

South 9th Street

Unoccupied Property

Asphalt

Subject Property

Asphalt

Asphalt

Commercial Property

Concrete

98.00

Concrete

97.00

Gravel

Gravel

Concrete

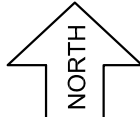
96.00

95.00

Washington Ave

KEY

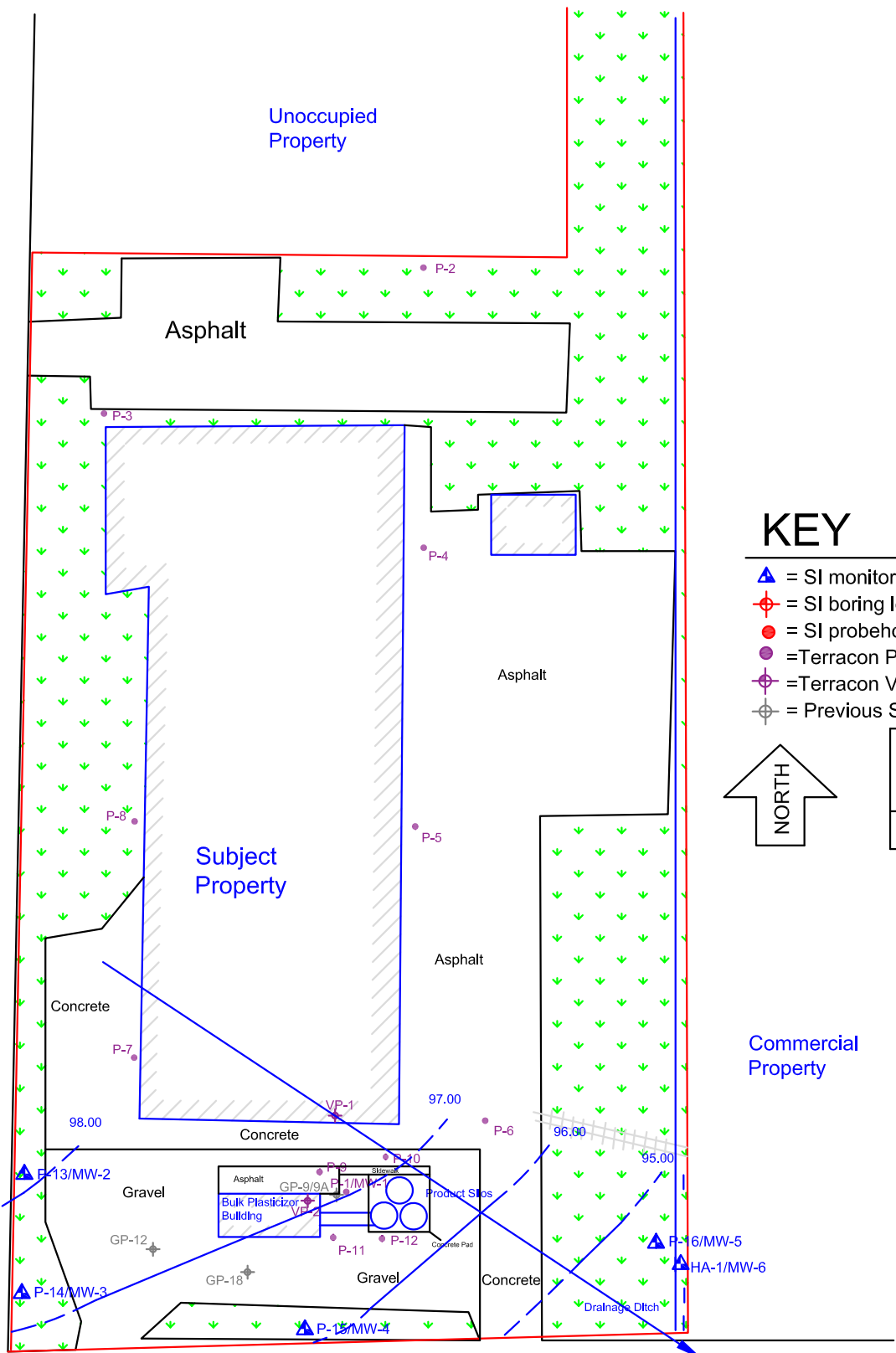
- = SI monitoring well
- = SI boring location
- = SI probehole location
- = Terracon Probe
- = Terracon Vapor Point
- = Previous Sampling Location



Scale

1 inch = 60 feet

All dimensions on this diagram are approximate



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File No.: 200207a
 DWG Date: 3-25-20
 Rev Date: 6-8-20
 Drawn By: BRF
 Checked By (PM): TJO

B.3.c Groundwater Flow Direction
 VPI Property
 3123 S. 9th Street
 Sheboygan, Wisconsin

Figure
 B.3.c

LeRoy, Bruce J - DNR (BJ)

From: Trent Ott <tott@fecinc.us>
Sent: Wednesday, August 12, 2020 2:57 PM
To: LeRoy, Bruce J - DNR (BJ)
Subject: Re: BRRTS Activity 02-60-001045
Attachments: VPI GW Contour Portrait (1).pdf

Categories: To do

BJ-

Thanks for the comments to closure. I just wanted to respond and give additional input prior to the closure committee review.

- The reason we installed MW-6 was to define MW-5. Then we re-sampled MW-6 to confirm the initial results and it was non-detect and would effectively define the plume in that direction. You also need to remember that this release is from 1974 (over 45 years ago) and has not migrated through the groundwater off-site.
- I did look at the flow map and agree that the flow arrow is off and would be more to the southeast. An updated figure is attached. Before installing an additional well I would suggest to confirm the flow direction.
- The P-11 sampling was from a temp well and the NR 141 well (MW-1) is only 18 feet away with significantly lower concentrations detected and no NAPL observed. In addition, soil results indicate higher concentrations at P-1/MW-1, P-10, and P-12; however, those temp and NR 141 wells are significantly lower in GW concentration. I don't believe the presence of NAPL is an automatic closure denial as there are sites with residual free product that do get closed. Removal of shallow impacts was undertaken back in approximately 1990, so some form of source control and remedial actions has been conducted at the site.

As to the additional groundwater sampling, I would still say that for an almost 50 year old release it doesn't appear to indicate a high risk. Thanks.

Trent

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On 8/6/2020 1:33 PM, LeRoy, Bruce J - DNR (BJ) wrote:

Hi Trent,

This case is scheduled to go to the closure committee in two weeks. I peeked at the SI a couple days ago, and waved it in front of the committee today to get some direction. They're definitely going to deny closure, based on a couple things.

- The ES exceedances at MW-5 and MW-6 are a concern. They think the nature and extent isn't defined there, possibly going off-site.
- The flow map needs a little work; as it's drawn, flow is more to the south than the arrow indicates, so I'd look to see if you've got the equipotentials correct, and then make sure your flow arrow is perpendicular to the equipotentials. As it's drawn, we'd want to see a well between MW-4 and MW-6, to see if the plume migrates that direction. Maybe the equipotentials aren't quite right, so that well doesn't make sense, I don't know. Your job to evaluate that one.

- Third, the concentration at P-11 indicates the potential for free product. Anything over 1 mg/L is the rule of thumb. You're over 2 mg/L, so we feel like you may have some NAPL. An existing source such as a NAPL is an automatic denial, so you'll have to figure out in some way if it's there. Even if you can't prove a NAPL exists, that's a high concentration to leave on such a small site. I anticipate future rounds of GW sampling if there isn't any sort of removal.

It was smart to do the vapor to more or less rule that out. We'll evaluate that fully at closure, but I think you're likely in decent shape with vapor.

I wouldn't do any site work on this; we're going to review in detail in two weeks, and get you a full list of things we'll need to move toward closure. I just wanted to let you know as soon as possible.

Any questions, let me know.

BJ

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

B.J. LeRoy
Wisconsin DNR
Note new phone number – 920-889-0151
BJ.Leroy@wisconsin.gov

-----Original Message-----

From: Trent Ott <tott@fecinc.us>
Sent: Tuesday, July 7, 2020 2:33 PM
To: LeRoy, Bruce J - DNR (BJ) <bruce.leroy@wisconsin.gov>
Subject: Re: BRRTS Activity 02-60-001045

BJ

That was a decision made by us and the RP to try and speed the process. I think there may have been a typo in the reports that I saw after submittal. The spill occurred in 1974 and was confirmed around 1994 when the initial clean up and closure took place. I believe we reference the spill in some sections of the reports as having occurred in 1994, it should be 1974. So based on our findings, and the length of time since initial release, a closure was submitted as well as the updated SI. Thanks and keep me updated.

Trent.

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On 7/7/2020 1:25 PM, LeRoy, Bruce J - DNR (BJ) wrote:

> Now I remember seeing the closure; I do have it in our closure folder for the case, as well as the SIR.
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