

**From:** Chronert, Roxanne N - DNR  
**Sent:** Wednesday, July 28, 2021 3:52 PM  
**To:** Trent Ott  
**Subject:** RE: FW: Vinyl Plastics 02-60-001045

Trent, per our discussion it would be best to do one of the following summarize the data in an updated SIR and submit with a fee, that would allow the department to comment in writing on the SIR and meet if necessary. Another option would be to submit the SIR and a RAOR with fee. This would allow us to comment on both the completeness of the SI and the proposed Remedial Action with the specifics outlined. Again the combined fee would be \$1050 for a SIR and RAOR.

Also, please ensure that the next submittal includes an emerging contaminate evaluation as per our letter of 8/17/2020.

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**Roxanne Nelezen Chronert**

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**From:** Trent Ott <[tott@fecinc.us](mailto:tott@fecinc.us)>  
**Sent:** Monday, July 26, 2021 2:42 PM  
**To:** Chronert, Roxanne N - DNR <[Roxanne.Chronert@wisconsin.gov](mailto:Roxanne.Chronert@wisconsin.gov)>  
**Subject:** Re: FW: Vinyl Plastics 02-60-001045

Roxanne-

As discussed, we provided the most recent soil and groundwater sampling analytical results. Based on these results our client would like to schedule a zoom call to discuss the project and obtain clarity on some of the project items as presented below:

- It is FEC's opinion that the release has been defined to the property and no further borings would be warranted at the site. The client would like clarification as to the DNR's concurrence with this opinion, or if any additional sampling location are deemed necessary that the DNR identify the locations for inclusion in our next round of sampling scheduled for August 2021.
- Due to the event of this spill having occurred in 1974 (over 45 years ago) the client is requesting clarification that sampling to establish trends at this site be limited to a year of groundwater monitoring.
- It is our opinion that due to the nature of the product released (LNAPL and non-volatile) and its noted behavior in the environment (non-mobile and contained in soil pores) that any free phase product encountered has been effectively removed through the purging of the monitoring wells. This is further justified by the complete lack of free phase product recharge in that well. As such, further remedial actions regarding free product do not appear to be warranted. Our client is requesting clarification as to the requirement of any active remedial

action (i.e. excavation) or whether placing an impermeable cap over the area will be sufficient to obtain site closure. They would like to conduct any required remedial action or capping before winter.

- The client is requesting discussion and agreement as to the extent of the impermeable cap that the DNR anticipates. Again they would like to conduct any capping before winter.
- The client requests further discussion and clarification as to any items that the DNR foresees that may be needed to move the site to closure.

Please contact me at your earliest convenience to schedule a time to discuss the above matters. Thanks.

Trent.

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