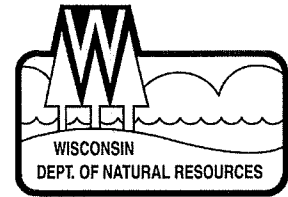


**State of Wisconsin**  
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September 22, 2017

Mr. Mike Higgins  
Mid-America Steel Drum Company  
9750 South Chicago Road  
Oak Creek, WI 53225

**SUBJECT:** Review of 'Revised Work Plan for Completion of Site Evaluation',  
Mid-America Steel Drum Company Inc/Kitzinger,  
2529 E Norwich Avenue, St. Francis, WI  
WDNR FID #241063570; BRRTS # 02-41-560089

Dear Mr. Higgins:

On April 28, 2017, the Department of Natural Resources (DNR) received the 'Work Plan for Completion of Site Evaluation' for the site identified above. The DNR provided a review of the Work Plan on June 5, 2017, concluding that the proposed actions would not result in a complete site investigation. A 'Revised Work Plan for Completion of Site Evaluation' was received by the DNR on August 21, 2017. The Revised Work Plan recommended the installation of an additional piezometer, an additional monitoring well, and an additional soil boring beyond what was originally proposed. As it is unclear how the collection of samples at these locations will result in a complete site investigation, the DNR will not approve the Revised Work Plan.

DNR's June 5, 2017, review letter summarized the deficiencies found within the original Work Plan. The Revised Work Plan did propose the installation of an additional groundwater monitoring well as was requested, identified specific locations where the piezometers will be installed, and stated that the criteria in RR-800 will be used to determine if the contamination will pose a vapor intrusion risk. The remaining items listed in the review letter were not adequately addressed. The DNR recommends referencing our previous review and emphasizes the following points:

- 1) An appropriate scope for the field investigation must be determined by considering the items listed in NR 716.07. This must include an assessment of existing field measurements and analytical data collected on site. Offsite data must also be assessed, if the site investigation will be conducted to determine how sources may have impacted your property. It is not clear how the proposed sampling relates to the potential sources identified. The presence of potential receptors, such as utility lines to the west of the property, need to be assessed to determine what field investigation is needed to determine whether contamination is migrating off, or onto, the property.
- 2) The DNR understands that a determination as to how each potential source of chlorinated volatile organic compounds has contributed to the contamination identified on the property may not be possible at this time, and that a final conclusion as to the source(s) that affected this property may not be made until additional field investigation is conducted. However, all potential sources (identified through historic information and analytical data) must still be considered when developing a site investigation work plan. The cover letter to the Revised Work Plan suggests that solvent use on the adjacent DF, Inc. property, onsite drum

reconditioning, and an offsite surface release may have resulted in the identified contamination. The potential for an onsite discharge on the northwest corner of the property, in the vicinity of KGP-1, must also be investigated. Field sampling activities should be proposed that will confirm the impacts caused by each of these sources and determine the degree and extent of contamination within onsite source areas. It is unclear how the sampling proposed in the Revised Work Plan relates to potential sources.

3) The cover letter provided with the Revised Work Plan states the goals of the site investigation: identify a source of contamination, define the extent of contamination in greater precision, define the vertical extent of contamination, determine the contribution of offsite sources to the contamination on this site, assess whether contaminant concentration are declining, identify preferential pathways, determine what receptors are impacted by contamination, and determine a remedial strategy. However, the cover letter and Revised Work Plan did not provide details as to how these objectives will be accomplished or how the proposed sampling activities help to achieve these goals. Specific details regarding proposed field activities will need to be provided in the work plan, which would include, but are not limited to:

- Describing which offsite wells will be surveyed and/or sampled, how these wells will be selected, and when in the investigative process this will be completed.
- Why an initial groundwater sampling event is needed prior to well construction and how this information will be used to assess the need for additional soil or groundwater investigation at this property.
- Specifically how many wells will be selected to test hydraulic conductivity, how they will be selected, and whether both monitor wells and piezometers will be assessed.
- Clarify what field work is being proposed in Sections 1.5 and 2.1 of the Revised Work Plan, as these sections appear to be contradictory.
- Recommend field investigation activities to determine the degree, extent, and source of the significant CVOC contamination observed within groundwater at SPM-4 and shallow soil samples at KGP-1.
- An explanation as to how the proposed samples will define contamination within shallow and deep groundwater zones and how the vertical extent of contamination will be investigated.
- Assess the need to investigate offsite migration of contamination.
- Clarify that national geodetic survey data will be used as the basis for all elevation measurements

You are required to complete a site investigation that defines the degree and extent of contamination, investigates the source area(s), identifies necessary remedial actions, and otherwise addresses the above comments and those made within DNR's June 5, 2017 response. It is recommended that you prepare a work plan that addresses the items described above for DNR review and approval. Otherwise, you are required to initiate the field investigation within 90 days from when the Revised Work Plan was submitted to the DNR, August 16, 2017, as required by Wis. Admin. Code § NR 716.11(2g). If you have any questions regarding any of the above items, please contact me at (608) 266-0941 or by email at [paul.grittner@wisconsin.gov](mailto:paul.grittner@wisconsin.gov).

Mid-America Steel Drum Company Inc/Kitzinger  
2529 E Norwich Avenue, St. Francis, WI  
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Sincerely,



Paul Grittner  
Contaminated Material Management Specialist  
Remediation & Redevelopment Program

cc: Kurt McClung, Key Engineering Group, LTD., 735 North Water Street, Suite 510, Milwaukee, WI  
53202 (electronic)  
Anne Van Grinsven, Environmental Enforcement Specialist, DNR  
SER File