

From: [Madden, Peter](#)
To: [Joslin, Richard R - DNR](#)
Cc: [Brotz, Adam](#); [Meyer, Todd](#)
Subject: Request Using BRRTS to record resolution of soil contamination-Plastics Engineering Co., Sheboygan
Date: Friday, November 18, 2016 9:18:54 AM

Mr. Joslin,

This e-mail is in response to our telephone conversation of November 17th. Plastics Engineering Company is not requesting a formal letter of conclusion from the Department on the soil contamination reported in October, 2016. We accept the Department's use of the BRRTS as the mechanism to document the actions taken by Plastics Engineering Company in response to the discovery of the contamination, and the Department's determination.

Thank you for your attention in dealing with this matter. Please contact me if you require additional information.

Peter Madden
Manager of Environmental Affairs
Plastics Engineering Company
P.O. Box 758
Sheboygan, Wisconsin 53082-0758
Tele: 920-458-2121
Fax: 920-451-3804
e-mail: pmadden@plenco.com

From: [Beggs, Tauren R - DNR](#)
To: [Joslin, Richard R - DNR](#)
Subject: NAR Concurrence for Plenco site, 2732 N 15th St, Sheboygan
Date: Friday, November 11, 2016 2:45:19 PM
Attachments: [image001.gif](#)
[image002.gif](#)
[image003.gif](#)
[image004.gif](#)
[image005.gif](#)
[image006.gif](#)

Hi Rick,

As discussed today between you, me and Keld, I concur that this case should be a NAR.

Thanks,

We are committed to service excellence.

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

Tauren R. Beggs

Hydrogeologist & Northeast Region Land Recycling Expert

Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

2984 Shawano Ave

Green Bay, WI 54313

Phone: (920) 662-5178

Fax: (920) 662-5197

Tauren.Beggs@wisconsin.gov

 dnr.wi.gov


From: [Madden, Peter](#)
To: [Joslin, Richard R - DNR](#)
Cc: [Brotz, Adam](#); [Kleine, Wayne](#); [Meyer, Todd](#)
Subject: RE: Report of Contamination-Plastics Engineering Co., Sheboygan
Date: Friday, November 04, 2016 11:32:53 AM
Attachments: [image007.png](#)
[image009.jpg](#)
[image011.png](#)
[image019.jpg](#)
[image021.jpg](#)
[image023.jpg](#)
[image025.png](#)
[image027.jpg](#)
[image029.png](#)
[image031.jpg](#)
[image033.jpg](#)
[image035.jpg](#)
[Footprint of Plastics Engineering Company North Avenue Plant-Sheboygan LOCATION OF ELEVATOR 5.pdf](#)
[161102 lab Report of Drummed Soil from Elevator 5 modernization.pdf](#)

Mr. Joslin,

My apologies for not getting these results to you sooner; they were held up at our consultant's office.

Attached is a floor plan of our facility with the location of the elevator marked. Building 31 is a three story building. The DRO results are also attached. The samples are identified as drums #2 through #7. The higher the drum number, the deeper the depth at which the sample was collected. These results represent soil removed from the jack shaft. As expected, the samples closer to the surface have higher DRO concentrations than those collected deeper. As explained, the process used to remove the soil cause some mixing of the soil column, so some of the DRO detected at lower levels was likely introduced into the samples from soil above. As noted in my preliminary report to you, a sample of soil from the bottom of the boring had a DRO concentration of 50.6 mg/kg. I believe these data support the position that contaminated soil has been substantially removed. The attached results will be used to profile the soil for proper disposal.

Please contact with if you have comments, suggestions, or additional questions.

Peter Madden

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Fax: 920-451-3804
e-mail: pmadden@plenco.com

From: Joslin, Richard R - DNR [<mailto:Richard.Joslin@wisconsin.gov>]
Sent: Wednesday, November 02, 2016 11:24 AM

To: Madden, Peter <pmadden@plenco.com>
Subject: RE: Report of Contamination-Plastics Engineering Co., Sheboygan

Hello Peter.

Hope things are well and that you have had a chance to enjoy this nice weather we are having.

Anyway, any progress with the items discussed below?

Again, any questions please feel free to contact me.

Rick

We are committed to service excellence.

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

Richard R. Joslin

Hydrogeologist – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727
Phone: (920) 662-5165
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov



From: Madden, Peter [<mailto:pmadden@plenco.com>]
Sent: Tuesday, October 11, 2016 11:09 AM
To: Joslin, Richard R - DNR
Subject: RE: Report of Contamination-Plastics Engineering Co., Sheboygan

Mr. Joslin,

Yes, the samples from the drums of soil removed from the boring have been submitted to the laboratory for DRO analysis. I will provide results and a site map as soon as I get them, which I expect to be in about a week. Please let me know if I can provide any other information.

Peter Madden

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e-mail: pmadden@plenco.com

From: Joslin, Richard R - DNR [<mailto:Richard.Joslin@wisconsin.gov>]
Sent: Tuesday, October 11, 2016 10:46 AM
To: Madden, Peter <pmadden@plenco.com>
Subject: RE: Report of Contamination-Plastics Engineering Co., Sheboygan

Peter

I received your letter. It is my understanding that samples from several drums are still being analyzed by the laboratory. When those results are available could you please send those to me so I have all analytical related to this work in my file. In addition, is it possible to get a map that shows the location of the freight elevator. I will have to run this by my supervisor and want to have all of the information available for our discussion.

Thanks Peter and have a great day!

We are committed to service excellence.

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

Richard R. Joslin

Hydrogeologist – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727
Phone: (920) 662-5165
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov



From: Madden, Peter [<mailto:pmadden@plenco.com>]
Sent: Thursday, October 06, 2016 4:55 PM
To: Joslin, Richard R - DNR
Cc: Brotz, Mike; Brotz, Adam; Mohr, Jeff; Meyer, Todd
Subject: Report of Contamination-Plastics Engineering Co., Sheboygan

Mr. Joslin

Attached is a letter regarding the DRO contamination we discussed on October 4. I will also send this via regular mail. Please contact me if have questions or comments, or if you need additional information.

Peter Madden

EHS Compliance Director
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P.O. Box 758
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PLASTICS ENGINEERING CO.
NORTH AVE. PLANT
BUILDING NUMBERS



FENCE LINE

R. R. SIDING

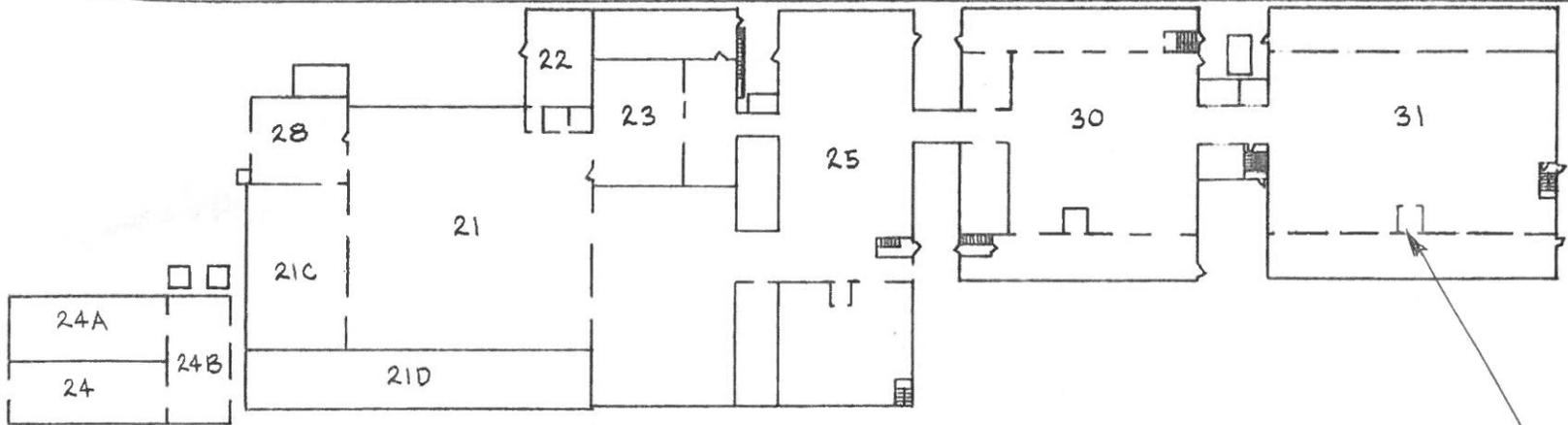
32

W. P. & L.

FENCE LINE

R. R. SIDING

27



FIRST FLOOR PLAN

location of
Elevator 5

FENCE LINE

Synergy Environmental Lab, INC.

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

PETER PITTNER
MILLER ENGINEERS & SCIENTISTS
5308 S. 12TH STREET
SHEBOYGAN WI 53081

Report Date 11-Oct-16

Project Name PLENCO ELEVATOR PIT
Project # 20048-001

Invoice # E31837

Lab Code 5031837A
Sample ID DRUM #2
Sample Matrix Soil
Sample Date 10/4/2016

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
General										
General										
Solids Percent	81.7	%			1	5021		10/5/2016	NJC	1
Organic										
General										
Diesel Range Organics	10900.0	mg/kg	11.6	37	10	DRO95		10/7/2016	NJC	2 43

Lab Code 5031837B
Sample ID DRUM #3
Sample Matrix Soil
Sample Date 10/4/2016

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
General										
General										
Solids Percent	79.7	%			1	5021		10/5/2016	NJC	1
Organic										
General										
Diesel Range Organics	14700.0	mg/kg	11.6	37	10	DRO95		10/7/2016	NJC	2 43

Project Name PLENCO ELEVATOR PIT
Project # 20048-001

Invoice # E31837

Lab Code 5031837C
Sample ID DRUM #4
Sample Matrix Soil
Sample Date 10/4/2016

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
General										
General										
Solids Percent	80.0	%			1	5021		10/5/2016	NJC	1
Organic										
General										
Diesel Range Organics	10600.0	mg/kg	11.6	37	10	DRO95		10/7/2016	NJC	2 43

Lab Code 5031837D
Sample ID DRUM #5
Sample Matrix Soil
Sample Date 10/4/2016

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
General										
General										
Solids Percent	77.8	%			1	5021		10/5/2016	NJC	1
Organic										
General										
Diesel Range Organics	3590.0	mg/kg	5.8	18.5	5	DRO95		10/7/2016	NJC	2 43

Lab Code 5031837E
Sample ID DRUM #6
Sample Matrix Soil
Sample Date 10/4/2016

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
General										
General										
Solids Percent	77.7	%			1	5021		10/5/2016	NJC	1
Organic										
General										
Diesel Range Organics	1120.0	mg/kg	1.16	3.7	1	DRO95		10/7/2016	NJC	2 43

Lab Code 5031837F
Sample ID DRUM #7
Sample Matrix Soil
Sample Date 10/4/2016

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
General										
General										
Solids Percent	78.6	%			1	5021		10/5/2016	NJC	1
Organic										
General										
Diesel Range Organics	868.0	mg/kg	1.16	3.7	1	DRO95		10/7/2016	NJC	2 43

"J" Flag: Analyte detected between LOD and LOQ

LOD Limit of Detection

LOQ Limit of Quantitation

Code ***Comment***

- 1 Laboratory QC within limits.
- 2 Relative percent difference failed for laboratory spiked samples.
- 43 Oil contamination indicated outside DRO window.

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature



A handwritten signature in blue ink, appearing to read "Michael J. Steel", is written over a horizontal line.

From: [Madden, Peter](#)
To: [Joslin, Richard R - DNR](#)
Subject: Contact information-Plastics Engineering Co., Sheboygan
Date: Tuesday, October 04, 2016 3:11:43 PM

Mr. Joslin

Thank you for discussing the reporting requirements for our DRO contamination. For your convenience in sending the reporting form, I am providing my e-mail address: pmadden@plenco.com, and my telephone number is included below.

Peter Madden

EHS Compliance Director
Plastics Engineering Company
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Sheboygan, Wisconsin 53082-0758
Tele: 920-458-2121
Fax: 920-451-3804
e-mail: pmadden@plenco.com

From: [Madden, Peter](#)
To: [Joslin, Richard R - DNR](#)
Cc: [Brotz, Mike](#); [Brotz, Adam](#); [Mohr, Jeff](#); [Meyer, Todd](#)
Subject: Report of Contamination-Plastics Engineering Co., Sheboygan
Date: Thursday, October 06, 2016 4:55:17 PM
Attachments: [Notification Letter and Request for No Further Action to DNR re Elevator 5 soil contamination.pdf](#)

Mr. Joslin

Attached is a letter regarding the DRO contamination we discussed on October 4. I will also send this via regular mail. Please contact me if have questions or comments, or if you need additional information.

Peter Madden

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Plenco - Elevator Shaft



Legend

- General Liability Clarification Letters
- Superfund NPL
- Voluntary Party Liability Exemption
- Rivers and Streams
- Open Water
- Municipality
- State Boundaries
- County Boundaries
- Major Roads**
 - Interstate Highway
 - State Highway
 - US Highway
- County and Local Roads**
 - County HWY
 - Local Road
- Railroads
- Tribal Lands



NAD_1983_HARN_Wisconsin_TM

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1:3,818



DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/org/legal/>

Note: Not all sites are mapped.

Notes

Red Dot: Elevator Location



PLASTICS ENGINEERING COMPANY
SHEBOYGAN, WISCONSIN 53082-0758 U.S.A

3518 LAKESHORE ROAD
POST OFFICE BOX 758
PHONE 920-458-2121
F A X 920-458-1923
www.plenco.com

October 5, 2016

Rick Joslin
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727

Dear Mr. Joslin,

Summary

As a follow-up to our telephone conversation of October 4, 2016, this letter provides information regarding the discovery of 51 mg/kg diesel range organics (DRO) measured in soil from bottom of the boring that held the elevator jack during repair of an industrial freight elevator. Based on the preliminary findings, Plastics Engineering Company requests the Wisconsin Department of Natural Resources (DNR) to issue a no further action letter for this site.

Site Description

Modernization of an industrial hydraulic freight elevator located at the Plastics Engineering Company manufacturing facility located at 2732 N. 15th Street in Sheboygan, Wisconsin required the removal of the old jack and liner. After the jack and liner were removed, soil that had entered the existing boring had to be removed in order to test the boring for plumbness and to install the new liner. As the soil was removed and drummed, it was evaluated using a PID meter, and samples were collected from each drum to profile the material for disposal. Because the elevator is hydraulic, the removed soil was evaluated for the presence of oil as the release of some oil around the jack would be typical in normal operation of the elevator. A sample of soil was also collected from the bottom of the boring, at a depth of fifty-two feet. This is the sample with a DRO concentration of 50.6 mg/kg.

The following information can be used in evaluating the soil test results.

- Water was introduced into the boring to make the soil into a slurry in order to remove it.
- The method for removing the soil from the boring was to use a large diameter bailer that was lowered into the boring.
- The slurry was aerated using compressed air to suspend the soil so it could be collected by the bailer.
- The addition of water and the use of air served to mix the soil in the boring, so the soil samples do not reflect a strict representation of the soil column in the boring. That being said, the PID readings steadily declined from the soil collected from the top of the material in the boring to the soil removed last.
- Laboratory analysis of soil sample was initially conducted on first drum of soil removed from the boring, and on the sample taken from the bottom of the boring. A sample from each of the remaining drums of removed soil will be analyzed for DRO in order to confirm the DRO concentration diminished with depth, as indicated by the PID readings.
- The sample collected at the bottom of the boring is not collected from native soil. It would contain some soil that entered the boring during the removal of the liner, as well as any engineered fill used during the original installation of the elevator.

Basis for Requesting No Further Action Determination

The 51 mg/kg reading was collected at a depth of fifty-two feet, and is located under a three story industrial building. Being inside a building, the entire area over and around the elevator shaft is covered by a concrete floor and is impervious and not subject to weather. This provides a barrier cap over the area. Due to the depth of the residual contamination, and its location beneath a building, additional sample collection would be problematic, and there appears to be no threat of adverse impact to groundwater, surface water, indoor air, human health, safety, or welfare, or to sensitive environments, posed by the residual soil contamination. The contamination found in the soil is not the result of a spill or equipment failure, rather it is the result of normal operation of the elevator's hydraulic system.

It is understood that the reporting of the detection of the residual soil contamination, and the proper disposal of the soil removed from the boring are required, and will be completed. Documentation of the conclusion of these items will be provided to the DNR. In addition, if any work is done at the site that allows access to the area of the residual contamination, additional testing will be conducted.

Please contact me if you require additional information in order to respond to this request.

Sincerely,

Plastics Engineering Company



Peter Madden
Manager of Environmental Affairs

c: Michael Brotz
Adam Brotz
Jeff, Mohr
Todd Meyer
Peter Pittner, Miller Engineers & Scientists