

## Borski, Jennifer - DNR

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**From:** Borski, Jennifer - DNR  
**Sent:** Friday, August 3, 2018 11:29 AM  
**To:** Hammerton, JP; 'Wayne Fassbender'  
**Subject:** May 2018 soil data interpretation for Appleton Wire (Former), BRRTS #02-45-000015  
**Attachments:** 6486-0740-Fig.4B Soil analytical results with Total Cr isocontours 24x36.pdf

JP & Wayne – Please see the email chain below regarding the May 2018 soil data. The decision regarding no further investigation to the north or south in North Meade Street is a result of soil samples UB-3 and UB-4.

EnviroForensics, at my request, previously provided me with an electronic figure for reference of soil sample locations GP-32, GP-33, GP-34, GP-35, UB-3 and UB-4 along with the analytical data reports from Pace & Synergy) to facilitate this internal discussion. The referenced figure is reattached here for your reference. The figure and analytical data will need to be officially submitted with the next formal report. Call with any questions.

### Abbreviations/Acronyms:

CC = Closure Committee  
CO = continuing obligation  
DC = direct contact  
Ft bgs = feet below ground surface  
Hex Cr = hexavalent chromium  
Ind = Industrial  
LOD = limit of detection  
LOQ = limit of quantitation  
Mg/kg = milligrams per kilogram  
ND = no detect  
NER = Northeast Region  
NI = Non-industrial  
RCL = Residual contaminant level  
SI = site investigation  
SIR = Site Investigation Report

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### Jennifer Borski

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**From:** Chronert, Roxanne N - DNR  
**Sent:** Friday, August 3, 2018 10:53 AM  
**To:** Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>  
**Subject:** RE: possible cc agenda ad-on item for Thur? - hex chrome in soil

I concur with your summary below. In addition the CC discussed that no additional SI is being required to the N or S in Meade St.

Thank you for taking the time to summarize our discussion below. Rox

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**Roxanne Nelezen Chronert**

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[Roxanne.Chronert@Wisconsin.gov](mailto:Roxanne.Chronert@Wisconsin.gov)

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**From:** Borski, Jennifer - DNR

**Sent:** Thursday, August 2, 2018 1:15 PM

**To:** Chronert, Roxanne N - DNR <[Roxanne.Chronert@wisconsin.gov](mailto:Roxanne.Chronert@wisconsin.gov)>

**Subject:** RE: possible cc agenda ad-on item for Thur? - hex chrome in soil

Roxanne,

Based on review and discussion with the NER closure committee (Lauridsen, McKnight, Chronert & Beggs), I understand the following:

1. DNR does not view the J-flagged soil data for hexavalent chromium at GP-33 from 3.5-4 ft bgs (Pace) or GP-34 from 1-1.5 ft bgs (Synergy) as exceedances of the NI DC RCL per s. NR 720.07(2)(d)2, Wis. Adm. Code. (NI DC RCL of 0.301 mg/kg < LOD of 0.718 or 0.64; LOD < detect < LOQ (J-flagged); re-analysis (split sample results from Pace & Synergy) did not confirm the detects above the LOD).
2. No further investigation is needed off-site to the north.
3. Notification of residual soil contamination under ch. NR 725 does NOT apply to GP-33 or GP-34 and no continuing obligation will be assigned to the off-site property.

In addition, the NER closure committee agreed that no further investigation is needed on-site west of GP-32 where hexavalent chromium was analyzed at 0-5 ft bgs and detected at 0.841 mg/kg between the LOD & LOQ (J-flagged).

Please call to discuss if this is not clear.

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**Jennifer Borski**

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**From:** Borski, Jennifer - DNR

**Sent:** Tuesday, July 31, 2018 3:31 PM

**To:** Chronert, Roxanne N - DNR <[Roxanne.Chronert@wisconsin.gov](mailto:Roxanne.Chronert@wisconsin.gov)>

**Subject:** possible cc agenda ad-on item for Thur? - hex chrome in soil

**Importance:** High

Roxanne,

I have a soil lab data issue at the Appleton Wire site 02-45-000015 (former metal plating facility) that needs either Closure Committee review or Keld/Rox review and decision. - What's the best way to do this? It's probably the most efficient to put the attached map up on the big screen in the conference room and call me after your cc meeting is done. Then we are all looking at the same thing and having one discussion. Let me know how you would like to proceed.

**Issue:** Off-site soil samples split to two labs for hexavalent chromium with different results.

**Question:** Does DNR view the J-flagged data as contamination for purposes of off-site notification and COs?

**Background:**

Ind DC RCL for Hex Cr = 6.36 mg/kg

NI RCL for Hex Cr = 0.301 mg/kg

RCL Spreadsheet says to “re-assess” if any hexavalent chromium present in soil for groundwater pathway.

Fee SIR review resulted in CC/peer review requiring delineation of hexavalent chromium in soil off-site to the north. (See attached map of chromium in soil at GP-16 and MW-22A)

**New data:**

The soil samples north of GP-16 (north side of source property), GP-33, and had the following results:

**Synergy** (LOD = 0.64)

1-1.5 ft ND

3.5-4 ft ND

**Pace**

1-1.5 ft ND (LOD = 0.796)

3.5-4 ft **0.763J** (LOD = 0.718)

The soil samples north of MW-22 (also north side of source property), GP-34, had the following results:

**Synergy** (LOD = 0.64)

1-1.5 ft **0.867J** → **samples rerun by lab resulted in ND for both intervals**

3.5-4 ft ND

**Pace**

1-1.5 ft ND (LOD = 0.774)

3.5-4 ft ND (LOD = 0.669)

A third soil sample location further north on the off-site property, GP-35, had ND from 1-1.5 & 3.5-4 ft bgs by both Synergy & Pace.

While we are discussing, I ask you to look at one other data point. The northwestern on-site delineation point just sampled, GP-32, also had a J-flagged result for hexavalent chromium from 0-5 ft of 0.841 mg/kg. Does the CC want to see even more soil samples on-site north of the loading dock (loading dock juts out between GP-31 & GP-32) or does DNR consider the soil delineation complete in this direction?

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**Jennifer Borski**

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### Legend

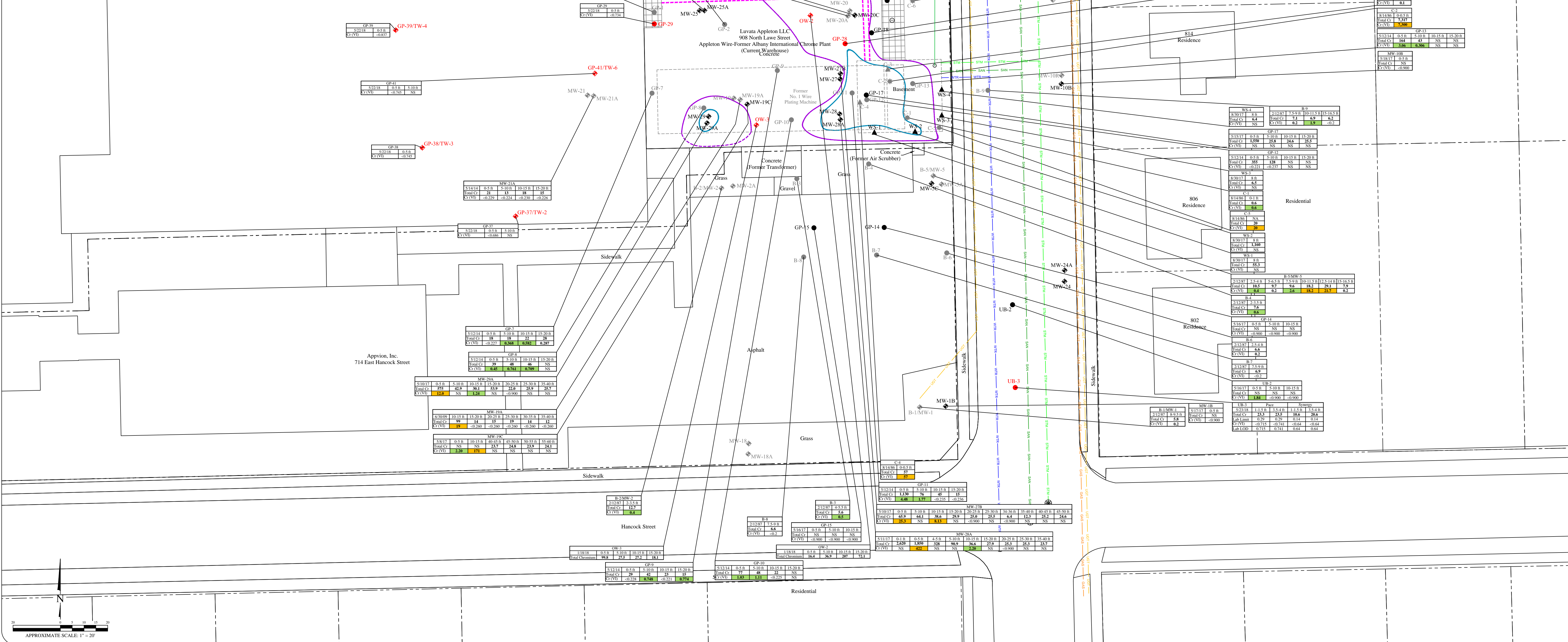
- Property boundary
- Underground gas utility line
- Underground water utility line
- Underground sanitary utility line
- Fiber optics line
- Underground storm utility line
- Pipe chase
- French drain and associated piping
- Sump
- Floor drain
- Soil boring (STS and Badger)
- Soil samples collected through concrete floor (STS)
- Soil samples collected through concrete wall (STS)
- Monitoring well (STS, McMahon, and Badger)
- Monitoring well abandoned (MW-10 in 1998) and (MW-11 in 1991)
- Monitoring well (EnviroForensics)
- Soil boring (EnviroForensics)
- Soil boring New (EnviroForensics)
- Soil boring/Temporary well New (EnviroForensics)
- Soil samples collected through concrete wall (EnviroForensics)
- Dairy tile floor

Analyte	Soil to Groundwater Residual Contaminant Level	Non-Industrial Residual Contaminant Level	Industrial Residual Contaminant Level
Total Cr	NE	NE	NE
Cr(VI)	0.301	6.36	

Note:

- Bold shaded blue values exceed WDNR Soil to Groundwater Residual Contaminant Level
- Bold shaded green values exceed WDNR Non-Industrial Residual Contaminant Level
- Bold shaded orange values exceed WDNR Industrial Residual Contaminant Level
- Bold values exceed laboratory detection levels
- Cr and Cr(VI) standards and analytical results are reported in milligrams per kilogram (mg/kg)
- PCE standards and analytical results are reported in micrograms per kilogram (µg/kg)
- Cr(VI) = Hexavalent Chromium
- Cr = Chromium
- NA = Not analyzed
- NS = Not sampled
- Soil samples collected greater than 10 feet below ground surface are considered saturated soil samples
- \* = Calculated using EPA Risk-based Screening Level Calculator
- Sample locations without data boxes are not sampled at this time
- Lab LOD = Laboratory limit of detecting

- Total chromium concentrations 100 mg/kg
- Total chromium concentrations 500 mg/kg
- Water table observation well (with 10 foot screen length)
- Piezometer (with 5 foot screen length set within the 30-40' depth interval)
- Piezometer (with 5 foot screen length set within the 40-50' depth interval)
- Piezometer (with 5 foot screen length set within the 50-60' depth interval)



APPROXIMATE SCALE: 1" = 20'

Figure	4B	Project	6486
SOIL ANALYTICAL RESULTS MAP WITH SELECT ISO-CONCENTRATION LINES SHOWING LATERAL DISTRIBUTION OF TOTAL CHROMIUM IMPACTS			
Albany International - Luvata Site			
908 North Lave Street			
Appleton, Wisconsin			
Date:	6/29/17	Designed:	EB
Drawn:	EB	Checked:	WF
DWG file:	6486-0740		
Approved	WF	Revision	Updates
No.	1	Date	7/3/18

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