



May 19, 2021

FV STEEL AND WIRE COMPANY
ATTN: CHAD ERDMANN
288 ARGENTINA AVENUE
BARTONVILLE IL 61607

SUBJECT: Site Investigation Incomplete – Additional Investigation Required
F V Steel and Wire Company (Former), 111 North Douglas Street, Hortonville, WI
WDNR BRRTS #: 02-45-560221

Dear Mr. Erdmann:

On March 30, 2021, Wisconsin Department of Natural Resources (DNR) received a report titled, *Additional Site Investigation Results October/November 2020*, dated March 19, 2021, which was submitted on your behalf by your consultant, AECOM Technical Services, Inc. The report was accompanied by a fee of \$1050, which is required under Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1), for formal DNR review and response. Based on review of your submittal and all available site investigation documentation in the case file, DNR has determined that additional investigation and documentation is needed in order to comply with Wis. Admin. Code NR 716.

Completion of the Site Investigation

In accordance with § NR 716.11(3)(a) Wis. Admin. Code the degree and extent of contamination at the above-referenced site (Site) has not been adequately defined and documented. The findings and interpretations by DNR regarding the incomplete site investigation are summarized below:

Soil

- Additional information is needed for the DNR to determine if the site investigation for soil is complete:
 - A map including all soil boring locations, delineating the extent of Volatile Organic Compound (VOC) and Polycyclic Aromatic Hydrocarbon (PAH) contamination in unsaturated soils, is required. Multiple maps may be appropriate (s. NR 716.15(4)(c), Wis. Adm. Code).
 - An analytical data table summarizing the results of the soil investigation is required.

Groundwater

- The degree and extent of contamination in groundwater has not been defined:
 - The vertical extent of contamination must be assessed. DNR recommends piezometers (PZ-4 through PZ-7) be installed as nested piezometers in order to characterize the vertical gradient and extent of contamination.
 - The map identifying the extent of VOC contamination in groundwater should be separated based on the depth the monitoring wells were screened (s. NR 716.15(4)(c), Wis. Adm. Code).
 - One map showing VOC contamination as identified in the monitoring wells screened at shallow intervals.
 - One map showing VOC contamination as identified in the monitoring wells screened at deeper intervals.

- The groundwater contamination maps in future submittals should include iso-concentration lines for Preventative Action Limit (PAL) and Enforcement Standard (ES) exceedances (s. NR 716.15(4)(c), Wis. Adm. Code).
 - In future submittals clarify whether the production well is still active or if it has been abandoned.
 - If the well has been abandoned, please provide the well abandonment documentation.
 - If the production well is still present, this well should be sampled for VOCs.
 - Include any analytical sampling results from the production well in the groundwater analytical tables.
 - Based on the groundwater sampling results, additional piezometers may need to be installed to define the vertical extent of contamination.
- DNR does not concur with the proposed location of piezometer PZ-7 in the State Highway 15 right-of-way (ROW). DNR recommends the following:
 - Attempt to gain off-site access to the former American Toy property to install the piezometer closer to the current known extent of deep groundwater contamination.
 - Make a minimum of two attempts to gain access by mailing certified letters requesting access to complete the investigation.
 - Provide DNR documentation of your attempts to gain access and include the certified delivery confirmation receipts or copies of the returned, undeliverable letter.
 - DNR will send additional correspondence via certified mail should you fail to gain access to perform this work off-site.
 - PZ-7 can be placed in the State Highway 15 ROW as a last resort if no response or written denial of access to the former American Toy property has been received and DNR is unable to gain access.

Vapor

- A vapor assessment or investigation was not discussed in the SIR and must be addressed (ss. NR 716.11(5), 716.11(3)(a) and 716.15(3)(g), Wis. Adm. Code).

Additional Notes

- A copy of the most recent deed, certified survey map and legal description of the property is required (s. NR 716.15(5), Wis. Adm. Code).
- Future site figures must include the locations of underground and aboveground utilities, including sewer laterals, to adequately evaluate preferential pathways and potential receptors (s. NR 716.15(2)(c)6, Wis. Adm. Code).
- An evaluation of emerging contaminants for this site is required to be completed prior to closure of the site, refer to August 2020 letter (s. NR 716.07, Wis. Adm. Code).

Be aware that during your investigation, you are required to comply with Wis. Admin. Code chs. NR 700-754 and all other applicable statutes and administrative rules, including those pertaining to solid and hazardous waste management and/or wastewater discharges. Wis. Admin. Code ch. NR 716 details specific requirements for site investigations and for interpretation and presentation of your findings.

Once the additional work has been completed and documented your consultant should evaluate whether the site investigation is complete based on the results of the additional work, and a complete SIR should be submitted. Keep in mind that additional site investigation may be necessary if the degree and extent of contamination is not defined. You can request a formal review of the SIR and response by DNR by submitting the applicable form and fee.

May 19, 2021
F V Steel and Wire Company
Mr. Chad Erdmann
Site Investigation Incomplete – Additional Investigation Required
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The DNR appreciates your efforts to investigate and remediate this property. If you have any questions or concerns, please feel free to contact me at (920) 510-4343 or via email at gwen.saliars@wisconsin.gov.

Sincerely,

A handwritten signature in blue ink that reads "Gwen Saliars". The signature is written in a cursive, flowing style.

Gwen Saliars
Hydrogeologist
Remediation and Redevelopment

cc: Gary Braun, AECOM Technical Services Inc, (gary.braun@aecom.com)