

Amadi, Eric A - DNR

From: Pelayo, Aristeo - DNR
Sent: Monday, March 12, 2018 10:58 AM
To: Amadi, Eric A - DNR
Cc: Fassbender, Judy L - DNR; Norman, Michele R - DNR
Subject: RE: Request for Input On Hex-Cr Data - Midwest Tanning Parcel BRRTS No. 02-41-556117

Hi Eric,

Glad that we now have the report – especially the 2 TestAmerical lab reports from 2001. I'll keep my comment regarding Cr, especially hex-Cr from the report.

If this is the same report that Sigma used in 2001, I don't know what their basis was for reporting **detection of hex-Cr**.

From the lab results, I did NOT see a single detection of hex-Cr. All reported hex-Cr (32 results in the Phase II documentation) were <6.5 mg/kg (with 6.5 being the highest of reported multiple reporting limits). The minimum hex-Cr reporting limit was 5.6 which today is relatively high, but in 2001 was OK (see old NR 720 Table 2 at: <http://docs.legis.wisconsin.gov/code/register/2006/608b/remove/nr720>). I think you can believe the hex-Cr results from the report.

However, one concern I have is that hex-Cr was not analyzed for the sample with highest Total-Cr (1,100 mg/kg Total-Cr from SB15/5-6'), and an unfiltered gw sample from the same boring had 250 mg/L. That should have triggered TCLP analysis even in 2001, especially since they id-ed a "blue green soil" from the boring. I think cyanide should have been tested for.

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Resty M. Pelayo

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From: Amadi, Eric A - DNR
Sent: Thursday, March 08, 2018 6:44 PM
To: Pelayo, Aristeo - DNR
Cc: Fassbender, Judy L - DNR; Norman, Michele R - DNR
Subject: RE: Request for Input On Hex-Cr Data - Midwest Tanning Parcel BRRTS No. 02-41-556117

Hi Resty:

We have received the 2001 Phase II ESA report prepared by Hygienetics for the subject site (**the detection of hex-Cr was reported to the WDNR in 2010, when Sigma Environmental, Inc.,** submitted the 2001 Phase II report prepared by Hygienetics).

I have attached a portion/sample of the original analytical report and chain of custody. Below is the link to the entire Phase II ESA report:

[20180118_29_Phase II.pdf](#)

The Phase II ESA report is also available on BOTW. Please let us know how representative or accurate these sampling results are. Let me know if you have questions. Thanks.

Eric

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Eric Amadi

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From: Pelayo, Aristeo - DNR
Sent: Friday, November 17, 2017 10:50 AM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Cc: Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>; Fassbender, Judy L - DNR <Judy.Fassbender@wisconsin.gov>
Subject: RE: Midwest Tanning Parcel BRRTS No. 02-41-556117

Hi Eric,

I don't think we can or should concur. Wouldn't DNR concurrence mean being at odds with the railroad? Since they are not DNR letters, can PSI send their retraction letters without DNR's concurrence?

While I'm glad that they tried to look for the COC, I still don't know what will be our basis for concurrence. I think that PSI is presumptive in claiming there's no hex-Cr when they did not test for it. PSI's basis for claiming no hex-Cr is NOT from their own samples, but from an old report with no COC – so with uncertainty about the sample preservation and holding time – and with a high DL (based on today's standards). Is this about right? If so, how would DNR concur with their claim? **I think we should let them know that we will be able to concur once they provide us with more-recent hex-Cr data that will support their claim.**

Here's a technical reason: We can't be sure that the right protocol for hex-Cr was followed in the past since we do not have the COC. What we are certain is that RCRA samples are field-preserved with acid. And hex-Cr should not be determined from a preserved sample because the preservative will have caused the conversion of hex-Cr to tri-Cr. So there needs to be 2 samples - 1 preserved and 1 unpreserved - to get total-Cr and hex-Cr.

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From: Amadi, Eric A - DNR
Sent: Thursday, November 16, 2017 4:38 PM
To: Pelayo, Aristeo - DNR
Cc: Norman, Michele R - DNR; Fassbender, Judy L - DNR
Subject: FW: Midwest Tanning Parcel BRRTS No. 02-41-556117

Hi Resty:

I met with Michele (my supervisor) today regarding the subject site retraction of two notification letters (i.e. previously sent to the owner of railroad right of way and the City of South Milwaukee). As you know, PSI, Inc. is requesting our input in the process of retracting these two letters. Please help provide explanation as to why ratios/similarities cannot be used to estimate the Hexavalent Chromium based on Total Chromium. Let me know if you have questions. Thanks.

Eric

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Eric Amadi

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From: Patrick Patterson [<mailto:patrick.patterson@psiusa.com>]

Sent: Wednesday, October 18, 2017 3:46 PM

To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>; Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>

Cc: George Marek <george.marek@quarles.com>; Larry Raether <larry.raether@psiusa.com>

Subject: Midwest Tanning Parcel BRRS No. 02-41-556117

Hi Eric and Michelle,

In regard to your September 15, 2017 email addressed to George Marek and me pertaining to PSI retraction letters, the following is PSI's data interpretation of the Hygienetics analytical test results that were shown in a soil table prepared by Sigma and included in their Phase II ESA report, dated September 30, 2010, which was sent to the WDNR as part of a previous case closure request, which was subsequently denied by the WDNR in 2010.

“In June 2001, Hygienetics Environmental placed twenty-four (24) soil borings around the exterior of the former Midwest Tanning facility and in other areas of the parcel. Further, in July they placed twenty-nine (29) soil borings within the interior of the former facility. The selected soil samples collected from the exterior borings were tested for VOCs, PAHs and RCRA Metals. In addition, fourteen (14) of these samples were tested for Hexavalent Chromium. The results indicated no detectable Hexavalent Chromium. The selected soil samples collected from the interior borings were also tested for VOCs, PAHs, and RCRA Metals. In addition, twenty-six (26) of these samples were tested for Hexavalent and Trivalent Chromium. The results indicated that all of the Total Chromium concentration detected in each sample was attributable to Trivalent Chromium and no Hexavalent Chromium was present in these samples.

In March 2011, PSI placed sixteen (16) soil borings around the exterior of the former facility and in other areas of the parcel. Numerous PSI borings were placed in the general vicinity of several of the Hygienetics borings. In March 2012, PSI placed twenty (20) soil borings within the interior of the facility and were placed near the locations of the previous Hygienetics interior borings. The selected soil samples collected from the PSI borings at similar sampling intervals as the Hygienetics samples were tested for VOCs, PAHs, and RCRA Metals. These samples were not tested for Hexavalent and Trivalent

Chromium. However, the Total Chromium levels detected within the selected samples from the PSI borings were generally at concentrations similar to the Total Chromium concentrations detected in the Hygienetics samples. Figures of the Hygienetics and PSI soil borings for the entire parcel and the interior of the facility are attached. I have also attached tables of the Hygienetics and PSI analytical test results.

Due to these similarities regarding Total Chromium levels and boring locations and that no Hexavalent Chromium was detected in the 40 Hygienetics soil samples, it is PSI's interpretation that the detected Total Chromium concentrations within the PSI soil samples are attributable to Trivalent Chromium and not Hexavalent Chromium."

In regard to the Hygienetics laboratory report and chain of custody, no laboratory report or chain of custody for the Hygienetics samples were found in our files. However, the text, boring location plan and analytical table were included in our files and were utilized for our case closure request, which was recently resubmitted to your attention. Let us know if this information satisfies your request and if we can send out the retraction letters to the City of South Milwaukee and the railroad company.

Thanks,
Pat

Patrick J. Patterson, P.E., P.G., C.S.T.
Senior Engineer
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