

CORRESPONDENCE/MEMORANDUM

DATE: May 5, 2016 FILE REF: Lesperance Property (Former)(LGU) and White Property (LGU)
ERP BRRTS #s 02-36-560273 and 02-36-096500

TO: File

FROM: Tauren Beggs (DNR Project Manager), Roxanne Chronert, Keld Lauridsen, and Kevin McKnight (Closure Committee)

SUBJECT: Project Manager Requested Closure Committee Review to Determine Site Investigation Completeness

Based on the available historic site investigation data from the 1990s for the EPA Removal and DNR Site Assessment at the White Property (White), the March 2013 Phase II Environmental Site Assessment (ESA) data for both cases, and the July 2015 Site Investigation data for both cases, the DNR has determined that the Site Investigation is not complete.

Additional site investigation activities are required. The below information were the topics discussed during the meeting:

- How to address historic off-site samples with soil standard exceedances (S-13 to S-15) collected by EPA in 1994 adjacent to White.
- PCB detection confirmation sampling near historic S-10 sample on White.
- Additional PCB soil and groundwater assessment on White.
- Additional groundwater sampling points in the area of the former above ground storage tanks (ASTs) on the Lesperance Property (Lesperance).
- Inability to delineate industrial exceedances for metals and polycyclic aromatic hydrocarbons (PAHs) in soil fill and evaluation of east half of Lesperance.
- Potential for sediment investigation.
- Surface water Evaluation.
- Appropriate number of BRRTS cases for Lesperance and White.

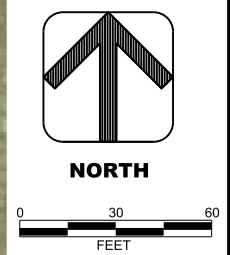
Additional Actions

The following are decisions made by the Project Manager with concurrence from the Closure Committee from the meeting for additional site investigation:

- Historic soil samples (Confirmation soil samples could potentially be collected by DNR since the initial sampling was done by EPA, additional discussion may be needed for this):
 - A soil sample needs to be collected along the White property boundary adjacent to the off-site sample S-13 for PAHs to confirm if there are soil standard exceedances. S-13: benzo(b)fluoranthene @ 440 µg/kg.
 - Cadmium was detected at the background threshold value of 1 ug/kg in S-14, so no metals confirmation sampling is needed along the White property boundary adjacent to off-site sample S-14.
 - A soil sample needs to be collected along the White property boundary adjacent to the off-site sample S-15 for mercury, arsenic, and PAHs to confirm if there are soil standard exceedances. S-15: mercury @ 3.7 mg/kg, arsenic @ 24.5 mg/kg, and benzo(b)fluoranthene @ 440 µg/kg.
 - A soil sample S-10, collected near a historic soil pile area in 1994 on White had PCB Aroclor

1260 at 1.7J mg/kg. A confirmation soil sample SGP-3 collected in December 2012 within approximately 20-30 feet of S-10 had no detection of any PCB aroclors. Therefore, the DNR does not require any further sampling in this area for PCBs.

- Concur with consultant recommendation that additional soil delineation is needed for PCBs around soil sample AGP-7 on White.
- In addition, groundwater will need to be assessed in the AGP-7 area on White since PCB concentrations were above the soil to groundwater pathway standard. This proposed groundwater sampling location is also within the most contaminated portion of the volatile organic compound (VOC) plume, so should be analyzed for VOCs as well.
- Two groundwater monitoring wells need to be installed on Lesperance, one near HA-17/SGP-21 area to assess upgradient, and one within the ASTs area.
- Resampling of the groundwater monitoring wells installed in 2015 is needed.
- Metal and PAH exceedances in soil above industrial direct contact standards on Lesperance and White are unable to be delineated, so are assumed to be across the property from property boundary to property boundary. Exception for Lesperance: There is limited soil data on the east half of Lesperance within the direct contact zone in the soil fill. Additional soil samples need to be collected and analyzed for PAHs and metals within the upper four feet to assess if direct contact exceedances are present on the east half of the property. If no exceedances, an argument could be made to exclude the east half of the property from capping requirements.
- There is historic sediment data adjacent to White and Lesperance. Additional sediment investigation is being conducted in the area in the near future. When future sediment data is received by DNR, the DNR will re-evaluate if there is a need for any further sediment investigation. The County can choose to sample prior to or concurrent with the upcoming sediment investigation in the area before further evaluation of future data is completed by the DNR and/or provide justification for these sites.
- A surface water data evaluation was completed by Jim W. Schmidt and he concluded no surface water assessment is needed.
- One round of vapor sampling was completed in sub-slab below buildings on Lesperance. Concentrations detected were well below commercial sub-slab vapor risk screening levels, so additional sampling is not needed.
- The primary contamination are metals and PAHs from historic soil fill with some limited contamination of VOCs and PCBs; therefore, Lesperance and White will continue to only have one BRRTS case for each site.
- The County has the local government unit (LGU) exemption for Lesperance and White and may invoke it at any time.



LEGEND

- AGP-11 SOIL PROBE
- ⊕ AMW-2 WATER TABLE OBSERVATION WELL
- APZ-1 PIEZOMETER
- ▲ VP-1 VAPOR PROBE
- ✕ SURFACE WATER SPOT ELEVATION
- ⊕ GP-8 WDNR SOIL BORING LOCATIONS - 1999
- ▲ S-14 EPA SOIL SAMPLE LOCATIONS - 1999
- MW-612 WPS MONITORING WELLS
- ⊕ SGP-24 SIGMA SOIL BORINGS - 2012
- (T-16) HISTORIC TANKS - REMOVED
- G — NATURAL GAS LINE
- - - G - - - HISTORIC U.S. OIL PIPELINE

NOTE: THIS DRAWING WAS PREPARED IN COLOR. REPRODUCTION BY MEANS OTHER THAN EQUIVALENT COLOR COPYING MAY CAUSE SOME DATA TO BE LOST OR MISREPRESENTED.

GOOGLE EARTH PRO IMAGERY DATED 5/14/13

7/10/2015
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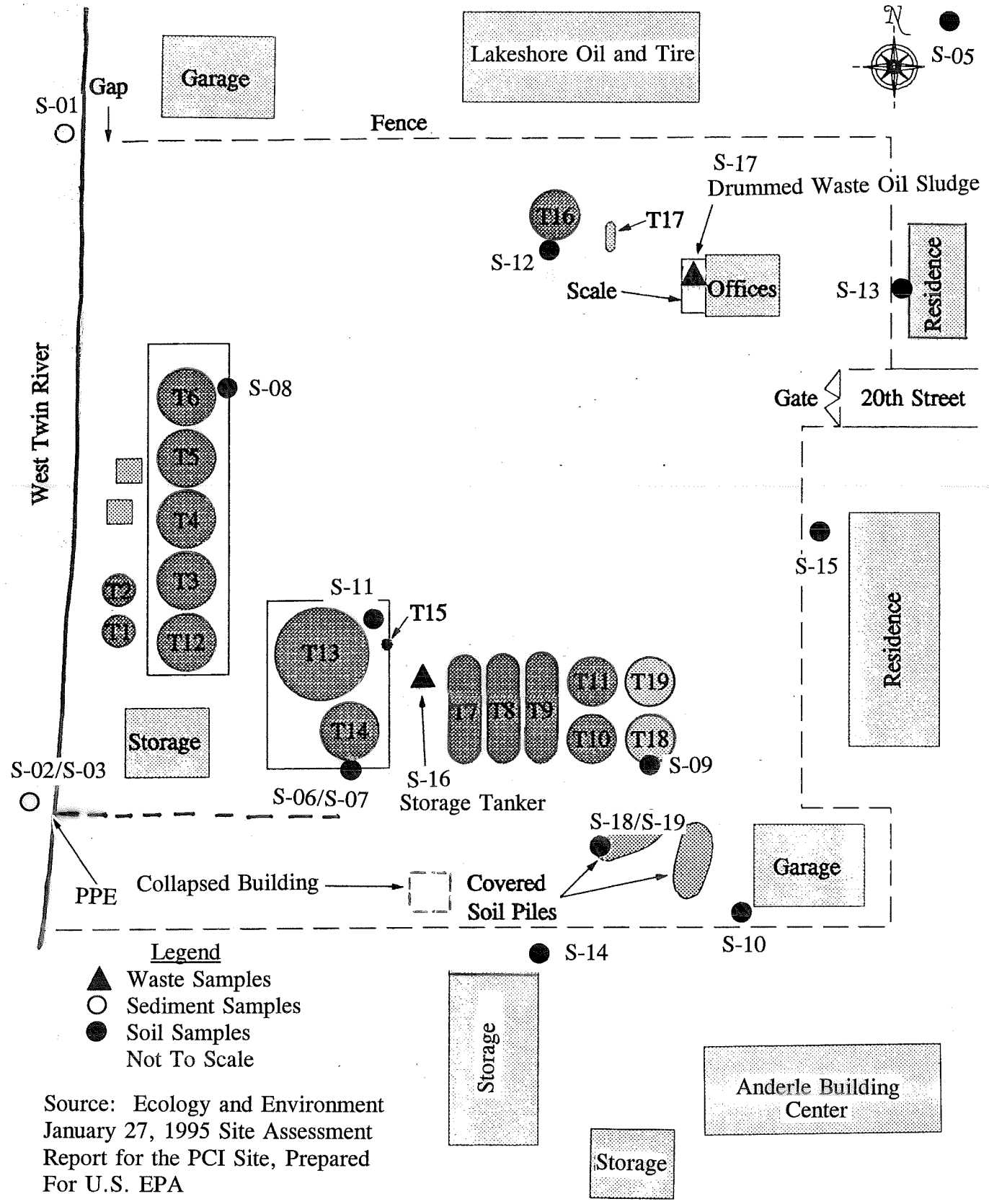
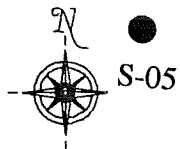
DR. BY	T. SHUPERT	BOOK NO.	
CHK. BY	J. STEINER	JOB NO.	19-0558,00
DATE	APRIL 2015	SCALE	AS SHOWN
NO.		DATE	
REVISION		NO.	
REVISION		DATE	

1910 20TH STREET & 2022 SCHOOL STREET
TWO RIVERS, WISCONSIN



SITE MAP

DRAWING NO.
2



- Legend**
- ▲ Waste Samples
 - Sediment Samples
 - Soil Samples
 - Not To Scale

Source: Ecology and Environment
 January 27, 1995 Site Assessment
 Report for the PCI Site, Prepared
 For U.S. EPA