

From: [Stanek, Linda K - DNR](#)
To: [Brian Schneider](#)
Cc: [Carey, Angela J - DNR](#); [Alessi, Timothy G - DNR](#)
Subject: Hazardous Waste Determination - Spic and Span (FMR) BRRTS # 02-41-585636
Date: Tuesday, March 19, 2024 11:10:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Brian,

As discussed in our meeting on March 19, 2024, Please update your Hazardous Waste Determination to include the following:

- Make a good faith effort to determine if a material is a listed hazardous waste. According to our database, there is a long history of manifesting spent halogenated solvents (F002) from the site. Additionally, the plume is underneath portions of the facility where solvents/PCE were used and stored. It is more likely than not that the contamination is a result of activities including generation of F002 listed waste. Reference to EPA website <https://www.epa.gov/hw/frequent-questions-about-hazardous-waste-identification#pce> regarding management of investigative derived waste containing PCE generated from soil beneath a former dry cleaner.
- Update Hazardous Waste Determination Information Reviewed to determine whether the discharge was a product (U210) or spent solvent (F002).
The facility manifested multiple hazardous wastes under EPA ID WID007947278 from 1988-2017 including listed waste [F002 \(spent halogenated solvents\)](#) which determined spent halogenated solvents met the standard for the F002 waste code from 1988-2006.
- Update records on the composition of the chemicals.
The manifests clearly establish that the determined spent halogenated solvents met the standard for the F002 waste code from 1988-2006.
- Update Characteristic Hazardous Waste Determination – Identified Locations to present the information so that we can review it for concurrence. Discuss/illustrate how the soil samples collected are representative of the soil mass targeted for excavation. Use (1) additional narration, (2) figure(s) that show the sample locations and contaminant concentrations in relation to the excavation, and (3) a table comparing the results (totals and TCLP) to appropriate standards. For example, Figure EXC. 1 “Proposed Excavation and Notes” could be updated with sample locations and text boxes with concentrations of PCE, TCE to show **why you believe samples are representative of the soil excavations.**

- Update Characteristic Hazardous Waste Determination – Testing Results to include Land Disposal Restriction (LDR) standards. Total hazardous constituent concentrations (PCE, TCE) are below the health-based standards (Industrial DC RCLs) for all soil samples, however, for listed waste, soil that is being landfilled **must also** meet the alternative LDR standards (10 times the universal treatment standard) for contaminated soil. For PCE and TCE the LDR is 60 ppm (10x6).
- Explain why TCLP analyses for D039 (PCE) and D040 (TCE) < TCLP standards is representative of the soil targeted for excavation and disposal.
- The 20 times rule was used to establish that TCE is not a characteristic waste and is an appropriate screening tool for soil that meets the SW846 Method 1311 definition of a **solid** sample (>99.5% solid). Confirm that the samples tested for TCLP were unsaturated and no liquid was extracted during sampling analysis.

If you would have any questions with the Hazardous Waste Determination or the report from the Hazardous Waste program's Facilities, Inspections, and Site Tracking (FIST) database, listing the facilities manifests, please reach out to Angela Carey at angela.carey@wisconsin.gov or 608-219-2143. All other questions or comments can be directed to me.

Thanks,

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Linda Stanek

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