



December 20, 2024

--sent by email--

Mr. Andy Selle, City Engineer  
City of Fort Atkinson  
101 N. Main Street  
Fort Atkinson, 53538

**Subject:** Review of “Site Investigation Report and Remedial Action Options Report” for the Former Loeb-Lorman Scrapyard 115 Lorman Street, Fort Atkinson, Wisconsin  
600 Oak Street, Fort Atkinson, BRRTS #02-28-588371

Dear Mr. Selle:

The Department of Natural Resources (Department) reviewed the “Revised Site Investigation Report” (Revised SIR) for the Former Loeb-Lorman Scrapyard site in Fort Atkinson, Wisconsin. The Revised SIR was prepared by Terracon Consultants, Inc. (Terracon) and submitted to the Department on the City of Fort Atkinson’s (City) behalf on July 23, 2023. A ch. NR 749, Wis. Adm. Code review fee was included with the submittal. Portions of Terracon’s March 24, 2023, “Interim Action Report” (IAR), which was submitted without a review fee, were also evaluated during the Department’s review.

The Revised SIR includes investigative findings for 115 Lorman Street, incorporates information from the IAR, and responds to concerns raised in the Department’s September 29, 2022, Review of “Site Investigation Report and Remedial Action Options Report” letter (Review Letter).

The Review Letter was prepared in response to Terracon’s “Site Investigation and Remedial Action Options Report”, which was submitted on July 11, 2022. The Review Letter noted four areas of concern with the project:

1. Many elements of the project were out of compliance with the cleanup rules.
2. The site investigation was not complete, and a revised Site Investigation Report was needed.
3. The proposed remedial action was not approved.
4. The conceptual model and reporting needed further work.

The City undertook an interim action, with excavation of PCB-contaminated soil at four areas, and excavation of light non-aqueous phase liquid (LNAPL) contaminated soil at another area. The interim action was then followed by site restoration, including site grading and placement of what Terracon calls an “interim cap”. The Department appreciates the efforts the City has taken to restore the site and keep conditions protective of human health. However, many of the concerns raised in the Review Letter have not been adequately addressed, notwithstanding the direct responses to those concerns included in Appendix I of the Revised SIR. The Department is not prepared or able to give a detailed accounting of areas of non-compliance and items where concerns have not been adequately addressed, the Review Letter should be reviewed to fill in data gaps and site history as best as able.

## **Site Investigation**

The site investigation remains incomplete. The focus should be on defining the source(s), degree, and extent of the PCB contamination. The site maps provided within the Revised SIR do not give a clear indication of the location and magnitude of the remaining PCB concentrations. There is an area with PCBs exceeding the 50 parts per million (ppm) threshold for TSCA waste. This area was not called out in the Revised SIR or IAR and documentation provided to the Department to-date suggest this area received no special waste handling or protective measures. There is PCB contamination at several areas that exceeds the federal high-occupancy cut-off concentration of 10 ppm. There are many areas where PCBs were detected in shallow soil samples over the industrial residual cleanup level of 1 ppm. The existing maps are insufficient for illustrating the areas of contamination, and for developing plans to fill data gaps.

The metals, polycyclic aromatic hydrocarbons, and volatile organic chemicals (VOCs) detected at the site will also need to be fully evaluated. However, the current data suggest the concentrations are similar to most industrial properties and the means of dealing with them should be straightforward. One caveat is the VOC sampling methodology described by Terracon does not meet the code requirement for immediate sample preservation, and so the existing soil VOC data is considered of low quality because the results are potentially biased low.

### **Interim Cover and Site Grading**

The placement of the “interim cover” did not comply with the design report requirements explained by the Department during the January 24, 2023, teleconference with the Department, Environmental Protection Agency (EPA), the City, and Terracon. The primary concerns resulting from a lack of design plans include:

- The likelihood that contaminated soils were re-worked and redistributed.
- The potential for contaminants (especially PCBs) within the crushed concrete and other fill materials placed at the site.
- Lack of documentation of the cover extent, location and thickness.
- Areas of exposed waste noted along the eastern and northeastern parts of the property.
- The ability to accurately identify boring and excavation confirmation sample locations.

### **Methodology and Reliability of the Site Investigation Results**

As previously stated, the Department is not able to give a full recitation of issues with the work at the site. However, a few examples are presented to show the significance of some of the project shortcomings.

- The detection of the 521 ppm PCBs at sample LA2-6 was not mentioned in the Revised SIR or the IAR. This result is significant because in addition to the site being above the 50 ppm TSCA threshold, it seems likely that PCB-contaminated soil from excavation area 2 was sent to a Subtitle D landfill, something that is not allowed by federal rule.
- There was no geological characterization of the sidewall samples performed during the interim action. Characterizing the material may bolster the conceptual site model of the PCB sources at the site.
- There are several areas of work completed to-date that fell short of code requirements and/or have technical reliability concerns.
  - No field notes were provided by Terracon. Field notes have been requested within the 2022 Review Letter.
  - The sampling methodologies are not adequately described, and the necessary duplicate samples were not collected, per Wis. Adm. Code, NR716.13. Duplicate samples are useful in confirming laboratory results and for documenting soil heterogeneity on a small scale.

- No iso concentration maps showing the distribution and magnitude of soil contamination were provided.
- Documentation Concerns:
  - The chain of custody documentation for borings SB-11 and SB-18 shows the soil samples were collect at 7 p.m. (or later) on November 5, 2022, which would be on a Saturday, over an hour past sunset.
  - Monitoring well MW-2 was reportedly sampled on December 7, 2022, over a month after it was abandoned, on November 4, 2022.
  - The PCB mass removal calculations appear incomplete. For example, at Area 2, the contaminated soil samples that were excavated are assumed to each represent about 100 cubic yards of soil, whereas the worst contaminated sidewall sample (LA2-6) is assumed to represent less than 5 cubic yards. Also, the extent of the contamination is not known, these calculations may be premature.
  - The fill thickness map does not match the relatively uniform soil profile shown on photos of the LNAPL excavation area.

The Department recommends using this letter and previous correspondence to put together a Site Investigation Work Plan to address previous comments and next steps. The Department recommends submitting this workplan with the appropriate fee for review and comment.

If you have any questions or concerns regarding this letter, please contact Brian Waite at (920) 716-0986 or by email at [brian.waite@wisconsin.gov](mailto:brian.waite@wisconsin.gov) to schedule a date and time to meet.

Best regards,



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