

Amadi, Eric A - DNR

From: Trainor, Tom J - DNR
Sent: Monday, August 8, 2022 5:22 PM
To: Brian Basten; Amadi, Eric A - DNR
Cc: Alessi, Timothy G - DNR
Subject: RE: BRRTS Nos. 02-41-556117 and 02-41-556175

Yes please

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Tom Trainor

Cell Phone: 920.412.5970
tom.trainor@wi.gov

From: Brian Basten <Brian.Basten@pacelabs.com>
Sent: Monday, August 8, 2022 4:52 PM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Cc: Trainor, Tom J - DNR <Tom.Trainor@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
Subject: RE: BRRTS Nos. 02-41-556117 and 02-41-556175

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Can I assume that it is your recommendation to have the client re-sample in this instance? That is the only answer that I am looking for.

Brian Basten (He/Him/His)

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From: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Sent: Monday, August 8, 2022 4:48 PM
To: Brian Basten <Brian.Basten@pacelabs.com>
Cc: Trainor, Tom J - DNR <Tom.Trainor@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
Subject: RE: BRRTS Nos. 02-41-556117 and 02-41-556175

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Hi Brian:

In addition to Tom's email below, the data will be used to:

- Determine the nature, degree and extent of the contamination in accordance with Wis. Admin. Code § NR 716; and,
- Make decisions on the case closure in accordance with Wis. Admin. Code § NR 726.

Please let us know if you have questions.

Thanks.

Eric

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Eric Amadi

Phone: (414) 405-0752

eric.amadi@wisconsin.gov

From: Trainor, Tom J - DNR <Tom.Trainor@wisconsin.gov>
Sent: Monday, August 8, 2022 4:29 PM
To: Brian Basten <Brian.Basten@pacelabs.com>; Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Cc: Trainor, Tom J - DNR <Tom.Trainor@wisconsin.gov>
Subject: RE: BRRTS Nos. 02-41-556117 and 02-41-556175

Hello

It is correct that PFAS are forever chemicals, but that is as a class, not by individual compound. There are precursor compounds that transform to other PFAS such as 8:2 FTS and 6:2 FTS.

if the DNR is making any kind of decision from the analysis, we will want to have a sample that meets thermal preservation and holding time requirements. Otherwise, that data can be called into question.

Another reason we don't want transformation to occur is if we are trying to identify the source of the contamination.

The only time I can think it may be ok is if the sample is one of many samples to be collected across the history of the site – like for quarterly monitoring where a decision is not being made and we are just keeping an eye on concentrations.

Eric, with that I'll let you reply to Brian based on the purpose of this sample collection event.

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Tom Trainor

Cell Phone: 920.412.5970

tom.trainor@wi.gov

From: Brian Basten <Brian.Basten@pacelabs.com>
Sent: Monday, August 8, 2022 3:11 PM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Cc: Trainor, Tom J - DNR <Tom.Trainor@wisconsin.gov>
Subject: FW: BRRTS Nos. 02-41-556117 and 02-41-556175

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Eric, I think that the question is in regards to the possible degradation of the COC. In this case it is PFAS. I understand that there are rules put in place to define hold times and thermal preservation and we follow those guidelines which ultimately brought us to this conversation.

If the lack of thermal preservation caused degradation of the PFAS compounds, I could see where the samples would need to be re-collected and would be considered invalid, but as we know, that is not the case with PFAS. I am not sure where this project is in regards to baseline testing but I do understand that PFAS in situ does not readily breakdown or degrade. My opinion is that the PFAS concentrations would not be affected by the delay in transportation or lack of thermal preservation to the point where the results would be impacted but that is just my opinion. What the client is looking for is guidance from the state which ultimately decides what is "Valid" and what is "Suspect" in regards to data interpretation. If you feel that the results generated would be suspect due to the thermal preservation guidelines set forth, then that is how we will proceed. Please let me know where the state stands on this matter and we will proceed with that in mind.

Please let me know if you would like to discuss this in more detail or if you have any questions.

Thanks for your understanding here. We are just trying to justify having a client go out and re-collect samples

Brian Basten (He/Him/His)

Client Services Manager | Pace®

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From: Patrick Patterson <patrick.patterson@intertek.com>
Sent: Friday, August 5, 2022 5:24 PM
To: Angela Lane <Angela.Lane@pacelabs.com>
Subject: FW: BRRTS Nos. 02-41-556117 and 02-41-556175

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Angie,

Here is what the WDNR said. Can you forward and ask what they think? I don't know what "validate" means from Eric. Let me know what they say.

Pat

From: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Sent: Friday, August 5, 2022 5:22 PM
To: Patrick Patterson <patrick.patterson@intertek.com>
Cc: Larry Raether <larry.raether@intertek.com>; Kuy Herpel <kuy.herpel@intertek.com>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
Subject: [External] RE: BRRTS Nos. 02-41-556117 and 02-41-556175

Hi Pat:

As you know, it is up to the lab to validate all of the data and if they can't do that then the data will be suspect. You have to work with the lab on the path forward, it's really their call as they follow the procedures laid out in the method.

Hope this helps.

Please let us know, if you have questions.

Thanks.

Eric

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Eric Amadi

Phone: (414) 405-0752

eric.amadi@wisconsin.gov

From: Patrick Patterson <patrick.patterson@intertek.com>
Sent: Thursday, August 4, 2022 2:47 PM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Cc: Larry Raether <larry.raether@intertek.com>; Kuy Herpel <kuy.herpel@intertek.com>
Subject: BRRTS Nos. 02-41-556117 and 02-41-556175

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Hi Eric,

I know that the City of South Milwaukee Parcel (Vacant Parcel-02-41-556175) and the Midwest Tanning Parcel (02-41-556117) projects have sat for a long time and I apologize for that. However, the property owner for these sites have giving PSI permission to proceed with our previously proposed additional services at these sites. One of these services was to collect water samples from the existing wells on both parcels to test for the presence of PFASs. This is to address the issue of emerging contaminants on open WDNR cases. Further, both sites were formerly associated with tanning manufacturing processes that is why we proposed testing for PFASs. No evidence of the presence of 1,4 Dioxane or other contaminants was determined. As such, we collected water samples and submitted them for analytical testing to Pace for PFASs. They said they subsequently overnighted it to their Minneapolis lab on July 29 for delivery on July 30. However, they indicated that the other lab didn't get it until August the 3rd and the ice had melted. I'd like some guidance in regards to this issue, please. Since PFASs are "forever chemicals", will there be an issue if the lab runs these samples or do others have to be collected and analyzed. I'm trying to keep the costs down for my client. Let me know soon on this.

Thanks,
Pat

Patrick J. Patterson, P.E., P.G.
Senior Engineer
Building & Construction
Intertek-PSI

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