

**From:** Beggs, Tauren R - DNR  
**To:** [Kevin R. Eibenholz \(keibenholz@releeinc.com\)](mailto:Kevin.R.Eibenholz@releeinc.com)  
**Subject:** Jagemann Plating Co Site Comments/Questions on Proposed Additional Investigation  
**Date:** Wednesday, May 24, 2017 4:32:00 PM  
**Attachments:** [20141028\\_36\\_SI\\_Wkpln\\_Appr.pdf](#)  
[Soil Boring and MW locations.pdf](#)

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Hi Kevin,

I have taken a look at the Site Investigation Update Report. I have the following comments/questions:

- The dates on page 4 of the report should be 2016, not 2017, correct? Please provide the revised page of the report. Sending it via email to me is sufficient.
- For the sampling of existing wells, MW-4 and PZ-4 should be added for RCRA metal analysis.
- A vapor mitigation system was installed. Documentation of the communication testing, vapor mitigation system information, location of the system, etc. needs to be submitted.
- From Kristen Dufresne's letter for notice to proceed with the site investigation work plan, dated October 28, 2014 (attached), where was the location of the piping run/former pipe break located? Has this area been fully defined for cadmium and chromium contamination?
- I agree with the additional soil and monitoring well locations up gradient of MW-15. There is a hotspot location at MW-14 which needs further investigation surrounding that location. There should be soil and groundwater locations to the north/northeast and west of MW-14 within the building to define degree and extent (such as in attached PDF). The need for additional investigation around this area was also outlined in the site investigation work plan notice to proceed letter, dated October 28, 2014.
- What is the reasoning behind doing soil gas sampling instead of sub-slab sampling? DNR recommends sub-slab instead of soil gas sampling where possible.
- Vapor mitigation systems are interim actions and should not be considered as remediation systems. Source control remedies need to be evaluated for sites with vapors above vapor risk screening levels (VRSLs) and/or vapor action levels (VALs) in order to reduce or eliminate the vapor intrusion pathway, so this will have to eventually be evaluated for this site per NR 722.

If you have any questions, please let me know.

Thanks,

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

**Tauren R. Beggs**

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October 28, 2014

Mr. Mike Jagemann  
Jagemann Plating Company, Inc.  
1324 South 26<sup>th</sup> Street  
Manitowoc, WI 54220

SUBJECT: Acknowledgment of Receipt/Notice to Proceed with Site Investigation Work Plan  
Jagemann Plating Company, 1324 South 26<sup>th</sup> Street, Manitowoc, Wisconsin  
WDNR BRRTS #: 02-36-555544

Dear Mr. Jagemann:

On July 10, 2014, the Wisconsin Department of Natural Resources (Department) received *Site Investigation Work Plan* prepared by Robert E. Lee & Associates, Inc. (REL) and submitted to the Department on behalf of Jagemann Plating Company, Inc. (Jagemann). On October 15, 2014, REL provided the Department with supplemental information in a submittal titled *Open ERP Site Update*. This letter will serve as your "Notice to Proceed" provided the following items are taken into consideration:

- REL's October 10, 2014 submittal titled *Open ERP Site Update* states the source of the chromium contamination is from a former broken pipe. Based upon submitted information, it is difficult to determine the location of the chromium piping run/former pipe break. The Department assumes that the location of the former pipe break has been the focus of the 2010 – 2013 site investigation activities. If not already assessed, the Department recommends the remainder of the piping run be assessed to determine whether or not it is acting as a migratory pathway.
- The above referenced work plan proposes the installation of three soil borings/monitoring wells. The Department is in agreement with the proposed approach but strongly recommends the installation of additional soil borings/monitoring wells in order to better define extent of contamination near soil sample B12/test well TW1. Also consider the appropriateness of installing a piezometer adjacent to one or more of the soil boring/monitoring well locations.
- The Department does not recommend collecting indoor/outdoor air samples at commercial property. Based on the February 9, 2014 sub-slab vapor sampling results, the Department believes it would be appropriate to install a vapor mitigation system at this time. The Department would also be in support of additional sub-slab sampling in the event Jagemann would like to confirm the previous results and/or expand the sub-slab sampling area within the building.
- Due to the location of the soil and groundwater contaminant plumes, the Department requests that the vapor intrusion pathway be assessed at the property known as 1332 South 26<sup>th</sup> Street, Manitowoc, Wisconsin.

- In future submittals, please include the following locations on the figures:
  - Chromium piping run and former break.
  - Groundwater Pit (refer to the water sample collected by Cardinal Environmental on June 22, 2010 for additional information).
  - Sump 1 – Is this location also known as the “Sump” depicted on the Site Layout Map?
  - Sump 2 – Is this location also known as the “Basement Sump” depicted on the Site Layout Map?
  - The “sump installed in the pit” as directed by the DNR.
  - 1332 South 26<sup>th</sup> Street.

Also ensure that the sample names provided on the figures match the sample names provided on the tables.

Please be aware that you are required to comply with all applicable statutes and administrative rules including the NR 700 series, Wis. Adm. Code, hazardous waste management, and wastewater discharges.

This letter does not represent Department "certification" that any response actions taken at your property, such as site investigation, remedial action or case closure under the ch. NR 700 series, are "approved by the Department," as those terms are used in the "remediated property; purchaser liability" section of the hazardous substance discharge law, s. 292.11, Stats.

If you have any questions, please feel free to contact me at 920-662-5443.

Sincerely,



Kristin DuFresne  
Hydrogeologist  
Remediation & Redevelopment Program

cc: Kevin Eibenholz, Robert E. Lee & Associates, Inc.

