

From: Hnat, John J - DNR
Sent: Wednesday, October 25, 2017 8:36 AM
To: Kevin Bugel (kbugel@gilesengr.com); daren daniels (songhai6971@hotmail.com)
Subject: Site Investigation Work Plan 0241306192, 0241553373, 0341556393

Kevin and Daren,

Below are items that have to be addressed in the proposal from Giles Engineering. The review process has been placed on administrative hold until we receive this information. Any questions, please call or email me.

1. Figure 2 in the proposal doesn't indicate the locations of the former soil and groundwater sample locations and their concentration results.
2. Submit a map that indicates where the soil results for lead, arsenic, and PAH compounds have exceeded their respective RCLS and soil to groundwater pathway based on previous investigations as discussed in 1.3. Previous Studies. Isoconcentration lines associated with the exceedances would present a better picture of the soil contamination onsite.
3. Submit a map that indicates the ES and PAL exceedances discussed in 1.3. Previous Studies as it relates to the "TW" and "B" grab groundwater locations.
4. Designate on Figure 2 and any subsequent maps the areas to be investigated. For example, Existing Building 1, has three soil borings and two temporary well locations. The map should clearly indicate if this is the fuel oil spill area. To the east area slightly southeast of this area, is an area that should be the CVOC spill area, but isn't designated as such.
5. Figure 2, should indicate the confirmation sample locations in the "Excavation Boundary 2008" located north of Lot 2.
6. Of the six soil samples to be completed in three locations (two per sample location) the DNR would require a sample within the first 4-feet of the surface to investigate any possible direct contact exceedances. The proposal didn't indicate where the soil samples were to be completed and why.
7. Although the subslab vapor evaluation port is proposed to be backfilled and abandoned, the DNR doesn't recommend abandoning this point at this time in case additional vapor sampling would be required. For instance, in case the vapor screening level (VSL) results are "slightly" above the VSL, in which case the DNR would require a confirmation vapor sample.
8. Chapter NR 141 requires specific construction requirements for groundwater monitoring wells. You should request a variance using the 1-inch diameter wells with prepacked wells screens for approval to facilitate groundwater sampling. In the request, the reason or reasons why this variance is requested should be discussed and how effective the sampling results would be compared to standard NR 141 groundwater monitoring wells.
9. On Page 5 of the proposal, after the last bullet, the oil spill location and soil boring associated with the oil spill investigation are cited for Figure 1. Figure 1 is an area-wide site location map. It should be stated for Figure 2.
10. The post-excavation soil samples in the Building No. 3 South Footing Line are designated EX-1 through EX-5 in Drake's 2009 report, not E-1 through E-5. Please make this minor change.
11. Soil samples for the Building No.3 and South Footing Line and Lot No. 3 Investigation didn't discuss the depths the soil samples would be taken. To investigate any possible direct contact issues, the zero to four-foot depth must be sampled. The proposal indicated only one soil sample up to 15 soil samples (one sample per boring) at an unknown depth. Are 15 samples sufficient for a 5.71-acre site spaced at 90-foot intervals? What is this based on?
12. Ten soil borings are to be converted into NR 141 variance groundwater monitoring wells. In the proposal on Page 6, it states, "Abandon the borings in accordance with Ch. NR 141 requirements." Does this mean that the variance wells will be abandoned after one groundwater sample? The DNR may require additional monitoring based on the initial sampling results. Please clarify this point in the proposal.

Thanks and have a great day.



Project Manager/Hydrogeologist
Remediation and Redevelopment Program
Southeast Region Headquarters
Wisconsin Department of Natural Resources

(☎) phone: (414) 263-8644

(☎) fax: (414) 263-8550

(✉) e-mail: John.Hnat@wisconsin.gov

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