

Beggs, Tauren R - DNR

From: David De Courcy Bower <david.decourcybower@erm.com>
Sent: Thursday, March 22, 2018 2:28 PM
To: Beggs, Tauren R - DNR; Marie Venne
Cc: Podlaski, Rick
Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Tauren,

Thank you for the quick reply!

Regards,

David

David de Courcy-Bower, P.E.
Principal Consultant

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"The Business of Sustainability"

From: Beggs, Tauren R - DNR [mailto:Tauren.Beggs@wisconsin.gov]
Sent: Thursday, March 22, 2018 1:59 PM
To: Marie Venne <Marie.Venne@erm.com>
Cc: David De Courcy Bower <david.decourcybower@erm.com>; Podlaski, Rick <Rick.Podlaski@thermofisher.com>
Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Hi Marie,

This email acts as my notice to proceed with the supplemental information for the work plan with the following comments:

- For investigation of benzene at MW-11S area, I would recommend limited sampling for PVOC + naphthalene, maybe one sample to the north and one to the south within 10-15' of MW-11S at the same depth interval. Since you will have equipment out there for other work, installing a couple quick shallow soil borings on the front end should be pretty minimal additional work and can put to rest any site investigation questions the closure committee may have about that area at the time this case is reviewed for closure, which can save time on the back end.
- I agree a request with fee for cumulative PAH risk assessment can be submitted.
- The approach for the VAS-24 area seems appropriate.
- The soil gas sampling approach seems appropriate. DNR recommends only sampling for the contaminants of concern (chlorinated VOCs) for vapors and collecting the soil gas sample within a few feet above the groundwater table.

FYI – This email does not act as an official approval of the site investigation work plan or site investigation. Approval with a formal written response from DNR can only be provided if the applicable review fee is submitted with the request.

If you have any questions, please feel free to give me a call.

Thanks,

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Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Marie Venne [<mailto:Marie.Venne@erm.com>]

Sent: Monday, March 19, 2018 3:01 PM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>

Cc: David De Courcy Bower <david.decourcybower@erm.com>; Podlaski, Rick <Rick.Podlaski@thermofisher.com>

Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Hi Tauren, I'm assisting David on the Former Hamilton Industries Site in Two Rivers. ERM proposes the following supplemental work to address the four questions you had last Monday (the 5th) after reviewing the Additional Site Investigation Report and speaking to David on the phone.

1. *Delineation of benzene in shallow soil at MW-11S.*
 - a. The shallow soil sample results collected at 3 feet below ground surface (ft bgs) at MW-11S did not exceed the direct contact residual contaminant levels (RCLs), but did exceed the soil-to-groundwater RCL for benzene. However, there were no detections of any constituents in the deeper soil sample collected at 10 ft bgs. Furthermore, no evidence of staining or odors were noted and photoionization detector (PID) readings were 0.2 parts per million (ppm) or less in soil boring VAS-5. Additionally, neither benzene nor any other petroleum compounds were detected in any of the Site groundwater wells. Given that MW-11S is located in an asphalt parking lot, the shallow petroleum related detections are most likely attributed to incidental leaks, drips and spills from parked vehicles and the asphalt surface rather than a larger source, and deeper soil and groundwater results indicate that shallow detects are not impacting the groundwater. Therefore, ERM believes these detections are sufficiently delineated and no further delineation is warranted at this time.
2. *Delineation of non-industrial direct contact exceedances of benzo(a)pyrene in LSB-2 and LSB-4.*
 - a. Given the low detection levels of petroleum related compounds in these borings, ERM proposes to evaluate these results using a risk based approach by evaluating carcinogenic polycyclic aromatic hydrocarbons (cPAHs) on a cumulative basis as outlined in WDNR guidance RR-079 and RR-087. If the detected concentrations exceed the cumulative non-industrial direct contact RCLs, ERM will propose additional work to delineate these detections. To facilitate this approach, we will submit a Request for Technical Assistance (Form 4400-237) and associated fee for the cPAH evaluation.
3. *Delineation of VAS-24 area and confirmation of initial PAL exceedance in groundwater.*
 - a. Trichloroethylene (TCE) was detected at 1.8 ppm in the groundwater sample collected at 10.5 ft bgs in VAS-24, but was not detected in deeper groundwater samples. Upgradient (VAS-23) and side-gradient (VAS-20/MW-19S) groundwater samples did not detect TCE. ERM proposes to install a well at VAS-24 to confirm the presence of TCE at concentrations above the PAL. If TCE is detected in the monitoring well, ERM will propose additional work to delineate the extent of the TCE in groundwater.
4. *Potential vapor concerns from the southern groundwater plume to the bar located on the corner of Jefferson and East River Street.*
 - a. ERM proposes to install and sample one soil gas probe between the building on the corner of Jefferson and East River Street and the groundwater plume to assess the potential for vapor intrusion risk to the building. The sample will be collected and evaluated in accordance with WDNR guidance RR-800.

If you concur, this email will be a supplement to the previously submitted work plan and ERM will complete the activities outlined above in addition to commencing quarterly groundwater sampling for CVOCs as recommended in the Additional Site Investigation Report. Based on the results of the work (Items 1 through 4), ERM will prepare a Remedial Action Options Report to address impacts at the site.

Regards,
Marie

Marie Venné, PE
Senior Engineer

ERM

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From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]
Sent: Monday, March 05, 2018 3:19 PM
To: David De Courcy Bower <david.decourcybower@erm.com>
Subject: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Hi David,

It was nice talking through this site with you today. To summarize our call, there were four items I had questions about for the investigation:

- Delineation of benzene in shallow soil at MW-11S. Doesn't appear to be impacting groundwater. Area formerly a parking lot.
- Delineation of non-industrial direct contact exceedances, benzo(a)pyrene found above direct contact in LSB-2 and LSB-4
- Delineation of VAS-24 area and confirmation of initial PAL exceedance in groundwater, not likely a large source in this area; primary operations of the site are further south where higher concentrations were found in groundwater.
- Potential vapor concerns from the southern groundwater plume, bar located on the corner of Jefferson and East River St.

I think that covers what we discussed. If you have any questions, please feel free to contact me.

Thanks,

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Tauren R. Beggs

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