

From: Chronert, Roxanne N - DNR
Sent: Friday, March 10, 2023 4:44 PM
To: jjudovich@vpicorp.com
Cc: Trent Ott
Subject: RE: Vinyl Plastics (Former) 02-60-001045 Review of RADR
Attachments: 2023_153_RADR_Appr.pdf

Jeff – thank you for the clarification regarding VPI Corporation. I have revised the letter from MMW Properties, LLC to VPI Corporation.

The revised document will be uploaded to BRRS in the near future. [WDNR EM/RR BOTW \(wi.gov\)](#)

Any questions after looking over the letter please let me know.

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Roxanne Nelezen Chronert

Phone: (920) 362-3981

Roxanne.Chronert@Wisconsin.gov

From: Chronert, Roxanne N - DNR
Sent: Friday, March 10, 2023 11:30 AM
To: jjudovich@vpicorp.com
Cc: Trent Ott tott@fecinc.us
Subject: Vinyl Plastics (Former) 02-60-001045 Review of RADR

This document will be uploaded to BRRS in the near future. [WDNR EM/RR BOTW \(wi.gov\)](#)

Any questions after looking over the letter please let me know.

Jeff please reach out to me at 920-362-3981 to discuss VPI verses MMW Properties LLC. As we get closer to closure we need to clarify the various entities VPI and MMW Properties LLC and contacts, for the 30 day Notification of Continuing Obligations and Residual contamination 4400-286, completing of the closure form, and issuing of final closure letter.

Roxanne

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Roxanne Nelezen Chronert

Northeast Region Remediation and Redevelopment Team Supervisor

Wisconsin Department of Natural Resources

2984 Shawano Avenue, Green Bay WI 54313-6727

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Roxanne.chronert@Wisconsin.gov



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March 10, 2023

VPI Corporation
Attn: Mr. Jeff Udovich
3123 South 9th Street
Sheboygan, WI 53082
Via Electronic Mail Only to jjudovich@vpicorp.com

Subject: Review of Remedial Action Documentation Report
Vinyl Plastics (Former), 3123 South 9th Street, Sheboygan, WI
DNR BRRTS Activity # 02-60-001045, FID # 460041560

Dear Mr. Udovich:

On January 13, 2023, your environmental consultant, Mr. Trenton Ott of Friess Environmental Consulting, Inc., submitted the report entitled *Remedial Action Plan Documentation Report for the VPI Corporation Property* (RADR) on your behalf requesting concurrence that the remedial actions taken were adequate and a closure request should be submitted. The Department of Natural Resources (DNR) received applicable fees for providing review and response in accordance with Wisconsin Administrative (Wis. Admin.) Code §NR 724.15. This RADR documents the groundwater monitoring, hot spot soil excavation, and capping.

Remedial Actions Taken:

Groundwater sampling was conducted from all remaining monitoring wells on April 12, 2022, and the samples were analyzed for Semi-Volatile Organic Compounds (SVOCs) and/or Volatile Organic Compounds (VOCs). On June 9, 2022, MW-1, MW-8, MW-9, MW-11, and MW-12 were sampled and analyzed for SVOCs and/or VOCs, prior to abandonment of the wells in preparation for hot spot source excavation.

On June 9, 2022, a hot spot source excavation of 40 tons of soil was completed in the vicinity of MW-8 and MW-11. Post-excavation soil samples were not collected as the soil excavation limits were based on pre-excavation sampling. The soil was disposed of out-of-state at the Waste Management facility in Arlington, Oregon. The site was regraded for asphalt installation. The regrading activities also included removal of the former railroad spur to the north of the excavation. Any excess materials from the grading operations were placed into the excavation cavity and covered with stone prior to capping with asphalt.

Post-remedial groundwater monitoring was conducted in July and September 2022 from MW-4, MW-5, MW-6, MW-7, MW-13, and MW-14.

Response to Remedial Action Documentation Report:

DNR has reviewed the RADR and all available file information and has determined that the RADR is conditionally approved. While reviewing the RADR, DNR noted the following concerns with the site investigation that require additional investigation and/or information prior to requesting closure:

Surface Water

- Collection of a surface water sample from the swale near MW-5 (near the leading edge of the plume) and analyze it for only bis(2-ethylhexyl) phthalate (DEHP). The surface water analytical results should be submitted for DNR Remediation and Redevelopment (RR) review within 10 days of receiving the results. DNR will review the surface water results with the Surface Water Program prior to closure submittal and provide a response on the adequacy of the surface water sampling.

Sediment

- Confirm with municipality if the swale is a mapped water way or connected to a storm sewer that discharges to surface water. Please provide your findings to the Roxanne N. Chronert. If the swale is connected to surface water and/or DEHP is found in surface water within the swale, sediment may need to be evaluated.

Soil and Sewer Lateral

- Soil excavation and capping are considered adequate. In the closure request please include a write up on the sewer lateral replacement, outline the DEHP concentrations in soil samples in the area of the former sewer lateral, and justify why no soil sampling or remedial action is needed.
- Due to the high concentrations and potential free product in the source area, soil that becomes accessible in the future should be considered for excavation, proper handling, and disposal.

Capping requirements

- The cap maintenance plan Figure D.2. Cap Maintenance Plan should be expanded to also include the western portion of bulk plasticizer building, pre-existing asphalt pad to the north of the Bulk Plasticizer building, and eastern portion of shed due to likelihood of presence of soil contamination.
- The property is currently zoned industrial. Cap maintenance will be required for soil contamination above the soil to groundwater pathway and both industrial and non-industrial direct contact soil standard exceedances.
- Cap maintenance will not be required for soils exceeding the soil to groundwater pathway in the gravel drive, as groundwater was monitored with a pervious gravel cover.

Groundwater

- No additional groundwater monitoring wells need to be installed for delineation purposes at this time and continued free product or groundwater monitoring for DEHP from the remaining monitoring wells is not warranted.

Tables and Figures

- The legends on all soil & groundwater figures should reflect the contaminate(s) that are being delineated. (i.e. Figure B.3.b.1. Groundwater Isoconcentration Diagram; legend should indicate this is reflecting DEHP enforcement standard (ES)/preventive action limit (PAL)).
- Create a vinyl chloride (VC) groundwater ES/PAL Isoconcentration figure (diagram). The legend should indicate PAL and ES are reflective of VC concentrations.
- Figure B.2.b. Residual Soil Contamination Diagram should depict both the soil to groundwater pathway and direct contact pathway exceedances, including differentiating between the direct contact industrial and non-industrial exceedance areas for DEHP.
- Add depth to groundwater to Table 2 Groundwater Analytical Results prior to resubmitting the closure request.

When requesting closure in the future, a new or revised closure request form and closure fee should be submitted.

March 10, 2023
Mr. Jeff Udovich, VPI Corporation
Review of Remedial Action Documentation Report
Vinyl Plastics (Former), DNR BRRTS # 02-60-001045

DNR appreciates your efforts to protect the environmental at this site. If you have questions regarding our recommendations, please contact me by calling (920) 362-3981, or email at Roxanne.Chronert@wisconsin.gov.

Sincerely,



Roxanne N. Chronert
Team Supervisor, Northeast Region
Remediation & Redevelopment Program

cc: Trenton Ott, Friess Environmental Consulting, Inc. (tott@fecinc.us)