

Beggs, Tauren R - DNR

From: Scherbert, Lynn <scherbtrl@AyresAssociates.com>
Sent: Wednesday, June 7, 2017 4:27 PM
To: Beggs, Tauren R - DNR
Cc: Honea, William
Subject: RE: Initial Comments for Site Investigation Report: White and Lesperance Properties

Hi Tauren,
Let us go through the rest of your bullet points and get things updated where we can and then we'll follow up.
Thank you,
Lynn

Lynn L Scherbert, PE

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From: Beggs, Tauren R - DNR [mailto:Tauren.Beggs@wisconsin.gov]
Sent: Wednesday, June 07, 2017 4:22 PM
To: Scherbert, Lynn <scherbtrl@AyresAssociates.com>
Cc: Honea, William <HoneaW@AyresAssociates.com>
Subject: RE: Initial Comments for Site Investigation Report: White and Lesperance Properties

Hi Lynn,

Yeah I understand regarding the data compilation. For my reference, as part of my review of the last investigation report, I went through the DNR files for the sites and grabbed all the data tables I could find, then scanned and consolidated them into PDFs. I have a PDF for the soil data tables and a PDF for the groundwater data tables. I tried converting them to renderable text in Adobe Pro to see if the copy and pasting function would be usable, but unfortunately it doesn't work very well. I can send you these PDFs if you think that would be helpful to you to expedite any data compilation for these sites.

Please let me know if you would like a copy of them for your use.

Thanks,

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Tauren R. Beggs

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From: Scherbert, Lynn [mailto:scherbtrl@AyresAssociates.com]
Sent: Wednesday, June 07, 2017 4:00 PM
To: Beggs, Tauren R - DNR
Cc: Honea, William
Subject: RE: Initial Comments for Site Investigation Report: White and Lesperance Properties

Hi Tauren,

We'll see if we can update with isoconcentration data for you and the borehole abandonment forms – odd that they were not in the previous report but we'll check.

Historical data we have some but I'm not sure if we have enough of the data to literally compile comparative tables – that could literally be days of work depending upon where the information is and what form it may have been in. We'll see about getting as much as possible updated.

Lynn

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From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]

Sent: Wednesday, June 07, 2017 3:54 PM

To: Scherbert, Lynn <scherbertl@AyresAssociates.com>

Subject: Initial Comments for Site Investigation Report: White and Lesperance Properties

Hi Lynn,

I started looking at the site investigation report submitted for the above referenced sites. I have some comments so far:

- There needs to be isoconcentration (plume) figures included in the report to show the interpretation of degree and extent of contamination in soil and groundwater based on all the data that has been collected for these sites. As far as the historical data collected (Sigma, EPA, DNR, WPS), it looks like you have all the sample locations on the figures, but do you have access to the old data or have the old data compiled at all? Compiling the data and comparing to current standards will eventually have to be done as part of the closure requests, once these sites would eventually get to a point of closure. It would likely be better to do that now, so all the tables are compiled as part of the site investigation, then when we get to an endpoint with these sites, the data will already be ready for the closure request. I understand there has been a lot of data collected at these sites throughout the years from multiple consultants and soil standards have changed multiple times, so it has made this site complicated to review both from a consulting and regulatory perspective.
- Borehole abandonment forms (Form 3300-005) need to be included in the report for soil borings that were not converted to monitoring wells. I also noticed that these were not included in the 2016 Site Investigation Report for the previous soil borings installed either, so you can include those in this report with the other abandonment forms that are needed.
- Soil to groundwater pathway RCLs are incorrect. These RCLs for Wisconsin are calculated with a dilution factor (DF) of 2, so when looking at the soil RCL spreadsheet (found at the attached link: <http://dnr.wi.gov/topic/Brownfields/Professionals.html>), the correct values are under the column with heading 2.00 (for example benzene RCL is 0.0051 mg/kg, not 0.0026 mg/kg).
- AGP-13 confirmed the non-industrial direct contact standard exceedances for PAHs adjacent to historical sample S-13, so I will need to discuss this unusual issue with my supervisor on how to proceed moving forward.
- The new PAH standards (March 2017) have decreased the amount of soil samples above industrial and/or non-industrial direct contact standards.
- Additional soil and groundwater sampling has recently been conducted on the WPS property, which includes some samples just north of the Lesperance property boundary. The report has not been submitted to the DNR yet, so I do not have those results yet.
- For an update on sediment sampling plans, WPS plans to initiate sediment sampling in early July 2017, which includes sampling of sediment adjacent to the Lesperance and White Properties.

If you would like to discuss any of the above comments with me, please feel free to contact me.

Regards,

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