State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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July 28, 2025

Worthington Cylinders Wisconsin LLC
Attn: Hope Everett
300 E Breed St
Chilton, WI 54013
Sent via electronic mail only to hope.everett@wthg.com

Subject: Review of Site Investigation Work Plan
Chilton Metal Products and Chilton Metal Products (Former) - CVOC
300 E Breed Street, Chilton, WI 54013
BRRTS #: 03-08-000802 and 02-08-561133; FID #: 408013760

Dear Ms. Everett:

On July 26, 2024, the Wisconsin Department of Natural Resources (DNR) received the "Vapor Intrusion Investigation Work Plan" (Report) prepared for Worthington Enterprises (Worthington) by Foth Infrastructure & Environment, LLC (Foth). The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Background

Worthington Cylinders Wisconsin, LLC ('the Site') has been used for industrial and manufacturing purposes since the 1970s and is currently a manufacturing facility for propane tanks. In 1983, a 1,000-gallon gasoline underground storage tank (UST) was removed from the Site near the southwest side of the building. A 550-gallon gasoline UST was removed in 1991 and impacted soil was removed from the excavation. Volatile organic compounds (VOCs) and chlorinated volatile organic compounds (CVOCs) have been detected in soil, groundwater, and soil vapor. Active soil and groundwater remediation activities took place through the 1990s, including limited soil vapor extraction as well as groundwater pump and treat and free product removal. Active remediation activities were discontinued due to the tight nature of the soils at the Site. Annual groundwater monitoring and manual free product recovery is still ongoing.

DNR requested revisions to the July 26, 2024, Report and development of a revised sampling plan on September 12, 2024. The requested revisions and sampling plan were submitted on July 3, 2025.

SIWP Summary

To delineate the environmental impacts of the reported discharge, the Report recommended completion of the following activities:

- Installation of at least seven sub-slab vapor ports and nine indoor air sample locations at the Main Manufacturing Building. Samples will be located:

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  - Where VOCs have recently been detected in monitoring wells and where the storm water line runs under the building.
  - In storm sewer manholes along the west side of the Main Manufacturing Facility.
  - Outside the building to the west along the bedding of the storm sewer line.
- Two co-located sub-slab vapor ports and indoor are sample locations within the Propane Filling Building.
  - Sampling will be completed inside the Propane Filling Building after filling operations are transitioned over to the new fill building.
  - Progress on the construction of the new filling building will be provided
- Sub-slab sampling will be conducted concurrently with indoor air sampling.
- Sub-slab and indoor air sampling will be completed using passive vapor samplers
  - Sub-slab samplers will be deployed for a minimum of 5 days
    - Samples will be analyzed for naphthalene, benzene, 1,2-DCA, cis-1,2 DCE, trichloroethene, ethylbenzene, tetrachloroethene, trimethylbenzenes, xylenes, vinyl chloride, trans-1,2 DCE
  - Indoor and outdoor air samplers will be deployed for a minimum of 10 days
    - Samples will be analyzed for naphthalene, benzene, 1,2-DCA, cis-1,2 DCE, trichloroethene, ethylbenzene, tetrachloroethene, trimethylbenzenes, xylenes, trans-1,2 DCE
    - Samplers will be placed in areas where they are more than six inches from the wall, in the breathing zone, have adequate air movement, and are protected from direct sun. At least one sampler will be deployed outdoors to screen for background concentrations.
- The initial round of vapor intrusion sampling will be performed in 2025 before the heating season starts. Sampling will be repeated later in 2025 after the heating season starts.

DNR Review of the SIWP

Following the DNR's review of the Report, the DNR concurs with revisions to the July 26, 2024, VI work plan addendum received on July 3, 2025, and requests that you proceed with the proposed work, while incorporating the following comments:

1. Include toluene and trimethylbenzenes in analysis of vapor samples.
   a. Guidance document RR-0136 and only lists the "most common" vapor contaminants. Reference the U.S. EPA Regional Screening Levels for other compounds. Toluene has a Vapor Action Level (VAL) of 22,000 ug/m^3, trimethylbenzenes has a VAL of 260 ug/m^3.

Schedule

The submitted Report does not include a schedule for conducting the field investigation and reporting the results, per Wis. Admin. Code § NR 716.09(2)(h). Therefore, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 days of submittal of this approval letter, by October 28, 2025.

- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR suggests that the SIR be submitted with a fee for review and response.

- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (920) 718-0063 or Ethan.Keller@Wisconsin.gov.

Sincerely,

Ethan Keller
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Heather Hallett, Foth Infrastructure & Environment, LLC (heather.hallett@foth.com)