**State of Wisconsin**
**DEPARTMENT OF NATURAL RESOURCES**
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February 15, 2024

Mr. Mike Higgins
Complete Recycling Services, LLC
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St. Francis, WI 53235
*Email only to:* mhiggins@completerecyclingservices.com

Subject: Review of "Site Investigation Work Plan"
Mid-America Steel Drum Company Inc/Kitzinger, 2529 East Norwich Avenue, St. Francis, WI
DNR BRRTS Activity #: 02-41-560089; FID #: 241063570

Dear Mr. Higgins:

The Department of Natural Resources (DNR) has completed its review of the January 23, 2024 *Site Investigation Work Plan* and other documentation submitted previously for the Mid-America Steel Drum Company Inc/Kitzinger site. The work plan proposes advancing ten soil borings for the collection of soil samples, installing a monitoring well and two piezometers, and conducting a vapor assessment. The DNR received the applicable technical assistance fee in accordance with Wis. Admin. Code § NR 749.04 (1) for providing this written response.

**Work Plan Review**

The proposed field activities are reasonable next steps for conducting the site investigation. Collected data could be useful for delineating the extent of groundwater and soil contamination, identifying source areas, determining contaminant migration pathways, assessing the potential for vapor intrusion to impact buildings, and beginning to assess options for conducting remedial actions. The DNR does provide the following comments and recommendations regarding the proposed work:

- In addition to the ten proposed soil borings, the DNR also recommends that soil borings be advanced in the following four locations:
  - One boring between KGP-1 and KGP-2 and one boring between KGP-1 and KMW-5 to investigate the eastern extent of contamination found at KGP-1.
  - One boring south of KMW-4 and one boring south of KMW-6.
- Numerous soil samples have already been collected at 9-10 feet below ground surface in the northwest corner of the property, some near where new borings are proposed. We recommend considering where soil data is already available when determining where to collect additional samples to avoid duplication.
- Consider collecting shallow samples from representative soil closest to surface to assess the potential for on-site discharges to have impacted the property. In the absence of other factors, it may be beneficial to collect deeper soil samples at depths similar to those where samples were previously collected from near-by borings for comparison.
- The DNR agrees installing a groundwater monitoring well in the vicinity of abandoned monitoring well SMW-3 is necessary for evaluating shallow groundwater.
- The two proposed piezometers will be installed at locations that appear appropriate to investigate contaminant extent and flow direction in deeper groundwater. Proposed screen depths are generally consistent with those at existing piezometers. Modifying the screen depth should be considered if changes in soil type or indictors of contamination are observed during installation.
- A groundwater sampling plan was not provided for DNR comment.

- An assessment should be conducted to determine why there is considerable variation in groundwater elevations measured at monitoring wells KMW-3, KMW-4, and KMW-6 compared to other wells at this site. Explain if this variation indicates there is issue with the integrity of certain wells that would result in inaccurate sample and elevation data being collected.
- A vapor assessment needs to be conducted as proposed in the Work Plan. Additional investigation will be required where assessment identifies a potential vapor intrusion risk.
- The extent of PFAS contamination in groundwater and the location of potential on-site sources must be investigated before the site investigation will be considered complete. An evaluation of the potential for PFAS containing compounds and other emerging contaminants to have been used and discharged at this site will need to be provided.
- You will need to clearly demonstrate that contamination is migrating from offsite if using this as justification for not defining the extent of impacts in all areas of the site.
- Detailed data evaluation and interpretation will be needed to explain the extent, sources, and migration of contamination at this site. Producing several detailed cross-sections displaying on-site conditions is recommended for conducting this evaluation.
- Groundwater elevation contours and flow directions displayed on groundwater elevation contour maps for this site and the adjacent site to the north should be double-checked for accuracy before being used to identify contaminant migration pathways.

**Conclusion**

The DNR reminds you that the site investigation is an iterative process; the proposed sampling may not define the extent of all contamination at the site. Sample results will need to be evaluated to determine if additional soil, groundwater, or vapor investigation will be required on- and/or off-site.

Sample results (including soil, groundwater, indoor air, and vapor) must be provided to the DNR, owners of the property where the samples were collected, and occupants of the buildings as appropriate within ten business days of receipt (Wis. Admin. Code § NR 716.14 (2)). Unless otherwise approved, submit a site investigation report to the DNR within 60 days after completion of the field investigation and receipt of laboratory data (Wis. Admin. Code § NR 716.15 (1) (a)).

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this review or wish to discuss any of these requests in further detail, please contact me by calling (414) 405-0764, or by email at paul.grittner@wisconsin.gov.

Sincerely,

Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

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