Foellmi, Thomas J - DNR

From: Schmoller, Michael R - DNR
Sent: Wednesday, May 27, 2020 9:21 AM
To: Bernard Fenelon
Cc: Martin, Steven L - DNR; 'Ramanauskas, Peter (ramanauskas.peter@epa.gov)'; John Osborne; DiMaggio, Janet H - DNR
Subject: RE: Johnson Controls Watertown

Hi Bernie
I did discuss the remedial actions option report with Peter at USEPA. We think the following:

The important remedial criteria are the 50 ppm beneath the building and the 1 ppm for wetland soils. Remediation to meet these cleanup criteria is mandatory.

We believe there needs to be a remedial plan to address the sediment and contaminated materials inside the storm sewer lines that exit the building and discharge to the wetlands. Section 6 of the remedial action options report discusses the condition of the storm sewer lines that lead to the three outfalls. It states that PCB contaminated soil lies adjacent to the underground piping and sometimes a sheen is seen on water in the submerged portions of the pipeline. Any remedial plan to address PCBs at the site must address these potential source areas.

In terms of inside the building sample results (die cast room floors, walls, ceiling supports, cranes, etc) it appears the only areas of concern are the die cast room floor bulk and sediment samples and the basement floor sediment and wipe samples . (Section 11 in the RAOR) Most other inside surfaces were either non detect for PCBs or were found at concentrations less than the applicable screening criteria. The risk based proposal needs to address the direct contact concerns in the die cast room and basement.

These are our concerns as we move forward. If you have any questions or comments please contact me directly at 608-576-0183

Mike

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R. Michael Schmoller
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From: Bernard Fenelon <bernard.fenelon@gza.com>
Sent: Tuesday, May 26, 2020 3:53 PM
To: Schmoller, Michael R - DNR <Michael.Schmoller@wisconsin.gov>
Cc: Martin, Steven L - DNR <StevenL.Martin@wisconsin.gov>; 'Ramanauskas, Peter (ramanauskas.peter@epa.gov)' <ramanauskas.peter@epa.gov>; John Osborne <John.Osborne@gza.com>
Subject: RE: Johnson Controls Watertown

We are in the process of preparing the risk-based disposal approval application in accordance with 40 CFR 761.61(c) and Tool 4 of the PCB Facility Approval Streamlining Toolbox as referenced in Peter Ramanauskas' email. In your March 31, 2020 email, you stated that you had not yet had time to complete review of the inside the building cleanup proposals. Should we expect any more comments from WDNR/USEPA on the remediation plan other than those already received regarding agreement on the 50 ppm total PCB cleanup goal for accessible soil beneath the building and stating that a 1 ppm total PCB cleanup goal should be used for the remedial objective in the wetland soil? Thank you.

Bernard G. Fenelon
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From: Schmoller, Michael R - DNR <Michael.Schmoller@wisconsin.gov>
Sent: Thursday, April 23, 2020 9:02 AM
To: Bernard Fenelon <bernard.fenelon@gza.com>
Cc: Martin, Steven L - DNR <StevenL.Martin@wisconsin.gov>; 'Ramanauskas, Peter (ramanauskas.peter@epa.gov)' <ramanauskas.peter@epa.gov>
Subject: Johnson Controls Watertown

Bernie
Can you send me an update on remedial actions planning for the site?

Thanks
Mike

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