

Saari, Christopher A - DNR

From: Foley, Kristine - DNR
Sent: Wednesday, December 19, 2007 9:55 AM
To: Saari, Christopher A - DNR
Subject: Reissuance of Contaminated Groundwater GP Coverage

Attachments: CM Christiansen Final .doc; Barnes Auto Reissue Final.doc

Good morning,

Susan Watson has granted the following WPDES General Permit coverage:

WI-0046566-5 for Contaminated Groundwater - Remedial Action Operations
Date Coverage Granted: 12/18/07

Facility	FIN	County	Basin Engineer	R&R PE
Barnes Automotive	30880	Bayfield	Chuck Olson	Chris Saari
C.M. Christiansen Company, Inc.	19786	Vilas	Steve Ohm	Chris Saari

The approval letters are attached. If you have questions, please don't hesitate to contact either me or Susan Watson.



CM Christiansen Final .doc (25... Barnes Auto Reissue Final.doc ...

 *Kris Foley*

WPDES Program Assistant
Wisconsin Department of Natural Resources
107 Sutliff Avenue
Rhineland, WI 54501
phone: (715) 365-8902
fax: (715) 365-8932
e-mail: Kristine.Foley@wisconsin.gov



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
John Gozdziwski, Regional Director

Northern Region Headquarters
107 Sutliff Ave.
Rhineland, Wisconsin 54501-3349
Telephone 715-365-8900
FAX 715-365-8932
TTY Access via relay - 711

December 18, 2007

FIN 19786

Mr. Eric Christiansen
C.M. Christiansen Company, Inc.
P.O. Box 100
Phelps, WI 54554

Subject: Reissuance of WPDES General Permit No. WI-0046566-05
Contaminated Groundwater Discharges from Remedial Action Operations

Dear Mr. Christiansen,

On July 1, 2007, the Department reissued the general permit for discharges of contaminated groundwater from remediation projects. The previous permit, WPDES Permit No. WI-0046566-4, covered discharges from your facility.

Our records indicate the C.M. Christiansen system discharges treated purge water collected from the monitoring wells via infiltration into the area of contamination. The Department is re-authorizing the remediation wastewater discharge from your facility under the reissued version of the permit, WPDES No. WI-0046566-05, enclosed with this letter, unless the information you provide to us indicates your discharge is no longer eligible for coverage. **You will also need to submit to us any recent effluent monitoring data.** The last monitoring results submitted to the wastewater program were collected in September 2003.

To assure you remain in compliance and avoid any enforcement action, please read your permit carefully. A quick summary of the changes to the permit can be found at the bottom of the first page of the fact sheet that follows page 14 of the permit.

You must do the following to assure you are now, and in the future remain, in compliance with the WPDES general permit and state law:

1. If your facility is: (a) no longer in operation, i.e., officially closed out by DNR, (b) planning to permanently stop all discharges of remedial action wastewaters to surface waters or the land surface, or (c) discharging the remedial action wastewaters to a WPDES permitted treatment facility, only complete section I and III of the attached Request for Coverage. Attach any other relevant information indicating the current status of the facility. Your facility will be removed from our list of facilities authorized to discharge under the general permit.
2. If your facility discharges remedial action wastewaters to the environment (to surface water or groundwater), please complete the entire Request for Coverage to verify that your discharge remains eligible for the enclosed general permit and return the Request to me **by Monday, January 14, 2008**. You will also need to submit an updated management plan. This plan should contain the justification for an alternate effluent limit for pentachlorophenol if this is still desired.
3. You are responsible for compliance with the conditions of this permit.

4. Discharge Monitoring Reports must be submitted to the Department by 15th of the month following a sampling event, or otherwise as approved in the discharge management plan. A DMR form is enclosed for you to report the required monitoring information or you may use an alternate equivalent form.

5. Our records show monitoring for the following contaminants is currently being required at this facility according to the previously approved discharge management plan. Naphthalene, Pentachlorophenol, Arsenic, and Total Recoverable Lead shall be collected from the purge water storage tanks and analyzed. This water can not be discharged until the permit limits are met. A record of daily flow is also required.

Additional information regarding the Department's legal authority in this matter and your rights of appeal are shown below. If you have any questions regarding the permit or your coverage under the permit you can contact me 715/365-8945 or at Susan.Watson@wisconsin.gov. Thank you very much for your cooperation.

Cordially,

Susan Scobell Watson
WPDES Permit Coordinator

Attachment: WPDES General Permit WI-0046566-05 and Fact Sheet
Request for Coverage

cc: NOR Permit File
Jeff Brauer, General Permit Coordinator, Madison (via e-mail)
Steve Ohm, Basin Engineer (via e-mail)
Chris Saari, Remediation and Redevelopment, Spooner (via e-mail)
Eric Kovatch, Natural Resource Technology, Inc., 23713 W. Paul Rd., Ste. D, Pewaukee, WI
53072

LEGAL AUTHORITIES AND APPEAL RIGHTS

Section 283.35, Stats., authorizes the Department to issue a general permit for discharges from categories or classes of point sources. The Department may withdraw a facility from coverage under a general permit if it is determined that a discharge is a significant contributor of pollutants to waters of Wisconsin, if the source is not in compliance with the permit terms and conditions, if you request it, or in certain other cases set out in s. 283.35, Stats. In lieu of general permit withdrawal, the Department may refer any violation of WPDES Permit No. WI-0046566-05 to the Department of Justice for enforcement under s. 283.89, Stats.

If you believe coverage of this facility under this permit is not appropriate, you may petition the Department for withdrawal of coverage and, where appropriate, apply for issuance of an individual WPDES permit pursuant to section 283.35(2), Stats. Issuance of such an individual permit will provide for a public comment period and, potentially, a public informational hearing and/or an adjudicatory hearing.

Alternatively, you may request judicial or administrative review of the Department's decision to cover your discharge under the enclosed general permit. Either request must be submitted no later than 30 days after this letter was mailed. To request judicial review of this decision pursuant to sections 227.52 and 227.53, Stats., a petition naming the Department of Natural Resources as respondent must be filed with the appropriate circuit court and served on the Department. To request a contested case hearing on this decision pursuant to section 227.42, Stats., a petition for hearing must be served on the Secretary of the Department of Natural Resources. This notice is provided pursuant to s. 227.48(2), Stats.

Saari, Christopher A - DNR

From: Saari, Christopher A - DNR
Sent: Friday, February 23, 2007 2:47 PM
To: Warzecha, Charles J - DHFS; Nehls-Lowe, Henry L - DHFS; Robinson, John H - DNR
Cc: Killian, James - DNR
Subject: RE: CM Christiansen

Thanks Chuck:

I will look at your comments in more detail on Monday, but at first glance, I'm glad to see that someone else thought the CSM prematurely dropped some possible exposure pathways. I've copied Jim Killian on this, too, to see what he thinks.

In terms of the reports, I found an extra copy of Coleman Engineering's Site Investigation Report in my office that you can use. I can either mail it down to you, or if Henry wouldn't mind, I could give it to him at our program Statewide meeting on the 28th and maybe he could deliver it to you? If I have time before Monday afternoon, I'll also make you a copy of NRT's Remedial Action Documentation Report and get that down to you.

I'll e-mail you the pertinent portions of DNR's 2004 ESI report in a separate message so that I don't clog everyone's Inbox.

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

From: Charles Warzecha [mailto:WARZECJ@dhfs.state.wi.us]
Sent: Friday, February 23, 2007 8:46 AM
To: Nehls-Lowe, Henry L - DHFS; Saari, Christopher A - DNR; Robinson, John H - DNR
Subject: Re: CM Christiansen

Chris,

I've had a chance to review the conceptual site model for the project. The human health concepts are basically in place but I'd suggest a number of changes. The model does not provide a lot of detail so we are left to do a little guessing to fill in the blanks. For the public health issues it is not necessary (or useful) to list primary or secondary receptors. The receptors can be ranked based on health risk when the assessment is completed if necessary. Similarly the designations for "Potentially important", "minor", and "incomplete" exposure routes is also premature. The wading/playing direct contact ingestion exposure may actually be the most important public health exposure pathway here and we do not have evidence to support considering it an incomplete exposure route.

The receptors that I believe should be assessed are anglers in the stream (fish consumption), anglers in the lake (fish consumption), and people from each age group having direct contact with sediments through wading, swimming, and playing in the stream and at the mouth of the stream. If the risks are close to decision break points from individual exposure routes, we should consider cumulative exposures (e.g. fishing and direct contact combined). Henry's exposure assumptions table did not include a residential scenario and neither does NRT's CSM. I'd recommend that the property owner include a residential direct contact scenario unless they are committed to maintain the property as non-residential. That's kind of a chicken and egg thing, some would prefer to only consider scenarios that they feel will have acceptable risks and agree to restrict others. Risk assessors would prefer to consider all possible scenarios and then based on risk, restrict those that aren't acceptable.

I do not have the following reports:

- * Coleman Engineering Site Investigation Report (February 1997);
this is a big (two-volume) report about 3 1/2" thick
- * NRT Revised Soil Remedial Action Options Report (May 1998)
- * NRT Design Report and Plan of Operation (June 1998)
- * NRT Remedial Action Documentation Report (January 2000)
- * DNR Expanded Site Inspection (July 2004)

I have a couple of drafts of the ESI but the most recent was March 30th of 2004. Is there a copy of the Coleman report in the central office files for the case? If there is, I may

be able to go over and review that rather than copying the entire thing for me. Same goes for the other reports on the list. I'm in the office today if you have questions or would like to talk about this further. Thanks, Chuck

>>> "Saari, Christopher A - DNR" <Christopher.Saari@Wisconsin.gov>
2/12/2007 1:09 PM >>>
Hi Chuck:

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Let
me know which, if any, you want copies of:

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Thanks again for participating in the call on Friday.

Chris Saari
Hydrogeologist, Remediation & Redevelopment Program Wisconsin Department of Natural
Resources
Telephone: 715-685-2920
E-mail: Christopher.Saari@Wisconsin.gov

Saari, Christopher A - DNR

From: Henry Nehls-Lowe [NEHLSHL@dhfs.state.wi.us]
Sent: Monday, February 19, 2007 4:12 PM
To: Warzecha, Charles J - DHFS; Saari, Christopher A - DNR; Hosch, James A - DNR; Robinson, John H - DNR
Subject: Preliminary Exposure Factors for Dioxin Sites
Attachments: Exposure Assumptions B.doc

In follow-up to possible exposure factors for the public that could be used at dioxin-contaminated sites, such as CM Christensen & Crawford Creek (Koppers). I came up with the attached table as a starting point for discussion.

Regards,

Henry Nehls-Lowe
Bureau of Environmental and Occupational Health
Division of Public Health
Wisconsin Dept of Health & Family Services
608-266-3479
608-267-4853 (fax)

Visit the Bureau of Environmental Health website at:
www.dhfs.state.wi.us/eh

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Variable	Reasonable Maximum Value (RME)	Central Tendency Exposure (CTE)
Exposure Frequency		
Adult - Recreational	60 days/year	20 days/year
Child - Recreational	60 days/year	20 days/year
Adolescent- Recreational	90 days/year	30 days/year
Angler	30 days/year	10 days/year
Angler - Subsistence	60 days/year	20 days/year
Hunter	30 days/year	10 days/year
Trapper	150 days/year	50 days/year
Exposure Duration		
Adult (>18)	30 years	15 years
Child (birth - 6)	6 years	6 years
Adolescent (7-18)	12 years	12 years
Angler/Hunter/Trapper	30 years	15 years
Averaging Time		
Carcinogenic Effects	70 years	70 years
Non-Carcinogenic Effects		
Adult (>18)	30 years	15 years
Child (birth - 6)	6 years	6 years
Adolescent (7-18)	12 years	12 years
Angler/Hunter/Trapper	30 years	15 years
Body Weight		
Adult (>18)	70 kg	70 kg
Child (birth - 6)	10 kg	15 kg
Adolescent (7-18)	25 kg	43 kg
Angler/Hunter/Trapper	70 kg	70 kg
Intake Rate		
Soil Ingestion		
Adult - Recreational	100 mg/day	50 mg/day
Child - Recreational	400 mg/day	100 mg/day
Adolescent- Recreational	100 mg/day	50 mg/day
Angler/ Hunter	100 mg/day	50 mg/day
Trapper	160 mg/day	80 mg/day

Saari, Christopher A - DNR

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Hydrogeologist, Remediation & Redevelopment Program Wisconsin Department of Natural Resources

Telephone: 715-685-2920

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Exposure Duration Adult (>18) Child (birth - 6) Adolescent (7-18) Angler/Hunter/Trapper	30 years 6 years 12 years 30 years	15 years 6 years 12 years 15 years
Averaging Time Carcinogenic Effects Non-Carcinogenic Effects Adult (>18) Child (birth - 6) Adolescent (7-18) Angler/Hunter/Trapper	70 years 30 years 6 years 12 years 30 years	70 years 15 years 6 years 12 years 15 years
Body Weight Adult (>18) Child (birth - 6) Adolescent (7-18) Angler/Hunter/Trapper	70 kg 10 kg 25 kg 70 kg	70 kg 15 kg 43 kg 70 kg
Intake Rate Soil Ingestion Adult - Recreational Child - Recreational Adolescent- Recreational Angler/ Hunter Trapper	100 mg/day 400 mg/day 100 mg/day 100 mg/day 160 mg/day	50 mg/day 100 mg/day 50 mg/day 50 mg/day 80 mg/day

1500 hrs. 2/9/07

CM Christensen conf. call

Tim Kellan

Eric Christensen

Laurie Parsons

Chuck Warzecha

Eric Kovatch

John Robinson

Bob Fox

D) Overview

- Upland remedact. - source removal actions in '97. Backfilling in upland areas, not in wetlands
- DNR EST - sed/SW sampling in 2004
- Owners perspective - E.C. - CMC doesn't engage in business anymore. ~ \$900K spent so far since '93, money came from CMC, drained reserves. Edgerton SDG decision cut them off from insurance. Decision was reversed, insurance paid for some limited work. Settlement was reached, money was used mainly to pay past costs, very little left. He feels that they'll do what's right, but everyone needs to recognize limited resources. Creek is best left alone; worst thing to do would be to stir (dredge) it up. PC Christensen does not want Ability To Pay.

208M

- Primary receptors would be focus of invest., best bang for buck. They feel need to focus invest. now more than ever on "realistic" risk
- They can't agree to use CBSQGs
- Want to use work done by Larry Burkhardt (sp?)
EPA - Duluth, to look @ fish population (BSAF ~~XXXX~~)
- NRT biologist looked @ stream, found diverse populations of species. They want to have stream looked @ again, focus on fish & pisc. birds
- JK can check on possible Fisheries studies of Military Ck.
- C.T. had questions about adequacy of upland invest & remed.; I said it was good
- JK questioned EC's statement that sed. are accumulating, contam. being buried. EC said beaver dams are problems & restrict flow. JK mentioned sed traps, sed stability studies
- CT had further questions about contam. transport to N. Twin Lk. They need to do minimal (at least) work to show contam. won't move to lake's fish pop. Also had questions about possible exposure (DC) to floodplain soils re-exposed through floods or dry sed. @ low flow. Might be able to use Koppers Crawford Ck. exposure assumptions

JK wondered, if ~~another~~ better defin is needed (D & E);
RF said maybe not, if contain isn't/can't
move

JK - Why are invertebrates moved to secondary
receptors? Based on prev ('93) survey, diversity
observed \Leftrightarrow benthic community looks good

CZ - Wildlife impacts might be driver

3) Focused RE (only gather data to improve CSM)

- modeling of risk assess issues
- sed stability

4) Schedule

- Do GW sampling
- Once there's agreement on CSM, they can
put WP outline together ~ 30 days
- Shoot for comments by 2/23 on CSM
- ~~WP outline avail. early~~
- GW sampling again in May, then present
data for Tech Assist. review to cease
further GW sampling

CZ & JK follow-up discussion on CSM

- similarities w/ Koppers, CZ will talk to
Henry Nehls-Lowe re: exposure assumptions
- CZ will coordinate response from all
- CZ has some qualms about site history (property
was razed just before PA/SE). I'm pretty
comfortable w/ SE & PA, but I'll forward reports
to him so he can take a look.

Saari, Christopher A - DNR

From: Eric P. Kovatch [ekovatch@naturalrt.com]
Sent: Thursday, February 08, 2007 2:35 PM
To: Saari, Christopher A - DNR; Warzecha, Charles J - DHFS; Robinson, John H - DNR; Killian, James - DNR
Cc: Eric R. Christiansen; Laurie L. Parsons; Richard G. Fox
Subject: Meeting documents
Attachments: Visio-1226 Preliminary Conceptual Site Model.pdf; 1226_MtgMaps_SedSamp.pdf; 1226_MtgMaps_Soil Exc.pdf; Site Photo.doc; 1226_Meeting Agenda_070209 WDNR.doc

Chris, John, Jim, and Chuck:

Attached please find the necessary documents for tomorrows meeting/conference call.

The attached items include:

- 1) agenda
- 2) map of areas excavated upland
- 3) map showing WDNR sediment sampling locations
- 4) Draft Conceptual Site Model
- 5) Aerial photo of the site.

Jim and Chuck – please let me know if you will be coming here to our office or if you will be joining via telephone. I have been assuming you will join us here, but let me know if I am mistaken.

Also, please let me know if you have trouble receiving any of the items.

Eric P. Kovatch
Natural Resource Technology, Inc.
23713 W. Paul Rd., Ste D
Pewaukee, WI 53072
262.523.9000 (Gen.)
262.522.1208 (Direct)

**Natural
Resource
Technology, Inc.**

**MEMORANDUM
Draft**

TO: Christopher Saari, John Robinson, and James Killian (WDNR),
Charles Warzecha (DHFS)

FROM: Rick Fox, Laurie Parsons, and Eric Kovatch (NRT)

DATE: February 8, 2007









RE: C. M. Christiansen, Former Pole Yard Site
Phelps, WI

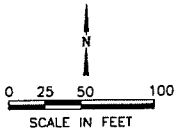
Meeting Date/Time: Friday, February 9, 10:00 AM to 12:00 PM
Location: NRT Main Conference Room

Discussion Items:

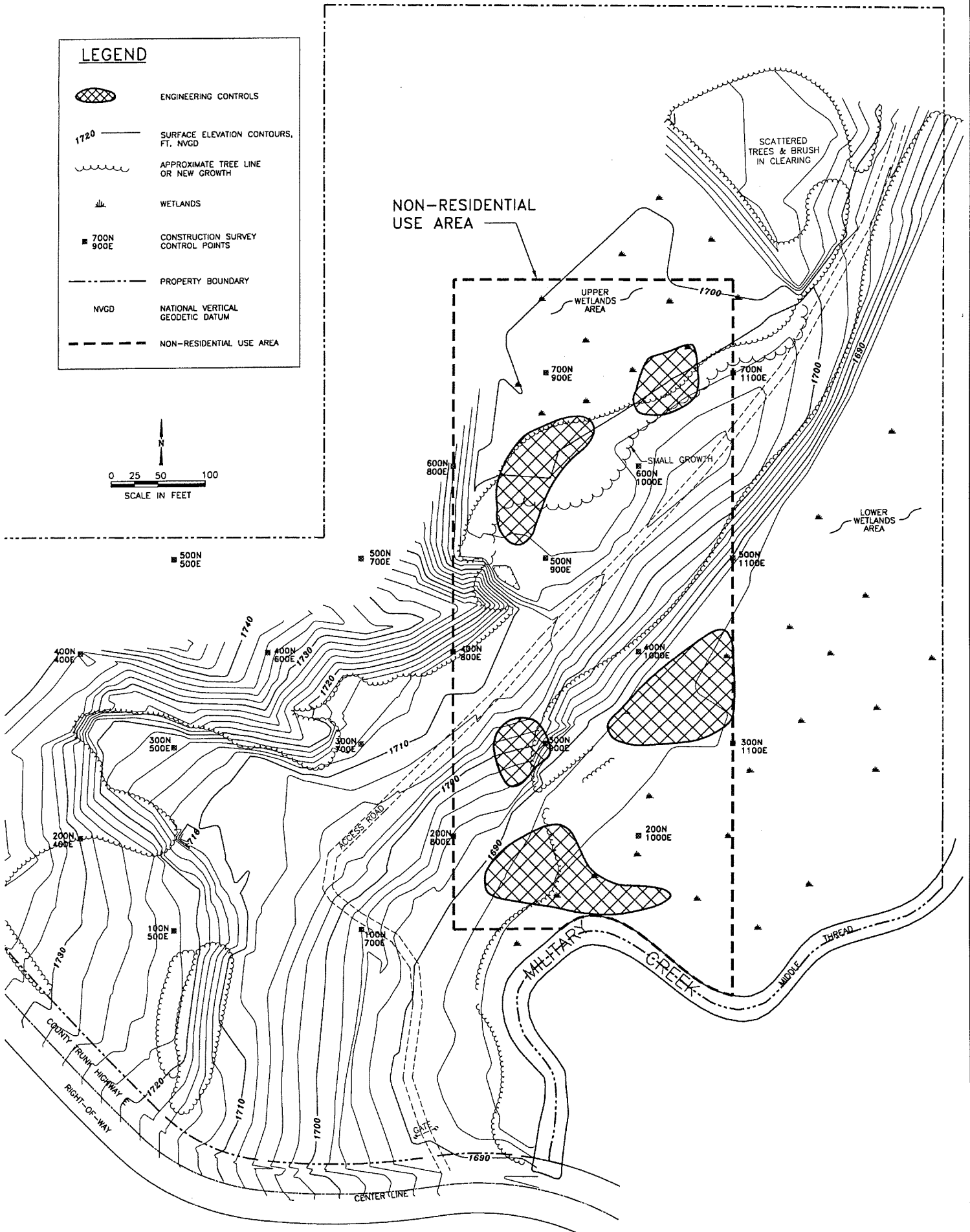
1. Overview
 - Technical
 - Owners Perspective
2. Conceptual Site Model
 - Applicable Exposure Pathways
 - Endpoints
3. Focused RI- Possible Activities
 - Site Observations and/or Sampling Issues
4. Schedule
 - Groundwater Sampling – May 2007
 - Work Plan

LEGEND

-  ENGINEERING CONTROLS
-  SURFACE ELEVATION CONTOURS, FT. NVGD
-  APPROXIMATE TREE LINE OR NEW GROWTH
-  WETLANDS
-  CONSTRUCTION SURVEY CONTROL POINTS
-  PROPERTY BOUNDARY
-  NATIONAL VERTICAL GEODETIC DATUM
-  NON-RESIDENTIAL USE AREA



NON-RESIDENTIAL USE AREA



- NOTES:**
1. BASE MAP SURVEY COMPLETED BY CEC WITH ADDITIONAL INFORMATION OBTAINED FROM USDA-ASCS HISTORICAL AERIAL PHOTOGRAPHS, A 7/7/95 SITE VISIT WITH C.M. CHRISTIANSEN CO., INC., AND A 5/21/96 FIELD INSPECTION.
 2. WETLAND AREA APPROXIMATELY INTERPRETED FROM WISCONSIN WETLAND INVENTORY MAP AND IS NOT FIELD VERIFIED.
 3. CONSTRUCTION GRID SURVEY POINTS WITH ORIGIN AT SW 1/16 SECTION CORNER, NE 1/4 OF SE 1/4 IN SECTION 35, T42N, R11E. IRON PIPE LOCATION BASED ON EAGLE LANDMARK SURVEY.
 4. EXCAVATION AND CAPPING AREA LIMITS BASED ON FIELD MEASUREMENT OFF OF CONSTRUCTION SURVEY CONTROL POINTS.
 5. PROPERTY BOUNDARY TAKEN FROM REGISTER OF DEEDS, VILAS COUNTY, WISCONSIN, VOLUME 801, PAGES 410-411.

SOURCE NOTES:

THIS MAP WAS MODIFIED FROM DRAWING BY COLEMAN ENGINEERING COMPANY (CEC), IRON MOUNTAIN, MICHIGAN, DATED FEBRUARY 1997, JOB NO. 95042 A7, AND A SURVEY BY EAGLE LANDMARK SURVEYING, INC., EAGLE RIVER, WISCONSIN, DWC. NO. E1292, DATED 1-06-98, REVISED ON 5-13-99.



Natural
Resource
Technology

**PROPERTY MAP FOR
DECLARATION OF RESTRICTIONS**

C.M. CHRISTIANSEN COMPANY, INC.
TAX PARCEL NO. 900-5 [018-1391]
PHELPS, WISCONSIN

PROJECT NO.
1226/RD/4.4

DRAWING NO.
1226-EX1

EXHIBIT
B

LEGEND

- SD-1 PROPOSED SEDIMENT SAMPLE
- UTILITY POLE
- OVERHEAD UTILITY LINES
- TELEPHONE PEDICAST
- TREE LINE
- SURVEY BENCHMARK
- CLAY POLE
- BURN AREA
- BORING
- BORING/MONITORING WELL
- PIEZOMETER
- HAND AUGER BORING
- SURFACE SOIL SAMPLES
- HOT SPOTS

NOTE: HIGHEST RECORDED POP SAMPLE RESULTS ARE INDICATED NEXT TO BORINGS/WELLS AND ARE SHOWN IN PPM (PARTS PER MILLION)

* DUPLICATE OR RETAKE SAMPLE LESS THAN 10 PPM

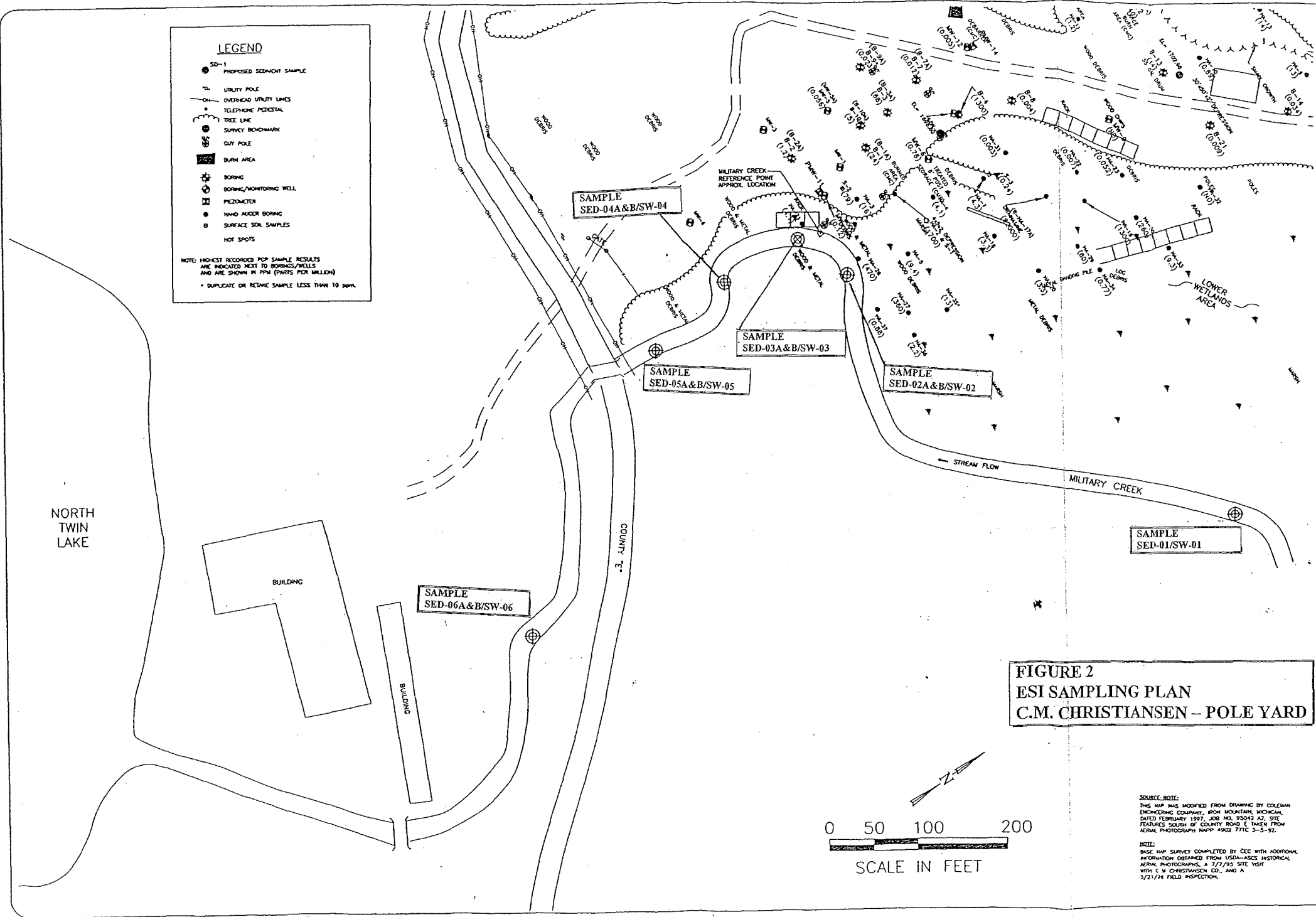

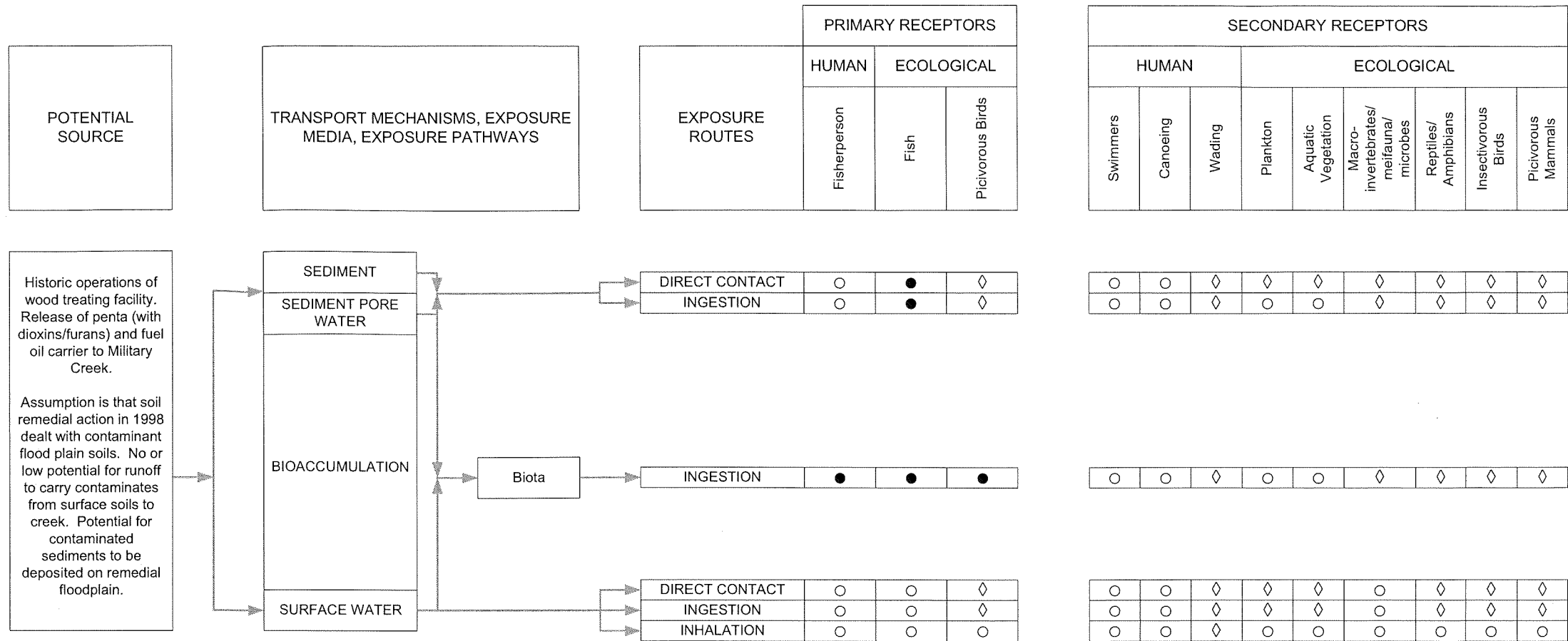


FIGURE 2
ESI SAMPLING PLAN
C.M. CHRISTIANSEN - POLE YARD

SOURCE NOTE:
 THIS MAP WAS MODIFIED FROM DRAWING BY COLEMAN ENGINEERING COMPANY, IRON MOUNTAIN, MICHIGAN, DATED FEBRUARY 1997, JOB NO. 95042 AZ. SITE FEATURES SOUTH OF COUNTY ROAD E TAKEN FROM AERIAL PHOTOGRAPH NAPP 4902 771C 5-3-92.

NOTE:
 BASE MAP SURVEY COMPLETED BY CEC WITH ADDITIONAL INFORMATION OBTAINED FROM USGS-ASCS HISTORICAL AERIAL PHOTOGRAPHS, A 7/7/95 SITE VISIT WITH C.M. CHRISTIANSEN CO., AND A 7/27/98 FIELD INSPECTION.


PROPOSED SEDIMENT SAMPLING LOCATIONS MILITARY CREEK INVESTIGATION WORK PLAN C.M. CHRISTIANSEN COMPANY FORMER POLE TREATMENT FACILITY PHELPS, WISCONSIN	DRAWN BY: TAS	DATE: 5/7/98
	CHECKED BY: JJP	DATE: 5/15/98
	APPROVED BY: JJP	DATE: 5/15/98
AUTOCAD FILE: 1226-B02.DWG		
	PROJECT NO. 1226/SED/2.3	
DRAWING NO. 1226-B02		
FIGURE NO. 1		



LEGEND:

- - Potentially important exposure route.
- ◇ - Minor exposure route.
- - Incomplete exposure route.

DRAFT – For Discussion Purposes Only

PROJECT No. 1226		PRELIMINARY CONCEPTUAL SITE MODEL FOR MILITARY CREEK MEDIA, CONTAMINANTS, AND ECOLOGICAL RECEPTORS	Drawn By: JTB	Date 02/06/2007
Figure X			Checked: EPK	Date 02/06/2007
			Approved:	Date



1000 1000

Saari, Christopher A - DNR

From: Eric P. Kovatch [ekovatch@naturalrt.com]
Sent: Thursday, February 08, 2007 2:35 PM
To: Saari, Christopher A - DNR; Warzecha, Charles J - DHFS; Robinson, John H - DNR; Killian, James - DNR
Cc: Eric R. Christiansen; Laurie L. Parsons; Richard G. Fox
Subject: Meeting documents
Attachments: Visio-1226 Preliminary Conceptual Site Model.pdf; 1226_MtgMaps_SedSamp.pdf; 1226_MtgMaps_Soil Exc.pdf; Site Photo.doc; 1226_Meeting Agenda_070209 WDNR.doc

Chris, John, Jim, and Chuck:

Attached please find the necessary documents for tomorrows meeting/conference call.

The attached items include:









- 1) agenda
- 2) map of areas excavated upland
- 3) map showing WDNR sediment sampling locations
- 4) Draft Conceptual Site Model
- 5) Aerial photo of the site.

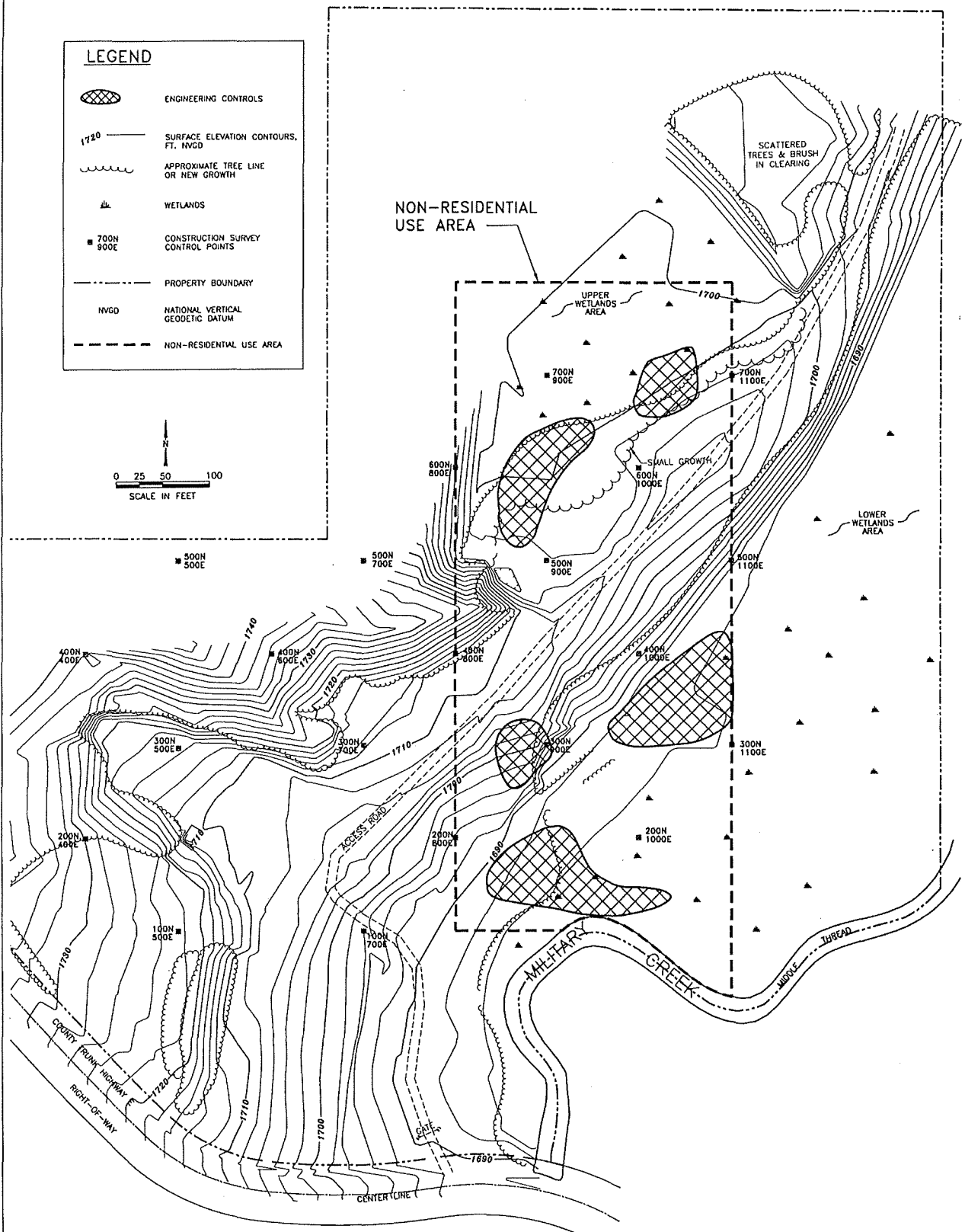
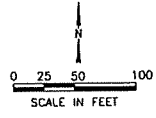
Jim and Chuck – please let me know if you will be coming here to our office or if you will be joining via telephone. I have been assuming you will join us here, but let me know if I am mistaken.

Also, please let me know if you have trouble receiving any of the items.

Eric P. Kovatch
Natural Resource Technology, Inc.
23713 W. Paul Rd., Ste D
Pewaukee, WI 53072
262.523.9000 (Gen.)
262.522.1208 (Direct)

LEGEND

-  ENGINEERING CONTROLS
-  SURFACE ELEVATION CONTOURS, FT. NVGD
-  APPROXIMATE TREE LINE OR NEW GROWTH
-  WETLANDS
-  CONSTRUCTION SURVEY CONTROL POINTS
-  PROPERTY BOUNDARY
-  NATIONAL VERTICAL GEODETIC DATUM
-  NON-RESIDENTIAL USE AREA



- NOTES:**
1. BASE MAP SURVEY COMPLETED BY CEC WITH ADDITIONAL INFORMATION OBTAINED FROM USDA-ASCS HISTORICAL AERIAL PHOTOGRAPHS, A 7/7/95 SITE VISIT WITH C.M. CHRISTIANSEN CO., INC., AND A 5/21/96 FIELD INSPECTION.
 2. WETLAND AREA APPROXIMATELY INTERPRETED FROM WISCONSIN WETLAND INVENTORY MAP AND IS NOT FIELD VERIFIED.
 3. CONSTRUCTION GRID SURVEY POINTS WITH ORIGIN AT SW 1/16 SECTION CORNER, NE 1/4 OF SE 1/4 IN SECTION 35, T42N, R11E. IRON PIPE LOCATION BASED ON EAGLE LANDMARK SURVEY.
 4. EXCAVATION AND CAPPING AREA LIMITS BASED ON FIELD MEASUREMENT OFF OF CONSTRUCTION SURVEY CONTROL POINTS.
 5. PROPERTY BOUNDARY TAKEN FROM REGISTER OF DEEDS, VILAS COUNTY, WISCONSIN, VOLUME 801, PAGES 410-411.

SOURCE NOTES:
 THIS MAP WAS MODIFIED FROM DRAWING BY COLEMAN ENGINEERING COMPANY (CEC), IRON MOUNTAIN, MICHIGAN, DATED FEBRUARY 1997, JOB NO. 95042 AT, AND A SURVEY BY EAGLE LANDMARK SURVEYING, INC., EAGLE RIVER, WISCONSIN, DWG. NO. E1292, DATED 1-06-98, REVISED ON 5-13-99.



PROPERTY MAP FOR DECLARATION OF RESTRICTIONS
 C.M. CHRISTIANSEN COMPANY, INC.
 TAX PARCEL NO. 900-5 [018-1391]
 PHELPS, WISCONSIN

PROJECT NO. 1226/RD/4.4
DRAWING NO. 1226-EX1
EXHIBIT B

**Natural
Resource
Technology, Inc.**

**MEMORANDUM
Draft**

TO: Christopher Saari, John Robinson, and James Killian (WDNR),
Charles Warzecha (DHFS)

FROM: Rick Fox, Laurie Parsons, and Eric Kovatch (NRT)

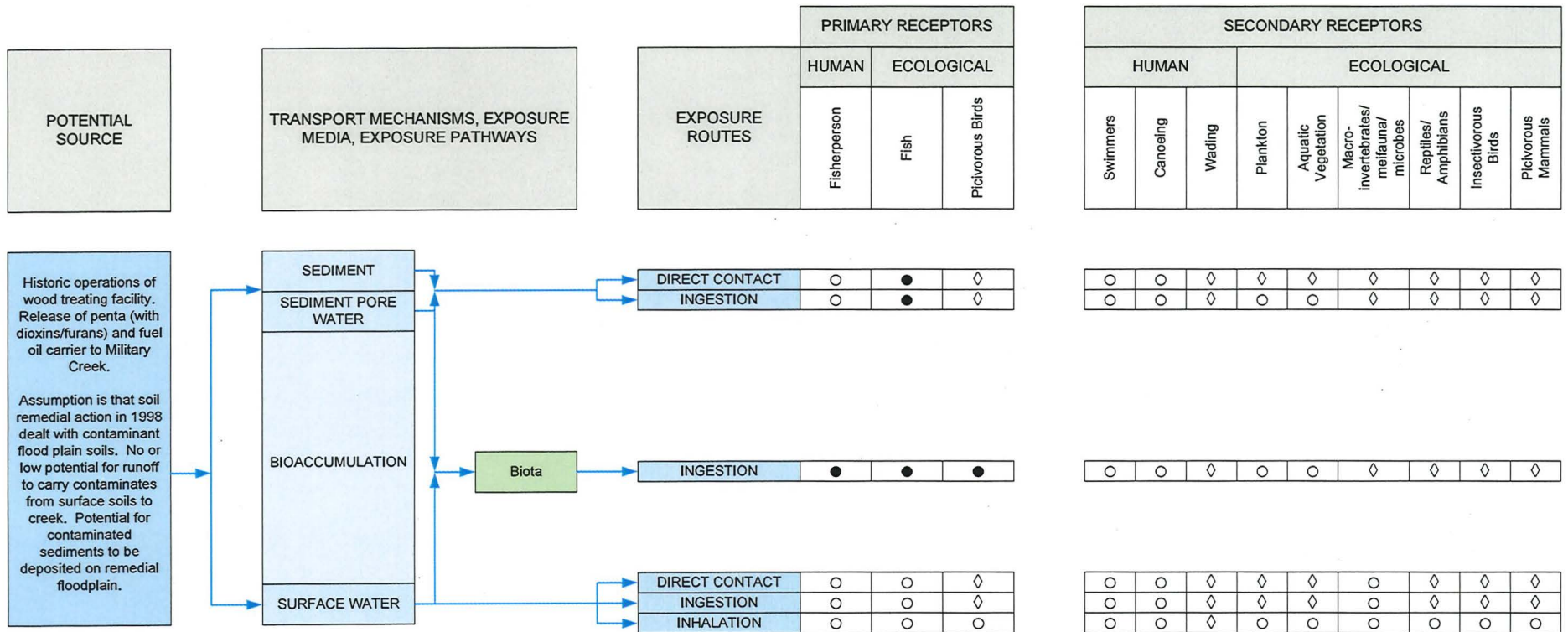
DATE: February 8, 2007

RE: C. M. Christiansen, Former Pole Yard Site
Phelps, WI

Meeting Date/Time: Friday, February 9, 10:00 AM to 12:00 PM
Location: NRT Main Conference Room

Discussion Items:

1. Overview
 - Technical
 - Owners Perspective
2. Conceptual Site Model
 - Applicable Exposure Pathways
 - Endpoints
3. Focused RI- Possible Activities
 - Site Observations and/or Sampling Issues
4. Schedule
 - Groundwater Sampling – May 2007
 - Work Plan



Historic operations of wood treating facility. Release of penta (with dioxins/furans) and fuel oil carrier to Military Creek.

Assumption is that soil remedial action in 1998 dealt with contaminant flood plain soils. No or low potential for runoff to carry contaminants from surface soils to creek. Potential for contaminated sediments to be deposited on remedial floodplain.

DRAFT – For Discussion Purposes Only

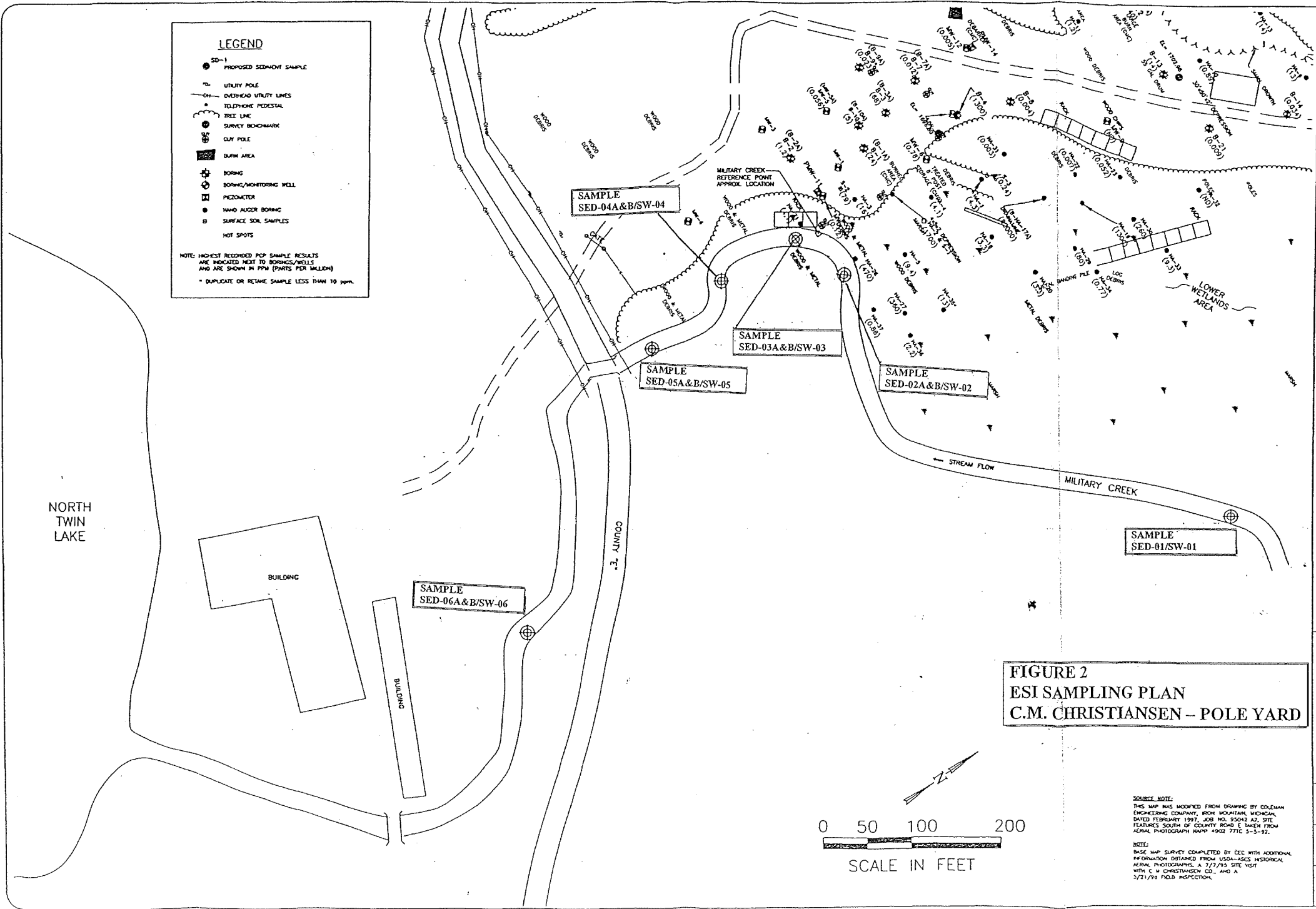
LEGEND:
 ● - Potentially important exposure route.
 ◇ - Minor exposure route.
 ○ - Incomplete exposure route.

PROJECT No. 1226		PRELIMINARY CONCEPTUAL SITE MODEL FOR MILITARY CREEK MEDIA, CONTAMINANTS, AND ECOLOGICAL RECEPTORS	Drawn By: JTB	Date 02/06/2007
Figure X			Checked: EPK	Date 02/06/2007
			Approved:	Date

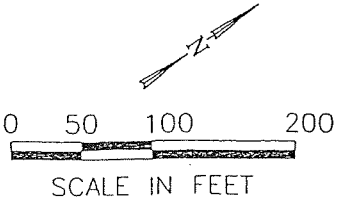
LEGEND

- SD-1 PROPOSED SEDIMENT SAMPLE
- UTILITY POLE
- OVERHEAD UTILITY LINES
- TELEPHONE PEDESTAL
- TREE LINE
- SURVEY BENCHMARK
- GUY POLE
- BURN AREA
- ⊕ BORING
- ⊕ BORING/MONITORING WELL
- ⊕ PIEZOMETER
- ⊕ HAND AUGER BORING
- SURFACE SOIL SAMPLES
- HOT SPOTS

NOTE: HIGHEST RECORDED POP SAMPLE RESULTS ARE INDICATED NEXT TO BORINGS/WELLS AND ARE SHOWN IN PPM (PARTS PER MILLION)
 * DUPLICATE OR RETAKE SAMPLE LESS THAN 10 PPM.



**FIGURE 2
ESI SAMPLING PLAN
C.M. CHRISTIANSEN - POLE YARD**



SOURCE NOTE:
 THIS MAP WAS MODIFIED FROM DRAWING BY COLEMAN ENGINEERING COMPANY, FROM MOUNTAIN VIEW, MICHIGAN, DATED FEBRUARY 1971. JOB NO. 82542 AS SITE FEATURES SOUTH OF COUNTY ROAD E TAKEN FROM AERIAL PHOTOGRAPH MAP# 4902 771C 3-3-92.

NOTE:
 BASE MAP SURVEY COMPLETED BY EEC WITH ADDITIONAL INFORMATION OBTAINED FROM USDA-ASCS HISTORICAL AERIAL PHOTOGRAPHS A 7/7/95 SITE VISIT WITH C.M. CHRISTIANSEN CO., AND A 3/21/99 FIELD INSPECTION.

DRAWN BY:	TAS	DATE:	5/7/98
CHECKED BY:	LJP	DATE:	5/15/98
APPROVED BY:	LJP	DATE:	5/15/98
AUTOCAD FILE: 1226-B02.DWG			

PROPOSED SEDIMENT SAMPLING LOCATIONS
 MILITARY CREEK INVESTIGATION WORK PLAN
 C.M. CHRISTIANSEN COMPANY
 FORMER POLE TREATMENT FACILITY
 PHELPS, WISCONSIN

Natural Resource Technology

PROJECT NO.	1226/SED/2.3
DRAWING NO.	1226-B02
FIGURE NO.	1

