From:	Egan, Alice M - DNR
Sent:	Monday, April 27, 2020 10:00 AM
To:	Gross, Erin
Cc:	Binder, Rick; 'deb.sielski@co.washington.wi.us'
Subject:	RE: Case Closure Requirements: Niphos Coatings Inc. (Former) (BRRTS #02-67-561163)

Hi Erin,
We have reviewed your email. We have the following recommendations:

1. The DNR approves the use of one inch diameter groundwater monitoring wells.
2. In the DNR's case closure not approved letter, we requested collecting groundwater samples from 14 wells. You indicated that 2 wells are in good condition with the rest questionable or removed/damaged. We could potentially approve the installation of fewer wells. Provide a figure with the locations of the proposed new wells and an explanation of how the locations will determine the plume characteristics.
3. We are requesting VOC sampling for groundwater samples because of past uses of the site and the need to confirm previous results.
4. Characterization of the waste material is not a requirement for case closure. This was a reminder that regulations require that during renovation or demolition of the building that the concrete floor be managed appropriately.
5. A cap over the entire site may not be necessary to be protective. Provide a rationale for capping the entire site including a figure of the extent of the cap, the purpose of the cap (direct contact/infiltration), each type of capping material present or proposed (including thickness, etc. and current condition) , and how the cadmium contaminated concrete would be appropriate as part of the cap.

What do you mean when you state the wells are removed/damaged? These wells should be abandoned according to Wis. Admin. Code § NR 141.25.

Provide the DNR with a site investigation work plan with the information requested above. If you would like to discuss this email, I am available at 414-940-9722.

Best regards,
Alice

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From: Gross, Erin <Erin.Gross@stantec.com>
Sent: Thursday, April 16, 2020 3:21 PM
To: Egan, Alice M - DNR <Alice.Egan@wisconsin.gov>
Cc: Binder, Rick <Rick.Binder@stantec.com>; 'deb.sielski@co.washington.wi.us' <Deb.Sielski@co.washington.wi.us>
Subject: Case Closure Requirements: Niphos Coatings Inc. (Former) (BRRTS #02-67-561163)

Hello Alice,

Rick and I have reviewed the Case Closure NR 726 Not Recommended letter dated April 2, 2020 and wanted to set up a call with you this **Tuesday April 21, 2020 at 10am** if you are available. Deb Sielski of Washington County would attend the call. We would like to discuss and receive clarification on the following items:

- The site was visited by Rick Binder and a representative from Washington County on April 3, 2020 and the status of the temporary wells on site was inspected. The following **wells were indicated as needing to be replaced** (see the attached figure for locations):
    - TW6 – Removed
    - TW7 – Removed/Damaged
    - TW8 – Removed/Damaged
        - Can we discuss this possibly not needing to be sampled as:
            - Has historically not been above the PAL/ES
            - TW11 has historically been below the PAL as well and is closer to the perimeter of the plume than TW8
    - TW9 – Removed/Damaged
    - TW11 – Removed/Damaged
    - TW13– Removed/Damaged
    - TW15 – Removed/Damaged
    - TW17 – Removed/Damaged
        - Could potentially get a cart rig east of the building and delineate the plume further east
    - The following wells could be sampled:
        - TW10 – Questionable
        - TW12 – Good condition
        - TW14 – Good Condition
        - TW16 – Questionable
        - TW18 – Questionable

- For the new wells, if deemed necessary, would these be approved to be **1”-diameter PVC wells** with 0.01-inch slot size 10-foot long screens as they were previously?
    - As previously done by AECOM and Stantec, these wells’ screens would be backfilled with a clean sand filter pack, up to one foot above the PVC screen and granular bentonite to the surface
    - Developed prior to sampling, which will consist of purging until the resultant water is low in silt/sediment to an appropriate volume given hydrogeological environment (given the well diameter and groundwater depth)
- We do not anticipate soil sampling during well installation. We had discussed blind drilling the new wells to save on costs with the driller as we already have soil data in these areas
- Why would we be sampling the **groundwater for VOCs**? Looks like arsenic and lead are the PAL/ES exceedances reported.
    - It looks like the only VOC detected in the groundwater was chloromethane which was determined to be a laboratory background contamination and not actual impacts in the

groundwater on the site (Stantec Supplemental Site Investigation Report, June 2019). Additionally the report states, "*VOCs were not detected in 26 previous soil samples, and chloromethane was the only VOC detected in groundwater (suggesting an absence of on-site sources of VOC contamination). Chloromethane was considered a 'lab artifact' attributable to sources of contamination present in the analytical laboratory*."

- Confusion on why characterization of waste material is included as an additional requirement needed for case closure under WAC NR 726
    - AECOM collected the concrete sample for purposes of waste characterization to evaluate if special handling would be required as part of building demolition or renovation (CON-2). The total cadmium concentration in this sample could theoretically exceed the TCLP limit listed in NR 661. Several soil and groundwater samples have been collected surrounding this concrete sample and elevated concentrations were not detected in these samples.
    - We are confused how this is encapsulated into NR 726 closure, as this appears to be more of a NR 289/291 statute issue?
        - As the concrete is currently still in place and may remain in place during renovation, and will be managed/cleaned accordingly, the waste has not yet been generated during the response action.
        - We obviously would work with the appropriate personnel at the WDNR to ensure that this concern is addressed, as we would for other materials such as asbestos/lead-based paint, but unsure why this concrete issue would need to be resolved for case closure under NR 726
- I believe the original cap maintenance plan was a conservative approach, so you are suggesting that the residual soil and groundwater contamination soley dictate that cap? We can make this change.

Please let me know if you are available for **10am on Tuesday April 21st** and I can send everyone a Skype invite.
Thank you,

Erin Gross P.G.
Staff Geologist

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