ENVIRONMENT
& HEALTH

Mr. Paul Grittner
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
141 NW Barstow Street
Waukesha, WI 53188-3789

RESPONSE TO WDNR COMMENTS: REMEDIAL ACTION DESIGN REPORT
FORMER EZ PAINTR/SHUR-LINE FACILITY
4051 SOUTH IOWA AVENUE, ST. FRANCIS, WISCONSIN
WDNR BRRTS NO. 02-41-183146

Dear Mr. Grittner:

January 17, 2025

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Ref. 1690004991

Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), has prepared the following response to the Wisconsin Department of Natural Resources' (WDNR) comments relating to Ramboll's October 2024 *NR 724 Remedial Action Design Report* (RADR) for the former EZ Paintr/ Shur-Line site in St. Francis, Wisconsin. WDNR's comments were provided in their December 19, 2024, *NR 724 Remedial Action Design Report* letter (the "December 2024 letter").

NOC's responses to WDNR's comments are provided below. For ease of review, WDNR's comments are grouped into the two categories:

- Changing Field Condition Related Comments; and
- General Safety Related Requests.

A copy of WDNR's December 2024 letter and Ramboll's response to WDNR's December 4, 2024, e-mail[1] requesting additional information are included as Attachment A for reference.

Changing Field Condition Related WDNR Comments and NOC Responses

The following table summarizes WDNR's comments that are associated with performing sampling and analysis that are responsive to changing field conditions. Where appropriate, responses and/or planned additional sampling activities are provided.

WDNR Comment	NOC Response
Conduct immediate vapor assessment and investigation if the groundwater contaminant plume is found to migrate in a different direction within the surrounding neighborhood, expand, or have an increase in contaminant concentrations.	The comment is acknowledged.

[1] On December 4, 2024, WDNR Project Manager, Paul Grittner, requested additional information from Ramboll Project Manager Susan Petrofske via e-mail. Ramboll replied via e-mail on December 11, 2024.

WDNR Comment	NOC Response
Consider collecting indoor air samples from the east side of the building concurrently when indoor air samples are collected on the west side. At a minimum, a plan should be developed to collect confirmation samples from the east side when contaminants on the west side are found to be greater than vapor action levels. This will confirm that airflow between the two sides of building is not allowing the occupied portion to be impacted.	Indoor air sampling is planned within the occupied eastern tenant space as follows: • Pre-construction: One baseline event, with one 14-day time weighted average passive air sampler placed within the eastern tenant space near the shared wall. • Construction: Up to two events, with one 14-day time weighted average sampler passive sample per event. • Operation: Up to four events, with one 14-day time weighted average sampler passive sample per event. The passive indoor air samples will be submitted to Eurofins Air Toxics for analysis of TCE by passive solvent extraction, Modified USEPA Method TO-17. The need for additional sampling locations or events beyond that described will be determined based on the results of air sampling conducted within the eastern and western tenant spaces.
Consider the need to reinstall P-1 if post-treatment groundwater sampling indicates the potential for increased contaminant concentrations at depth.	The comment is acknowledged.
Reevaluate changing the groundwater sampling frequency at certain wells to an annual basis after conducting one round of post-remedial sampling from the entire well network.	The comment is acknowledged.

General Safety Related WDNR Requests and NOC Responses

The following table summarizes WDNR's requests to ensure that that remediation work will be conducted safely.

WDNR Requests	NOC Response
Confirm temperature and vapor pressure monitoring points are positioned appropriately to ensure that utilities north of the building will not be impacted by the increases in temperature.	The remediation vendor expects that temperatures will increase above ambient only within a distance of approximately 25 feet from the nearest electrode. Based on this expected radius of influence and electrode placement, the water, sewer, and gas lines along East Tesch Avenue will not be impacted. An additional temperature monitoring point (TMP-M04) will be installed between the remediation area and utilities that enter the north side of the building along East Tesch Avenue. The location of TMP-M04 is provided on the updated ERH layout figure (Drawing Y-2 in Appendix C of the RADR) in Attachment B.

WDNR Requests	NOC Response
Confirm the potential for spent carbon that will be taken off site for recycling is a hazardous waste has been considered, and that the facility chosen for disposal of this material is equipped to recycle this waste.	The intent is to manage the granular activated carbon (GAC) treatment vessels to avoid potential overloading that could render the spent carbon as hazardous waste (i.e., fail TCLP analysis). As described in the RADR, two GAC vessels will operate in series with frequent field screening pre-, mid-, and post-treatment. When breakthrough is detected in the lead vessel, it will be removed from service and replaced with the lag vessel. A new vessel will then be used for the lag vessel. A number of clean GAC vessels will be staged on site to allow for quick and timely changeouts. Samples will be collected from the first six spent carbon vessels for TCLP-VOC analysis to ensure proper waste characterization and management. Additional samples will be collected from the spent carbon used during the peak contaminant loading period to confirm consistency with the initial waste characterization sampling data. Please note the anticipated carbon vendor (Tetrasolv Filtration) is capable of regenerating and managing both non-hazardous and hazardous spent carbon.
Sample MW-9, in addition to MW-13, MW-14, and MW-16, when periodically sampling groundwater while conducting the thermal treatment.	The comment is acknowledged.

We appreciate the WDNR's continued assistance and involvement in NOC's remediation effort. If you have any questions or require additional information, please feel free to contact us at the numbers listed below.

Yours sincerely,

Susan Petrofske
Senior Managing Consultant
D +1 262 901 3501
spetrofske@ramboll.com

Scott Tarmann, PE
Principal
D +1 262 901 0093
starmann@ramboll.com

cc: Kristin Jones, NOC (electronic copy)

Attachments

Attachment A: WDNR's December 19, 2024, Letter and Ramboll Response to December 4, 2024, E-Mail
Attachment B: Updated ERH Layout Figure (Drawing Y-2 in Appendix C of the RADR)

ATTACHMENT A

WDNR *"REVIEW OF NR 724 REMEDIAL ACTION DESIGN REPORT"* LETTER (DECEMBER 19, 2024)

RAMBOLL RESPONSE TO WDNR'S DECEMBER 4, 2024, "*REQUEST FOR ADD'L INFO*" E-MAIL (DECEMBER 11, 2024)

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1027 W. Saint Paul Avenue
Milwaukee WI 53233

Tony Evers, Governor

Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

WISCONSIN
DEPT. OF NATURAL RESOURCES

December 19, 2024

Ms. Kristin Jones
Newell Operating Company
6655 Peachtree Dunwoody Road
Atlanta, GA 30328
Via Email Only to: kristin.jones@newellco.com

Subject: Review of *NR 724 Remedial Action Design Report*
EZ Paintr FMR – Shur Line Facility, 4051 South Iowa Avenue, St. Francis, WI
DNR BRRTS Activity #: 02-41-183146; FID #: 241501370

Dear Ms. Jones:

The Department of Natural Resources (DNR) has completed its review of the October 29, 2024, *NR 724 Remedial Action Design Report* (Report) submitted for the EZ Paintr FMR – Shur Line Facility site. The Report presents a plan for utilizing in-situ thermal remediation to remove trichloroethene from the west side of the property and an area south of the building. Supplemental information provided to the DNR on December 11, 2024, by your environmental consultant was also considered as part of this review. The applicable technical assistance fee for providing a review and response, in accordance with Wis. Admin. Code § NR 749.04 (1), was provided.

The DNR approves of the remedial design for removing contaminants from soil within the treatment area. Remedial actions conducted at this site must reduce the vapor intrusion risk at off-site residences. The success of the remediation (and the need to take additional actions beyond those proposed) will depend on demonstrating whether conditions at the site post-remediation meet the closure requirements in Wis. Admin. Code Ch. NR 726. This would include reducing groundwater contaminant concentrations offsite as required by Wis. Admin. Code § 726.05 (6), removing (or significantly reducing) the risk of vapor intrusion to offsite properties to ensure compliance with Wis. Admin. Code § 726.05 (4) (e), and demonstrating the mass and concentration of contaminants within the source area has been reduced to the extent practicable, per Wis. Admin. Code § 726.05 (8) (b) 1.

The sampling plan for monitoring conditions before, during, and after the thermal treatment is also approved. The DNR reminds you to be responsive to changing field conditions as indicated by sample analysis and requests that you conduct the following actions as needed:

- Conduct immediate vapor assessment and investigation if the groundwater contaminant plume is found to migrate in a different direction within the surrounding neighborhood, expand, or have an increase in contaminant concentrations.
- Consider collecting indoor air samples from the east side of the building concurrently when indoor air samples are collected on the west side. At a minimum, a plan should be developed to collect confirmation samples from the east side when contaminants on the west side are found to be greater than vapor action levels. This will confirm that airflow between the two sides of building is not allowing the occupied portion to be impacted.
- Consider the need to reinstall P-1 if post-treatment groundwater sampling indicates the potential for increased contaminant concentrations at depth.
- Reevaluate changing the groundwater sampling frequency at certain wells to an annual basis after conducting one round of post-remedial sampling from the entire well network.

To ensure the remediation will be conducted safely the DNR requests the following:

- Confirm temperature and vapor pressure monitoring points are positioned appropriately to ensure that utilities north of the building will not be impacted by the increases in temperature.
- Confirm the potential for spent carbon that will be taken offsite for recycling is a hazardous waste has been considered, and that the facility chosen for disposal of this material is equipped to recycle this waste.
- Sample MW-9, in addition to MW-13, MW-14, and MW-16, when periodically sampling groundwater while conducting the thermal treatment.

We appreciate your efforts to protect the environment, facility occupants, and the homeowners who live near this site. If you have any questions regarding this review or wish to discuss any of these requests in further detail, please contact me by calling (414) 405-0764, or by email at paul.grittner@wisconsin.gov.

Sincerely,

Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Susan Petrofske, Ramboll US Consulting – spetrofske@ramboll.com
Jeanne Tarvin, Ramboll US Consulting – jtarvin@ramboll.com

From: Susan Petrofske
Sent: Wednesday, December 11, 2024 3:44 PM
To: Grittner, Paul V - DNR
Cc: Scott Tarmann; Paul Lindquist; Jeanne Tarvin
Subject: RE: Request for add'l info - EZ Paintr NR 724 RADR

Good Afternoon Paul,

Thank you for your questions concerning the Remedial Action Design Report (RADR) for the in situ thermal remediation (ISTR) project at the former Shur-Line/ EZ Paintr site in St. Francis, Wisconsin. This email provides our responses to your request for additional information about the ISTR system.

DNR Additional Info Request #1: A description of the general makeup of the 'conductive material' that will be placed around the electrodes.
The material placed around each electrode is a proprietary inert carbon coke material made up of 99.35% by weight carbon. Moisture and ash comprise the remaining 0.65%. During the manufacturing process, the carbon coke material is heated to 1,200°C so the coke is free of any volatile compounds.

DNR Additional Info Request #2: The frequency soil samples will be collected at each confirmation boring location.
Ramboll anticipates initiating the soil confirmation soil sampling program approximately 7 months after the heating operation. Soil confirmation samples will be collected from 14 locations using "hot soil sampling methods" as discussed in Appendix E of the RADR. Soil confirmation sample depths from the 14 boring locations will be similar to sample depths collected for the interior site investigation borings (i.e., 2 to 3 feet below ground surface [ft-bgs], 6 to 7 ft-bgs, 14 to 15 ft-bgs, 22 to 23 ft-bgs, and 29-30 ft-bgs). Ramboll and the ISTR contractor (TRS) will review the analytical results from the soil samples collected and will determine the need for further ERH system operation or shut-down of the electrode field.

With the exception of the area south of the building as described in Section 3.1.1 of the RADR, if specific soil sample locations and depths demonstrate that the soil remediation goal of 1 mg/kg TCE is not achieved, the ERH electrode field around the soil boring location may be reenergized and heating will resume. After further operation and monitoring indicates that the lines of evidence for achieving the remediation goal have been attained, an additional round of confirmation soil samples will be collected directly adjacent to the soil boring locations with elevated CVOC concentrations. The soil samples collected from additional confirmation sampling rounds will be focused at the depth intervals where the soil remediation goal of 1 mg/kg TCE was not achieved in the previous soil sampling event. Within the building this process will resume until the confirmation soil samples show the remediation goals as outlined in the RADR have been achieved. For the area south of the building, sampling and operation may be discontinued prior to meeting the remediation goal as described in Section 3.1.1 of the RADR.

DNR Additional Info Request #3: An explanation as to why groundwater sampling has not been proposed to be conducted during the operation of the thermal remediation system. Can some sampling (focusing on wells immediately down gradient of building) be incorporated int the plan to confirm that there will be no changes to the groundwater plume that would affect vapor risk at nearby residences?
The current semi-annual groundwater monitoring program will continue at the site during ISTR operation. The existing groundwater monitoring events are tentatively scheduled for April 2025, October 2025, and April 2026. Groundwater samples will be collected from monitoring wells MW-2, MW-3A, MW-5, MW-6, MW-9 through MW-19, MW-21, and MW-22, and piezometers P-3 and P-4. Monitoring well MW-20 and piezometer P-2 are within or near the TTZ and will not be accessible during ISTR operation due to proximity to the electrode field and elevated subsurface temperatures.

In response to your inquiry, we plan to sample three downgradient monitoring wells (MW-13, MW-14, and MW-16) on a periodic basis to supplement the data collected during the routine semi-annual sampling events to further document that there are no changes to plume conditions while the ISTR system is operating.

DNR Additional Info Request #4: Explanation as to how the obstruction and anomalies identified to be present south of the treatment area (above and underground utilities, ash, and the extraction trench) prohibit the use of ISTR in this area.

The presence of physical obstructions and anomalies at the property south of the former EZ Paintr/Shur-Line facility, which include underground electrical and natural gas utilities and high voltage overhead electrical transmission lines makes the installation of the ERH electrodes and infrastructure nearly impossible to do in a safe and effective manner. As the ERH electrodes must be installed using drilling equipment needing relatively high overhead clearances and have a spacing of no greater than 14.5 feet for the heating process to be effective, there are several locations where the underground and overhead utilities interfere with the placement of electrodes that would be placed in the area farther to the south. In addition, the underground electrical line adjacent to the southernmost row of electrodes cannot withstand temperatures above 20°C based on information provided by We Energies engineers. For these reasons, the extent of the ERH electrode field and heating area has been limited to approximately 15 feet north of this underground electrical line.

Ramboll and NOC appreciate the DNR's review of the RADR. Please let us know if you have any additional questions or require further clarification on the items discussed above.

Kind regards
Susan Petrofske

From: Grittner, Paul V - DNR <Paul.Grittner@wisconsin.gov>
Sent: Wednesday, December 4, 2024 4:22 PM
To: Susan Petrofske <SPETROFSKE@ramboll.com>
Subject: Request for add'l info - EZ Paintr NR 724 RADR

Subject: Request for additional information - NR 724 Remedial Action Design Report
EZ Paintr FMR – Shur Line Facility, 4051 South Iowa Avenue, St. Francis
DNR BRRTS Activity #: 02-41-183146; FID #: 241501370

Susan,

The Department of Natural Resources is working to complete our review of the October 29, 2024, NR 724 Remedial Action Design Report, and requests some additional information to clarify a few aspects of this project.

1) A description of the general makeup of the 'conductive material' that will be placed around the electrodes.

2) The frequency soil samples will be collected at each confirmation boring location.

3) An explanation as to why groundwater sampling has not been proposed to be conducted during the operation of the thermal remediation system. Can some sampling (focusing on wells immediately down gradient of building) be incorporated into the plan to confirm that there will be no changes to the groundwater plume that would affect vapor risk at nearby residences?

4) Explanation as to how the obstruction and anomalies identified to be present south of the treatment area (above and underground utilities, ash, and the extraction trench) prohibit the use ISTR in this area.

Please let me know if you have any questions regarding this request.

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Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

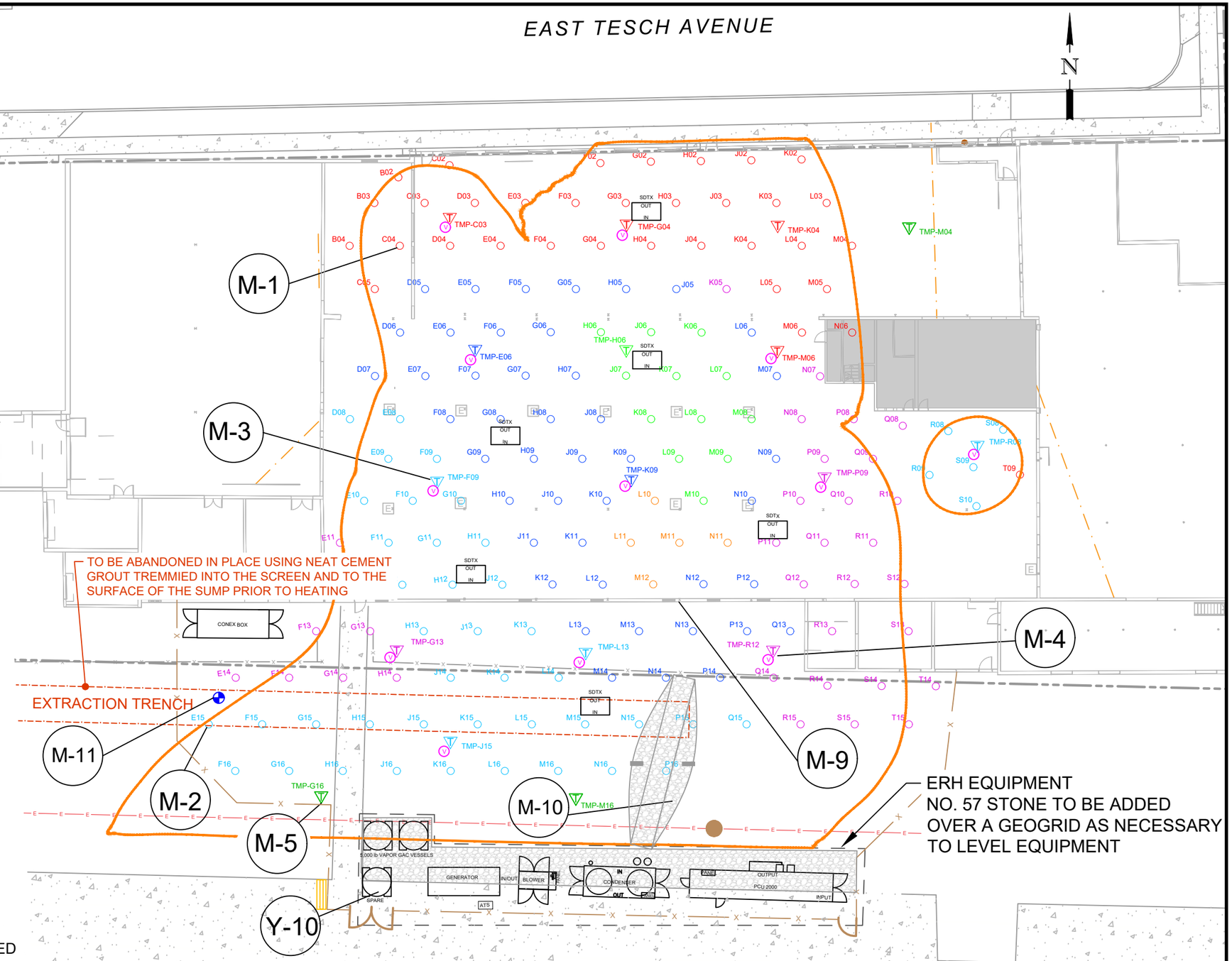
Paul Grittner
Hydrogeologist – Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
Phone: 414-405-0764
paul.grittner@wisconsin.gov

ATTACHMENT B

UPDATED ERH LAYOUT FIGURE
(DRAWING Y-2 IN APPENDIX C OF THE RADR)

PRELIMINARY

Not Approved for Construction



NOTES

INGRESS AND EGRESS THROUGH THE BUILDING DOORS NEAR ELECTRODES C02, H02, G13 AND Q13 WILL BE LIMITED BY SYSTEM COMPONENTS. ALTERNATIVE PATHS WILL BE MARKED WITH SIGNS.

LEGEND

- ELECTRODE 17' DEPTH (QTY. 34)
- ELECTRODE 22' DEPTH (QTY. 33)
- ELECTRODE 25' DEPTH (QTY. 44)
- ELECTRODE 27' DEPTH (QTY. 44)
- ELECTRODE 29' DEPTH (QTY. 12)
- ELECTRODE 35' DEPTH (QTY. 5)
- BASEMENT
- MODELLED TCE ISOCONCENTRATION CONTOUR (1 mg/kg)
- TEMPERATURE MONITORING POINT WITH CO-LOCATED PRESSURE MONITORING POINT 14' DEPTH (QTY. 4)
- TEMPERATURE MONITORING POINT WITH CO-LOCATED PRESSURE MONITORING POINT 19' DEPTH (QTY. 3)
- TEMPERATURE MONITORING POINT WITH CO-LOCATED PRESSURE MONITORING POINT 20' DEPTH (QTY. 4)
- TEMPERATURE MONITORING POINT WITH CO-LOCATED PRESSURE MONITORING POINT 24' DEPTH (QTY. 2)
- TEMPERATURE MONITORING POINT WITH CO-LOCATED PRESSURE MONITORING POINT 25' DEPTH (QTY. 1)
- UTILITY TEMPERATURE MONITORING POINT 5' DEPTH (QTY. 3)
- GRAVEL PIPING, EQUIPMENT AND CABLE SUPPORT TO BE INSTALLED
- SECURITY FENCE
- HYDRAULIC MANAGEMENT WELL
- JERSEY BARRIERS
- WE ENERGIES MANHOLE
- BURIED ELECTRIC

NO.	DATE	CAD	ENG	REVISIONS
1	8/8/24			ADDED GRAVEL WALKWAY
2	10/8/24			ADDED TMP-J15
3				
4				
5				
6				
7				
8				
9				
10				

0 15 30 60

SCALE IN FEET

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DESIGNED BY: E. KOWALKOWSKI

DRAWN BY: A. PEABODY

CHECKED BY: PENDING APPROVAL

PROJECT MANAGER: K. NOVELLO

TECHNOLOGY REVIEW: QSAT PERSONNEL

SITE: FORMER EZ PAINTR SITE

LOCATION: ST. FRANCIS, WISCONSIN

CLIENT: RAMBOLL

ERH SYSTEM LAYOUT

APPROVED FOR CONSTRUCTION

BY _____

DATE _____

DATE: 2025.JAN.08

PROJECT: WI.2465

SHEET: Y-2