



October 18, 2019

City of Chilton
Mr. Todd Schwarz, Director of Public Works
42 School Street
Chilton WI 53014

Subject: Site Investigation Review
Chilton Plating, Chilton Plating Adjacent Property, and Schneider Property.
BRRTS# 02-08-000632, 02-08-000040, and 02-08-551794

Dear Mr. Schwarz:

This letter provides the City of Chilton (the City) a response to a fee-based review request for multiple properties acquired by the City. Chilton Plating and the Schneider Property have been open environmental repair (ERP) cases since 1981 and 1995 respectively and the City is interested in redevelopment of the sites. The progression towards closure of these cases has also been stalled since 2008 for Chilton Plating and 1995 for the Schneider Property. Historical site investigation work was performed by the Wisconsin Department of Natural Resources (DNR) and previous responsible parties. More recent investigation work was performed by the City. The City requested this specific review for development planning and consideration of grant requests to assist in continued environmental repair at the properties. The City acquired the properties by means to receive exemption as a responsible party under the Local Governmental Unit (LGU) exemption. The work described work in this letter will be needed in order to meet the requirements of Wis. Adm. Code § NR 726 to obtain case closure by the City or a future property owner.

Following review of the information submitted to the DNR, the DNR determined that the site investigation is not complete and additional soil, groundwater, and sediment sampling will be necessary to meet Wis. Adm. Code § NR 716 standards. The following is a list of actions to provide general guidance to the City with the development of future environmental remediation work plans. Additional actions may be necessary pending additional investigation activity and the best available information.

General Comments:

- Historical soil and groundwater data should be integrated into future technical documents submitted to the DNR.
- A separate case will be created for the petroleum discharge identified at 415 E Main Street.
- BRRTS case numbers 02-08-551794 (Adjacent Property) and 02-08-000632 (Schneider Property) can be merged into one case with 02-08-000040 (Chilton Plating). All parcels are currently owned by the City and separate discharges of hazardous substances were not identified on these 2 parcels outside of impacts from Chilton Plating.
- Case creation and merging to be done after consultation with the City.

Sediment:

- Additional sediment sampling should be considered within the South Branch Manitowoc River (the River) in the area of the high soil concentrations for nickel and cyanide at B-3, and downstream of SED-2.

- Sampling should be performed in the various geomorphic features such as pools and bars where deposition is occurring, even downstream of the SED-1 sample (there appears to be an area north of the bridge and GS-16 where deposition may occur). Sediment sampling should also be performed along the River cross-section from bank to bank.
- Depending on the degree and extent of sediment contamination, remedial action may be necessary to address the contamination in the sediment.

Utilities:

- Utility corridors (onsite, offsite, and historic) should be evaluated as conduits for groundwater and vapor migration.

Vapor Intrusion:

- Chlorinated volatile organic compound (CVOC) vapors have been identified in sub-slab sampling.
- Currently, the site buildings are not occupied, and it is recommended that site buildings are not occupied unless vapor mitigation is performed.
- Any development will need to account for the vapor intrusion pathway in building construction or remodeling of the current structures to be protective of human health.

Parcel Specific Comments:

415 E Main Street:

- Additional soil sampling is necessary to define the degree and extent of volatile organic compound (VOC) contamination. Sampling to the west of SGP-27 and into the right of way of E. Main Street is recommended.
- Groundwater monitoring well installation and monitoring for VOCs is recommended in the vicinity of SGP-7 (upgradient of SMW-4) and in the ROW East of SGP-30 (downgradient of SMW-4).

Chilton Plating Property: (including Chilton Plating additional parcel and Schneider Property)

Soil - Metals and Cyanide:

- Metals and cyanide figures should be created for each major contaminant to facilitate review.
- Additional soil samples in the building under the plating lines should be considered to better define the degree and extent of metal contamination (hexavalent chromium). This would be helpful in planning remedial action and evaluation of soils as hazardous waste.
- Degree and extent of metals contamination is not defined across the property.
 - Additional sampling of nickel and lead on eastern and western portion of property. (Note Chilton Plating building crosses property line onto Schneider parcel.)
 - Hexavalent chromium sampling northeast of building (B1-B9 hexavalent chromium not evaluated in 1988 investigation)

Groundwater - Metals and Cyanide:

- The existing monitoring well network should be sampled for metals. Some of the existing monitoring wells have not been sampled for several years and others have not been sampled for metals or only for hexavalent chromium.
- Installation of additional wells to define degree and extent of metal groundwater contamination to be evaluated after sampling. Additional well(s) to the east and west of the building appear to be warranted based on historic data.

- Monitoring well network should define contaminant plume preventive action limit (PAL) and enforcement standard (ES) exceedances and provide data regarding potential surface water impacts.

Petroleum VOCs:

- Evaluation of source(s) of methyl tert-butyl ether (MTBE) in monitoring wells SMW-3 and MW-3/CPMW-03 above the ES and PAL is needed. MTBE was not observed at 415 E Main St.

Soil - CVOC:

- The degree and extent of CVOC contamination in soils is not defined. Soil samples should be considered to the west (Chilton Plating Adjacent), eastern portion of Schneider parcel, and offsite across E Main St. to the southeast.

Groundwater - CVOC:

- Evaluate the need for a piezometer at MW-3/CPMW-03 location to define vertical extent of CVOC contamination.
- Evaluated the need for an additional monitoring well south of CPMW04A to determine if CVOC groundwater contamination extends across E. Main Street.

Per- and Polyfluoroalkyl Substances (PFAS)

- This site was operated as a chromium metal plating facility since 1960. The use of PFAS is associated with chromium metal plating operations in Wisconsin and throughout the United States. This site may be a source of PFAS contamination.
- Information previously provided for this facility indicates there was a discharge from chromium metal plating activities which are historically linked to PFAS use. Site Investigation Scoping (Wis. Admin. Code § NR 716.07) and the Site Investigation Work Plan (Wis. Admin. Code § NR 716.09) require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with discharges.
- The DNR requests that you submit a work plan to investigate PFAS contamination at the Chilton Plating Site (BRRTS# 02-08-000040).

The DNR will be contacting you to meet to discuss the contents of this letter to facilitate the City's redevelopment efforts. Please contact me at 920-424-7890 or by email at kevin.mcknight@wisconsin.gov with any questions.

Sincerely,



Kevin D. McKnight
Hydrogeologist
Remediation and Redevelopment Program

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