State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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May 23, 2023

Worthington Cylinders Wisconsin, LLC
Attn: Hope Everett
300 East Breed St
Chilton WI 53014
Sent via electronic mail only to: hope.everett@worthingtonindustries.com

SUBJECT: Review of the 2022 Groundwater Monitoring Update
Chilton Metal Products (Former),
300 East Breed Street, Chilton, Wisconsin
BRRTS #s 03-08-000802 and 02-08-561133

Dear Ms. Everett:

On April 28, 2023, the Wisconsin Department of Natural Resources (DNR) received the "2022 Groundwater Monitoring Update" (Report) prepared by Foth Infrastructure & Environment, LLC. The Report included a request to change the frequency of long-term groundwater monitoring and was submitted with a fee for DNR review and response.

Review

The DNR reviewed the Report and all available file information and does not concur with the change to long - term groundwater monitoring as proposed. Based on the data provided, sampling all wells on a time frame less than annually will not be approved; a subset of wells at minimum must be sampled annually. The DNR has also determined that long-term groundwater monitoring is not appropriate at this time since the site investigation under Wis. Admin. Code ch. NR 716 does not appear to be complete. The degree and extent of contamination identified at the site has not been adequately characterized or documented. Additional evaluation of remedy is recommended.

Background

The site was formerly operated by Chilton Metal Products, Inc. The DNR was notified of the Petroleum Volatile Organic Compound (PVOC) and Chlorinated Volatile Organic Compound (CVOC) contamination in 1990. During a building expansion one 550-gallon tank (Tank #1) containing gasoline was removed on March 25, 1991. Tank #1 was filled with water as a means of abandonment in the 1970's. Tank #1 was located beneath the floor of the Chilton Metal Products plant, on the west side of the building. A second tank (Tank #2), a 1,000-gallon gasoline tank, was removed in 1983. Active soil and groundwater remediation activities took place through the 1990's. Groundwater monitoring has continued on a monthly and subsequently annual basis since.

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Long-Term Groundwater Monitoring Request

After reviewing the Report and all case file information submitted to date, the DNR does not concur with the change in frequency of long-term groundwater monitoring as proposed.

- Sampling all wells on a time frame less than annually will not be approved. A subset of wells must be sampled annually. At this time, long term monitoring is not appropriate due to:
    - Degree and extent of contamination is not defined with respect to Wis. Admin Code ch. NR 716.
    - Wells in the source area S-1, S-2, S-5, S-10, and S-15 have only been sampled a single time. Wells S-3, S-4, S-9, and S-17 have only been sampled three to four times. A limited number of sampling events over long time periods of time at wells within the source area is not conducive to producing conclusive results to establish trends for natural attenuation.
    - Elevated contaminant concentrations above Enforcement Standards as well as free product in monitoring wells are still present within the source area. Long term monitoring will not be effective in reducing contaminant mass in a reasonable period of time; additional evaluation of remedy appears appropriate.
    - Obvious stable or receding trends have not been observed.

Completion of the Site Investigation

The degree and extent of contamination currently identified at the site has not been adequately defined and documented with respect to Wis. Admin. Code ch. NR 716. The findings and interpretations by the DNR regarding the incomplete site investigation are summarized below:

1. <u>Soil</u>
   The degree and extent of soil contamination currently identified at the site has not been adequately defined and documented with respect to Wis. Admin. Code ch. NR 716. Evaluate the need for additional soil investigation.

2. <u>Groundwater</u>
   The degree and extent of groundwater contamination currently identified at the site has not been adequately defined and documented with respect to Wis. Admin. Code ch. NR 716. Evaluate the need for additional groundwater investigation.

3. <u>Vapor</u>
   Evaluate the vapor intrusion pathway on-site and off-site for PVOCs and CVOCs per the DNR guidance document RR-800, "Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin Wis. Stat. ch. 292; Wis. Admin. Code ch. NR 700." If the screening evaluation indicates that further vapor assessment is needed, prepare a vapor intrusion work plan, and submit for DNR review. Trichloroethylene (TCE) poses a short-term (i.e., acute) health risk in indoor air at certain concentrations that justifies expedited assessment, investigation, and mitigation as immediate or interim actions. Because TCE is a contaminant of concern at the site, assessment of the vapor intrusion pathway should be prioritized and completed as soon as possible.

4. <u>Other Media (Emerging Contaminants)</u>
   Emerging contaminants include perfluoroalkyl and polyfluoroalkyl substances (PFAS), 1,4-dioxane and others. Per Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, site investigation scoping and work plans should include an evaluation of potential PFAS compounds and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the

site. The evaluation should include any available information on whether any products containing PFAS were used in any process services, the duration of PFAS-containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded. Site investigation work plans should also include a sampling and analysis strategy to be used during field investigation that considers all information in the evaluation conducted under Wis. Admin. Code § NR 716.07.

Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.09(1), the DNR is requesting the submittal of a supplemental site investigation work plan within 60 days of the date of this letter, by July 22, 2023. The work plan must comply with Wis. Admin. Code § NR 716.09(2). A fee is recommended for DNR review and response.
- Per Wis. Admin. Code § NR 716.11(2g), the additional site investigation activities must begin within 90 days of the submittal of the work plan.
- Per Wis. Admin. Code § NR 716.14, all sampling results are required to be submitted within 10 days of receiving the laboratory data.
- Per Wis. Admin. Code § NR 716.15(1), a supplemental site investigation report shall be submitted within 60 days after completion of the field investigation. A fee is recommended for DNR review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

After completion of the site investigation, evaluation of additional remedial action appears warranted. Your consultant should submit a remedial actions option report (RAOR) within 60 days after the completion of the field investigation.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (920) 718-0063, or at ethan.keller@wisconsin.gov.

Sincerely,

Ethan Keller
Northeast Region
Remediation & Redevelopment Program

cc: Robert J. Meller, Foth Infrastructure & Environment, LLC (robert.meller@foth.com)
Heather L. Hallett, Foth Infrastructure & Environment, LLC (heather.hallett@foth.com)