

From: Schultz, Josie M - DNR
Sent: Thursday, August 13, 2020 12:46 PM
To: 'Donald P. Gallo'
Cc: 'Matt Dahlem'; 'Silje Roalsvik'; Nancy Reid
Subject: RE: Revised Sampling Plan - Bay Towel

Good Afternoon Don,

Thank you for your email regarding Bay Towel – Solvent Investigation, BRRS # 02-05-237064. The DNR cannot provide a specific concentration for saturated soil clean-up goal/mass removal at this time as DNR soil standards apply to unsaturated soil and present soil contamination is at depths below the historic low groundwater table. Although this soil is saturated, additional mass removal would likely reduce the receptor risk, length of long-term monitoring, and bring this site to closure in a shorter timeframe. The cleanup goal is based on the factors of closure; ensuring that the site investigation (SI) is complete, groundwater plume is stable, utilities aren't acting as a preferential pathway, and vapor intrusion issues are addressed both off-site and future on-site.

The site has been through several remedial actions over time, however the SI is not yet complete. DNR requires a minimum of 8 additional rounds of groundwater monitoring after BAM has been fully utilized. A vapor intrusion investigation has yet to be completed, which should include sanitary vapor investigation and utility backfill vapor investigation. Without this information, it's unknown if remaining contamination will continue to contribute to groundwater and vapor.

Based on the information submitted to date, we are unable to make any further determination at this time. If you would like a more in-depth review, please request a fee-based review that is accompanied by additional supporting documentation and modeling for various saturated soil concentrations. As you are likely aware, compiling this information and DNR review timeline being 60 days, this review will likely not be possible prior to excavation being backfilled.

Please let me know if you have any additional questions or concerns moving forward with the excavation and additional investigation for this site.

Sincerely,
Josie

We are committed to service excellence.

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

Josie M. Schultz

Hydrogeologist – Northeast Region Remediation and Redevelopment Team
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay, WI 54313-6727
~~Phone: 920-662-5424~~ Office phone line will be disconnected in October
Cell: 920-366-5685
Josie.Schultz@Wisconsin.gov



From: Donald P. Gallo <DGallo@axley.com>
Sent: Monday, August 10, 2020 6:22 PM
To: Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>
Cc: 'Matt Dahlem' <mdahlem@fehr-graham.com>; 'Silje Roalsvik' <sroalsvik@resolutemgmt.com>; Nancy Reid <nreid@resolutemgmt.com>
Subject: FW: Revised Sampling Plan - Bay Towel

Josie;

Below is a summary of discussions today with Bay Towel's insurance adjuster and hydrogeologist. As we discussed today, Bay Towel's concern is with respect to removal of impacted soils prior to backfill. We have an open excavation in some areas 20 to 30 deep and need direction with respect to the pathway to case closure. The site is classified as tight clay; however, there is an excess of groundwater over what our consultant and contractor had expected so it is believed that certain sand stringers may exist. Matt Dahlem has sent to your attention a map of the gw well locations and recent analytical data, including sidewall and bottom sampling. Fehr Graham has recommended the installation of 22 hollow stem auger borings for additional site investigation and Rolute has agreed to fund 11 borings as a first phase, then pending the results of the first phase of analytical testing, installation of additional borings as needed to define the extent of soil and ground water contamination.

Bay Towel's concern is that we do not want to backfill the excavation if additional impacted soil removal is necessary. Normal engineering controls including site capping is expected; however, Bay Towel does not want to monitor ground water for years or indefinitely. Please contact Matt Dahlem directly at 920-246-8292 with any questions or concerns. It is my understanding that you will present this matter to the peer review committee on Wednesday, August 12, 2020 for their comments and concerns re: the pathway to case closure. We look forward to your review and the peer review comments regarding the remedial activities on this site. We also appreciate your prompt attention to this site as there exists a dangerous condition with this open excavation and Bay Towel wishes to complete the remedial activities and backfill the excavation promptly.

Donald P. Gallo

Phone: 262.409.2283 | Cell: 414.507.6350

Axley Brynson, LLP

From: Silje Roalsvik <sroalsvik@resolutemgmt.com>
Sent: Monday, August 10, 2020 4:47 PM
To: Donald P. Gallo <DGallo@axley.com>; Nancy Reid <nreid@resolutemgmt.com>
Cc: 'Matt Dahlem' <mdahlem@fehr-graham.com>
Subject: RE: Revised Sampling Plan - Bay Towel

Thanks again for the call today gentlemen.

By way of summary and roadmap for the immediate future action plan:

- 1) Matt Dahlem with Fehr Graham will contact WDNR case manager Josie Schultz regarding a site specific cleanup standard. Matt will present a case to remove soils exceeding 153,000 ug/kg leaving soils below this concentration in place since there are no potential contaminant migration pathways of concern at the site. The site groundwater is not a potable water supply, the impacts are delineated and have not migrated off-site so groundwater does not pose a risk to the public via ingestion. The site contamination does not pose a risk to surface water. The soil impacts are present at depths of 25 to 30 ft., so soil does not pose a risk via direct contact or a construction work scenario.
- 2) Completion of the first set of step out borings was approved (SW-10A/1, SW-10/1, SW-10B/1, etc.). It is a total of 11 soil borings. Also, approved lab testing at a quick turn around and utility clearance of all 22 soil boring locations in case additional borings are needed.
- 3) Work will begin tomorrow with one drill rig and on Wednesday with two drill rigs. Fehr Graham will provide an update of progress by Wednesday. The drilling progress can be assessed at this time.
- 4) Deeper soil samples (35 and 40 ft.) will be provided to the lab but not analyzed until after the 30 ft. results are received. The data collected will be used to assess if the second set of step out borings are needed and will be additional data to present to the WDNR.
- 5) Costs were approved at the unit rates provided in the CO.

Fingers crossed for good results on first set of borings!
Silje

From: Donald P. Gallo <DGallo@axley.com>
Sent: Friday, August 7, 2020 12:09 AM
To: Silje Roalsvik <sroalsvik@resolutemgmt.com>; Nancy Reid <nreid@resolutemgmt.com>
Cc: 'Matt Dahlem' <mdahlem@fehr-graham.com>
Subject: FW: Revised Sampling Plan - Bay Towel

[CAUTION EXTERNAL EMAIL]

Donald P. Gallo

Phone: 262.409.2283 | **Cell:** 414.507.6350
Axley Brynelson, LLP

From: Matt Dahlem <mdahlem@fehr-graham.com>
Sent: Thursday, August 6, 2020 3:52 PM
To: Donald P. Gallo <DGallo@axley.com>
Subject: Sampling Plan - Bay Towel

Attached is the next phase of work, with the map, select data and then boring locations.

So we have stepout borings at the sidewall samples that exceeded our 33,000 ug/kg threshold at the following locations:

SW-7
SW-9A
SW-9B
SW-9 / SW-9C – same location
SW-10
SW-10A
SW-10B
SW-11
SW-11A
SW-11B
SW-12

Additionally, within the SW-8 excavation, soil was hottest at SW-8 at 25-feet. We got SW-13 delineated to the east and base sample BS-6 delineated vertically at 30-feet, but it appears there was no sampling done within the excavation to the north or south – so I added on SW-14 and SW-15 at 25-feet to delineate that small SW-8 excavation. It should be noted we cant take those personally as they are too deep – so we would need to probably sample those during additional excavations or we drill – we can discuss which option we choose. I just don't want us in the hole at that depth. We have data at "T" and "P" but shallow, with the hot stuff at 25-feet, I think we need to address these sidewalls at SW-14 and SW-15 to satisfy delineation

The attached cost is same as yesterday that you reviewed – I have not added any sidewall sampling. If we could get in there or Legacy does us a favor and pops out and can get us these 2 samples with the excavator, the cost should be nominal anyway for 2 extra samples.

Matt

MATT DAHLEM, PG | Branch Manager
Fehr Graham | Engineering & Environmental

909 North 8th Street, Suite 101
Sheboygan, Wisconsin 53081
P: 920.453.0700
fehr-graham.com

Schultz, Josie M - DNR

From: Silje Roalsvik <sroalsvik@resolutemgmt.com>
Sent: Tuesday, July 28, 2020 12:21 PM
To: Env_Consulting
Subject: FW: Bay Towel, 501 S. Adams street

Nancy,

Please see below on Royal Cleaners. Thank you!
Silje

From: Donald P. Gallo
Sent: Tuesday, July 28, 2020 12:22 PM
To: Silje Roalsvik
Cc: 'Matt Dahlem' ; John Butz
Subject: Bay Towel, 501 S. Adams street

[CAUTION EXTERNAL EMAIL]

Silje;

The test results are in and two of the three areas are at no detect which is very good. The third area is quite hot, SW8 at 25 foot level, 758,000 ppb. I will forward the lab test results to you so that you can provide them to Nancy.

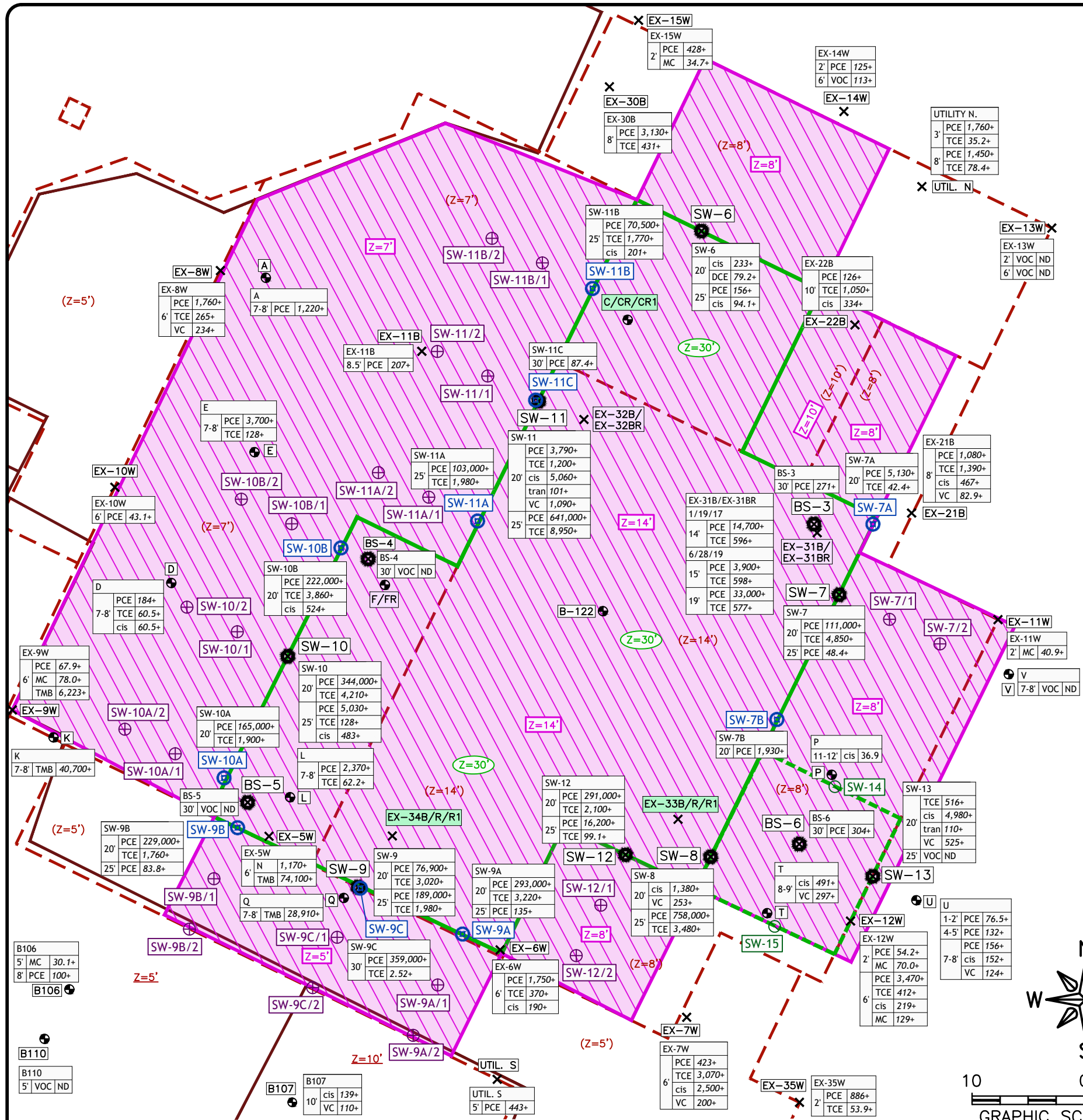
I have asked Fehr Graham to revise their "additional cost" estimate so that they can discuss these additional excavation and treatment with Nancy. I will forward this additional cost detail to you as soon as I receive it from Fehr Graham and then you can have Nancy discuss this directly with them. Thank you for this consideration; fortunately it seems to be a fairly small area at the 25 foot level perhaps to the 30 foot level or deeper but it is clearly a hot spot of contaminant mass.

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SOIL CHEMISTRY OF RE-SAMPLED AREAS

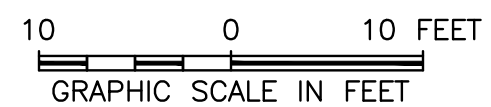
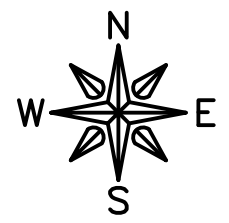
Sample ID	Depth	Contaminant	Concentration
C/CR/CR1	6/28/16	PCE	18,000+
	7-8'	TCE	2,640+
		cis	873+
	6/28/19	PCE	233,000+
EX-32B/EX-32BR	1/19/17	PCE	20,700+
	14'	TCE	1,900+
		cis	133+
	6/28/19	PCE	19,000+
EX-34B/BR/BR1	1/23/17	PCE	177,000+
	14'	TCE	5,910+
		cis	758+
	6/28/19	PCE	85,200+
B-122	8/29/19	PCE	225,000+
	15'	TCE	9,920+
		cis	3,500+
	20'	PCE	164+

LEGEND

- 0-2' SAMPLE DEPTH
- PCE TETRACHLOROETHENE (ug/kg)
- TCE TRICHLOROETHENE (ug/kg)
- cis cis-1,2-DICHLOROETHENE (ug/kg)
- tran trans-1,2-DICHLOROETHENE (ug/kg)
- VC VINYL CHLORIDE (ug/kg)
- MC METHYLENE CHLORIDE (ug/kg)
- DCE 1,2-DICHLOROETHENE
- TMB TRIMETHYLBENZENE, TOTAL (ug/kg)
- VOC VOLATILE ORGANIC COMPOUNDS
- ND NO DETECT
- DBS DETECTIONS BELOW STANDARDS
- ITALICS+* EXCEEDS GROUNDWATER PATHWAY RCL
- BOLD++** EXCEEDS NON-INDUSTRIAL DIRECT CONTACT (0-4') RCL
- ITALICS/BOLD++* EXCEEDS BOTH GROUNDWATER & DIRECT CONTACT RCL
- EX-31B/EX-31BR* SAMPLE LOCATION RE-DRILLED & SAMPLED
- EX-34B/R* SAMPLE LOCATION RE-DRILLED & SAMPLED AT DEEPER DEPTHS
- (Z=5')* 2016 FEHR GRAHAM EXCAVATION & DEPTH
- Z=5'* 2018 FEHR GRAHAM EXCAVATION & DEPTH
- Z=20'* CLEAN SOIL TO BE STAGED & DEPTH
- Z=30'* PROPOSED EXCAVATION & DEPTH AFTER CLEAN SOIL REMOVED & STAGED
- (Z=30')* EXCAVATION EXTENSION TO 30'

- SOIL BORINGS (SOIL REMAINING ONSITE)
- EXCAVATION SAMPLE (SOIL REMAINING ONSITE)
- SUMMER 2020 EXCAVATION SAMPLE
- ADDITIONAL SIDEWALL SAMPLES
- DEEPER SIDEWALL SAMPLE AT PREVIOUS LOCATIONS
- PROPOSED SIDEWALL SAMPLES AT 25'
- STEP OUT BORINGS
- ACTIVE MONITORING WELL
- ACTIVE PIEZOMETER

FIGURE 1
 PROPOSED ADDITIONAL SAMPLES
 BAY TOWEL – SOLVENT INGESTION
 501 S. ADAMS ST.
 GREEN BAY, WI 54301
 BRRTS NO.: 02-50-237064



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8/6/20