Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request Form 4400-237 (R 12/18)

Notice: Use this form to request a written response (on agency letterhead) from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by

Definitions

"Property"refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance"refers to the Department's assistance or comments on the planning and implementation of an environmental

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This from should be used to request the following from the DNR:

- Technical Assistance
 - Liability Clarification
 - Post-Closure Modifications
 - Snacializad Arraamante (tay cancellation narratistad arraamante atc.)

Do not use this form if one of the following applies:

- Request for an off-site liability exemption or clarification for Property that has been or is perceived to be contaminated by one
 or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site
 Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the Lender Liability Exemption, s 292.21, Wis. Stats., if no response or review by DNR is requested. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an exemption to develop on a historic fill siteor licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- Request for closure for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dor wi dov/topic/Brownfields/Pubs.html

- 1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
- 2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
- 3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program and the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
- 4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located.

See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf^{**}

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request Form 4400-237 (R 12/18)

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Section 1. Contact and Recip	ient Information				
Requester Information					
This is the person requesting tech	inical assistance or a post-c	losure	modification review, that his or her liability be	e clarifi	ed or a
specialized agreement and is ider	tified as the requester in Se	ection	7. DNR will address its response letter to this	persor	n
Last Name	First	MI	Organization/ Business Name	and	Environmental
Garman	Evic		Global Remediation	5	ervicer (GRES)
Mailing Address 4111 East 37th	St. North		City Wichida	State KS	ZIP Code 67220
Phone # (include area code) 316-828-7470	Fax # (include area code)		Email evic.covman@Kochind.com	И	
The requester listed above: (selec	ct all that apply)				
Is currently the owner		[Is considering selling the Property		
Is renting or leasing the Pro	operty	[Is considering acquiring the Property		
Is a lender with a mortgage	e interest in the Property				
Other. Explain the status of	the Property with respect to	the a	pplicant:	20	
Ashview Terro	ice Apartments	, A	shwanbinon, WI, GRE	: >	Sife
project Mar	raiger.				
Contact Information (to be co	ontacted with questions a	about	this request) Selec	t if san:	ne as requester
Renier	First Joseph	M	Wood Environments	Infr	rastructure solutions (IZES
Mailing Address 800 Marquette K	he, suite 900		City Minneapolis	State Mn/	ZIP Code 55402
Phone # (include area code) 320-963-5742	Fax # (include area code)		Email jue . renier @ wood ple . e	C D DOA	
Environmental Consultant	(if applicable)				
Contact Last Name	First	MI	Organization/Business Name		
Mailing Address	Ave, Suite 90.	9	City Minneapolis,	State MW	ZIP Code
Phone # (include area code)	Fax # (include area code)		Email		
320-963-5742			Jue. renirved woodple	in co	m
Attorney (if applicable)					
Contact Last Name	First	MI	Organization/ Business Name		
Mailing Address	1		City	State	ZIP Code
Phone # (include area code)	Fax # (include area code)		Email		

Form 4400-237 (R 12/18)

Property Owner (if diffe	erent from requester)	·			
Contact Last Name	First	MI Organization/ Bi	usiness Name		
Gerry	Charles + Marilyn				
Mailing Address		City	1	State	ZIP Code
1360 Greenwa	y levrace	Elm	Grove	WE	3312C
Phone # (include area code)	Fax # (include area code)	Email			
Property Name	ation		FI	D No. (if known)
Ashvic.	N Terroce Apa	avtments			7
BRRTS No. (if known)		Parcel Identifica	tion Number		· · · · · · · · · · · · · · · · · · ·
02-05-5	64043				
Street Address		City	1	State	ZIP Code
988-1020	Willard Prove	/FSh Wai	pron	WP	
County	Municipality where the Property	is located	Property is compo	osed of: Pro	perty Size Acres
lgrown	○ City ○ Town ⊗ Village of	1 Ashnanbenon	Ø parcel	parcels	3.3
1. Is a response needed by a	specific date? (e.g., Property cl	losing date) Note: Most	requests are comple	eted within 60 d	ays. Please
plan accordingly.					
Date request	red by: 1/30/70				
Reason:					
	A 1				al a a
	Short field see	as m - wont	no execut	t work,	Man Masti
2. Is the "Requester" enrolled	as a Voluntary Party in the Volu	untary Party Liability Ex	emption (VPLE) prog	gram?	
No. Include the fee th	at is required for your request	t in Section 3, 4 or 5.			
○ Yes. Do not include a	separate fee. This request will	be billed separately thro	ough the VPLE Prog	iram.	
Fill out the information in	n Section 3, 4 or 5 which corre	esponds with the type	of request:		
Section 3. Technical A Section 4. Liability Cla	ssistance or Post-Closure Mo	odifications;			
Section 4. Elability ola	finication, of Section 5. Specia	anzeu Agreement.			
Section 3. Request for Te	chnical Assistance or Post-C	Closure Modification	DND Up 1		
Select the type of technical a	ssistance requested: [Numbers	s in brackets are for W	DNR Usej		
to an immediate ac	Letter (NFA) (Immediate Actions tion after a discharge of a hazar	s) - NR 708.09, [183] - Irdous substance occurs	Include a fee of \$3 Generally, these ar	350. Use for a v re for a one-tim	ritten response e spill event.
Review of Site Inve	stigation Work Plan - NR 716.09	9, [135] - Include a fee	of \$700.		
Review of Site Inve	stigation Report - NR 716.15, [1	137] - Include a fee of	\$1050.		
Approval of a Site-S	Specific Soil Cleanup Standard -	- NR 720.10 or 12, [67]	- Include a fee of \$	1050.	
Review of a Remed	dial Action Options Report - NR	722.13, [143] - Include	e a fee of \$1050.		
Review of a Remed	tial Action Design Report - NR 7	724.09, [148] - Include	a fee of \$1050.		
Review of a Remed	dial Action Documentation Report	ort - NR 724.15, [152] -	Include a fee of \$3	50	
Review of a Long-to	erm Monitoring Plan - NR 724.1	7, [25] - Include a fee	of \$425.		
Review of an Operation	ation and Maintenance Plan - NF	R 724.13, [192] - Inclu	de a fee of \$425.		
Other Technical Assistant	ce - s. 292.55 Wis Stats (97) (For request to build on a	an abandoned landfi	Il use Form 440	0-226)
Schedule a Technic	cal Assistance Meeting - Includ	the a fee of \$700			
Hazardous Waste I	Determination - Include a fee o	of \$700.			
Other Technical As	sistance - Include a fee of \$70	00. Explain your request	in an attachment.		

Post-Closure Modifications - NR 727, [181]

Technical Assistance, Environmental Liability **Clarification or Post-Closure Modification Request** Form 4400-237 (R 12/18)

Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. Include a fee of \$1050. and: Include a fee of \$300 for sites with residual soil contamination; and

Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. [Numbers in brackets are for DNR Use]

Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

Include a fee of \$700.

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures:
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender:
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the

sheriff's sale.

- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was not conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292. 21(1)(c)2.,h.-i., Wis. Stats .:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

Include a fee of \$700.

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.
- Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];

Perceived environmental contamination - [649];

hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or

solid waste - s. 292.23 (2), Wis. Stats. [649].

Form 4400-237 (R 12/18)

* Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the 1/4, 1/4 section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

Section 4. Request for Liability Clarification (cont.)

- Lease liability clarification s. 292.55, Wis. Stats. [646]
 - Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:
 - a copy of the proposed lease;
 - (2) the name of the current owner of the Property and the person who will lease the Property;
 - a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
 - map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
 - (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
 - (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below. Include a fee of \$700 and an adequate summary of relevant environmental work to date.

No Action Required (NAR) - NR 716.05, [682]

Include a fee of \$700.

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

Include a fee of \$700.

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: <u>dnr.wi.gov/topic/Brownfields/lgu.html#tabx4</u>.

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

Form 4400-237 (R 12/18)
Include a fee of \$700, and the information listed below:
(1) Phase I and II Environmental Site Assessment Reports,
(2) a copy of the Property deed with the correct legal description.
Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]
 Include a fee of \$700, and the information listed below:
(1) Phase I and II Environmental Site Assessment Reports,
(2) a copy of the Property deed with the correct legal description.
Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]
Include a fee of \$1400, and the information listed below:
(1) a draft schedule for remediation; and,(2) the name, mailing address, phone and email for each party to the agreement.
Section 6. Other Information Submitted
Identify all materials that are included with this request.
Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.
Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.
Phase I Environmental Site Assessment Report - Date:
Phase II Environmental Site Assessment Report - Date:
Legal Description of Property (required for all liability requests and specialized agreements)
Map of the Property (required for all liability requests and specialized agreements)
Analytical results of the following sampled media: Select all that apply and include date of collection.
Groundwater Soil Sediment Other medium -
Date of Collection:
A copy of the closure letter and submittal materials
Draft tax cancellation agreement
Draft agreement for assignment of tax foreclosure judgment
Other report(s) or information - Describe: Site Investigation and Remediation work plan
For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?
○ Yes - Date (if
○ No
Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:
dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf.
Section 7. Certification by the Person who completed this form
I am the person submitting this request (requester)
for for Request
I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.
6/4/20
Signature Date Signed
Title 320-963-5742 Telephone Number (include area code)
Wood Ets

Form 4400-237 (R 12/18)

Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a DNR regional brownfields specialist with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf.



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only							
Date Received	Date Assigned		BRRTS Activity Code	BRRTS No. (if used)			
DNR Reviewer			Comments				
Fee Enclosed? No	Fee Amount \$		Date Additional Information Requested	Date Requested for DNR Response Letter			
Date Approved Final Determination							



Site Investigation and Remediation Work Plan for the Ashview Terrace Apartments Site, Ashwaubenon, Wisconsin (WDNR Site # 02-05-564043)

Global Remediation and Environmental Services Wichita, Kansas Project #7311150004

Prepared for:

Global Remediation & Environmental Services

4111 East 37th St. North, Wichita, Kansas 67220

6/4/2020



Wood Environment & Infrastructure Solutions, Inc. 800 Marquette Avenue Suite 900 Minneapolis, MN 55402 USA T: 612-332-8326 www.woodplc.com

6/4/2020

Mr. Bruce J Leroy Wisconsin Department of Natural Resources 2984 Shawano Ave Green Bay, WI 54313

RE: Site Investigation and Remediation Work Plan Ashview Terrace Apartments Site at 988-1020 Willard Drive, Ashwaubenon, Wisconsin (WDNR Site # 02-05-564043)

Dear Mr. Leroy,

Wood Environment & Infrastructure Solutions, Inc. (Wood), is pleased to present this Site Investigation and Remediation Work Plan, on behave of Global Remediation and Environmental Services, for the Ashview Terrace Apartments Site. This plan provides a scope of work to refine the extent of landscape cover areas that have been proposed within green spaces at the site. These cover areas will supplement the existing asphalt, sidewalk or other hard cover, such that the direct contact pathway to paper sludge at the site is minimized.

Let us know if you have any questions.

Sincerely,

Wood Environment & Infrastructure Solutions, Inc.

nn-

Joséph M. Renier, PG Associate Hydrogeologist 320.963.5742 joe.renier@woodplc.com

Andrew Fiskness, PMP Project Manager 612.252.3628 andrew.fiskness@woodplc.com



Certification Statement

I, Joseph M. Renier, hereby certify that I am a hydrogeologist as the term defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Admin. Code, or licensed in accordance with requirements of ch. GHSS3, Wis. Adm. Code, and that to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to NR 726, Wis. Adm. Code."

20 Signature and title Date







Site Investigation and Remediation Work Plan for the Ashview Terrace Apartments Site, Ashwaubenon, Wisconsin (WDNR Site # 02-05-564043)

Global Remediation and Environmental Services Project Location Project #7311150004

Prepared for:

Global Remediation & Environmental Services 4111 East 37th St. North, Wichita, Kansas 67220

Prepared by:

Wood Environment & Infrastructure Solutions, Inc. 800 Marquette Avenue Suite 900 Minneapolis, MN 55402 USA T: 612-332-8326

6/4/2020

Copyright and non-disclosure notice

The contents and layout of this report are subject to copyright owned by Wood (© Wood Environment & Infrastructure Solutions, Inc.). save to the extent that copyright has been legally assigned by us to another party or is used by Wood under license. To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report. The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of Wood. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests. Any third party who obtains access to this report by any means will, in any event, be subject to the Third Party Disclaimer set out below.

Third-party disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Wood at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Wood excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

wood.

Table of Contents

1.0	Introdu	ction		1			
2.0	Backgro	دground1					
	2.1	Site De	scription and Features	1			
	2.2	Previou	Is Investigations	2			
	2.3	Site Str	atigraphy	2			
	2.4	Landsc	ape Cover Plan	2			
3.0	Scope of	of Work		3			
	3.1	Shallov	v Soil Investigation	3			
		3.1.1	Boring Locations	3			
		3.1.2	Shallow Soil Sampling	3			
		3.1.3	Analytical Samples and Testing	4			
		3.1.4	Equipment Decontamination	4			
		3.1.5	Investigation-Derived Waste	5			
	3.2	Health	and Safety	5			
	3.3	Utility (Clearance	5			
	3.4	Access	Agreement	5			
4.0	Reporti	ng		5			
5.0	Referen	nces		6			

List of Figures

Figure 1:	Site Location Map
-----------	-------------------

- Figure 2: Historical Soil Results (Visual and Analytical)
- Figure 3: Typical Landscape Improvement Area Cross-section Schematic
- Figure 4: Proposed Soil Borings

List of Appendices

Appendix A Site Borings Completed as of June 2020





1.0 Introduction

This Site Investigation and Remediation Work Plan (Work Plan) was prepared for Global Remediation & Environmental Services (GRES) by Wood, Environment & Infrastructure Solutions, Inc. (Wood), for work at the Ashview Terrace Apartments site (the Site), located at 988-1020 Willard Drive, in the Village of Ashwaubenon, Brown County, Wisconsin. A Site location map is provided as Figure 1. The Site is being managed as a Wisconsin Department of Natural Resources (WDNR) BRRTS Site (site # 02-05-564043).

The goal of this Work Plan is to further define areas where paper sludge may be present in the top 18 inches of soil such that direct contact could occur, necessitating an engineered barrier to mitigate potential exposure to polychlorinated biphenyls (PCBs) and metals. The recommended engineered barrier involves the installation of a geotextile and stone landscape cover in existing green spaces at the Site (Wood, February 2019). These landscape cover areas will supplement the existing asphalt, sidewalk, other hard cover, and clean topsoil to aid in mitigating direct contact with the underlying soil.

The approach for this additional investigation will be to refine the boundaries of the previously recommended landscape cover areas by performing a series of hand probe soil borings to depths of approximately 18 inches within green spaces at the Site. The soil cores from the hand probes will be evaluated for the presence of paper sludge in the top 18 inches through visual observations and limited confirmatory laboratory analysis. The project background and scope of work (SOW) for this investigation is presented in the following sections.

2.0 Background

During the 1930s a portion of the Site and land to the south (currently owned by the Ashwaubenon School District and the Village of Ashwaubenon), was used as a borrow pit (OMNNI, 2015). Aerial photos show the pit to be present until at least 1960. The borrow pit area on the Site and School District/Village property was filled in with paper sludge in some locations. In addition, the pit area on the School District/Village property was used as a town dump. PCBs, possibly associated with the referenced fill materials and/or other sources, have been detected at levels above soil criteria at the Site and School District/Village property. The School/Village property was remediated under WDNR Site #02-05-559562 (Ashwaubenon School District/Klipstine Park Site).

2.1 Site Description and Features

The Site is relatively flat with a slight slope to the southeast and is occupied by apartment buildings, paved driveway, parking areas and green space.

The Site encompasses 3.3 acres. Approximately 2.0 acres of the Site are covered by apartment buildings and other hardscape; including parking areas, driveways, and walkways. The total acreage covered by grass (green space) is 1.3 acres, of which 0.9 acre is within the area of the former borrow pit. The green space within the former pit area therefore constitute 27 percent of the total property.

The surrounding area is a mix of light commercial and residential development. No surface water bodies exist on Site and the nearest surface waters to the Site are Dutchman Creek and the Fox River located approximately 0.8 mile and 1.4 miles southeast of the Site, respectively.





2.2 **Previous Investigations**

As summarized below, five environmental investigations by OMNNI and Wood (formerly Amec Foster Wheeler), have been conducted at the Site from February 2015 to December 2017:

- A Phase II Subsurface Investigation (Phase II) (OMNNI, 2015)
- A Site Investigation (SI) (Amec Foster Wheeler, 2017)
- A Supplemental Site Investigation (SSI) (Amec Foster Wheeler, 2018a)
- A Supplemental Site Investigation Addendum (SSI Addendum) (Amec Foster Wheeler, 2018b)
- A Hand Probe Investigation (Amec Foster Wheeler, August 2017)

These investigations included installing Geoprobe, hand auger, and hand probe soil borings; installing and sampling two temporary monitoring wells, collecting 43 soil and two groundwater analytical samples, and visually inspecting all sample cores. Note that 35 of the 43 soil sample locations to date have been taken from within the 0.9 acre of green space co-located with the former pit area. Collectively, this work has been used to characterize the subsurface materials/stratigraphy and to assess the presence of PCBs and metals in soil and shallow groundwater across the Site. A listing of soil borings and a map showing the soil boring and temporary well locations completed as of June 2020 are provided in Appendix A.

2.3 Site Stratigraphy

The Site topsoil is underlain by sandy clay and/or silty sand where native materials were encountered (i.e., outside the former borrow pit area). Over the remainder of the Site, within the confines of the former borrow pit, fill was generally encountered below 1 to 2 feet (ft) of topsoil or asphalt and road base. The fill in the central portion of the Site within the former borrow pit extends up to 16 ft below ground surface (bgs) and consists of sandy clay and/or silty sand, gravel and paper sludge. Paper sludge in this area has been observed at depths ranging from the surface to 13.5 ft bgs.

2.4 Landscape Cover Plan

As discussed with WDNR in a meeting with Georgia Pacific and Wood on February 22, 2017, an engineered barrier may be used to minimize exposure to soils impacted at levels of concern at the site. The cover may consist of 18 inches of soil or a combination of soil plus geotextile/stone landscape cover. Wood formulated a Landscape Improvement Plan (Wood, February 2019) to cover current green space locations with detections of PCBs and/or metals above soil criteria or containing paper sludge within the top 18 inches of soil. A total of 14 areas requiring additional cover were identified (Figure 2). The location and extent of the proposed cover areas was selected based on past site assessment activities, site features (buildings, pavement, etc.), and aesthetics. The proposed cover is landscape fabric overlain by landscape river rock applied to the existing ground surface to achieve a combined (soil and landscape cover) thickness of 18 inches. A typical cross section of the proposed landscape cover is presented on Figure 3-1; Wood, 2019).

The WDNR reviewed the Landscape Improvement Plan and provided comments in an email dated September 18, 2019 and during a teleconference on January 14, 2020. WDNR indicated that additional soil characterization was necessary to confirm the lateral extent of the 14 proposed landscape cover areas. Since there is a strong correlation between the presence of paper sludge and impacts above soil criteria, it was agreed by WDNR, GRES and Wood during the January 14, 2020 teleconference that the additional delineation would consist primarily of visual evaluation of soil cores for the presence of paper sludge. In





addition, the WDNR requested limited additional analytical sampling of shallow surficial soil to confirm that concentrations in soil levels are below applicable criteria.

3.0 Scope of Work

This section presents the proposed SOW at the Site to aid in determining the lateral extent of the landscape cover areas.

3.1 Shallow Soil Investigation

The shallow soil investigation will include performing a series of hand probe borings within Site green spaces to a depth of 18 inches at the approximate locations shown on Figure 4. These locations have been selected to refine the perimeter of the cover areas. Additional step-out borings may also be required, as described below. The investigation will include both visual evaluation of the soil cores and laboratory analysis of selected soil samples, as indicated below.

3.1.1 Boring Locations

Cover Area Perimeter Borings. A series of borings will be installed around the perimeter of each of the proposed soil cover areas to aid in determining the lateral extent of the cover area, depending on area shape and field conditions. Initially, approximately 50 to 60 perimeter borings will be performed at locations within approximately 5 ft of the previously estimated perimeters. This would result in a total of 85 to 95 sample locations within the 0.9-acre of green space co-located with the pit area (or a sample density of over 90 sample locations per acre). Additional borings may also be performed within the previously estimated perimeters to confirm the orientations of the cover areas.

Cover Area Step-out Borings. Additional step-out borings may be installed around perimeter boring locations where paper sludge is observed in the top 18 inches of the soil column. Step-out borings will be added in roughly 5-ft increments, as needed, to further delineate the soil cover areas, i.e., until evidence of paper sludge in the top 18-inches of soil is not observed or a barrier to exposure, such as an apartment building, sidewalk, parking area, or other structure is encountered. The total number of step-out borings will be determined in the field, based on the result of the perimeter borings.

Additional Borings. Eight additional borings will be installed in green spaces without currently proposed soil cover areas to further characterize shallow soil in those areas (Figure 4). This number may be adjusted based on field conditions and materials encountered.

3.1.2 Shallow Soil Sampling

Soil borings will be advanced to a total depth of 18 inches (1.5 ft bgs or refusal) with a 1-inch diameter, stainless steel hand probe window sampler. Following insertion of the probe to depth, the sampler will be extracted and the core will be visually screened and logged. In particular, the core will be visually inspected for the presence of paper sludge. A limited number of samples will also be collected for laboratory analysis as described below.

Hand probe boring locations and elevations will be surveyed to the nearest 0.1 foot (vertically and horizontally) by a registered land surveyor following completion of the field activities. Proposed locations shown on Figure 4 may need to be adjusted in the field based on utilities, obstructions, etc.





3.1.3 Analytical Samples and Testing

Based on the past site assessment activities a correlation of PCB, lead, and mercury presence within observed paper sludge has been established. However, soil samples from a subset of the borings will be analyzed for PCBs, lead, and mercury in soil. Seven samples (or samples from roughly 10% of the proposed soil borings) will be collected for laboratory analytical testing. The analytical samples will target cores with visually discernable paper sludge.

Soil samples will be submitted to the Pace Analytical Services (Pace) laboratory in Green Bay, Wisconsin and tested for PCBs (reported as individual Aroclors and total PCBs), lead, and mercury. Analytical methods and method numbers are as follows:

Pa	<u>irameter – Soil</u>	EPA or WI Method
٠	PCBs	8082 w/ 3541 Prep
٠	Lead	6010B/ 7471 Prep
٠	Mercury – (total)	1631B

Since the WDNR has different residual contaminant levels (RCLs) for different forms of mercury, speciation of mercury is proposed on some of the samples collected for analytical testing. To determine what form of mercury is generally present, four samples (approximately 5% of the total proposed sample locations) will be tested for elemental and methyl mercury in addition to total mercury. These samples will be submitted to the Eurofins Frontier Global Sciences Analytical Laboratory in Fife, Washington, which is equipped to perform mercury speciation. Analytical methods and method numbers for these parameters are as follows:

Pa	rameter	EPA or WI Method
•	Mercury – (total)	1631B
•	Mercury – (elemental)	Modified 1631
•	Mercury – (methyl mercury)	Modified 1630

The mercury speciation analyses will be performed on at least two samples that contain paper sludge so that the type of mercury present in both paper sludge and soil that does not contain paper sludge can be evaluated, as no historical sampling has been conducted for elemental or methyl mercury. The concentration of mercury present in the samples as mercury salts (e.g., mercuric chloride) will also be calculated as the difference between total mercury and elemental mercury.

Quality assurance/quality control (QA/QC) samples will consist of one duplicate, one matrix spike/matrix spike duplicate (MS/MSD), and one rinsate blank for the total sample lot delivered to each lab.

3.1.4 Equipment Decontamination

Decontamination of the hand probe and miscellaneous sampling equipment will be conducted after each boring using the following procedure:

- Wash equipment with detergent (Alconox) and potable water using brushes,
- Rinse/wash equipment with potable water,
- Rinse equipment twice with de-ionized distilled organic free water and allow to air dry, and
- Collect all wash/rinse water.





3.1.5 Investigation-Derived Waste

Investigation-Derived Waste (IDW) generated during this investigation will include soil boring cuttings, equipment decontamination water, and used personal protective equipment (PPE).

IDW soils and water will be containerized in Department of Transportation (DOT) approved, locking, labeled 55-gallon drums. The drums will be placed on a pallet, covered and stored in one of the vacant apartment building garage stalls. Labeling on the drums will include the date, type of material in the drum, the point of origin of the material (i.e., the Site), and the Wood project manager's telephone number.

IDW will be disposed of in accordance with appropriate state and federal regulations. To determine the method of IDW transportation and disposal, soil cuttings and decontamination water will be sampled and analyzed for parameters based on the profiling requirements of the selected disposal facility. It is assumed that one soil IDW sample and one water IDW sample will be collected and analyzed.

IDW will remain on Site until analytical data is received to determine proper disposal. Wood assumes that soil IDW generated during this investigation will be transported to and disposed of by Badger Disposal in Milwaukee, Wisconsin, consistent with previous work at the Site.

3.2 Health and Safety

The existing site-specific Health and Safety Plan (HSP) completed for the previous Site investigations will be updated where/if required for the supplemental investigation work, in order to ensure that all necessary health and safety policies and procedures are followed in the field to ensure a safe work environment. It is assumed that all investigative work will be conducted using "Level D" PPE, consistent with previous work at the Site.

3.3 Utility Clearance

Prior to mobilization to the Site, the Wisconsin one-call Diggers Hotline (1-800-242-8511) will be contacted for utility clearance and the Site will also be cleared by a private utility locator. In addition, Wood representatives will check with the Site owner to determine the possible presence of underground utilities in the vicinity of the proposed borings. Wood will document the utility information obtained from the public and private locates as well as from the Site owner and confirm that the proposed shallow hand probe borings are sited at locations that are clear of utilities.

3.4 Access Agreement

The access agreement with the apartment complex owner will be checked to confirm that it is still in effect and will be renewed if required, for the new supplemental work.

4.0 Reporting

Wood will prepare and submit a detailed report summarizing the methods used to conduct the additional investigation, the results of field work, and recommended adjustments to the proposed landscape cover areas previously described in the Landscape Improvement Plan. The report will include sufficient detail to be approved as a remedy in accordance with WDNR Chapter NR 724. The report will also include reference to a restrictive covenant for land use going forward in accordance with WDNR Chapter NR 726. Upon approval of the investigation report, the adjusted cover remedy will be implemented at the Site.





5.0 References

- Amec Foster Wheeler, (June 2016). Site Specific Health and Safety Plan, Ashview Terrace Apartments Site, Ashwaubenon, Brown County, Wisconsin.
- Amec Foster Wheeler, (June 2017). Site Investigation Report, Ashview Terrace Apartments Site, Ashwaubenon, Brown County, Wisconsin.
- Amec Foster Wheeler, (January 2018a). Supplemental Site Investigation Report, Ashview Terrace Apartments Site, Ashwaubenon, Brown County, Wisconsin.
- Amec Foster Wheeler, (January 2018b). Supplemental Site Investigation Report Addendum, Ashview Terrace Apartments Site, Ashwaubenon, Brown County, Wisconsin.
- Code of Federal Regulations, Title 40 (40 CFR) 761.61 (a)(4)(i)(A), and 761.61(a)(7) and (a)(8)
- OMNNI, (February 2015). Phase II Subsurface Investigation at the Perry Property, 988-1020 Willard Dr., Parcel VA-120-5, Ashwaubenon, Brown County, Wisconsin Report.
- WDNR, (January 14, 2020). Georgia Pacific and Wood, teleconference January 14, 2020
- WDNR, November, 2014. WDNR Remediation and Redevelopment document RR-786, PCB Remediation in Wisconsin under the One Cleanup Program Memorandum Agreement.
- WDNR, (November, 2013). Chapter NR 720 Soil Cleanup Standards.

WDNR, (October, 2013). NR Chapter 726, Case Closure.

- WDNR, (February, 1997). NR Chapter 724, Remedial and Interim Action Design, Implementation, Operation, Maintenance and Monitoring Requirements.
- Wood, (February, 2019). Landscape Improvement Plans for Ashview Terrace Apartments, 1010 Willard Drive, Village of Ashwaubenon, Wisconsin.



Figures





SB17-03 (8 Sample Depth 1-2 ft bgs Aroclor 1016 ND Aroclor 1221 ND Aroclor 1222 ND Aroclor 1232 ND Aroclor 1242 ND Aroclor 1254 ND Aroclor 1260 ND Total P268 ND Arsenic ND Barium 28.0 Cadmium ND Che" 4.2 Mercury ND Silver ND Silver ND	V4/2017) 2-4 ft bgs ND	
SB16-10 (6/22/2016) Sample Depth 1-2 ft bgs 2-4 ft bgs Aroclor 1016 ND ND Aroclor 1221 ND ND Aroclor 1222 ND ND Aroclor 1232 ND ND Aroclor 1242 ND ND Aroclor 1254 2.76 0.767 Aroclor 1254 2.76 0.767 Aroclor 1250 1.37 1.16 Total PCBs 9.24 2.43 Arsenic 4.2 10.3 Barium 590 637 Cadmium 175 140 Lead 830 719 Mercury 12.8 13.9 Selenium ND ND Silver 11.5 8.7		
Image: state	SSI7-15 0-6" 6-12' 12-18" 18-24" 2-30" Market State Market State	
SS17-17 0-6" 6-12" 12-18" 18-24" 24-30"	Barium 33.3 6.1 Cadmium 0.015 J ND Chromium 20.4 3.8 Lead 3.9 0.88 Mercury ND ND Selenium ND ND Silver ND ND ND ND ND 1-2 ft bgs 3-4 ft bgs ND ND	

Appendix A

Site Borings Completed as of June 2020

Table A-1 Historical Soil Boring Summary Site Investigation and Remediation Work Plan Ashview Terrace Apartments Site Ashwaubenon, Wisconsin

Investigation	Borings	Boring Numbers	Temporary Wells	Installation Method	Boring Depth (ft)	Analytical Collected
OMNI - 2015 :Phase II Site Investigation	3	B1 though B3		Push Probe	5.5	PCBs
AMEC-FW - 2016: Site Investigation	12	SB16-01 through SB16-12	TW16-01	Push Probe	8 to 24	PCBs and Metals
AMEC-FW -2017: Supplemental Site Investigation	5	SB17-01 through SB17-05	TW17-01	Push Probe	8 - 24	* PCBs and Metals
AMEC-FW -2017: Supplemental Site Investigation Addendum	2	SB17-06 and SB17- 07		Hand Auger	2.9 and 3.7	PCBs
AMEC-FW - 2017: Hand Probe Investigation	21	SS17-01 through SS17-21		Hand Probe	2.5	None - Visual for Paper Sludge
Total	43					

* One sample at SB17-04 collected for VOCs and PAHs

wood.

Checked: JMR