



June 2, 2022

City of Chilton  
Mr. Chris Marx, Director of Public Works  
42 School Street  
Chilton WI 53014  
Via electronic mail to: [chiltdpw@chiltonwi.com](mailto:chiltdpw@chiltonwi.com)

SUBJECT: Review of Site Investigation Report – Additional Investigation Needed  
Chilton Plating Co. Inc, 420 East Main Street, Chilton, WI  
WDNR BRRTS #: 02-08-000040  
FID #: 408026300

Dear Mr. Marx:

On March 21, 2022, the Wisconsin Department of Natural Resources (DNR) received a *Site Investigation Report Addendum* for the above-referenced site, dated February 2022, and submitted by your consultant, The Sigma Group, Inc (Sigma) on your behalf. The report was accompanied by the appropriate fee, required under Wisconsin Administrative Code § NR 749.04(1), for formal DNR review and response. Based on review of your submittal, DNR has determined that additional work is needed to complete the site investigation.

## Background

Environmental investigation activities have been conducted on property since 1988 to identify potential and known contamination associated with the long-term use of the site for the Chilton Plating Company. The site is comprised of three parcels all currently owned by the City of Chilton and is adjacent to the South Branch of the Manitowoc River. Investigations have included soil, groundwater, vapor, and sediment analysis with the most current sampling events having occurred in 2020 and 2021. The site is associated with multiple spills including: a release from a faulty drain channel resulting in the discharge of rinse water to the river via a storm drain, a release of non-chlorinated plating solvents to the soil; and a release of wastewater from the brass holding tank.

Historic use of the site includes long-term use as the Chilton Plating Company (1960-2008), and used as a salvage yard, machine shop and bulk oil facility. Chilton Plating Company primarily conducted zinc, chrome, and nickel electroplating. Tanks and/or barrels containing nickel, chrome, cadmium, and/or cyanide were located at the site and used during the electroplating process. A nine square foot open top vapor degreaser containing trichloroethylene (TCE) was utilized to clean the metal prior to plating and an aboveground storage tank (AST) containing TCE was located in the northeast corner of building. Due to the known use of the site for chrome plating, the facility likely utilized per- and polyfluoroalkyl substance (PFAS) (primarily perfluorooctanesulfonic acid (PFOS)) as wetting agent to prevent production of toxic hexavalent chromium fumes by chromic acid baths.

## Review of the Site Investigation

The DNR reviewed the Site Investigation Report Addendum (SIR) and available historical site investigation documentation in the case file and determined that the SIR is not complete and additional work is needed to meet the requirements of Wis. Admin. Code ch. NR 716. Additional investigation is needed to fully define the degree and extent of soil, groundwater, and sediment contamination at the site. In addition to the proposed recommendations by Sigma in the SIR, the DNR recommends addressing the following deficiencies:

- Degree and extent of soil contamination is not complete. Additional sampling for hexavalent chromium is needed to the northwest of HA-1.
- Recommend another round of groundwater samples for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), PFAS, and Resource Conservation and Recovery Act (RCRA) metals from all monitoring wells for consistency with results.
- Evaluate total chromium in sediment. The evaluation may be completed by sampling the sediment at locations of hexavalent chromium J-flag detections, or by sampling shallow soil along the river bank (north of the hand auger samples) for total chromium. Note that if only soil is investigated, additional sediment sampling may be necessary depending on the total chromium identified in soil. Total chromium is being requested for two reasons:
  1. Hexavalent chromium is present at levels of concern in the sediment and current guidance is not sufficient to evaluate it; and
  2. Based on an evaluation of the ratio of hexavalent chromium vs total chromium observed at this site in soil, total chromium levels may also be a concern in sediment based on the results of the hexavalent chromium sampling.

### Additional Requests

The DNR is recommending the following items for future submittals:

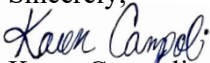
- Sample results from 415 E. Main were included in this SIR; as a reminder, this will be a separate case, so future submittals should not include this data as it will be in the 415 E. Main evaluation.
- Sediment results must be compared to soil residual contaminant levels (RCLs) in addition to threshold effect concentration (TEC), midpoint effect concentration (MEC), & probable effect concentration (PEC). Soil RCLs should be included on the sediment analytical data tables for future submittals.
- Clarify why B-13, B-16, & B-17 are missing from the Table 1 Soil Analytical Data.
- Redraw lead delineation on figures and include in future submittals. The lead background threshold value (BTV) cannot be used for this site, no metal samples were collected from Schneider Property (East property), but low levels of lead in NW corner, not near manufacturing activities; therefore, there is a lead source present onsite.

### Schedule

- The DNR requests the submittal of a site investigation work plan to address the comments identified above. Please be aware that based on the results of the sampling, additional work may be necessary to complete the site investigation.
- Site investigation results are requested to be submitted to the DNR in a SIR Addendum after completion of the field investigation and receipt of laboratory data. The DNR suggests that the SIR be submitted with a fee for review and response.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have questions regarding this letter, please contact Karen Campoli at (920) 510-4349 or via email at [Karen.Campoli@wisconsin.gov](mailto:Karen.Campoli@wisconsin.gov).

Sincerely,

  
Karen Campoli

Hydrogeologist -Remediation and Redevelopment Program

cc: Stephen Meer, The Sigma Group, Inc ([smeer@thesigmagroup.com](mailto:smeer@thesigmagroup.com))