

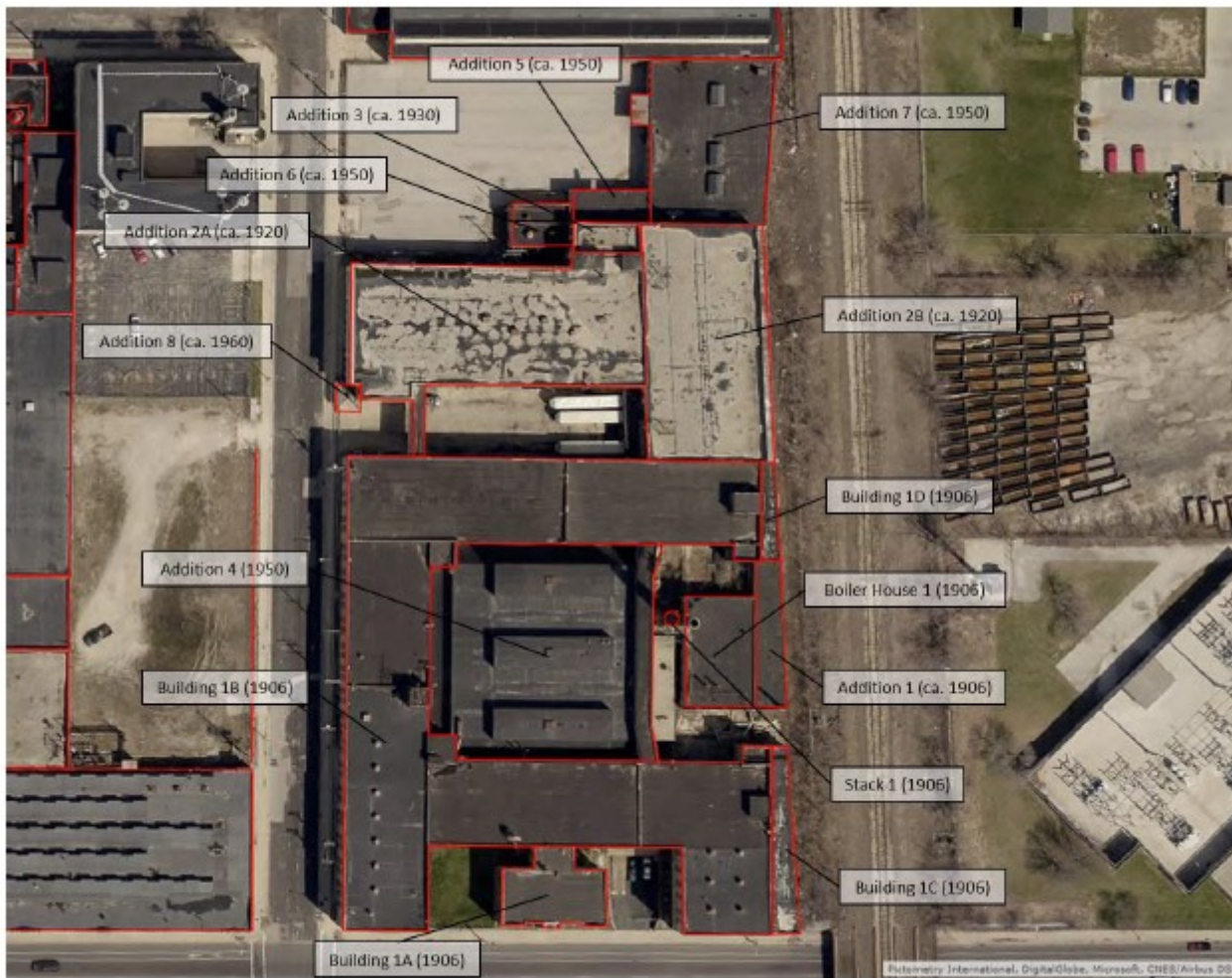
## Pfeiffer, Jane K - DNR

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**From:** Robert Reineke <rreineke@ksinghengineering.com>  
**Sent:** Friday, April 30, 2021 12:13 PM  
**To:** Pfeiffer, Jane K - DNR; Daniel Pelczar  
**Subject:** RE: Community Within the Corridor - East Block (02-41-263675) - Additional Information Requested for Site Investigation Work Plan (SIWP)

Jane,

You requested additional response in regards to the SIWP. Please refer to the figure below which labels the various areas of the building.



Please find our responses below.

### *I. Source identification (scoping the investigation)*

*Wis. Admin. Code § NR 716.01 states that the site investigation must define the extent and degree of contamination and identify the source(s) of contamination. Furthermore, Wis. Admin. Code § NR 716.07(1) requires that the history of the site or facility, including industrial land uses that may have been associated with one or more hazardous substance discharges, be evaluated.*

*A. Discuss the widespread distribution of trichloroethylene (TCE) related to a conceptual site model. Discuss potential sources and source areas of TCE at this site. Given the presence of high moisture content clay soils beneath the building, it appears unlikely that there was widespread migration through vapor and/or groundwater from a single release/source area.*

KSingh concurs that there have likely been several source areas of contamination. Based on soil sampling results, the TCE plume identified in the previous investigation encompasses Additions 7 (“1” Factory), 6 (transfer house), 5 (loading dock) 3 (loading area), 2B (packing plant), 2A (factory), and 8 (guard house). Source areas were the USTs in the northern courtyard, Addition 7, and Addition 2A.

For the remainder of the building, Addition 4 (Heat Treating Plant) was investigated previously with GTS-26 and GTS-27 performed in and adjacent to Addition 4 with no source detected. Heat treatment does not use TCE in processes.

Boiler House 1 and Addition 1 (coal house) are not considered sources of contamination as no factory activity occurred within the structures.

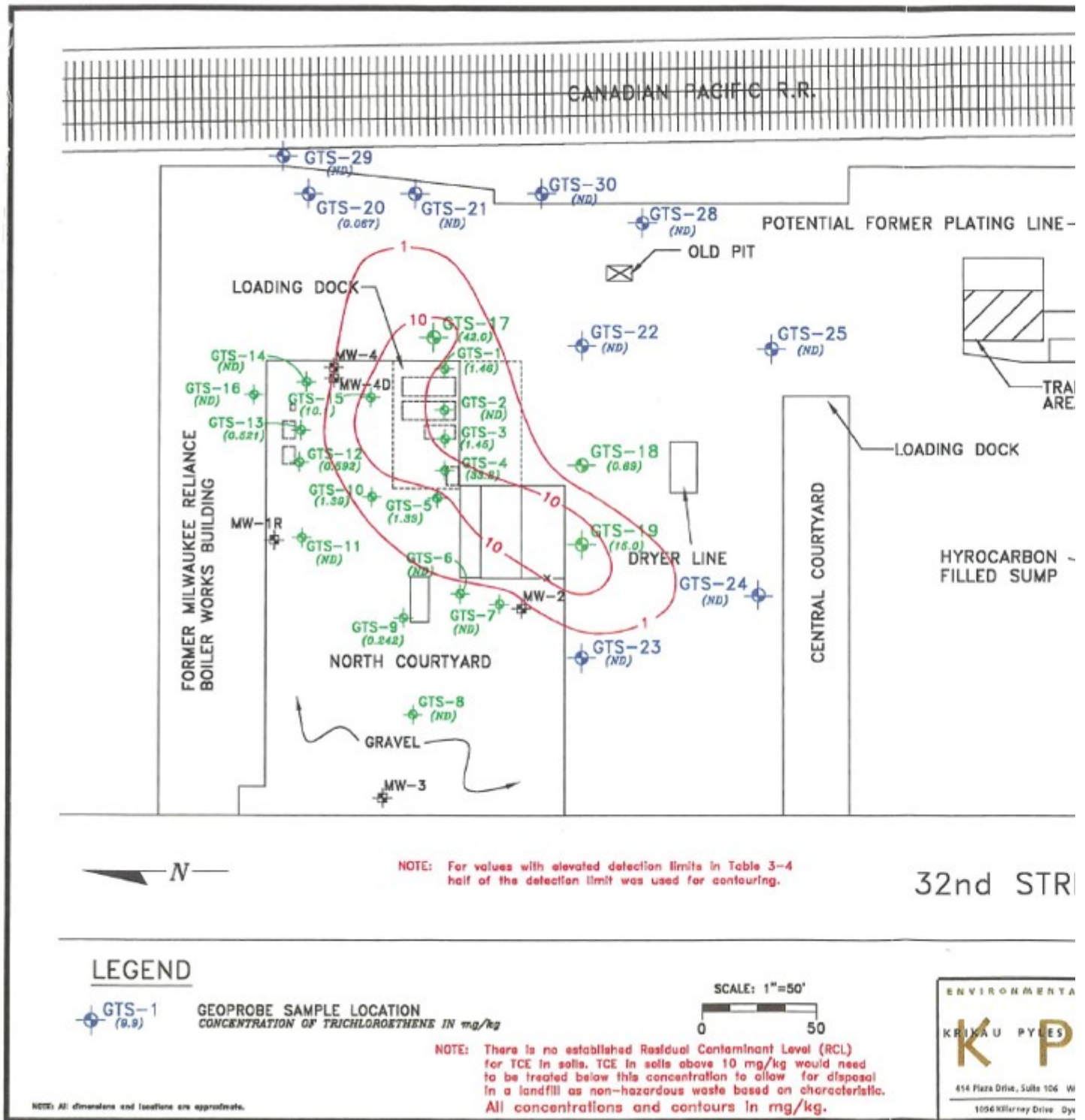
Building 1D (shipping shed) was utilized for loading and unloading rail cars and not for factory purposes. No source is suspected in this area.

Building 1B is the historic factory where the majority of detected TCE was found during the current soil sampling. Building 1B is considered a source area due to historic factory operations in this area. TCE sources may be found throughout Building 1B.

Building 1C (shipping shed) was utilized for loading and unloading rail cars and not for factory purposes. No source is suspected in this area.

Building 1A is a historic office building. No source is suspected in this area.

The historic investigation of TCE is shown on the following figure with geoprobes GTS-17 through GTS-26 and GTS-28 performed within the building (Addition 7, Addition 2A, Addition 2B, and Addition 4).



Historic uninvestigated areas include much of Building 1B which we believe to be the source of the previously undiscovered releases.

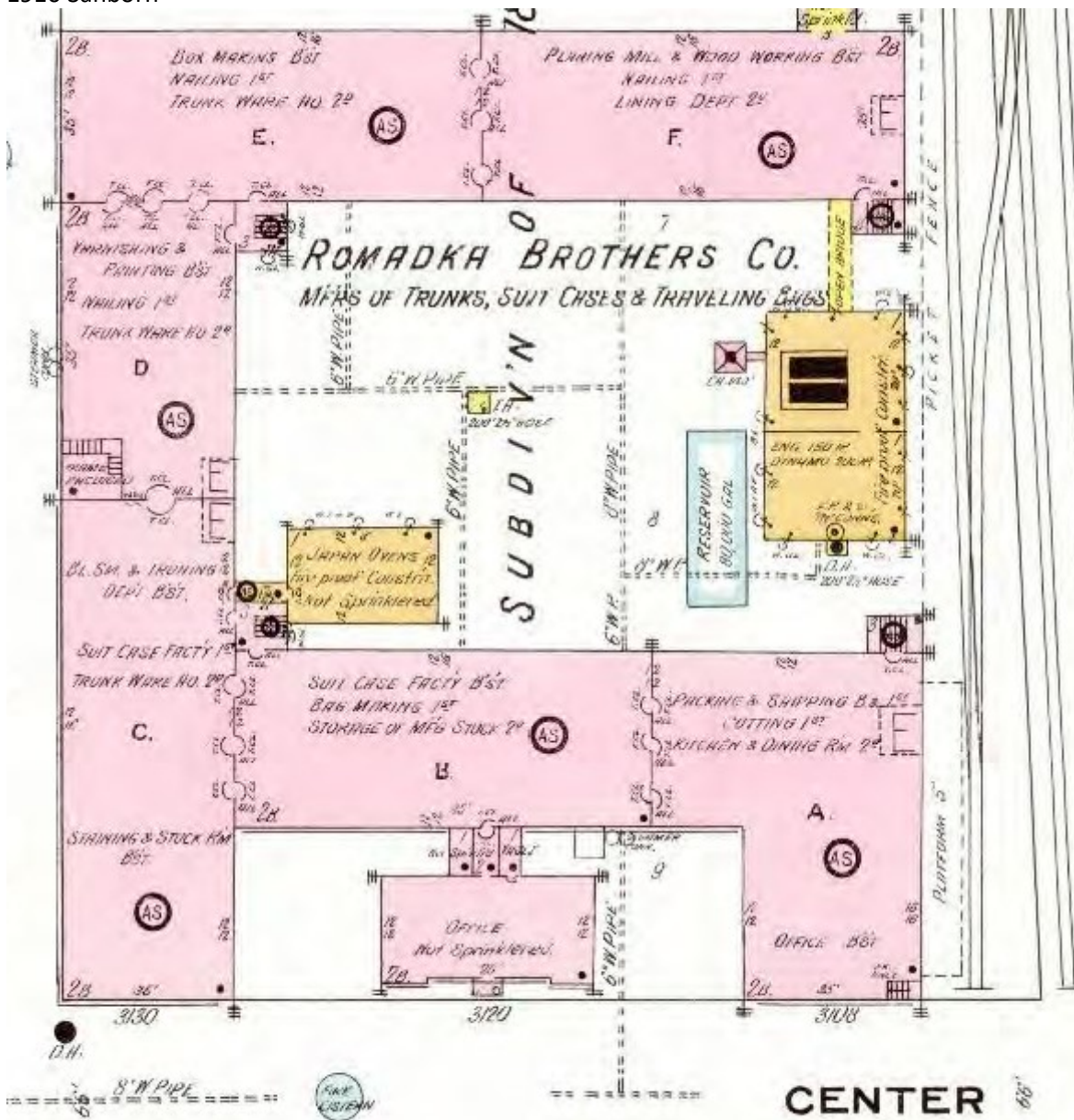
*B. Considering the historical use of the site, discuss whether there were degreasing stations throughout the building, and if possible, discuss the specific locations of these stations. Incorporate interviews from the Phase I ESA in your discussion, as applicable.*

As discussed above, buildings 1B, 2A, 2B, and addition 7 are suspected source areas of TCE where manufacturing was performed. Building 1B was the only suspect area that was previously uninvestigated. Sanborn maps don't identify

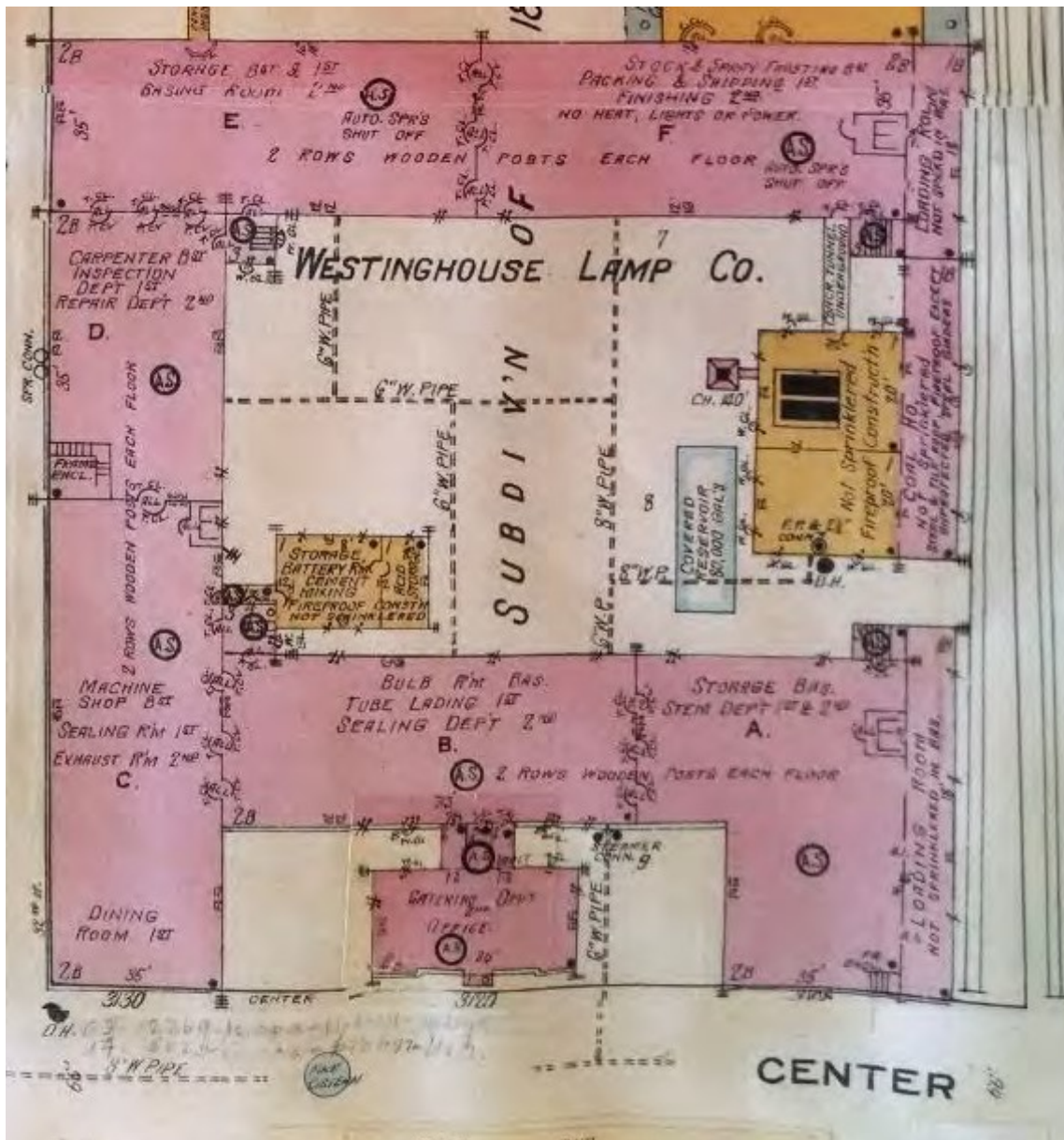


specific degreasing stations, but building 1B W and 1B SW are identified as having historic painting and machine shop uses. These were the locations where the greatest concentrations of TCE were encountered.

1910 Sanborn



1928 Sanborn



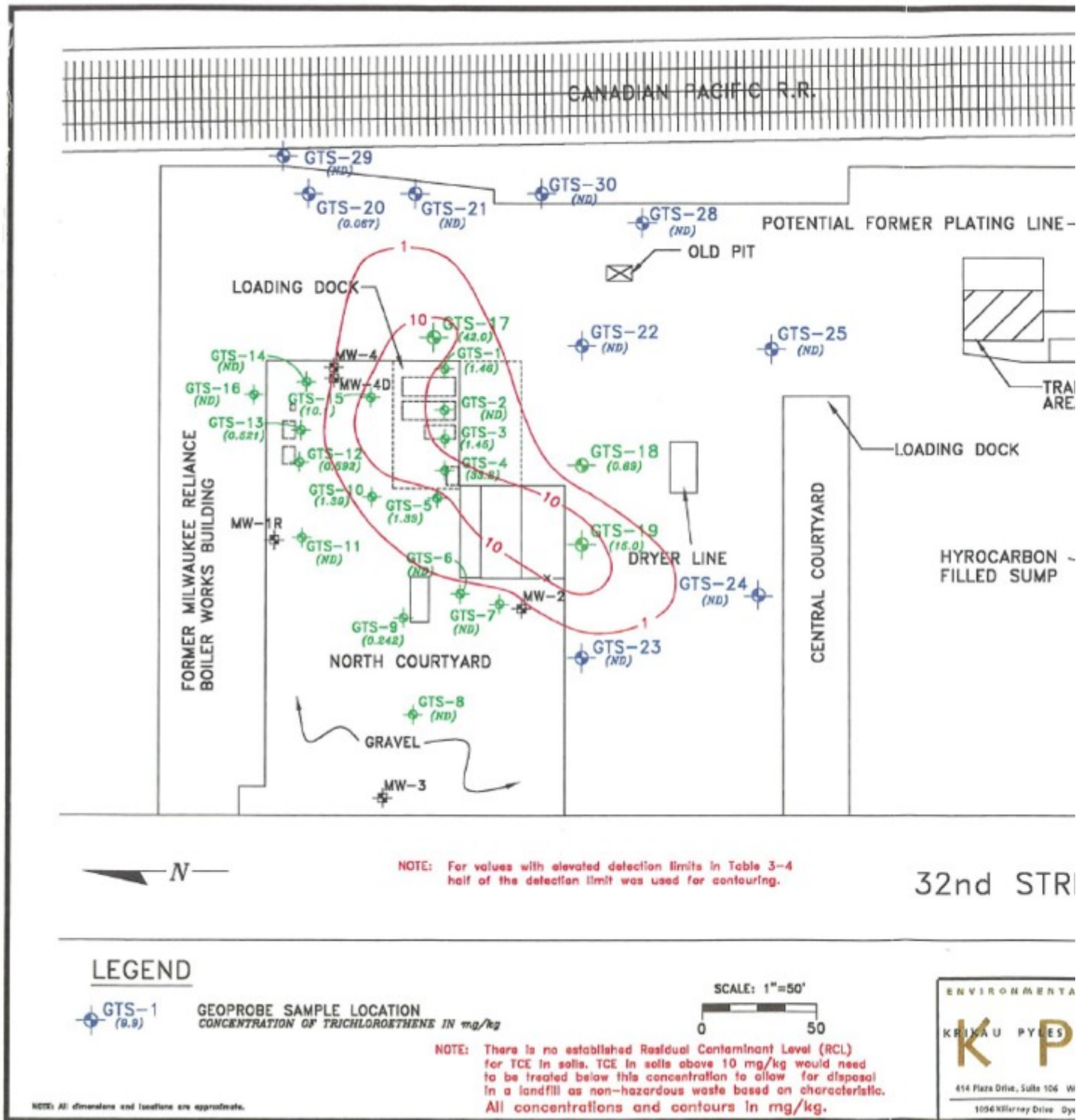
Interviews did not identify any specific locations of degreasing operations. In general, shipping and storage was on the east end of the plant and industrial operations were on the western portions which is consistent with the findings of the investigations to date.

II. Addressing previous investigations during future site investigation activities (scoping the investigation and work plan development) Wis. Admin Code § NR 716.09(2)(f)(8) requires a discussion of how sampling results will relate to results of any previous investigations.

A. Provide historic site figures showing the location of contamination associated with the historic site investigation conducted prior to the 2008 case closure. Discuss the potential new sources of contamination as they may relate to previous investigations.

As discussed above, the historic investigation did not include Building 1B. See below for the historic figure included in the SIWP.





8 soil samples have been collected in building 1B and the greatest concentrations of TCE were encountered in the West and Southwest portions of building 1B.

Soil borings WB-B-MW-4, EB-B-20, EB-B-21, EB-B-22, EB-B-24, & EB-B-25 with associated monitoring wells are designed specifically to delineate the extent from sources in Building 1B with interior soil samples providing information on the magnitude of contamination.

Please let us know if you require any further information. Thanks.

Robert T. Reineke, P.E.



262.821.1171, ext. 111 (p) | 262.424.5191 (cell)

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**From:** [Pfeiffer, Jane K - DNR](#)

**Sent:** Wednesday, April 28, 2021 12:16 PM

**To:** [Daniel Pelczar](#)

**Cc:** [Robert Reineke](#)

**Subject:** Community Within the Corridor - East Block (02-41-263675) - Additional Information Requested for Site Investigation Work Plan (SIWP)

Greetings Daniel,

My name is Jane Pfeiffer and I am the DNR Project Manager for the above-referenced site. I am currently reviewing the SIWP, submitted to the DNR on April 19, 2021, and noticed that some of the information requested in the DNR's *Review of Remedial Action Design Report* letter (attached), dated April 9, 2021, was omitted from the work plan. Therefore, please send the information outlined below at your next earliest convenience:

- Provide a response to parts A and B of section I of the site investigation segment of the April 9, 2021 DNR letter. The information presented in Appendix A of the SIWP should be considered and incorporated in this discussion.
- Provide a response to part A of section II of the site investigation segment of the April 9, 2021 DNR letter. The information presented in Appendix C of the SIWP should be considered and incorporated in this discussion.

Please note that the DNR plans to formally review this SIWP during a peer review session next week. Therefore, if possible, please submit the above information to the RR electronic submittal portal by this Friday, April 30, 2021. Please let me know if you have any questions.

Thank you,

Jane

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**Jane Pfeiffer**

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