



February 19, 2018

JOHN AHLGRIMM  
AHLGRIMM EXPLOSIVES COMPANY INC  
1829 E RAVENSWOOD CT  
APPLETON WI 54913

Subject: Response to *NR 716 Groundwater Site Investigation and Supplemental Remedial Action Report* and *NR 716 Supplemental Site Investigation Report* for Ahlgrimm Explosives Co Inc – Prill Area, W9899 Givens Rd, Town of Hortonia, WI DNR BRRTS # 02-45-558037

Dear Mr. Ahlgrimm:

On September 21, 2017, the Wisconsin Department of Natural Resources (DNR) received a *NR 716 Groundwater Site Investigation and Supplemental Remedial Action Report* (“SIR/RAR”) dated September 18, 2017 for the above-named site for property located at W9899 Givens Rd, Town of Hortonia, Outagamie County, Wisconsin (the “Property”). Terracon submitted the SIR/RAR on behalf of Ahlgrimm Explosives Co Inc. (“Ahlgrimm Explosives”). The DNR also received the \$1,050 review fee in accordance with ch. NR 749, Wis. Adm. Code.

The Northeast Region (NER) Closure Committee performed a peer-review of the SIR/RAR on November 2, 2017. Based on discussion during the peer-review, I met with you and Scott Hodgson with Terracon at the Property on November 14, 2017 to discuss the need for additional soil and groundwater data to make a determination regarding the investigation and cleanup at the Property. During our meeting, DNR learned use of the raw ammonium nitrate (prill) bin was discontinued at the Property in January 2017 and you have since obtained prill for your business use from an off-site provider.

DNR requested two specific items: 1) an up-gradient monitoring well and groundwater sampling for nitrite-nitrate as nitrogen to better assess background nitrate concentrations due to farming operations in the area; and 2) sampling of backfilled soil beneath the prill bin for total nitrogen to determine if a release from the prill bin was on-going and to calculate the volume of residual soil contamination remaining after the 2013 and 2015 soil excavations. At that time, I requested a decision from you if you prefer DNR finalize the written response to the SIR/RAR, or pause review for up to 60 days until submittal of the requested information.

Terracon contacted DNR on November 17, 2017 on your behalf and requested DNR pause review of the SIR/RAR until additional soil and groundwater data could be submitted. Terracon followed up with submittal of a *Site Investigation Work Plan* on December 14, 2017 based on our verbal conversation at the Property and DNR provided a notice to proceed the following day.

Terracon collected the additional data and DNR received a *NR 716 Supplemental Site Investigation Report* (SSIR) dated January 15, 2018. The NER Closure Committee continued peer-review of the SIR/RAR and SSIR on February 15, 2018. Scott Hodgson with Terracon attended at his request.

## Determinations

The DNR makes the following determinations with respect to chs. NR 716, 720 and 724, Wis. Adm. Code:

1. The applicable soil standard for total nitrogen is 100 milligrams per kilogram (mg/kg) with remedial action required for residual soil containing total nitrogen above 300 mg/kg as required by the Department of Agriculture, Trade and Consumer Protection (DATCP).
2. The residual soil contamination beneath the prill bin above 100 mg/kg is less than one cubic yard and considered de minimis.
3. Nitrite-nitrate as nitrogen above the enforcement standard of 10 milligrams per liter (mg/L) from farming operations have impacted upgradient shallow groundwater.
4. The soil and groundwater site investigation is approved.
5. The remedial actions performed at the site are approved.

### Future Actions

It is appropriate to submit a request for closure under ch. NR 726, Wis. Adm. Code along with the \$1,050 case closure review fee in accordance with ch. NR 749, Wis. Adm. Code. A final review and case closure determination will take place after receipt of the complete request for closure and submittal of the required review fee.

Thank you for the opportunity to review the SIR/RAR and SSIR. Please contact me with any questions in Oshkosh by phone at 920-424-7887 or by email at [jennifer.borski@wisconsin.gov](mailto:jennifer.borski@wisconsin.gov).

Sincerely,



Jennifer Borski  
Hydrogeologist  
Remediation & Redevelopment Program

Copy: Rodney Martin, N2857 County Road T, Hortonville, WI 54944  
Scott Hodgson, Terracon – [scott.hodgson@terracon.com](mailto:scott.hodgson@terracon.com)