

June 1, 2017

Ms. Jennifer Borski
Hydrogeologist
WDNR – Oshkosh Area Office
625 E. County Rd Y, Suite 700
Oshkosh, WI 54901-9731

**RE: Investigative Waste - Former American Toy & Furniture Facility,
825 Main Street (US Highway 45), Hortonville, Wisconsin,
WDNR BRRTS Numbers 02-45-000563 and 03-45-245541.**

Dear Ms. Borski:

On May 24, 2017, the DNR sent *Continuing Obligation Modification Notice to Proceed for American Toy & Furniture (Former)* correspondence for both BRRTS Numbers 02-45-000563 and 03-45-245541. The former American Toy & Furniture facility is located at 825 W. Main Street, Hortonville, Wisconsin 54944-8422.

In the correspondence, well abandonment documentation and investigative waste documentation were requested. The well abandonment documentation was provided for both cases on May 21, 2017 under separate submittals.

For the investigative waste, this correspondence documents both cases since the majority of the investigation activities were conducted on a site level not a case level.

In 1994, Robert E. Lee & Associates investigated the property. The investigation report¹ documented the advancement of five hand-augered borings, 11 drilled soil borings, monitoring well installation, and associated analysis. From the portion of the report that I have, I did not come across documentation on the investigative waste management.

In 1994, McLaren/Hart Engineers Midwest, Inc. investigated the property. Their draft report² documented the advancement of seven hand-auger borings, 18 geoprobe borings, the collection of 73 soil samples, two groundwater samples,

¹ American Toy and Manufacturing Company, Environmental and Property Assessment/Site Investigation, dated May 6, 1994, prepared by Robert E. Lee & Associates, Inc.

² Limited Phase II Environmental Assessment of the American Toy and Furniture Company, dated May 12, 1994, prepared by McLaren/Hart Engineers Midwest, Inc.

and associated analysis. From the portion of the report that I have, I did not come across documentation on the investigative waste management.

In 1998, the DNR conducted a phase II environmental assessment as part of the Department's Brownfield Environmental Assessment Program (BEAP). The BEAP report documents the advancement of eight soil borings, the installation of four monitoring wells, the collection of 16 soil samples and five groundwater samples, and associated analysis³.

I did not locate any documentation on the actual disposal of the investigative waste in the DNR report documenting the DNR investigation⁴. However, In Appendix A, Sampling and Analysis Work Plan, section IX(A.) *Sampling Equipment, Decontamination and Investigative Wastes*, there is discussion on how the wastes should have been handled. The drums next to the former monitoring well locations were removed long ago. There may be disposal documentation in the DNR files.

Investigative waste management from OMNNI's 2001 investigation was documented in the Site Work Plan⁵. I believe the investigative waste was handled as outlined in the work plan. We reviewed our paper and electronic files for further documentation, but were unable to locate any additional references to the investigative waste handling. Because of software upgrades, our email files only go back to 2004. The soil and water disposal should have occurred between July 2001 and July 2002 based on activities that were taking place at the site. I believe we were approved to place the soil cuttings and water near the location of the borings and that there should be email correspondence during 2001-2002 between OMNNI and the DNR discussing the waste handling.

The investigative waste from OMNNI's 2004 investigation was documented in the *Investigative Waste Management* section of the Investigation Report⁶. In the Investigation Report, there was a discussion of a drum located near monitoring well MW5⁷. The soil analysis from the drum was provided in the Investigation Report. The disposal documentation for the drum located near monitoring well MW5 is attached.

Recent OMNNI investigative waste (additional groundwater sampling and additional direct push soil borings) was handled similarly to the 2004 OMNNI investigative waste. Excess sample material from the direct push borings and

³ Referenced in the Investigation Report, Former American Toy & Furniture, dated September 30, 2004, prepared by OMNNI Associates.

⁴ Phase II Environmental Assessment, American Toy & Furniture Facility, dated 3/18/99, prepared by the Wisconsin Department of Natural Resources.

⁵ Site Work Plan for the Former American Toy & Furniture Facility, dated April 24, 2001, prepared by OMNNI Associates.

⁶ Investigation Report, Former American Toy & Furniture, dated September 30, 2004, prepared by OMNNI Associates.

⁷ Monitoring well MW5 was installed prior to the DNR's and OMNNI's investigations. The soil in the drum was assumed to be from MW5's cuttings, possibly mixed with other investigative soil waste.

spent sampling supplies were disposed of as solid waste. Micro-purge sampling groundwater was volatilized on the asphalt pavement on the east end of the property. The direct push equipment was decontaminated at the driller's facility.

An electronic copy of this correspondence was emailed to you on 6/1/17. If you have any questions on this information, please contact me at 920/830-6141 or by email at bwayner@omni.com. Thank you for your assistance.

Sincerely,
OMNNI Associates, Inc.


Brian D. Wayner, P.E.
Environmental Engineer

Attachment

cc: Barry and Tracy Jennerjohn, (by email)
Mike Gonnering, Affordable Rental Storage, (by email)



ONYX
WASTE SERVICES

January 4, 2005

Jessie Rose
Environmental Services Plus
W1732 County Road KK
Kaukauna WI 54130

Re: Special Waste Approval Letter

Dear Jessie:

We are pleased to advise that the special waste listed below was approved on 12/16/04 for disposal at the Onyx Hickory Meadows Landfill. The attached profile is your documentation that verifies this waste stream is not a hazardous or unauthorized waste and also verifies approval to accept this waste stream by the Onyx Hickory Meadows Landfill as indicated by the signature of our approvals department and our general manager. The waste approval is valid as follows:

Generator:	Former American Toy & Furniture Co.
Address of Waste Generated:	825 Main St. Hortonville, WI 54944
Waste Stream:	Remediation Waste
Waste Category:	37a
Profile Number:	HML05-002
Profile Recertification Date:	One Time Only
Waste Disposal Method:	Direct Landfill

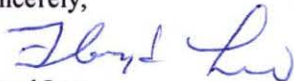
Please note the special conditions for acceptance are as follows:

- 1. No Free Liquids**
- 2. Each load must have a manifest signed by an authorized representative or agent of Former American Toy & Furniture Co. accompanying the waste for disposal.**

We greatly appreciate the confidence and trust you have placed in selecting Onyx Hickory Meadows Landfill, LLC, to manage your bioremediation and disposal needs. As an additional note, we have fulfilled all Wisconsin DNR regulations and our landfill meets or exceeds the design, construction and operating standards promulgated under 40 CFR 258.

If you have questions or need assistance with additional waste disposal, please do not hesitate to contact us at (920) 853-8553.

Sincerely,



Floyd Leo
Business Development

