

Feeney, John M - DNR

From: Feeney, John M - DNR
Sent: Tuesday, August 17, 2021 9:02 AM
To: Keith LINTON; 'Robert Cigale'
Subject: Cook Composite/Former Freeman Chem/Arkema, 340 S. Railroad St., Saukville, WI, BRRTS #: 02-46-000767

Hello Keith and Bob,

The DNR has done a preliminary review of your site investigation work plan (SIWP) received on March 12, 2021. The SIWP was submitted by you in response to the DNR's August 18, 2020 review letter. The DNR requests that you submit the following in an SIWP addendum before we complete our review:

New, Updated Cross Sections and Figures

- The conceptual site model needs to be better defined with revised/updated figures and cross-sections through known and potential source areas:
 - Include locations and depths of piping, utilities, basements, sumps, etc. on the cross sections.
 - Add scales to all figures.
 - Add data to figures and iso-concentration lines to illustrate the known lateral and vertical extent of contamination.
- All data, including confirmation soil samples taken from the church ballfield excavation, should be considered. The DNR is in the process of scanning and uploading the October 21, 1996 church ballfield soil remediation construction documentation report to the DNR's public database which has confirmation soil sampling data from the remedial excavation.
- Include proposed soil borings on the cross sections and figures to justify locations and depths for further delineation, based on known contamination and/or source areas.

Provide Justification of Proposed Source Area(s) Investigations

- Review identified contaminant source areas that are not being evaluated (reference Figure 28 of the SIWP).
 - Discuss any potential source areas that are not being evaluated and explain why no sampling is needed.
 - Discuss if source areas exist inside the buildings and explain if/how sampling inside the buildings is needed. The SIWP suggests that most/all discharges occurred outside the buildings.
- Confirm material storage areas.

Soil Pathway Comments to Address

- Borings central to source areas are needed (not just perimeter borings) to assess current contaminant concentrations in soil.
- Compare proposed sampling locations to known source areas or areas of contaminated soil requiring delineation.
- When soil contamination has been identified at depth, deeper soil samples may be needed than what is identified in the SIWP.
- In very highly contaminated source areas, saturated soil samples are needed to a depth that fully characterizes the sources.
- Discuss if proposed soil borings should be analyzed for PFAS.

Groundwater Pathway Comments to Address

- Discuss if all sources have been adequately identified for wells with highest groundwater concentrations.
 - Consider if additional soil borings are needed to determine possible sources of the groundwater contamination.
- Ranney Collectors
 - Justify that these sampling points are representative of shallow groundwater conditions.
 - If not, discuss if additional water table wells are needed for definition and/or long-term monitoring.
- Replacement well for W-37 is needed (It's the DNR's current understanding that a separate groundwater SIWP is to follow the additional soil investigations).

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