



December 7, 2023

VPI Corporation  
Attn: Jeff Udovich  
3123 South 9<sup>th</sup> Street  
Sheboygan, WI 53082  
Via Email Only to [jjudovich@vpicorp.com](mailto:jjudovich@vpicorp.com)

Subject: Remaining Actions Needed for Case Closure under Wis. Adm. Code chs. NR 700-754 Vinyl Plastics (Former), 3123 South 9<sup>th</sup> Street, Sheboygan, WI 53082  
DNR BRRTS Activity # 02-60-001045

Dear Mr. Udovich:

On September 15, 2023, the Department of Natural Resources (DNR) reviewed your request for closure of the case described above. The DNR reviews environmental remediation cases for compliance with applicable local, state and federal laws. The following actions are required prior to the DNR granting you case closure in compliance with Wis. Stat. ch. 292 and Wis. Adm. Code chs. NR 700-754. Upon completion of these actions, closure approval will be provided. Pursuant to Wis. Adm. Code § NR 726.09 (2) (g), you are required to provide this information to the DNR within 120 days of the date of this letter.

## Remaining Actions Needed

### Monitoring Well or Remedial System Piping Filling and Sealing

The monitoring wells at the site must be properly filled and sealed in accordance with Wis. Adm. Code ch. NR 141. Documentation of filling and sealing for all wells and boreholes must be submitted to Roxanne Chronert on DNR Form 3300-005. To download the form, go online at [dnr.wi.gov](http://dnr.wi.gov) and search "form 3300-005".

## Documentation

The closure documentation was reviewed for completeness and consistency. The following revisions were identified and need to be submitted prior to DNR granting closure approval:

- Page 1, WTM Coordinates Represent, check Source Area
- Page 1, Check here if the RP is the owner of the source property, check this box.
- Figure B.3.b.1 - DEHP MW-5 and MW-9 are above enforcement standard DEHP plume, MW-5 and MW-9 should be included in enforcement standard plume, adjust PAL accordingly.
- Figure B.3.b.2 – include P-12 in enforcement standard exceedance in vinyl chloride plume.
- Figure B.2.a. & B.2.b. - P-10 is above soil to groundwater pathway and direct contact standards, P-10 and should be included in delineation of both soil to groundwater and direct contact delineations. soil and direct contact update figures
- Figure B.3.a - Cross section should include MW-5 as an enforcement standard exceedance.
- Table A.3 remove P-12 at 2' and P-25 at 1' feet if consider soil excavated.
- Update Maintenance Plan Figure D.2 to reflect ground cover adequately - asphalt/gravel.

When the required actions are completed, submit the appropriate documentation within 120 days of the date of

this letter, to verify completion. At that point, your closure request can be approved and your case can be closed.

Only revisions or updates to the closure packet need to be submitted per the suggested revisions listed above. The submittal of an electronic copy is required in accordance with Wis. Adm. Code s. NR 726.09 (1). See *Guidance for Electronic Submittals for the Remediation and Redevelopment Program, RR- 690* for additional information. To view the document online, go to [dnr.wi.gov](http://dnr.wi.gov) and search “RR 690”.

### **Listing on Database**

This site will be listed on the DNR’s Bureau for Remediation and Redevelopment Tracking System on the Web (BOTW) and RR Sites Map, to provide public notice of remaining contamination and continuing obligations. The continuing obligations will be specified in the final case closure approval letter sent to you. Information that was submitted with your closure request application will be included on BOTW, located online at [dnr.wi.gov](http://dnr.wi.gov) and search “BOTW”.

### **In Conclusion**

We appreciate your efforts to restore the environment at this site. This remedial action project is nearing completion. I look forward to working with you to complete all remaining actions that are necessary to achieve case closure.

If you have any questions regarding this letter, please contact me at (920) 362-3981 or at [Roxanne.Chronert@wisconsin.gov](mailto:Roxanne.Chronert@wisconsin.gov).

Sincerely,



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

cc: Trent Ott, Friess Environmental Consulting, Inc. ([tott@fecinc.us](mailto:tott@fecinc.us))  
Rick Frieseke, Friess Environmental Consulting, Inc. ([rfrieseke@fecinc.us](mailto:rfrieseke@fecinc.us))