

From: Delcore, Lee R - DNR
Sent: Tuesday, June 1, 2021 9:55 AM
To: Ron Anderson; Eric Dahl
Cc: Ann Polzean
Subject: Review of Herriges Bulk Plant South Additional Information (BRRTS #02-67-11189)

Ron and Eric,

On May 25, 2021, the additional information provided in response to the October 8, 2020 *Site Investigation Not Approved – Additional Info. Needed for Case Closure* letter was discussed by a peer review group. The following comments on a path forward to complete the investigation, evaluate the remedy, and finish the closure request are the result:

Conceptual Site Model

Based on the historic operation of the site as a petroleum bulk plant since the 1920's and the investigatory laboratory results that have been provided to date, it is deemed likely that the contamination is sitewide. The pole barn structure that was erected over a substantial area of the former bulk plant footprint in 2001 has no documented soil samples collected from below, no documented condition of the soil/fill material on which it is built, and no documented off-site disposal of any impacted soil. The area below the building cannot be interpreted as not being impacted without additional information/interpretation. If no additional sampling below the building is proposed, the area below the building would have to be represented as impacted and incorporated in the extent of impacts.

Soil

The degree and extent of soil contamination needs to be delineated and interpreted. A Supplemental Site Investigation Report (SIR) incorporating the data collected March 8, 2021, should be submitted. The report should include updated figures and cross-sections with the analytical results clearly represented. Including the analytical results on the figures and providing a visual interpretation significantly helps in the review and justification for the remedy. For this case, use of Benzo[a]pyrene (BaP) as the indicator compound would be prudent.

The SI Report submitted on June 7, 2020 included Appendix E/Other Documentation. A Site-Specific Resident Site Screening Levels for Soil sheet with output generated June 15, 2016 was provided in that Appendix. Since that time, Publication RR-079 – Risk Assessment Approach for Calculating cPAH Non-Industrial Direct Contact RCLs – Wis Admin Code § NR 722.11(1) <https://dnr.wi.gov/files/PDF/pubs/rr/RR079.pdf> was published in September 2017. This email gives approval to use the updated risk assessment approach for cPAHs. Use of the Risk Based Approach could help justify the adequacy of the sampling and reduce the need for continuing obligations, particularly in relation to the samples collected in the near surface from the off-site property to the east. In addition, using the risk assessment approach could help justify the size of the cap proposed over the area of G-23 is an appropriate remedy.

Once the Supplemental SIR, Risk Based Calculations and interpretation are provided, the SI can be considered for completion approval, the remedy can be considered for approval, and closure documentation can be updated.

Thank you for your time and effort to move this site to closure,

Lee

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