Supplemental Site Investigation

Neillsville Foundry 1200 E. 15th Street Neillsville, Wisconsin BRRTS No. 02-10-000048 FID No. 610031400

Prepared for:

Wisconsin Department of Natural Resources Madison, Wisconsin

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Ayres Associates Project No. 10-1231.00 \ec5031\secr-wm\mrs\020325a.doc

Contents

<u>F</u>	age ivo.
Executive Summary	1
Introduction	3
Site Location and Project Numbers	3
Project Contacts	3
Subcontractors	4
Site Investigation Background	
Site Investigation Methods	5
Site Investigation Results	6
Soil	6
Soil Characteristics and Geology	
Soil Analytical Results	7
Extent of Soil Contamination	8
Ground Water	9
Ground Water Depth and Flow	
Hydraulic Conductivity	9
Vertical Gradient	10
Ground Water Analytical Results	10
Extent of Ground Water Contamination	
Potential Receptors	
Conclusions	
Property Use and Waste Volume	12
Soil Quality	12
Ground Water Quality	
Recommendations	
Standard of Care	
NR 712.09 Submittal Certification	

List of Tables

	Page No.
Table 1 Ayres Associates' Soil Boring Analytical Results for Metals and VOCs Table 2 Ayres Associates' Soil Boring Analytical Results for PAHs Table 3 Historical Soil Boring Analytical Results from Exploration Technology, Inc. Using ASTM Water Leachate Test Method or TCLP Method Table 4 Monitoring Well Information and Ground Water Elevations Table 5 Seepage Velocity Results Table 6 Ayres Associates' Ground Water Analytical Results Table 7 Historical Ground Water Analytical Results from ETI	23 24 25 26
List of Figures	
	Page No.
Figure 1 Location Map	17
List of Appendices	
Appendix A ETI Historical Site Map	
Appendix B Field Procedures	
Appendix C Soil Boring Logs	
Historical (ETI)	
Ayres Associates	
Appendix D Soil Analytical Results	
Historical (ETI)	
Ayres Associates	
Appendix E Monitoring Well Construction, Well Development Forms, WIF Form	
Appendix F Slug Test Data	
Appendix G Ground Water Analytical Results	
Historical Ground Water (ETI)	
Ayres Associates Ground Water	
Appendix H WDNR Spill Information	

Executive Summary

The Wisconsin Department of Natural Resources (WDNR) retained Ayres Associates in July 2000 to complete a supplemental investigation of the Neillsville Foundry. The foundry is located in the NE ¼ of the NE ¼ of Section 14, Township 24 North, Range 2 West, City of Neillsville, Clark County, Wisconsin. The current property owner is O'Neill Industries, Inc. The on-site building has been used as a foundry since 1969. Former operators of the Neillsville Foundry historically disposed of iron casting manufacturing waste in an area south of and to the east of the existing building. In 1998, a new operator, Century Castings Corporation, began leasing the property from O'Neill Industries, Inc. The facility continues to be an active foundry.

Concerned about improper disposal of foundry waste on the property, the WDNR ordered an investigation by the current owner in 1990. Exploration Technology Incorporated conducted the initial site investigation in 1990. They installed ten backhoe test pits, nine soil borings, three monitoring wells (MW-1A, 2A, and 3A), and one piezometer (MW-2B) and conducted laboratory analyses of soil and ground water samples.

In 1997, Dames & Moore was hired to do a clay borrow site investigation for the Neillsville Foundry. They determined that approximately 15,500 cubic yards of fine-grained soil would be needed to construct a final cover layer for the waste disposal area, which spans approximately 4 acres. The borrow site with the greatest potential was the Bruce Vandenberg property adjacent and to the east of the Neillsville Foundry.

Ayres Associates' additional investigation began on July 21, 2000, by inspecting and redeveloping the existing monitoring wells on site. Nineteen soil samples were collected from a 0- to 4-foot depth at various locations within the waste disposal area and the wetland area south of the building. A hydraulic conductivity test for monitoring wells MW-1, 2A, 2B, and 3A was conducted on July 24, 2000. Ground water samples were collected from monitoring wells MW-1A, 2A, 2B, and 3A on July 24 and September 25, 2000.

Arsenic concentrations ranging from 1.2 to 19.1 mg/kg were detected in most of the soil samples from the 0- to 4-foot depth range. These concentrations exceed the NR 720 Soil Cleanup Industrial Standards. One soil sample had a NR 720 exceedance for chromium and another sample exceeded the industrial soil cleanup levels for the polycyclic aromatic hydrocarbon (PAH) dibenzo(a,h)anthracene. Polychlorinated biphenyls (PCBs) were not detected in the soil samples.

Based on review of these findings, the WDNR requested installation of four piezometers and two water table monitoring wells, collection of one round of ground water samples from the existing wells and two from new wells and piezometers, and collection of background soil samples for metals content. New monitoring wells were installed on June 5, 2001, and a background soil sample was also collected from the foundry sand used by the current site operator. The new wells and piezometers were developed and surveyed, and ground water samples were collected on July 17 and September 12, 2001.

PAH and dissolved metals were not detected at concentrations exceeding NR 140 standards at any of the monitoring wells. Ground water sample analysis showed Wisconsin Administrative Code NR 140 Enforcement Standard (ES) and Preventive Action Limit (PAL) exceedances for tetrachloroethane (PCE) and a PCE breakdown byproduct, trichloroethene, in MW-2A and MW-2B. In addition, low levels of MTBE, chloroethane, and chloroform near or below the limit

of quantitation were detected at MW-1A and MW-1B. The source of chloroethane and chloroform detects may be from the laboratory.

Because PCE was not detected in the other wells, PCE contamination appears to be caused by a point source near MW-2A/2B or originated in the disposal area up gradient from MW-2A/2B. Water quality down gradient of MW-2A/2B is not known because there are no down gradient monitoring wells and the area is a wetland. O'Neill Creek, located approximately 950 feet down gradient from MW-2A/2B, is the likely receptor of any ground water contamination migrating from this site.

NR 140 PAL exceedances for benzene concentrations were also detected in MW-4A and up gradient well MW-1B. The benzene and MTBE contamination source in the up gradient piezometer, MW-1B, is unknown. MW-1B is located near the road (15th Street) and it is possible that an undocumented petroleum spill or release from the bus garage up gradient from this well occurred at one time. The benzene contamination source at MW-4A may be from vandalism. In 1999, approximately 90 gallons of diesel fuel was released to the ground from an aboveground storage tank (AST) located near MW-4A. Benzene contamination has not been detected in wells side or down gradient from MW-4A but was detected at a low concentration in down gradient well MW-2A.

Based on the findings of this supplemental site investigation, we recommend the following:

- Meeting with the WDNR and current landowner to discuss future land use options and a range of remedial action options.
- Based on the outcome of this meeting, evaluate appropriate remedial action alternatives and prepare a remedial action options report. Potential alternatives include capping of the waste disposal area, removal of waste materials for a beneficial use, fencing the area and recording a soil deed restriction, and no action.
- Continue ground water quality monitoring to determine the trend of PCE and benzene contamination in the ground water. Installing a down gradient well to determine the limits of ground water contamination may not be feasible or practical given the proximity to wetlands and the location of O'Neill Creek as a down gradient receptor.

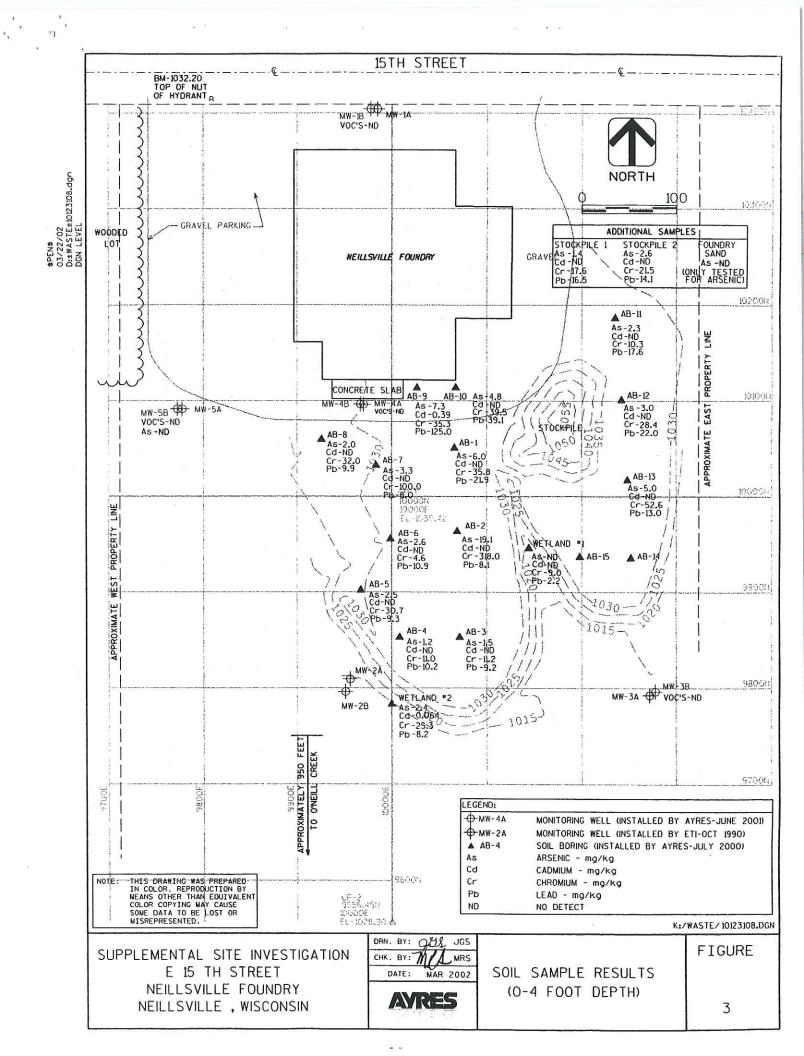


TABLE 1 AYRES ASSOCIATES' SOIL BORING ANALYTICAL RESULTS FOR METALS AND VOCs **NEILLSVILLE FOUNDRY**

				ME	TALS		T	VOCs										
Sample Location	Depth (Feet)	Sample Date	Arsenic	Cadmium	Chromium	Lead	Percent Solids	В	E	Т	Total X		1,2,4-TM	1,3,5-TM				
100 miles (100 miles (0 - 4	7/21/00	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	%	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)				
	0-4	7/21/00		<0.053	35.8	21.9	NM	NM	NM	NM	NM	NM	NM	NM				
	0-4		19.1	<0.359	318	8.1	NM	NM	NM	NM	NM	NM	NM	NM				
100000	0-4	7/21/00	1.5	<0.038	11.2	9.2	NM	NM	NM	NM	NM	NM	NM	NM				
	0-4	7/21/00	1.2	<0.032	11.0	10.2	NM	NM	NM	NM	NM	NM	NM	NM				
	0 -3.5	7/21/00	2,5	<0.049	30.7	9.3	NM	NM	NM	NM	NM	NM	NM	NM				
	0 - 4		2.6	<0.043	4.6	10.9	NM	NM	NM	NM	NM	NM	NM	NM				
	0-4	7/21/00	3,3	<0.040	100	0.8	NM	NM	NM	NM	NM	NM	NM	NM				
7.000	0-4	7/21/00	2.0	<0.050	32	9.9	NM	NM	NM	NM	NM	NM	NM	NM				
100		7/21/00	7.3	0.39	35.3	125	NM	NM	NM	NM	NM	NM	NM	NM				
200000000000000000000000000000000000000	0-4	7/21/00	4.8	<0.069	39.5	39.1	NM	NM	NM	NM	NM	NM	NM	NM				
	0-2	7/24/00	2.3	<0.038	10.3	17.6	NM	NM	NM	NM	NM	NM	NM	NM				
	0-3	7/24/00	3.0	<0.038	28.4	22.0	NM	NM	NM	NM	NM	NM	NM	MM				
	0 - 4	7/24/00	5.0	<0.053	52.6	. 13.0	NM	NM	NM	NM	NM	NM	NM	NM				
	0 - 4	7/24/00	3.1	<0.041	41.2	12.9	NM	NM	NM	NM	NM	NM	NM	NM				
10/2002 10/2004	0 - 4	7/24/00	2.3	<0.043	18.3	11.2	NM	NM	NM	NM	NM	NM	NM	NM				
	near surface	7/21/00	<0.95	<0.043	9.0	2.2	NM	NM	NM	NM	NM	NM	NM	NM				
HOMOSANA AND AND AND AND AND AND AND AND AND	near surface	7/21/00	2.4	0.064	25.3	8.2	NM	NM	NM	NM	NM	NM	NM	NM				
200.1103.0000000000000000000000000000000	near surface	7/21/00	1.4	<0.036	17.6	16.5	NM	NM	NM	NM	NM	NM	NM	NM				
	near surface	7/21/00	2.6	<0.052	21.5	14.1	NM	NM	NM	NM	NM	NM	NM	NM				
AB-1 AB-2 AB-3 AB-3 AB-4 AB-5 AB-6 AB-7 AB-8 AB-9 AB-10 AB-11 AB-12 AB-13 AB-14 AB-15 WETLAND #1 WETLAND #2 STOCKPILE #1 STOCKPILE #2 MW-1B MW-3B MW-4A MW-5B*	7.5 - 9.5	6/5/01	NM	NM	NM	NM	87.4	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025					
	12.5 - 14.5	6/5/01	NM	NM	NM	NM	86.7	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025				
MW-3B	5 - 7	6/5/01	NM	. NM	NM	NM	79.5	<0.025	<0.025	<0.025	<0.025	<0.025		<0.025				
	12.5 - 14.5	6/5/01	NM	NM	NM	NM	85.4	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025				
MW-4A	12.5 - 14.5	6/5/01	NM	NM	NM	NM	85.9	<0.025	<0.025	<0.025	<0.025		<0.025	<0.025				
	17.5 - 19.5	6/5/01	NM	NM	NM	NM	83.9	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025				
MW-5B*	0 - 2 (Background)	6/5/01	<2.03	NM	NM	NM	NM	NM	NM	NM	NM	<0.025 NM	<0.025 NM	<0.025 NM				
	7.5 - 9.5	6/5/01	NM	NM	NM	NM	88.5	<0.025	<0.025	<0.025	<0.025	<0.025	-	-				
	20 - 22	6/5/01	NM	NM	NM	NM	83,3	<0.025	<0.025	<0.025	<0.025		<0.025	<0.025				
	From Facility	6/5/01	<1.64	NM	NM	NM	99.8	NM	NM	NM	NM	<0.025	<0.025	<0.025				
P 720 Soil Clans	up Industrial S	tandard	1.6	510	200	500				, VIVI	MIVI	NM	NM	NM				

NOTE: All locations were analyzed for PCBs and no detects were found. Therefore, PCBs are not included in this table.

ABBREVIATIONS AND ACRONYMS

DRO = Diesel range organics

B = Benzene

E = Ethylbenzene

T = Toluene

X = Total Xylenes

MTBE = Methyl tert-bulyl ether

1,2,4-TMB = 1,2,4-Trimethylbenzene

1,3,5-TMB = 1,3,5-Trimethylbenzene

NR = No response

NS = No Standard

NM = Not Measured

DESIGNATIONS

Blank cells indicate not analyzed

< = Not detected at or above this value

⁼ Concentration exceeded NR 720 standard

⁼ Concentration exceeded NR (20 stational)

* = MW-5B sample at 0-2 foot depth is considered to be a reprsentative sample for background concentrations in soil.

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AYRES ASSOCIATES SOIL BORING ANALYTICAL RESULTS FOR PAHS NEILLSVILLE FOUNDRY TABLE 2

	Ругепе	mg/Kg	1.5	0.19	0.42	0.56	0.44	0.31	4.	0.41	76.0	0.61	0.35	1.7	1.0	0.36	0.58	0.24	0.21	0.43	0.39		30000	
		Н					_							100									30	
	Phenanthrene	mg/Kg	0.47	0.18	0.21	0.43	0.25	0.28	0.52	0.26	0.49	0.40	0.25	0.37	0.56	0.23	0.29	0.12	0.093	08'0	0.24		390	
	enelerlindeN	mg/Kg	0.73	1.5	2.8	3.9	1.8	1.5	17	3.3	0.46	0.23	1.9	0.37	0.97	2.1	0.71	0.75	0.76	0.90	0.87		110	
	ənənyq(bɔ-,ɛ,2,t) onəbnl	mg/Kg	<0.089	<0.053	<0.051	<0.049	<0.049	<0.049	<0.051	<0.048	0.32	0.26	<0.049	0.023	<0.051	<0.050	<0.050	<0.057	<0.049	<0.048	<0.048		3.9	
	Fluorene	mg/Kg	<0.089	<0.092	<0.088	<0.085	0.14	<0.085	<0.089	<0.083	<0.089	<0.91	<0.086	<0.087	<0.088	<0.088	<0.087	0.11	<0.086	<0.084	<0.084		40000	
AH's)	Fluoranthene	mg/Kg	0.78	0.58	1.0	1.0	0.88	0.67	1.0	0.73	0.83	0.65	0.50	0.94	0.93	0.58	0.63	0.37	0.37	0.67	0.62		40000	
ARBONS (F	Dibenzo(a,h)anthracene	mg/Kg	<0.19	<0.20	<0.019	<0.18	<0.18	<0.18	<0.19	0.46	0.32	0.32	<0.18	<0.19	<0.19	<0.19	<0.18	<0.21	<0.18	<0.18	<0.18		0.39	
CHYDROC	Сһуусепе	mg/Kg	<0.033	<0.034	0.11	0.83	<0.032	<0.032	<0.033	<0.031	<0.033	0.038	0.48	<0.033	<0.033	<0.033	<0.33	<0.037	<0.032	<0.031	<0.031		390	
POLYNUCLEAR AROMATIC HYDROCARBONS (PAH'S)	Benzo(k)fluoranthene	mg/Kg	0.039	<0.0083	<0.0079	<0.0077	<0.0077	<0.034	<0.0080	<0.0075	0.13	0.11	<0.0077	0.048	<0.0079	<0.0079	<0.0078	<0.0089	<0.0077	<0.0076	<0.0075			
NUCLEAR	Benzo(g,h,l)perylene	mg/Kg	0.12	<0.037	0.040	0.049	<0.034	0.011	0.097	<0.033	0.43	0.32	<0.034	<0.035	<0.035	<0.035	<0.035	<0.040	<0.034	0.061	0.045		39	
POLY	Benzo(b)fluoranthene	mg/Kg	0.19	0.0080	0.031	0.056	0.035	<0.043	0.11	0.019	0.40	0.31	0.029	0.21	0.076	0.015	0.033	0.0087	0.0086	0.024	0.016	0.048 <0.042		
	Benzo(a)pyrene	mg/Kg	0.20	<0.046	<0.044	<0.043	<0.043	0.022	<0.44	<0.042	0.30	0.23	<0.043	<0.044	<0.044	<0.044	<0.043	<0.050	<0.043	0.043	<0.042			
	Benzo(a)anthracene	mg/Kg	0.13	<0.018	0.048	690.0	0.051	<0.029	0.13	0.030	0.17	0.15	<0.028	0.19	0.082	0.022	0.034	<0.020	0.023	0.065	0.048			
	Acenaphthylene	mg/Kg	1.2	<0.21	<0.20	06:0	0.68	<0.75	1.1	<0.19	<0.20	0.59	<0.19	0.61	0.92	<0.20	0.51	<0.22	<0.19	99.0	0.57		00009	
	S-Methylnapthalene	mg/Kg	<0.20	0.67	3.3	6.4	2.9	1.7	3.0	3.6	<0.20	1.2	1.6	<0.20	<0.20	1.8	1.5	3.0	1.7	5.4	3.3		40000	
	enelsritgsnlyntelene	mg/Kg	<0.18	0.29	<0.18	0.49	0.28	0.28	<0.18	0.87	<0.18	<0.18	<0.17	<0.17	<0.18	<0.18	<0.17	<0.20	<0.17	0.31	0.35		70000	
	Sample	Date	7/21/00	7/21/00	7/21/00	7/21/00	7/21/00	7/21/00	7/21/00	7/21/00	7/21/00	7/21/00	7/24/00	7/24/00	7/24/00	7/24/00	7/24/00	7/21/00	7/21/00	7/21/00	7/21/00			
	Sample	Depth (feet)	0-4	0-4	0-4	0-4	0-4	0 - 3.5	0-4	0 - 4	0-2	0-4	0-2	0-3	0 - 4	0 - 4	0 - 4	near surface	near surface	near surface	near surface		Levels-WDNR Interim ation RR-519-97	
Sample			AB-1	AB-2	AB-3	AB-4	AB-5	AB-6	AB-7	AB-8	AB-9	AB-10	AB-11	AB-12	AB-13	AB-14	AB-15	WETLAND #1	WETLAND #2	STOCKPILE #1	STOCKPILE #2		Industrial Soil Cleanup Levels-WDNR Interim Guidelines. Publication RR-519-97	

Abbreviations and Acronymns

mg/kg = milligram per kilogram

= Exceeds WDNR Interim Soil Cleanup Standards for PAHs (Publication RR-519-97, April 1997 (corrected))

NEILLSVILLE FOUNDRY E. IISTH St. School Bus Bldg. & Yd. Niellsville, Wi E. 115TH ST € 89.6.1 P.L.-5 Founday පිදු 47 86' 84* K + 8-1 B-9+ B-10 + B-8 584 +B-5/ + B-7 80' 93 B-6 2-95 781 9 NOTE: SBI-9 installed on October 8, 1991 介 @ 2" PYC Monitor Well And Water Levels Dunp + Test Pit 100 test EJK. 11-02-90 213911