



March 20, 2024

Ms. Colleen Landisch-Hansen  
Village Administrator  
Village of Thiensville  
250 Elm Street  
Thiensville, WI 53092

Mr. Andrew Lafond  
Director of Public Works  
Village of Thiensville  
250 Elm Street  
Thiensville, WI 53092

Subject: Site Investigation Work Plan Review  
Thiensville Village Highway Department, 120 West Freistadt Road, Thiensville, WI  
BRRTS #: 02-46-000366  
FID #: 246090900

Dear Ms. Landisch-Hansen and Mr. Lafond:

The Department of Natural Resources (DNR) has recently reviewed the *Status Report & Proposed Additional Investigative Activities*, (the Report) submitted on your behalf by your consultant, Moraine Environmental Inc., (Moraine). The Report was received by the DNR on November 30, 2023 and was submitted with a fee for a written response from the DNR. This letter serves as your response.

### Background

The DNR received a spill report on February 14, 1991, after drums at the site reportedly had been opened and tipped over by vandals. The spill report indicated soil contamination was from petroleum substances. A telephone log in the DNR's case file dated February 21, 1991, denotes "MEK (methyl ethyl ketone), solvents, and gasoline" as being present, and that the fire department had used the gasoline in plastic lined pits to practice firefighting at the site. On February 7, 2005, the DNR received a copy of an invoice documenting the off-site disposal of 100 cubic yards of contaminated soil from the site.

The DNR received an update report from Moraine with maps showing the excavated areas, boring locations, tables, and some boring logs on May 20, 2014. Since 2021, regular progress has been made investigating the site with Moraine submitting status reports to the DNR on March 8, 2021; September 22, 2022; and August 25, 2023. Contaminants found at the site to-date include polycyclic aromatic hydrocarbons (PAHs) in soil, and per- and polyfluoroalkyl substances (PFAS) compounds in soil and groundwater.

### Review

The DNR considers your proposed work plan to be in substantial compliance with Wis. Admin. Code § NR 716 with the following comments and requirements:

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1. History of the site, previous discharges, and uses of the contaminant on the site.

Site Investigation Scoping (Wis. Admin. Code § NR 716.07) and the Site Investigation Work Plan (Wis. Admin. Code § NR 716.09) require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with discharges.

- a. The DNR's files indicate that CVOCs may have been discharged at the site from the original spill. However, soil samples from soil borings B1 to B3 had no detections of VOCs other than PVOCs.
  - o As confirmation that VOCs other than PVOCs are not present, add VOC groundwater sampling to the next round of groundwater sampling in all wells.

2. Potential or known impacts to receptors.

Per Wis. Admin. Code § NR 716.07(7), potential or known impacts to receptors must be evaluated, including on-site and nearby potable wells, buildings, and utilities.

- a. The piezometer PZ-1 had a (proposed) preventive action limit (PAL) exceedance for Perfluorooctanesulfonic acid (PFOS) which may indicate a potential contaminant pathway to the nearby potable wells. Sample the on-site potable well for PFAS compounds and any other nearby potable wells determined to be at risk.
- b. Evaluate the surface water pathway for contaminant transport from the site and sample the surface water in the nearby pond if it is determined to be at risk.

3. Visual aids

Wis. Admin Code §§ NR 716.15(4)(c) and (d) require the site investigation report to include iso-concentration maps and cross sections to depict the hazardous substance concentrations in each environmental medium.

- a. Include soil iso-concentration maps and cross sections with data in your next submittal.
- b. Submit a map of sub-surface utilities at the site.
- c. Add the outline of the former burn area to the figures and discuss the completeness of the characterization at this location.
- d. Add the outlines of the excavation area(s) to the figures. This remedial excavation likely occurred in or just prior to April of 1991 based on the soil waste profile on file with the DNR.

4. Other DNR Comments

- a. Re- sample the piezometer to confirm the detected contaminant concentrations.
- b. The DNR concurs with the proposal to sample soil for PFAS at the soil borings for the proposed monitoring well locations.
- c. In the future, if installing an Wis. Admin. Code § NR 141 variant well such as the current on-site wells, a variance must be requested from the DNR and granted before the wells are installed.
- d. Revise units on Figure B.2.a: Soil Contamination - PFAS should not be ug/m<sup>3</sup>.
- e. As a reminder Wis. Admin. Code § NR 716.14 requires all sample results to be submitted to the DNR within 10 days following receipt of the data.

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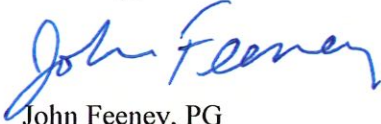
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The DNR appreciates your work and looks forward to receiving a report for this environmental contamination site. If you have any questions regarding the site or this letter, please contact me as the DNR Project Manager, or have your consultant contact me at 262-416-8643 or by email at [johnm.feeney@wisconsin.gov](mailto:johnm.feeney@wisconsin.gov).

Sincerely,



John Feeney, PG

Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

cc: Mr. David Lennon, Moraine Environmental, Inc.

