From: Beggs, Tauren R - DNR

Sent: Tuesday, May 31, 2022 1:35 PM

To: Nicole L. LaPlant

Cc: 'mjagemann@jagemannplating.com'; Rob Hoverman

Subject: Notice to Proceed for Proposed Additional Soil & Groundwater Investigation -

Jagemann Plating Co Inc, BRRTS # 02-36-555544

Hi Nicole,

This email acts as a general notice to proceed with the workplan.

Some General Comments:

- If MW-15 has been or will be repaired, it should be sampled for PFAS and dissolved RCRA metals.
- Some of the groundwater sampling proposed in this workplan will help determine if the jflagged arsenic detections above the enforcement standard (ES) from multiple wells in the June 2019 sampling round can be confirmed or not (There does not appear to be an arsenic source on site).
- Keep an eye on the MW-2 and MW-3 area for VOCs and PFAS as monitoring continues and interim action/remediation occurs.
- A site investigation is an iterative process, so depending on the results of the sampling from this work plan, additional investigation may be needed.

If you have any questions, please let me know.

Regards,

We are committed to service excellence.

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

Tauren R. Beggs Phone: (920) 510-3472

Tauren.Beggs@wisconsin.gov (preferred contact method during work at home)

From: Nicole L. LaPlant <nlaplant@releeinc.com>

Sent: Tuesday, May 24, 2022 1:52 PM

To: Beggs, Tauren R - DNR < Tauren. Beggs@wisconsin.gov>

Cc: 'mjagemann@jagemannplating.com' < mjagemann@jagemannplating.com' >; Rob Hoverman

<rhoverman@enviroforensics.com>

Subject: Proposed Additional Soil & Groundwater Investigation - Jagemann Plating Co Inc, BRRTS # 02-

36-555544

Hello Tauren,

Robert E. Lee & Associates, Inc. (REL) has prepared a workplan for additional soil and groundwater investigation based on the results of the most recent soil and groundwater data from January/February 2022; and our discussion during the March 30, 2022 conference

call. Isoconcentration maps of trichloroethene (TCE) in soil and groundwater based on the newly gathered soil and groundwater data are included as attached Figures 8.a and 9.a.

The proposed additional work is as follows:

- Advance three (3) soil borings within the northwest portion of the Building's manufacturing area using a Geoprobe® to further define the extent of the contaminants detected in soil beneath the Building to the north and west of borings B-22, B-23, and B-24. The proposed soil boring locations are shown in the attached Figure 5. Soil samples will be collected at two-foot continuous intervals to a maximum depth of 14 feet below grade (fbg) using hydraulic push sampling methods. Each soil sample will be described in the field by an REL geologist. One soil sample from the 0 to 4 fbg sampling interval in each boring will be submitted to Pace Analytical Services, LLC for analysis of VOCs, RCRA metals, and PFAS. A second soil sample from a depth greater than 4 fbg that exhibits the greatest PID reading or the greatest potential for contamination in each soil boring may also be submitted for laboratory for analysis. Soil sample collection, handling, and field-screening procedures will follow WDNR guidance and those included in our November 2021 workplan. Soil drill cuttings will be placed in 55-gallon steel drums and temporarily stored on-site, pending the results of the sampling.
- Following completion of soil sampling, three (3) temporary monitoring wells will be constructed within the borings to evaluate groundwater quality. The temporary wells will be constructed of one-inch diameter polyvinyl chloride (PVC) pipe with 10 feet of 0.010-inch slot screen placed to intersect the groundwater table. The actual screen length and interval will depend on field observations made during drilling. Wells will be installed with a filter pack and annual space seal. No glues, solvents, or lubricants will be used in the well construction. All wells will be completed with flush-mount protective covers. The horizontal and vertical locations of the new wells will be surveyed to determine the ground surface and groundwater elevation. The proposed temporary well locations are shown in the attached Figure 5.
- Following installation, REL personnel will develop the temporary monitoring wells using a peristaltic pump to remove the effects of drilling, well installation, and to maximize well yield. Development will continue until ten saturated well volumes are removed, or the wells produce sediment-free water. All well development and sampling equipment will be thoroughly cleaned between wells. Development water will be placed in 55-gallon steel drums and temporarily stored on-site, pending the results of the groundwater sampling.
- Following development and after the temporary wells have stabilized, the three (3) newly installed temporary monitoring wells and existing monitoring wells MW-4, MW-5, MW-6, MW-7, MW-17, MW-18, and MW-19; and Piezometers PZ-3, PZ-4, PZ-13, and PZ-16 will be sampled in accordance with WDNR *Groundwater Sampling Procedures (WDNR Publication No. PUBL 037-96 and PUBL 038-96)* and our November 2021 workplan. A sample will also be collected from the groundwater pit Sump 1. Prior to sampling, groundwater elevation data will be measured and recorded at each

- temporary well. The groundwater samples will be collected using low-flow sampling techniques and submitted to a Pace Analytical Services, LLC for analysis for VOCs and dissolved RCRA metals.
- Groundwater samples collected from the three (3) newly installed temporary wells and existing monitoring wells MW-4, MW-6, MW-7, MW-17, MW-18; Piezometers PZ-4, and PZ-16; and Sump 1 will also be laboratory analyzed for PFAS compounds analysis (WI PFAS List - 33 compounds). The analyses will be performed by PFAS WDNR-certified laboratory Pace Analytical Services, LLC. The WDNR is currently developing sampling guidance, groundwater standards, and other procedures aimed at the regulation of PFAS. Along with the developing WDNR regulatory procedures, there are several existing sampling guidance resources from various agencies such as the State of Michigan Department of Environment, Great Lakes, and Energy, the U.S. Department of Defense, the U.S. Environmental Protection Agency, and the Interstate Technology & Regulatory Council. REL has developed a standard operation procedure (SOP) for PFAS sampling in groundwater based on the procedures and guidance developed to date by these agencies. The groundwater samples will be collected in accordance with REL's SOP 12 - PFAS Groundwater Sample Collection included in the previous November 2021 workplan. One (1) field reagent blank will be collected for QA/QC purposes.
- The soil boring and monitoring well installation is currently scheduled for June 2, 2022. Laboratory analytical results are typically available within two weeks of the soil sampling. The temporary monitoring well(s) will be developed one to two weeks after installation, provided they yield water. Groundwater samples will be collected approximately one to two weeks following well development. Laboratory analytical results of the groundwater samples will be available within two weeks of sampling. Data evaluation will occur after receipt of the laboratory analysis from the soil and groundwater sampling, and the results will be tabulated and submitted to the WDNR for review per Ch. NR 716.14, Wis. Adm. Code.

Proposed work for an interim action and/or additional vapor sampling will be submitted under a separate cover. If you have any questions and/or comments, please let me know.

Thank you,

Nicole L. LaPlant
Project Manager/Geologist

920-662-9641 | nlaplant@releeinc.com

