

## Pfeiffer, Jane K - DNR

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**From:** Pfeiffer, Jane K - DNR  
**Sent:** Friday, September 22, 2023 7:50 AM  
**To:** Shane LaFave  
**Cc:** Pratap Singh; Que El-Amin; Hoverman, Robert R - DNR (Rob); Mylotta, Pamela A - DNR; Nobile, Trevor W - DNR; Lara Page; Harpke, Lauren R.; Hughes, Audra A - DNR; Angy Singh  
**Subject:** Community Within the Corridor (CWC) - East Block (02-41-263675) - Comments on Soil Sampling Plan

Good Morning Shane,

On September 15, 2023, the DNR received *Soil Sampling Plan* (the Plan), prepared by K. Singh & Associates, Inc. on behalf of CWC for CWC East Block. The Plan was submitted in response to the DNR's September 7, 2023, *Remedial Action Options Report Review* letter. The Plan states the following requests:

- *"We request that WDNR approve the "contained-out" decision for TCE contaminated soils with concentrations less than 8.8 mg/kg as soon as possible in order to begin excavation next week.*
- *We request that if WDNR has any feedback or comments as we move forward with sampling in areas with documented TCE in soil greater than 8.8 mg/kg that they notify us as soon as possible.*
- *For a project of this magnitude and complexity, we request to schedule a meeting with WDNR on a monthly basis to move the project forward."*

Given the time sensitive nature of CWC's requests, the DNR provides the immediate comments below:

- Two areas of remedial soil excavation are planned within Unit 1050. Based on the concentrations of TCE identified in soil samples collected immediately north and east of Unit 1050, the DNR requests that at least one soil sample be collected from each of these areas of excavation in Unit 1050 to determine whether the soil is a characteristic hazardous waste prior to excavation and disposal.
- One area of remedial soil excavation is planned within the northern mechanical room. The excavation in this room is planned from 0-4 ft below ground surface and the nearby sample location VE-4 was collected from 0-1 ft below ground surface, which means that the TCE concentrations from the 1-4 ft soil interval near this excavation area have not been determined. Furthermore, this planned area of remedial soil excavation is in close proximity to the former underground storage tanks located in the northern courtyard. Given this information, collect at least one soil sample from within the 4 ft excavation area to determine whether the soil is a characteristic hazardous waste prior to excavation and disposal.
- All of the planned pre-excavation soil samples where total TCE exceeds 10 mg/kg must be further analyzed using TCLP to determine whether the soils in the area of excavation are a characteristic hazardous waste. A concentration of 10 mg/kg for total TCE is determined based on RCRA's "20 times" rule. More specifically, for TCE, any soil sample that is greater than 20 times the toxicity characteristic TCLP value of 0.5 mg/kg (i.e., 10 mg/kg), should be analyzed using TCLP to determine whether the soil is a characteristic hazardous waste prior to excavation and disposal.
- The DNR does not have any additional revisions or requirements concerning the pre-excavation soil sampling presented in the Plan, other than the comments listed above.
- The DNR will work to schedule a meeting with CWC for the month of October to discuss the status of both CWC East Block and CWC West Block. The DNR will work to organize this meeting in separate email correspondence. The DNR will not organize monthly meetings with CWC at this time, however, additional meetings can be scheduled in the future as they may be needed. The DNR looks forward to continuing to work to provide CWC

with expedited DNR reviews, as may be needed and as is feasible, for the both CWC East and CWC West Block submittals.

- A \$700 technical assistance fee was submitted with the Plan. Given that a \$1,050 technical assistance fee was already submitted by CWC with the July 25, 2023, *Remedial Action Options Report*, the Plan will be reviewed under the \$1,050 fee and the \$700 fee submitted with the Plan will be returned to CWC.

Lastly, to assist in our final review of the Plan, the DNR requests that the following information be presented as soon as feasible:

- In the *“Proposed Additional Soil Sampling Plan”* section of the Plan, K. Singh provides the pre-excavation soil sample intervals. Clarify whether these samples are to be collected from the impacted soil and not from the clean, imported fill that was used during recent redevelopment activities. Clarify the depth below ground surface that the samples will be collected.
- Figure 5 of the Plan shows eighteen soil sample locations near sample location HS-5 and the *“Proposed Additional Soil Sampling Plan”* section of the Plan indicates that there will be a total of 24 pre-excavation soil samples collected near HS-5. Confirm the total number of sample locations near HS-5 and the exact locations from where these will be collected. Update Figure 5 as may be necessary to be consistent with the narrative presented in the Plan.

After the above requested information is submitted, the DNR will provide CWC a letter response to the Plan with additional comments for your consideration that will not conflict with the above DNR comments. The purpose of this email was to provide the more immediate feedback that was requested by CWC in the Plan. The DNR’s goal is to provide CWC with a letter response to the Plan by early October, pending the submittal of the requested additional information to the DNR. Please do not hesitate to reach out should you have any questions.

Thank you, Jane

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Jane K. Pfeiffer

Hydrogeologist - Remediation & Redevelopment Program

Wisconsin Department of Natural Resources

Phone: (414) 435-8021

[jane.pfeiffer@wisconsin.gov](mailto:jane.pfeiffer@wisconsin.gov)

