Polzean.

Eric and I will be in the office all day tomorrow if you would like to call to discuss.

Thanks! Ron

Ron Anderson PG

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From: Delcore, Lee R - DNR <Lee.Delcore@wisconsin.gov>
Sent: Monday, May 17, 2021 10:01 AM
To: Ron Anderson <rona@metcofs.com>; Eric Dahl <ericd@metcofs.com>
Cc: Ann Polzean <ann@herrigesoil.com>
Subject: RE: Herriges Oil Bulk Plant South - results of the recent Geoprobe soil sampling project - 230 Prospect Street, Kewaskum WI

Ron and Eric,

This site was discussed with peers on May 14th. Based on the information and review, a plan needs to be provided to address the direct contact exceedances at the site. The six inches of gravel in the area of G-11/G-23 does not appear to be a protective cap. The remedy and proposed continuing obligations need to be based on and take into account the property use, and not just the zoning. The question came up whether the current use is truly industrial or more of a business/commercial. The proposal to address the area by covering with a concrete/asphalt pad or excavation of contaminated material to approximately 3 feet bgs and backfilled with clean soil/gravel is viable, but a plan on how big of an area would be appropriate based on the data, use, and risk needs to be presented. If you and or Eric are available for a call tomorrow, we can work out some details

Lee

Lee Delcore

Hydrogeologist - Remediation and Redevelopment Program

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Lee.Delcore@wisconsin.gov

From: Jason Powell <jasonp@metcofs.com>
Sent: Tuesday, March 30, 2021 1:14 PM
To: Delcore, Lee R - DNR <Lee.Delcore@wisconsin.gov>
Cc: Ann Polzean <ann@herrigesoil.com>; Ron Anderson <rona@metcofs.com>
Subject: Herriges Oil Bulk Plant South - results of the recent Geoprobe soil sampling project - 230 Prospect Street, Kewaskum WI

Good morning Lee, attached is the updated site layout map, updated soil/residual soil tables, and laboratory document.

In discussions with our client, this area was a former bulk plant from the 1920s or 1930s to 2001 when the bulk plant was dismantled and removed. The only fill material that was known to be brought into the site was a thin layer of gravel prior to the construction of the existing building.

On March 8, 2021, twelve additional Geoprobe soil borings were conducted to 2 or 4 feet below ground surface to further define PVOC and PAH contamination. Six of the borings (G-26, -27, -28, -31, -32, and -33) were used to further define horizontal extent and six of the borings (G-22, -23, -24, -25, -29, and -30) were used to determine if the shallow soil (0-2 feet bgs) could be considered as cap material to address the direct contact exceedances already noted at 3.0-3.5 feet bgs.

The six borings conducted to define horizontal extent showed no direct contact or groundwater pathway exceedances for PAH compounds.

Three of the six borings (G-24, -25, and -30) conducted to 2 feet bgs showed no direct contact exceedances for PAH or PVOC compounds. It should be noted that groundwater RCL exceedances for PVOCs were noted in borings G-24 and G-25.

Three of the six borings (G-22, -23, and -29) conducted at 2 feet bgs showed direct contact exceedances for PAH compounds. Soil boring G-22 was conducted at the eastern property boundary near former monitoring well MW-4 with a sample collected at 1.5 feet bgs and did exceed Non-Industrial Direct Contact standards for PAH compounds, however being this area along with G-12, -20, and -21 are covered by a manicured lawn this could be considered an appropriate cap to address the direct contact PAHs. Soil boring G-29 was conducted on the western property boundary near former monitoring well MW-2 with a sample collected at 1.5 feet bgs and did exceed Non-Industrial Direct Contact standards for PAH compounds, however this area is covered with asphalt and is an appropriate cap to address the direct contact PAHs.

Soil boring G-23 conducted to 2 feet bgs exceeded the Industrial Direct Contact standards. The sample adjacent to it (G-11) collected at 3.5 feet bgs also exceeded the Industrial Direct Contact standards. This area is currently covered with approximately 6 inches of gravel which may not be enough to be considered an appropriate cap. If not, this area of direct contact exceedances

will likely be required to be addressed by an appropriate cap. An additional 1-2 feet of clean gravel would not be an option due to the building, adjacent concrete pad, and surface drainage. Thus the area would likely need to be addressed by covering with a concrete/asphalt pad or excavation of contaminated material to approximately 3 feet bgs and backfilled with clean soil/gravel.

If the state determines that the site could be re-submitted for closure at this time, we can prepare the updated/revised closure request. However, if additional work is going to be required (most notably would be the area of G-11/G-23) it would be best to address that issue at this time followed by an updated closure request. After your review of this current information, please contact METCO and our client to discuss moving this site toward "closure". If you have any questions please call or email.

Thanks,



Jason Powell

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