

From: Ken Ebbott <kebbott@fehr-graham.com>
Sent: Monday, December 12, 2016 2:43 PM
To: Easterly, Jennifer S - DNR
Cc: Ken Ebbott; DuFresne, Kristin I - DNR
Subject: RE: Bay Towel data

Jenny,

See below:

- A) With the haz waste confusion, I am wondering if some facts about the site might give us a regulatory avenue to allow for the treated soil to be discarded.
- 1) Namely - the site quit drycleaning in 1989. We have the information gleaned from the dig that was previously not possible to be known, and the high levels of contamination we're finding appear related to pipes from the former UST system which the owner has indicated was no longer in use since the 1960's. If we indicate on a Haz Waste determination worksheet signed by the owner that they believe all the released drycleaning chemicals predate RCRA, would that help eliminate the material as being listed, and then we only have to meet the characteristic criteria (pass TCLP) - and the total limitation is removed?

B) Treated Data:

Treated Soil I1 Total PCE 248 mg/kg TCLP PCE 0.23 mg/l; Total TCE 1.87 mg/kg, TCLP TCE 0.0038 mg/l
Treated Soil I2 Total PCE 36.3 mg/kg TCLP PCE 0.025 mg/l; Total TCE 1.03 mg/kg TCLP TCE 0.025 mg/l

Treated Soil K1 Total PCE 184 mg/kg TCLP PCE 0.061 mg/l; Total TCE 4.14 mg/kg TCLP TCE 0.0044 mg/l TCLP VC 0.0024 mg/l

Treated Soil K2 Total PCE 25.3 mg/kg TCLP PCE 0.0093 mg/l; Total TCE 0.496 mg/kg TCLP TCE ND

Treated Soil Q1 Total PCE 436 mg/kg TCLP PCE 5.5 mg/l; Total TCE 2.86 mg/kg TCLP TCE 0.028 mg/l

Treated Soil Q2 Total PCE 224 mg/kg TCLP PCE 0.25 mg/l; Total TCE ND TCLP TCE ND TCLP VC 0.0042 mg/l

Sampling Method: We sampled the treated soil using a composite sample of the material from five locations, mixing in a bowl, and submitting one sample for total and TCLP VOC analysis.

Treated soil from Area K1 occupies two 30 CY boxes.

Soil from I 2 occupies one full 30 CY box and the seventh, half box - so two boxes.

Treated soil from Q1 and Q2 occupies one 30 CY box.

Soil from the rest of the treated soil areas, K2 and I1, occupy one 30CY box each.

C) Untreated Data

Boxes for I1 and I2 Treated:

Some of the Untreated Soil Samples are from the following Borings:

Boring O 4-5' PCE 2,380,000 ug/kg, TCE <12,500, VC <12,500

Boring O 7-8' PCE 2,780,000 ug/kg, TCE <12,500, VC <12,500

Box Q 1 and Q 2 Treated:

Boring M2 4-5' PCE 7,710,000 ug/kg, TCE <31,200, VC <5,000

Boring M2 7-8' PCE 1,380,000 ug/kg, TCE <5,000, VC <5,000

Other labs from older soil work - not done by us - I think I have lab reports but not certain - from 2003

Boring AG9 2-4' PCE 11,000,000

Boring AG2 0.5-2' PCE 1,700,000

Box K1 and K2 Treated:

Boring D 1-2' PCE 155,000 ug/kg, TCE 19,700 ug/kg, VC <1000

Boring B2 1-2' PCE 155,000 ug/kg, TCE 6,120, VC <625

Boring F 1-2' PCE 41,700 ug/kg, TCE <200, VC <200 - but failed TCLP, so made treated area extend to it

Other labs from older soil work - not done by us - I think I have the lab reports but not certain - from 2003

Boring AG-1 2-4' PCE 91,000

Boring AG4 0-2' PCE 220,000

Boring AG13 2-4' PCE 250,000

Hopefully this helps and we can find a way to approve at least some of the soil for disposal.

As noted, the boxes are too heavy to move, so if we can empty some to the landfill, and partially empty others, we may be able to relocate them to a heated building, but we'll have to do that promptly.

Thanks

Ken

KENDRICK EBBOTT | P.G. Branch Manager
Fehr Graham - Engineering & Environmental

From: Easterly, Jennifer S - DNR [mailto:Jennifer.Easterly@wisconsin.gov]

Sent: Monday, December 12, 2016 1:54 PM

To: Ken Ebbott <kebbott@fehr-graham.com>

Cc: DuFresne, Kristin I - DNR <Kristin.DuFresne@wisconsin.gov>

Subject: Bay Towel data

Hi Ken,

Can you add/fill out the table below with your data from Bay towel so we can try to get you an answer.

Name	Waste Code	Container/ Sample ID	TCLP Value	Industrial RCLs for Contained Out Value	Non- wastewater LDR Value	LDR 10* Value	Initial Sample Results mg/kg
Trichloroethylene	F001/D039		.7 mg/l	8.81 mg/kg	6 mg/kg	60 mg/kg	
Tetrachloroethylene	F001/D040		.5 mg/l	153 mg/kg	6 mg/kg	60 mg/kg	
Vinyl Chloride	D043		.2 mg/l	2 mg/kg	6 mg/kg	60 mg/kg	

We are committed to service excellence.

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

Have you signed up for our free e-subscription to WDNRs Hazardous Waste Decoded? Sign up [here](#)

Jennifer Easterly

Waste Management Specialist Advanced
Waste and Materials Management Program
Wisconsin Department of Natural Resources

Oshkosh Service Center

625 E. County Road Y, Suite 700

Oshkosh, WI 54901

Phone: 920-303-5431

Fax: 920-424-4404

jennifer.easterly@wisconsin.gov



dnr.wi.gov

