

From: [Carey, Angela J - DNR](#)
To: [Stanek, Linda K - DNR](#)
Cc: [Alessi, Timothy G - DNR](#); [Martinez, Joseph J - DNR](#)
Subject: FW: Additional Waste Characterization - Spic and Span
Date: Tuesday, June 11, 2024 1:42:51 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Everyone,

I met with Brian Schneider today and they will be proceeding with the sampling we recommended in the text of the email chain below. Our correspondence back and forth is noted by different colors. He indicated that the sampling may be delayed a few days while they obtain the correct number of sample containers.

Thanks, and let me know if you have any questions about our recommendations and how they satisfy requirements for waste determinations.

Angie

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Angela Carey

Cell Phone: (608) 219-2143

angela.carey@wisconsin.gov



dnr.wi.gov



From: Carey, Angela J - DNR
Sent: Tuesday, June 11, 2024 1:22 PM
To: Brian Schneider <BSCHNEIDER@ramboll.com>
Subject: RE: Additional Waste Characterization - Spic and Span

For our conversation at 1:30...

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Angela Carey

Cell Phone: (608) 219-2143

angela.carey@wisconsin.gov



dnr.wi.gov



From: Brian Schneider <BSCHNEIDER@ramboll.com>
Sent: Tuesday, June 11, 2024 11:54 AM
To: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>
Subject: FW: Additional Waste Characterization - Spic and Span

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Angela,

I have a few minor questions (in red). I will call a little after 1:30.

Thanks,

Brian Schneider, P.E. WI, MI, IL

Senior Managing Consultant

D 262-901-3507

M 262-893-8617

bschneider@ramboll.com

Classification: Confidential

From: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>
Sent: Tuesday, June 11, 2024 11:16 AM
To: Brian Schneider <BSCHNEIDER@ramboll.com>
Cc: Stanek, Linda K - DNR <linda.stanek@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Robert A. Miller <rmiller@spicandspan.com>; Martinez, Joseph J - DNR <Joseph.Martinez@wisconsin.gov>
Subject: RE: Additional Waste Characterization - Spic and Span

Hi Brian,

I have provided comments in **green** within the text of your email below.

I am available today from 1:30-2:00 and 3:15-4:30 if you have any questions about our comments and recommendations.

Thank you,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Angela Carey

Cell Phone: (608) 219-2143

angela.carey@wisconsin.gov



dnr.wi.gov



Classification: Confidential

From: Brian Schneider <BSCHNEIDER@ramboll.com>

Sent: Tuesday, June 11, 2024 8:16 AM

To: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>

Cc: Mitch Levenhagen <MLEVENHAGEN@ramboll.com>

Subject: RE: Additional Waste Characterization - Spic and Span

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Thank you, Angela.

Brian Schneider, P.E. WI, MI, IL

Senior Managing Consultant

D 262-901-3507

M 262-893-8617

bschneider@ramboll.com

Classification: Confidential

From: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>

Sent: Tuesday, June 11, 2024 8:09 AM

To: Brian Schneider <BSCHNEIDER@ramboll.com>

Cc: Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Martinez, Joseph J - DNR <Joseph.Martinez@wisconsin.gov>; Stanek, Linda K - DNR <linda.stanek@wisconsin.gov>; Robert

Miller <rmiller@spicandspan.com>

Subject: RE: Additional Waste Characterization - Spic and Span

Hi Brian,

I received your message yesterday and understand the need for a quick turnaround. We will have comments for you by early afternoon.

Thank you,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Angela Carey

Cell Phone: (608) 219-2143

angela.carey@wisconsin.gov



dnr.wi.gov



Classification: Confidential

From: Brian Schneider <BSCHNEIDER@ramboll.com>

Sent: Friday, June 07, 2024 12:29 PM

To: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>

Cc: Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Martinez, Joseph J - DNR <Joseph.Martinez@wisconsin.gov>; Stanek, Linda K - DNR <linda.stanek@wisconsin.gov>; Robert Miller <rmiller@spicandspan.com>

Subject: Additional Waste Characterization - Spic and Span

CAUTION: This email originated from outside the organization.

Do not click links or open attachments unless you recognize the sender and know the content is safe.

Angela,

Based on the discussion today with Linda, Tim and Joseph, I am writing to propose additional sampling to characterize the soils at the Spic and Span site. To review, soil samples were collected for TCLP analysis for PCE from SB-7 at 4'-6' and SB-12 at 5'-7'. For the sample from SB-7, the total PCE concentration was 19.4 mg/kg and the TCLP was <0.010 mg/L, and for the sample from SB-12 the sample was collected from the interval above the 71 mg/kg sample and the TCLP result was 0.03 mg/L (this was done because the excavation will not go deeper than 7' here). The soil sample analytical data table is attached. Maps showing the soils borings and the proposed excavation areas and depths are also attached.

General Comments:

- Only samples from the excavation area can be used to make the waste determination.
- TCLP results can vary based on several factors including the nature of contamination, total contaminant concentration, and soil heterogeneity. Lower contaminant concentrations can yield higher TCLP values. As a result, conclusions cannot be based on a few TCLP analyses for the highest total contaminant concentrations.
- Limited sampling in relation to the extent of excavation is inadequate to characterize the soil for a waste determination.

There are three areas for excavation (shown on the attached maps):

Area	Volume (CY)	Representative Borings	# Total VOC Samples
A	175 CY.	SB-7	1
1		Middle of excavation depth, highest PCE totals concentration of all samples collected on site except SB-5 and SB-12	
<p>Proposal: No additional sampling because the existing sample is representative of the volume and given the TCLP result of this sample and the data on the 42 other soil samples on site, it is unlikely that a TCLP exceedance would be obtained here.</p>			

Comments/Recommendations:

- One sample from the 4-6' interval is not representative of the 175 CY of soil targeted for excavation.
- Recommend collecting an additional sample from the 6-9' interval (Total and TCLP if necessary) adjacent to SB-7. **One sample, run for totals, if totals are greater than 14 mg/kg run TCLP - Correct.**
- Alternatively, a waste determination can be made for the 0-6' interval, only. **Excavate to 7'? 7' to 8.5' is only about 2 – 3 tons – we can only concur with the material we have data for.**

B	325 CY.	SB-1, SB-2 and SB-3	6
0		SB-2 and SB-3 were included because they are close to the excavation.	
<p>Proposal: Collect a soil sample for TCLP analysis adjacent to SB-1 at 8'-10', and a totals and TCLP sample from 6'-8' adjacent to SB-14. This would yield two TCLP samples and seven totals samples representative of the area.</p>			

Comments/Recommendations:

- SB-2 and SB-3 are outside the limits of excavation and therefore are not representative of the 325 CY of soil targeted for excavation. Data from SB-2 and SB-3 will not be considered in the waste determination.
- Limited or no data is provided for all intervals targeted for excavation. Additional data is needed to support the waste determination for soil in Area B.
- Recommend collecting additional samples from the 4-8' interval (Total and TCLP if necessary) and TCLP from the 8-10' interval adjacent to SB-1. **Composite from 4' to 8' – Correct.**
- Recommend collecting additional samples from the 0-5' and 5-9' interval (Total and TCLP if necessary) adjacent to soil boring SB-14. **Same - Composite sample acceptable. – 4 samples totals, TCLP if indicated – Correct – for Area B, 4 samples run for total and TCLP if indicated.**

C	500 CY.	SB-4, SB-5, SB-12, and SB-21	5
1		The north part of the excavation is well covered by SB-4 and SB-21, limited TCLP data.	

Proposal: Collect a soil sample for TCLP analysis adjacent to SB-4 at 6'-8' and to SB-5 at 6'-8'. This would provide five totals samples and three TCLP samples for this volume.

Comments/Recommendations:

- Limited or no data is provided for all intervals targeted for excavation. Additional data is needed to support the waste determination for soil in Area C.
- Recommend collecting additional samples (Total and TCLP if necessary) from the 2-6' and 6-9' intervals adjacent to SB-4. Rerun totals at 6'-9'? Correct.
- Recommend collecting additional samples (Total and TCLP if necessary) from the 4-8' interval adjacent to SB-5. TCLP Only? Need total concentration for listed waste determination.
- Recommend collecting additional samples (Total and TCLP if necessary) from the 0-4' and 4-9' intervals adjacent to SB-21. O.K.
- Recommend collecting additional samples (Total and TCLP if necessary) from the 0-4' and 4-8' intervals adjacent to SB-12. O.K.

Overall, this would provide PCE TCLP analyses for the locations of the five highest PCE totals results out of all the samples collected, and given the other existing data from the 42 soil samples within the area of less than 1/2 acre, we believe this is more than sufficient to characterize the soil proposed for excavation. See general comments above regarding representative sampling. Borings are conducted adjacent to existing borings in order to take advantage of existing totals data and to avoid the need for an additional utility locate. We agree that placement of new borings adjacent to older borings is appropriate and should be sampled to obtain the data necessary to support an accurate waste determination.

Your prompt attention and comment on to this is appreciated. At the present time, we have a driller available for next week. Please contact me if you have any questions.

Thank you,

Brian Schneider, P.E. WI, MI, IL

Senior Managing Consultant

E & H

D 262-901-3507

M 262-893-8617

bschneider@ramboll.com

Ramboll
234 W. Florida Street
Fifth Floor
Milwaukee, WI 53204
USA

<https://ramboll.com>