Joslin, Richard R - DNR

From: Beth Erdman <berdman@generalengineering.net>
Sent: Friday, July 19, 2019 7:58 AM
To: Joslin, Richard R - DNR
Cc: Chuck Anderson; gene@valleyenvironmentalresponse.com; Mitch Hubert; Cory Spejcher
Subject: Additional Spill Information: Solberg
Attachments: A.1. GW Analytical Table - GW From UST Backfill.pdf; A.1. GW Analytical Table - DNR.pdf; Figure 4 - Soil and Groundwater Sample Location Map.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning Rick,

As a follow up to our conversation earlier this week and pending your meeting with DNR staff to discuss how to move forward with Solberg, I have attached additional information including a table with the historic analytical results collected from the UST backfill at the location of the oil UST (the northeastern black dot on the concrete pad of the attached map). These samples were collected during the pump down's required to complete the repairs to the UST system at the site and are representative of concentrations in the pea gravel backfill of the UST bed. As you can see the numbers have come down significantly when compared to the numbers in the table I sent last week. This reduction is likely a result of water removal conducted during repairs. As you know, the water pumped from the UST bed during repairs has been containerized in frac tanks and is being treated, tested and ultimately disposed of at Green Bay Metro Sewerage district. To date, 21,000 gallons has been disposed of and approximately 40,000 more gallons is being treated in frac tanks for future disposal.

It should be noted that the UST system design would allow for additional water samples to be collected from the tank bed at the site to further monitor the concentrations within the tank backfill if needed.

Please let me know if you have further questions or need additional information.

Thank you,

Beth

Beth A. Erdman
Environmental Project Manager | General Engineering Company
916 Silver Lake Drive | PO Box 340 | Portage, WI 53901
P 608-742-2169 | F 608-742-2592 | C 608-697-8004
berdman@generalengineering.net
www.generalengineering.net

TABLE A.1.
GROUNDWATER ANALYTICAL RESULTS
THE SOLBERG COMPANY

Monitoring Well	NR 140		Tank Bed GW (above oil tank)		
Sampling Date	ES	PAL	3/20/2019	4/8/2019	4/26/2019
FLASHPOINT (degrees Farenheit)					
Flashpoint	NE	NE	110	125	NA
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOC) (µg/L)					
Benzene	5	0.5	**2030**	**2540**	**560**
Ethylbenzene	700	140	**1860**	**1950**	**850**
Methyl tert-butyl ether (MTBE)	60	12	<14	<28	<28
Naphthalene	100	10	**490**	**330 J**	<210
Toluene	800	160	**13,500**	**16,800**	**7500**
1,2,4-Trimethylbenzene	480	96	**2100**	**1540**	**770**
1,3,5-Trimethylbenzene			**4600**	**340**	**182 J**
m&p-Xylene	2000	400	**6900**	**7300**	**3800**
o-Xylene			**3600**	**3500**	**1900**

NE = NR 140 Standard Not Established
J = Analyte detected above laboratory limit of detection but below limit of quantitation.
D = Result not applicable due to sample dilution
Bold indicates analytical results above NR 140 ES
Italics indicates analytical results above NR 140 PAL
NA= Parameter not analyzed
µg/L=micrograms per liter
mg/L=miligrams per liter

TABLE A.1.
GROUNDWATER ANALYTICAL RESULTS
THE SOLBERG COMPANY

Monitoring Well	NR 140		GW-1	GW-2	GW-3	GW UST
Sampling Date	**ES**	**PAL**	**6/27/2019**	**6/26/2019**	**6/27/2019**	**6/26/2019**
FLASHPOINT (degrees Farenheit)						
Flashpoint	NE	NE	NA	NA	NA	NA
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOC) (µg/L)						
Benzene	5	0.5	<0.32	<0.32	<0.32	**95**
Ethylbenzene	700	140	<0.29	<0.29	<0.29	*305*
Methyl tert-butyl ether (MTBE)	60	12	<0.24	<0.24	<0.24	<12
Naphthalene	100	10	<1.3	<1.3	<1.3	**186 J**
Toluene	800	160	<0.29	<0.29	<0.29	**1380**
1,2,4-Trimethylbenzene	480	96	<0.46	<0.46	<0.46	**840**
1,3,5-Trimethylbenzene			<0.67	<0.67	<0.67	**226**
m&p-Xylene	2000	400	<0.52	<0.52	<0.52	**2120**
o-Xylene			<0.7	<0.7	<0.7	**1090**

NE = NR 140 Standard Not Established

J = Analyte detected above laboratory limit of detection but below limit of quantitation.

D = Result not applicable due to sample dilution

Bold indicates analytical results above NR 140 ES

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Figure 4 - Soil and Groundwater Sample Location Map

7/10/2019 8:54:39 AM

1:240

0 0.00275 0.0055 0.011 mi

0 0.0045 0.009 0.018 km

Brown County
Brown County WI

maps.gis.co.brown.wi.us

Joslin, Richard R - DNR

From: Beth Erdman <berdman@generalengineering.net>
Sent: Wednesday, July 10, 2019 9:51 AM
To: Joslin, Richard R - DNR
Cc: Chuck Anderson; gene@valleyenvironmentalresponse.com; Mitch Hubert; Cory Spejcher
Subject: Please Advise: 20190318NE05-1 Solberg Company Gasoline Spill
Attachments: Figure 3 - Excavation Limits Map.pdf; Figure 4 - Soil and Groundwater Sample Location Map.pdf; A.2. Soil Analytical Results Table - DNR.pdf; A.1. GW Analytical Table - DNR.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning Rick,

As a follow up to our telephone conversation, attached you will find the requested excavation limits map, the map identifying the soil and groundwater sample locations associated with the spill response, and the analytical tables for both soil and groundwater.

The spill occurred as the result of spring flooding compromising the UST oil water separator system at the site. It was estimated that approximately 100 gallons of gasoline was released at the time of the spill. The spill was immediately surrounded by absorbent boom and pom pom pending the area drying out. The very wet spring prevented the repairs to the UST system and remedial excavation from taking place at the site until June as the depth to groundwater at the site is very shallow and varied from the surface at the time of the spring flooding to what is now approximately 16" below ground surface. During repairs, the tank bed was dewatered, the water was containerized in frac tanks, treated and properly disposed of at the Green Bay Metro Sewerage District.

On June 24th the final repair was made to the water side of the UST system (southern most tank) necessitating the top of the UST be excavated and exposed. Impacted soil present at the top of the UST was removed and disposed of at WM Ridgeview landfill. Water was again containerized and is being treated for disposal. The excavation was left open following repair. On June 25th through 26th excavation of soils impacted by the spill was completed with soil going to WM Ridgeview landfill. Soil was field screened using a PID throughout the excavation, at greater than 40 locations to further confirm all impacted soil was removed. Excavation ranged from 4 to 12 inches below ground surface with the exception of where it was excavated to make the water UST repair, where the excavation extended to approximately 3 feet.

As directed by WDNR, soil samples (13) were collected approximately every 30 feet along the base of the excavation. Water was not encountered at any of the soil sample locations. Additionally, due to the very shallow depth to groundwater, WDNR directed that groundwater samples be collected from three test pits dug outside the excavation limits and one be collected from the water from the UST system tank bed that had been exposed during the repair. Both soil and groundwater results are included on the attached table. It should be noted that soil at the site consists of silt with some very fine sand. Test pits GW-1 and GW-3 did not produce water the day they were excavated but water was present the following day, June 27th when samples were collected with depth to water being approximately 16 inches below ground surface.

The analytical results did not identify any soil or groundwater results exceeding WAC NR140 or NR720 standards, with the exception of the water sample collected in the UST backfill which contained PVOCs and naphthalene concentrations exceeding NR 140 enforcement standard. Based on the results, it appears the impacts resulting from the spill have been remediated to the extent practicable. There is no indication that residual soil remains as the result of the spill. The water sample collected from the UST backfill is not indicative of groundwater and appears to be localized to the pea

gravel backfill surrounding the UST system based on the clean water results collected from the three test pits surrounding the excavation. At this time please advise on how to proceed as the result of the water sample collected from the UST system backfill exceeding NR 140 standards?

Thank you and if you need additional information or have questions, do not hesitate to contact me at any time.

Beth

Beth A. Erdman
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TABLE A.1.
GROUNDWATER ANALYTICAL RESULTS
THE SOLBERG COMPANY

Monitoring Well	NR 140		GW-1	GW-2	GW-3	GW UST
Sampling Date	**ES**	**PAL**	**6/27/2019**	**6/26/2019**	**6/27/2019**	**6/26/2019**
FLASHPOINT (degrees Farenheit)						
Flashpoint	NE	NE	NA	NA	NA	NA
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOC) (µg/L)						
Benzene	5	0.5	<0.32	<0.32	<0.32	**95**
Ethylbenzene	700	140	<0.29	<0.29	<0.29	*305*
Methyl tert-butyl ether (MTBE)	60	12	<0.24	<0.24	<0.24	<12
Naphthalene	100	10	<1.3	<1.3	<1.3	**186 J**
Toluene	800	160	<0.29	<0.29	<0.29	**1380**
1,2,4-Trimethylbenzene	480	96	<0.46	<0.46	<0.46	**840**
1,3,5-Trimethylbenzene			<0.67	<0.67	<0.67	**226**
m&p-Xylene	2000	400	<0.52	<0.52	<0.52	**2120**
o-Xylene			<0.7	<0.7	<0.7	**1090**

NE = NR 140 Standard Not Established

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Bold indicates analytical results above NR 140 ES

Italics indicates analytical results above NR 140 PAL

NA= Parameter not analyzed

µg/L=micrograms per liter

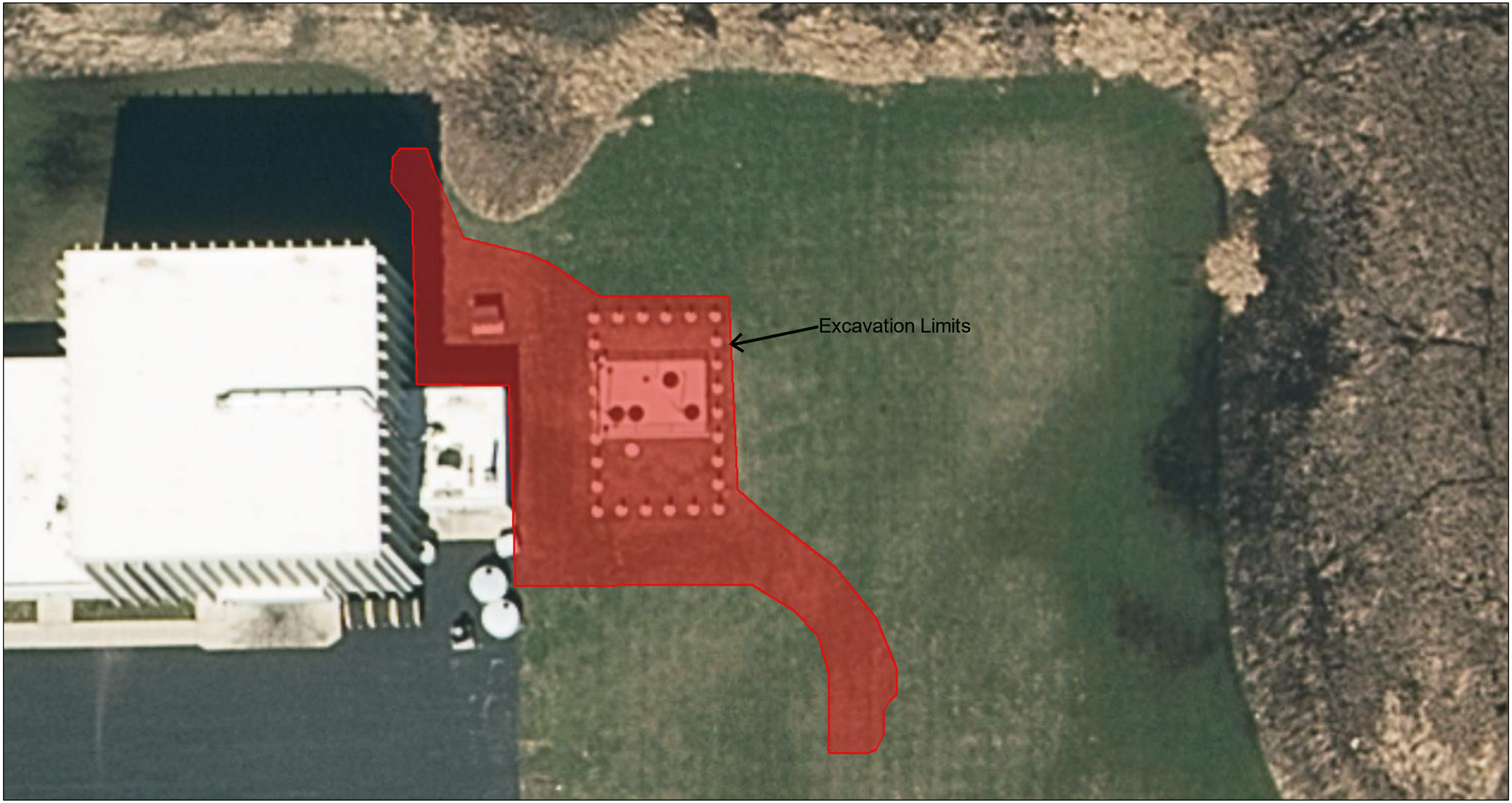
mg/L=miligrams per liter

TABLE A.2
SOIL ANALYTICAL RESULTS TABLE
VALLEY ENVIRONMENTAL RESPONSE - SOLBERG
GEC PROJECT # 2-0119-56L

Sample No.	WDNR Industrial Direct Contact RCL	WDNR Non-Industrial Direct Contact RCL	WDNR Soil to Groundwater RCL	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	SS-10	SS-11	SS-12	SS-13
Sampling Date				6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/26/2019	6/26/2019	6/26/2019
Sample Depth (feet)				6 inches	6 inches	6 inches	6 inches	6 inches	6 inches	6 inches	8 inches	4 inches	4 inches	6 inches	6 inches	8 inches
Saturated/Unsaturated				US	US	US	US	US	US	US	US	US	US	US	US	US
VOLATILE ORGANIC COMPOUNDS (VOCs) (µg/kg)																
Benzene	7070	1600	5.1	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Ethylbenzene	35400	8020	1570	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Methyl tert-butyl ether	282000	63800	27	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Naphthalene	24100	5520	658	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Toluene	818000	818000	1107	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	219000	219000	1382	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	NE	182000		<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	27.1 J	<25
Xylenes, -m, -p	260000	260000	3960	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Xylenes, -o				<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25

J = Analyte detected above laboratory limit of detection but below limit of quantitation.
Bold indicates analytical results exceed NR 720 RCL
RCL = Residual Contaminant Level
DCL = Direct-Contact Levels
NA = Parameter not analyzed
NE = NR 720 RCL not established

Figure 3 - Excavation Limits



7/10/2019 8:38:29 AM

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0 0.00275 0.0055 0.011 mi

0 0.0045 0.009 0.018 km

Brown County
Brown County WI

maps.gis.co.brown.wi.us

Figure 4 - Soil and Groundwater Sample Location Map

7/10/2019 8:54:39 AM

1:240

0 0.00275 0.0055 0.011 mi

0 0.0045 0.009 0.018 km

Brown County
Brown County WI

maps.gis.co.brown.wi.us

Joslin, Richard R - DNR

From: Joslin, Richard R - DNR
Sent: Tuesday, March 19, 2019 8:44 AM
To: mitch.hubert@solbergfoam.com
Cc: Joslin, Richard R - DNR
Subject: Wisconsin DNR Spill Responsible Party Notification for SERTS ID 20190318NE05-1

RR-5538 Wisconsin DNR Spill Electronic Reporting and Tracking System (SERTS) Responsible Party Notification

This notification contains information for the Responsible Party of the spill referenced below. Included is important legal information and links to spill response resources.

March 19, 2019

Spill Occurred: Unknown
Spill Reported: 2019-03-18 14:33
Substance(s): Gasoline - Unleaded and Leaded
SERTS ID: 20190318NE05-1

Spill Location:
1520 BROOKFIELD AVE
Howard, WI
Brown County

Responsible Party:
Solberg Company
Mitch Hubert
Chemist
1520 Brookfield Ave
[NO RP ADDRESS 2]
Green Bay, WI 54313

Notice to Responsible Party

The person identified as the "Responsible Party" pursuant to Wis. Admin. Code § NR 700.03 (51) is obligated to take the necessary response actions to address the hazardous substance discharge or environmental pollution under Wis. Stat. ch. 292.

Obligations

Your legal responsibilities are defined in Wis. Stat. ch.292 and Wis. Admin. Code chs. NR 700-754. In particular, the hazardous substances spill law, Wis. Stat.§ 292.11 (3), states:

> RESPONSIBILITY. A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wis. Admin. Codechs. NR 700 - 754 establish requirements for actions to be taken by responsible parties to restore the environmental to the extent practicable; protect public health, safety, welfare and the environment; and establishes

documentation requirementsassociated with these response actions, where a hazardous substance discharge or environmental pollution has occurred. Wis. Admin.Code § NR 708.05 requires responsible parties to take immediate action to halt a hazardous substance discharge or environmental pollution and minimize the harmful effects of the discharge or environmental pollution to the air, lands and waters of the state, unless otherwise directed by the DNR.

Below are initial actions that should be taken to address a hazardous substance discharge or environmental pollution:

Obtain the services of an environmental responsecontractor and/or an environmental consultant to help ensure that proper immediate actions are taken and documented. Information about environmental consultants and dnr.wi.gov search "environmental consultants" and "spills".

Review, along with your contractor or consultant, Wis. Admin. Code NR 708.05(6) requires the submittal of written documentation to the DNR of immediate actions taken and the outcome of those actions, within 45 days after the hazardous substance discharge notification to the DNR.

Comply with Wis. Admin. Code § NR 708.09, which specifies the requirements for the preparation and submittal of a final report to the DNR documenting the actions taken to respond to the hazardous substance discharge and environmental pollution. Reports may be submitted to the appropriate DNR regional spill coordinator, listed below

Review the remainder of Wis. Admin. Code NR 708 to ensure that all immediate response action requirements have been complied with.

DNR Determination

The DNR will provide a cursory review of the Wis. Admin. Code ch. NR 708 reports, if submitted without a review fee. If no further action is necessary, the DNR will note that in the Bureau for Remediation and Redevelopment (BRRTS) database. If you want a written response from the DNR related to a "no further action" decision, or any other determination, please fill out and submit DNR Form 4400-237with the appropriate fee.

If, however, groundwater wells are affected by the hazardous substance discharge or environmental pollution, if free product removal is required, if there is evidence that contaminated soil may be in contact with groundwater or residual contamination poses a threat to public health or the environment, the DNR shall require additional action per Wis. Admin. Code § NR708.09(2).

Please contact me if you have any questions regarding this notification or you would like to discuss your specific situation in more detail.

DNR Regional Spill Coordinator:

Rick R Joslin
(920) 424-7077
Richard.Joslin@Wisconsin.gov