

LeRoy, Bruce J - DNR (BJ)

From: LeRoy, Bruce J - DNR (BJ)
Sent: Wednesday, September 18, 2019 8:20 AM
To: Renier, Joe M
Subject: Ashview RAP/Risk Analysis Review - BRRTS # 02-05-564043

Categories: Track

Joe,

The Northeast Region peer review committee and central office Technical Resources Section Chief reviewed the remedial action concept/drawings and risk analysis you prepared for Ashview. If you were to submit the RAP with the proposed remedy, we would not approve it without additional pre-design investigation.

The site investigations you completed determined the nature and extent of contamination. The DNR reviewed the investigations without fee and agreed to move on to a remedial action plan. The site's PCB, lead and mercury concentrations in soil create a direct contact risk according to NR 720, indicating the need for removal and/or capping. On two occasions the DNR reviewed drawings (without fee) that you prepared for the RAP. Your plan proposes to cover small portions of the property that are not already covered with concrete or buildings. Your plan does not propose to cover all grass areas on the property where a direct contact risk may still remain.

Your risk analysis proposes a concentration average for each compound with an upper confidence limit. The UCL replaces individual concentrations for comparison to direct contact standards. Based on DNR guidance RR-991 (Compliance Averaging of Soil Contaminant Concentration Data), the data sets used for UCL calculations appear to contain multiple sample populations (Guidance Document Example #1). For that reason, the calculations can't be accepted as submitted.

Very little sample information exists for the top 12 inches of soil, which is the range most critical to mitigating a direct contact risk. The samples you used for the risk analysis mostly occur below two feet. Boring logs indicate that sludge exists in the top 12 inches of soil. Using samples from below 2 feet to estimate what occurs in the top foot of soil is not allowable.

In discussing this site in comparison to other PCB sites in the RR program, we do not allow areas to remain uncovered that potentially contain PCBs, lead or mercury above direct contact standards within the top foot of soil. We have no precedence for it. While we agree on the nature and extent of contamination, the on-site distribution of contamination is not well known for the remedy you proposed.

The DNR agrees that sludge is the best indicator of contamination at a PCB site. If you want to pursue covering only portions of the grass areas on site, additional pre-design investigation is necessary to understand where sludge may be present in the top 12 inches of soil. Another option is to cap all the grass areas, either with a removal/replacement of soil, or by adding cover material over the top of existing grass areas.

In the future for this site, it may be beneficial to you to submit documents with a fee for DNR review. The DNR typically charges a fee for the two RAP meetings we've had on this case. You can find fee information here; <https://dnr.wi.gov/topic/Brownfields/Fees.html>.

Let me know if you have questions or want to discuss the project further.

BJ

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B.J. LeRoy, PG

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