

From: Beggs, Tauren R - DNR
Sent: Thursday, December 9, 2021 12:41 PM
To: mjagemann@jagemannplating.com
Cc: 'nlaplant@releeinc.com'
Subject: Site Investigation Work Plan Approval Letter for Jagemann Plating Co Inc, BRRTS # 02-36-555544
Attachments: 20211209_36_SIWP_Appr.pdf

Good afternoon Mike,

Attached is the Site Investigation Work Plan Approval letter for the above referenced site. If you want a paper copy, please let me know.

Please feel free to contact me if you have any questions.

Regards,

We are committed to service excellence.

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Tauren R. Beggs

Hydrogeologist & Northeast Region Land Recycling Expert

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dnr.wi.gov



December 9, 2021

Jagemann Plating Co., Inc.
Attn: Michael Jagemann
1324 South 26th Street
Manitowoc, WI 54220
Via electronic mail only to: mjagemann@jagemannplating.com

Subject: Review of Site Investigation Work Plan
Jagemann Plating Co Inc, 1324 South 26th Street, Manitowoc, WI
BRRTS #: 02-36-555544, FID #: 436041980

Dear Mr. Jagemann:

On November 12, 2021, the Wisconsin Department of Natural Resources (DNR) received the *Supplemental Site Investigation Results and Proposed Workplan with a Technical Assistance Request* (SIWP) prepared for Jagemann Plating Co., Inc. by Robert E. Lee & Associates, Inc. The SIWP was submitted with a fee for DNR review and response. The submittal of a SIWP is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the SIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

SIWP Summary

To further define the degree and extent of contamination, to further characterize the chlorinated volatile organic compound (VOC) contaminant mass below the building, and to determine if per and polyfluoroalkyl substances (PFAS) are present at the site, the following work is proposed:

- Six proposed sampling locations for soil and groundwater for analysis of VOCs and Resource Conservation and Recovery Act (RCRA) metals.
- Collect groundwater samples from existing monitoring wells MW1, MW2, MW3, MW5, MW8, MW14, MW15 and MW19; piezometers PZ3 and PZ13; and the six proposed temporary wells for analysis of PFAS (Wisconsin DNR PFAS List – 33 compounds).
- Submittal of results to DNR after receipt of laboratory analysis and data evaluation.

DNR Review of the SIWP

Following the DNR's review of the SIWP, the DNR concurs that you can proceed with the proposed work, with the following comments:

- Collect groundwater depth measurements, evaluate groundwater flow, and provide a groundwater flow map for water table wells and piezometers.
 - Evaluate whether any other monitoring wells and/or piezometers are warranted based on sample data and groundwater flow, especially near the area of MW2 and PZ3.
- The next groundwater monitoring event should include all wells and piezometers for sampling of VOCs and/or RCRA metals since many wells beyond the delineated groundwater enforcement standard (ES)

plume have not been sampled for two years or longer. Future sampling of PFAS will be based on the sampling results of the investigation work proposed in this SIWP.

- Evaluate Sump 1 and Sump 2 operation and determine if additional sampling is needed.
- DNR understands that an interim action and additional vapor sampling is proposed in a separate report, *Interim Action Documentation Report & Operation, Maintenance & Monitoring Plan*, received by DNR on November 10, 2021.
- A more comprehensive Site Investigation Report (SIR) should be submitted after the additional investigation work is completed and needs to include cross sections.
- DNR understands this work is being completed to determine the magnitude and extent of the contaminant mass for chlorinated VOCs under the building and to determine if PFAS is present for remedial action planning purposes. A plan for groundwater monitoring will need to be included in the remedial action planning.

The site investigation can be an iterative process. Site investigation activities may indicate that further assessment is needed to define the degree and extent of contamination.

Schedule

The submitted SIWP indicates the proposed investigation work will be completed mid-December 2021 to January 2022, so the field investigation will be initiated within 60 days after DNR approval, as required per Wis. Admin. Code § NR 716.11(2r).

The DNR is requesting implementation of the following schedule:

- Sampling results must be reported to the DNR within 10 days of receiving the data, per Wis. Admin. Code § NR 716.14(2).
- Results of the site investigation activities must be submitted to the DNR in a comprehensive SIR that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR recommends that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (920) 510-3472 or at Tauren.Beggs@wisconsin.gov.

Sincerely,



Tauren R. Beggs
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Nicole LaPlant, Robert E. Lee & Associates, Inc. (nlaplant@releeinc.com)