Frito Lay Inc Area 3
09-54-551580
SCR022

IVERTECH LLC

RECEIVED
APR 25 2008

April 24, 2008

Ms Wendy Weihemuller
Remediation and Redevelopment
Wisconsin DNR
3911 Fish Hatchery Road
Madison, WI 53711

Re: Discovery of Substances Exceeding NR 720 Soil Clean Up Standards
Frito Lay Facility
2810 Kennedy Drive
Beloit, WI

area 3

Dear Ms Weihemuller:

IverTech LLC has been authorized by Frito Lay to provide the DNR notification that soil sampling conducted beneath 9-inch thick monolithic poured concrete flooring in their storage room for cleaning compounds has been found to contain petroleum compounds above reporting levels for certain petroleum products (greater than 10 mg/kg for DRO and GRO) and above action level (100 mg/kg) for DRO.

The soil sample was collected because Frito Lay plans to remove concrete flooring and perhaps some underlying soil as part of a building remodeling project. As a proactive measure, Frito Lay wished to determine if the soil beneath the concrete contains regulated constituents as one of their options include removing some of the soil. As such, the sampling was not conducted in response to a release or "discharge" as we understand it is defined by 292 State Statutes. That is why we have not attached a Notification for Hazardous Substance Discharge form.

Based on a review of the MSDS data sheets provided by Frito Lay, the cleaning compound room houses above grade storage tanks that store equipment cleaning compounds including food grade sodium hydroxide based detergents and nitric and phosphorus acid based rinses and sanitizers. There are no floor drains in this area and secondary containment is provided. The monolithic concrete flooring was found to be in good structural condition with no cracking observed.

An initial soil sample was obtained from the base of a 4 inch core hole on March 13, 2008. The soil sampling interval was about 0-1 feet below concrete. Since there was no obvious reason for specific parameters, a full array of parameters was analyzed to include DRO, GRO, VOC, total RCRA metals, TCLP lead (required for disposal at the Janesville landfill), and PAH.

2880 Jonathan Circle Madison, WI 53711
608-273-3751 608-273-3754 (fax)
dliverson@charter.net

The results revealed below detection for VOC, mostly below detection and below action level for PAH (for industrial sites), below the 20 x rule for RCRA metals, a GRO of 12.8 mg/kg, and a DRO of 227 mg/kg. The results of the sampling are attached. The underlying soil sampled consisted of sandy soils. There was no obvious sign of petroleum odor noted.

There was no obvious source for the petroleum impacted soil other than perhaps construction forming oil from when the concrete was poured in place; perhaps in the 1970's.

Based on the results of the sampling and interaction with Frito Lay, IverTech recommended; 1) reporting to the DNR, and 2) sampling at additional locations and different depths to determine nature and extent. Frito Lay subsequently authorized both activities.

This letter addresses Recommendation 1.

On April 23, 2008, additional core holes were advanced at three representative locations. Since the cleaning compound room (measuring about 18 ft by 18 ft) is inaccessible for drilling equipment, hand auguring was used to obtain soil samples from about one foot below concrete to about 3.5 feet below grade. Given the results of the initial sample, the six samples are being analyzed in an expedited fashion for DRO and GRO/PVOC. The soils consisted of sandy material and there was no petroleum odor noted in any of the samples.

The results of the sampling will be discussed with Frito Lay and submitted to the DNR. Depending on the results, Frito Lay may chose to leave the soils in place or have some or all removed and landfilled. The project is scheduled to begin the week of May 5, 2008.

We look forward to receiving any positive suggestions or requirements from the DNR in addressing this issue.

Sincerely,
IverTech LLC

Dennis L. Iverson, P.E.
Principal Engineer

cc: Mr. Richard Arrowood-Frito Lay
Ms Lisa Carroll-Frito Lay

ATTACHMENT 1

ANALYTICAL DATA

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

March 26, 2008

Dennis Iverson
IVERTECH, LLC.
2880 Jonathan Circle
Madison, WI 53711

RE: Project: C7353 FL
Pace Project No.: 401673

Dear Dennis Iverson:
Enclosed are the analytical results for sample(s) received by the laboratory on March 18, 2008. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Eric Wied

eric.wied@pacelabs.com
Project Manager

Enclosures

REPORT OF LABORATORY ANALYSIS

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Pace Analytical®

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

CN ✓

Page: 1 of 1

0974031

Section A Required Client Information:	Section B Required Project Information:	Section C Invoice Information:
Company: IVERTECH LLC	Report To: DENNIS IVERSON	Attention:
Address: 2880 JON ATHAN CIRCLE	Copy To:	Company Name: SAME
MADISON, WI 53711		Address:
Email To: DIVERSON@CHARTER.NET	Purchase Order No.:	Pace Quote Reference:
Phone / Fax	Project Name: FL	Pace Project Manager:
Requested Due Date/TAT: NORMAL	Project Number: C 7353	Pace Profile #:

REGULATORY AGENCY

☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER
☐ UST ☐ RCRA ☐ Other_____

SITE LOCATION ☐GA ☐IL ☐IN ☐MI ☐MN ☐NC ☐OH ☐SC ☐WI ☐OTHER_____

Section D Required Client Information

Valid Matrix Codes

MATRIX	CODE
DRINKING WATER	DW
WATER	WT
WASTE WATER	WW
PRODUCT	P
SOIL/SOLID	SL
OIL	OL
WIPE	WP
AIR	AR
OTHER	OT
TISSUE	TS

ITEM #	SAMPLE ID (One Character per box. (A-Z, 0-9 / .-) Samples IDs MUST BE UNIQUE)	MATRIX CODE	SAMPLE TYPE G=GRAB C=COMP	COLLECTED COMPOSITE START DATE	COLLECTED COMPOSITE START TIME	COLLECTED COMPOSITE END/GRAB DATE	COLLECTED COMPOSITE END/GRAB TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Filtered (Y/N)	DRO/GRO	PAH	VOC	TOTAL RCRA METALS	TCLP LEAD	SOLIDS	GRO	Residual Chlorine (Y/N)	Pace Project Number / Lab I.D
1	SAMPLE 1 001	SL	G	3/14/08	2P				4										✓	✓	✓	✓	✓	✓		401673 1-4oz PA 1-4oz gA 3-2ozg A+FX
2																										
3																										
4																										
5																										
6																										
7																										
8																										
9																										
10																										
11																										
12																										

Additional Comments:

RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITION			
[signature]	3/14/08	5P	D. Farmer	3/17/08	0830		Y/N	Y/N	Y/N
D. Farmer	3/17/08	1310					Y/N	Y/N	Y/N
Dunham	3-18-08	0950	C. [signature] Pace	3-18-08	0950	RCI	Y/N	Y/N	Y/N
							Y/N	Y/N	Y/N

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER: DENNIS IVERSON

SIGNATURE of SAMPLER: [signature] DATE Signed (MM / DD / YY)

Temp in °C | Received on Ice | Custody Sealed Cooler | Samples Intact

SEE REVERSE SIDE FOR ...

ORIGINAL

Pace Analytical
www.pacelabs.com

Pace Analytical Services, Inc.
1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: C7353 FL
Pace Project No.: 401673

Sample: SAMPLE 1 **Lab ID: 401673001** Collected: 03/14/08 14:00 Received: 03/18/08 09:50 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
WIDRO GCS	Analytical Method: TPH DRO Wisconsin Preparation Method: TPH DRO Wisconsin								
Diesel Range Organics	**227**	mg/kg	18.4	4.0	8	03/20/08 11:37	03/20/08 14:50		
WIGRO GCV	Analytical Method: TPH WI GRO/PVOC 8021 Preparation Method: TPH GRO/PVOC WI ext.								
Gasoline Range Organics	**12.8**	mg/kg	3.0	3.0	1	03/19/08 11:17	03/19/08 19:54		
6010 MET ICP	Analytical Method: EPA 6010 Preparation Method: EPA 3050								
Arsenic	**5.9**	mg/kg	1.2	0.070	1	03/24/08 11:00	03/24/08 18:56	7440-38-2	
Barium	**117**	mg/kg	0.30	0.062	1	03/24/08 11:00	03/24/08 18:56	7440-39-3	
Cadmium	**0.20J**	mg/kg	0.30	0.0075	1	03/24/08 11:00	03/24/08 18:56	7440-43-9	
Chromium	**17.2**	mg/kg	0.30	0.034	1	03/24/08 11:00	03/24/08 18:56	7440-47-3	
Lead	**19.0**	mg/kg	0.59	0.040	1	03/24/08 11:00	03/24/08 18:56	7439-92-1	
Potassium	**1360**	mg/kg	11.9	1.6	1	03/24/08 11:00	03/24/08 18:56	7440-09-7	
Selenium	**<0.086**	mg/kg	1.2	0.086	1	03/24/08 11:00	03/24/08 18:56	7782-49-2	
Silver	**<0.013**	mg/kg	0.59	0.013	1	03/24/08 11:00	03/24/08 18:56	7440-22-4	
6010 MET ICP, TCLP	Analytical Method: EPA 6010 Preparation Method: EPA 3010								
Lead	**<0.0069**	mg/L	1.0	0.0069	1	03/20/08 15:24	03/24/08 22:52	7439-92-1	
7471 Mercury	Analytical Method: EPA 7471 Preparation Method: EPA 7471								
Mercury	**0.031**	mg/kg	0.012	0.0019	1	03/24/08 15:10	03/25/08 13:24	7439-97-6	B
8270 MSSV PAH by SIM	Analytical Method: EPA 8270 by SIM Preparation Method: EPA 3546								
Acenaphthene	**<3.1**	ug/kg	33.2	3.1	1	03/21/08 06:58	03/21/08 15:13	83-32-9	
Acenaphthylene	**<3.4**	ug/kg	33.2	3.4	1	03/21/08 06:58	03/21/08 15:13	208-96-8	
Anthracene	**<3.7**	ug/kg	33.2	3.7	1	03/21/08 06:58	03/21/08 15:13	120-12-7	
Benzo(a)anthracene	**18.7J**	ug/kg	33.2	3.7	1	03/21/08 06:58	03/21/08 15:13	56-55-3	
Benzo(a)pyrene	**8.8J**	ug/kg	33.2	3.5	1	03/21/08 06:58	03/21/08 15:13	50-32-8	
Benzo(b)fluoranthene	**46.0**	ug/kg	33.2	3.6	1	03/21/08 06:58	03/21/08 15:13	205-99-2	
Benzo(g,h,i)perylene	**25.1J**	ug/kg	33.2	3.8	1	03/21/08 06:58	03/21/08 15:13	191-24-2	
Benzo(k)fluoranthene	**43.2**	ug/kg	33.2	3.4	1	03/21/08 06:58	03/21/08 15:13	207-08-9	
Chrysene	**57.9**	ug/kg	33.2	4.0	1	03/21/08 06:58	03/21/08 15:13	218-01-9	
Dibenz(a,h)anthracene	**5.3J**	ug/kg	33.2	3.8	1	03/21/08 06:58	03/21/08 15:13	53-70-3	
Fluoranthene	**32.6J**	ug/kg	33.2	3.7	1	03/21/08 06:58	03/21/08 15:13	206-44-0	
Fluorene	**<3.3**	ug/kg	33.2	3.3	1	03/21/08 06:58	03/21/08 15:13	86-73-7	
Indeno(1,2,3-cd)pyrene	**21.3J**	ug/kg	33.2	3.7	1	03/21/08 06:58	03/21/08 15:13	193-39-5	
1-Methylnaphthalene	**<2.7**	ug/kg	33.2	2.7	1	03/21/08 06:58	03/21/08 15:13	90-12-0	
2-Methylnaphthalene	**3.5J**	ug/kg	33.2	2.8	1	03/21/08 06:58	03/21/08 15:13	91-57-6	
Naphthalene	**<2.3**	ug/kg	33.2	2.3	1	03/21/08 06:58	03/21/08 15:13	91-20-3	
Phenanthrene	**14.2J**	ug/kg	33.2	3.6	1	03/21/08 06:58	03/21/08 15:13	85-01-8	
Pyrene	**28.8J**	ug/kg	33.2	3.9	1	03/21/08 06:58	03/21/08 15:13	129-00-0	
Nitrobenzene-d5 (S)	63	%	27-117		1	03/21/08 06:58	03/21/08 15:13	4165-60-0	
2-Fluorobiphenyl (S)	70	%	30-98		1	03/21/08 06:58	03/21/08 15:13	321-60-8	
Terphenyl-d14 (S)	64	%	27-90		1	03/21/08 06:58	03/21/08 15:13	1718-51-0	

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ANALYTICAL RESULTS

Project: C7353 FL
Pace Project No.: 401673

Sample: SAMPLE 1 **Lab ID: 401673001** Collected: 03/14/08 14:00 Received: 03/18/08 09:50 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV Med Level Normal List	Analytical Method: EPA 8260		Preparation Method: EPA 5035/5030B						
Benzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	71-43-2	W
Bromobenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	108-86-1	W
Bromochloromethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	74-97-5	W
Bromodichloromethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-27-4	W
Bromoform	<25.9	ug/kg	60.0	25.9	1	03/19/08 10:50	03/19/08 14:54	75-25-2	W
Bromomethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	74-83-9	W
n-Butylbenzene	<40.4	ug/kg	60.0	40.4	1	03/19/08 10:50	03/19/08 14:54	104-51-8	W
sec-Butylbenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	135-98-8	W
tert-Butylbenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	98-06-6	W
Carbon tetrachloride	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	56-23-5	W
Chlorobenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	108-90-7	W
Chloroethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-00-3	W
Chloroform	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	67-66-3	W
Chloromethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	74-87-3	W
2-Chlorotoluene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	95-49-8	W
4-Chlorotoluene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	106-43-4	W
1,2-Dibromo-3-chloropropane	<82.3	ug/kg	250	82.3	1	03/19/08 10:50	03/19/08 14:54	96-12-8	W
Dibromochloromethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	124-48-1	W
1,2-Dibromoethane (EDB)	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	106-93-4	W
Dibromomethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	74-95-3	W
1,2-Dichlorobenzene	<44.4	ug/kg	60.0	44.4	1	03/19/08 10:50	03/19/08 14:54	95-50-1	W
1,3-Dichlorobenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	541-73-1	W
1,4-Dichlorobenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	106-46-7	W
Dichlorodifluoromethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-71-8	W
1,1-Dichloroethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-34-3	W
1,2-Dichloroethane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	107-06-2	W
1,1-Dichloroethene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-35-4	W
cis-1,2-Dichloroethene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	156-59-2	W
trans-1,2-Dichloroethene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	156-60-5	W
1,2-Dichloropropane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	78-87-5	W
1,3-Dichloropropane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	142-28-9	W
2,2-Dichloropropane	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	594-20-7	W
1,1-Dichloropropene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	563-58-6	W
cis-1,3-Dichloropropene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	10061-01-5	W
trans-1,3-Dichloropropene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	10061-02-6	W
Diisopropyl ether	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	108-20-3	W
Ethylbenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	100-41-4	W
Hexachloro-1,3-butadiene	<26.4	ug/kg	60.0	26.4	1	03/19/08 10:50	03/19/08 14:54	87-68-3	W
Isopropylbenzene (Cumene)	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	98-82-8	W
p-Isopropyltoluene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	99-87-6	W
Methylene Chloride	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-09-2	W
Methyl-tert-butyl ether	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	1634-04-4	W
Naphthalene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	91-20-3	W
n-Propylbenzene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	103-65-1	W
Styrene	<25.0	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	100-42-5	W

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ANALYTICAL RESULTS

Project: C7353 FL
Pace Project No.: 401673

Sample: SAMPLE 1 **Lab ID: 401673001** Collected: 03/14/08 14:00 Received: 03/18/08 09:50 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV Med Level Normal List	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B								
1,1,1,2-Tetrachloroethane	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	630-20-6	W
1,1,2,2-Tetrachloroethane	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	79-34-5	W
Tetrachloroethene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	127-18-4	W
Toluene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	108-88-3	W
1,2,3-Trichlorobenzene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	87-61-6	W
1,2,4-Trichlorobenzene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	120-82-1	W
1,1,1-Trichloroethane	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	71-55-6	W
1,1,2-Trichloroethane	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	79-00-5	W
Trichloroethene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	79-01-6	W
Trichlorofluoromethane	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-69-4	W
1,2,3-Trichloropropane	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	96-18-4	W
1,2,4-Trimethylbenzene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	95-63-6	W
1,3,5-Trimethylbenzene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	108-67-8	W
Vinyl chloride	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	75-01-4	W
m&p-Xylene	**<25.0**	ug/kg	120	25.0	1	03/19/08 10:50	03/19/08 14:54	1330-20-7	W
o-Xylene	**<25.0**	ug/kg	60.0	25.0	1	03/19/08 10:50	03/19/08 14:54	95-47-6	W
Dibromofluoromethane (S)	82	%	64-140		1	03/19/08 10:50	03/19/08 14:54	1868-53-7	
Toluene-d8 (S)	83	%	67-139		1	03/19/08 10:50	03/19/08 14:54	2037-26-5	
4-Bromofluorobenzene (S)	81	%	64-133		1	03/19/08 10:50	03/19/08 14:54	460-00-4	
Percent Moisture	Analytical Method: ASTM D2974-87								
Percent Moisture	**15.7**	%	0.10	0.10	1		03/20/08 09:04		

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ACCREDITED IN ACCORDANCE WITH nelac

DiMaggio, Janet H - DNR

From: Dennis Iverson [dliverson@charter.net]
Sent: Wednesday, April 30, 2008 11:21 AM
To: DiMaggio, Janet H - DNR
Cc: Richard Arrowood; Carroll, Lisa M {FLNA}; Joe Martino
Subject: Frito Lay-Beloit
Attachments: A081714 april 23 08 data.pdf; sample location map frito lay april 08.doc; Friot Lay Cleaning Room location map april 30 08.pdf

Janet,

Per our discussion of earlier today I am forwarding additional information in follow up to our April 24, 2008 letter to Wendy regarding the Frito Lay site in Beloit.

Attached are both the results from our sampling last Wednesday (April 23, 2008) and two site maps showing the locations of all the samples collected. One site map is from JP Cullen, the contactor doing the remodeling. Since it was difficult to see the locations because of scale, I added a larger 40 scale sketch which shows the locations better. The results show that the only positive hit was DRO of 40 mg/kg (the GRO was qualified) from Sample 1. The 29 ug/kg of toluene on Sample 1A was a false positive as you will noted it was also identified in method blank.

The April 23 samples were collected from beneath three 10-inch cores located as shown on the attached site map. The samples 1, 2, and 3 were obtained from about 0-1 foot below the concrete, and that samples 1A, 2A, and 3A were sampled from about 24-36 inches below the concrete. The idea here was to sample what appears to be about 6-12 inches of bedding material below the concrete, probably imported structural fill placed beneath the concrete slab (Samples 1, 2, and 3) and sample the underlying native soil. The estimated date of placement of the concrete in this area is associated with plant expansions in the 1970's.

A stainless steel hand auger was used to collect the samples. All three concrete cores revealed no signs of cracks and appeared to be in excellent structural condition. The soils encountered below the 9-inch poured concrete floor included: Sample 1 and 1A- gravel fill 0-9 inches, native clay 9-15 inches, and natural dark brown medium fine sand 15-32 inches. Sample 2 and 2A -light brown sand 0-36 inches (appeared all natural-probably because there was no clay), Sample 3 and 3A- 0-9 inches sand and gravel fill, 9-18 inches coarse sand and gravel with cobbles that reached refusal (large cobble) at about 18 inches.

Given the limited nature of the impact and because the materials stored in the area are not related (no petroleum-rather cleaning compounds-sodium hydroxide and nitric and phosphoric acids), it appears that the origin may be related to forming oil during construction, and therefore de minimus and therefore no action is required. We propose to send a formal follow up letter summarizing this info.

Please provide any comment on this matter in the timeframe you offered.

Thank you,

Dennis

Dennis Iverson, P.E.
IverTech LLC
2880 Jonathan Circle
Madison, WI 53711
608-273-3751
608-273-3754 fax
608-212-7772 cell

Summary of Test Results

Project Name: Frito Lay
Project Location: Beloit, Wisconsin

Project Number: C

Sample Type: Soil
Concentration: mg/kg, dry weight

Sample Number	Sample Description	Date Collected	Date Received	Date Analyzed	Solids, Total		Gasoline Range Organics		BFB (Surr)
A081714-01	Sample 1	04/23/08	04/23/08	04/25/08	83.5%		4.0	J	98.9%
A081714-02	Sample 1A	04/23/08	04/23/08	04/25/08	87.2%	<	2.5		96.5%
A081714-03	Sample 2	04/23/08	04/23/08	04/25/08	96.0%	<	2.5		96.1%
A081714-04	Sample 2A	04/23/08	04/23/08	04/25/08	95.3%	<	2.5		93.0%
A081714-05	Sample 3	04/23/08	04/23/08	04/25/08	94.7%	<	2.5		97.1%
A081714-06	Sample 3A	04/23/08	04/23/08	04/25/08	94.6%	<	2.5		90.4%

J = Estimated.

	Gasoline Range Organics
Method Detection Limit	1.4
Practical Quantitation Limit	4.7
Reporting Limit	2.5

Method Reference: Wisconsin GRO

WI Lab Certification #113289110

E.C.C.S.
2525 Advance Road
Madison, WI 53718
Phone: (608)221-8700
Fax: (608)221-4889

Approved by: [signature]

Date: 4/29/08

Summary of Test Results

Project Name: Frito Lay
Project Location: Beloit, Wisconsin

Project Number: C

Sample Type: Soil
Concentration: mg/kg, dry weight

Sample Number	Sample Description	Date Collected	Date Extracted	Date Analyzed	Solids, Total		Diesel Range Organics	C9 (Surr)
A081714-01	Sample 1	04/23/08	04/24/08	04/24/08	83.5%		40	105%
A081714-02	Sample 1A	04/23/08	04/24/08	04/24/08	87.2%	<	40	105%
A081714-03	Sample 2	04/23/08	04/24/08	04/24/08	96.0%	<	40	106%
A081714-04	Sample 2A	04/23/08	04/24/08	04/24/08	95.3%	<	40	104%
A081714-05	Sample 3	04/23/08	04/24/08	04/24/08	94.7%	<	40	104%
A081714-06	Sample 3A	04/23/08	04/24/08	04/24/08	94.6%	<	40	103%

	Diesel Range Organics
Reporting Limit	40

Method Reference: Wisconsin DRO

WI Lab Certification #113289110

E.C.C.S.
2525 Advance Road
Madison, WI 53718
Phone: (608)221-8700
Fax: (608)221-4889

Approved by:

Date: 4/25/08

8260 VOCs
Summary of Test Results

Project Name:	Frito Lay	Date Analyzed:	04/24/08
Project Location:	Beloit, Wisconsin	Concentration:	ug/kg, dry weight basis
Sample ID:	Sample 1	Dilution Factor:	1
Date Collected:	04/23/08	Lab Sample Number:	A081714-01
Sample Type:	Soil		
Solids, Total:	83.5%		

Compound	Reporting Limit	Sample Result
Methyl-t-butyl Ether	25	< 25
Benzene	25	< 25
Toluene	25	< 25
Ethylbenzene	25	< 25
m+p-Xylene	50	< 50
o-Xylene	25	< 25
1,3,5-Trimethylbenzene	25	< 25
1,2,4-Trimethylbenzene	25	< 25
Dibromofluoromethane		108%
Toluene-D8		101%
4-Bromofluorobenzene		101%

Method Reference: Modified 8260
WI Lab Certification #113289110

E.C.C.S.
2525 Advance Road
Madison, WI 53718
Phone: (608)221-8700
Fax: (608)221-4889

Approved by:

Date: 4/27/08

8260 VOCs
Summary of Test Results

Project Name:	Frito Lay	Date Analyzed:	04/24/08
Project Location:	Beloit, Wisconsin	Concentration:	ug/kg, dry weight basis
Sample ID:	Sample 3A	Dilution Factor:	1
Date Collected:	04/23/08	Lab Sample Number:	A081714-06
Sample Type:	Soil		
Solids, Total:	94.6%		

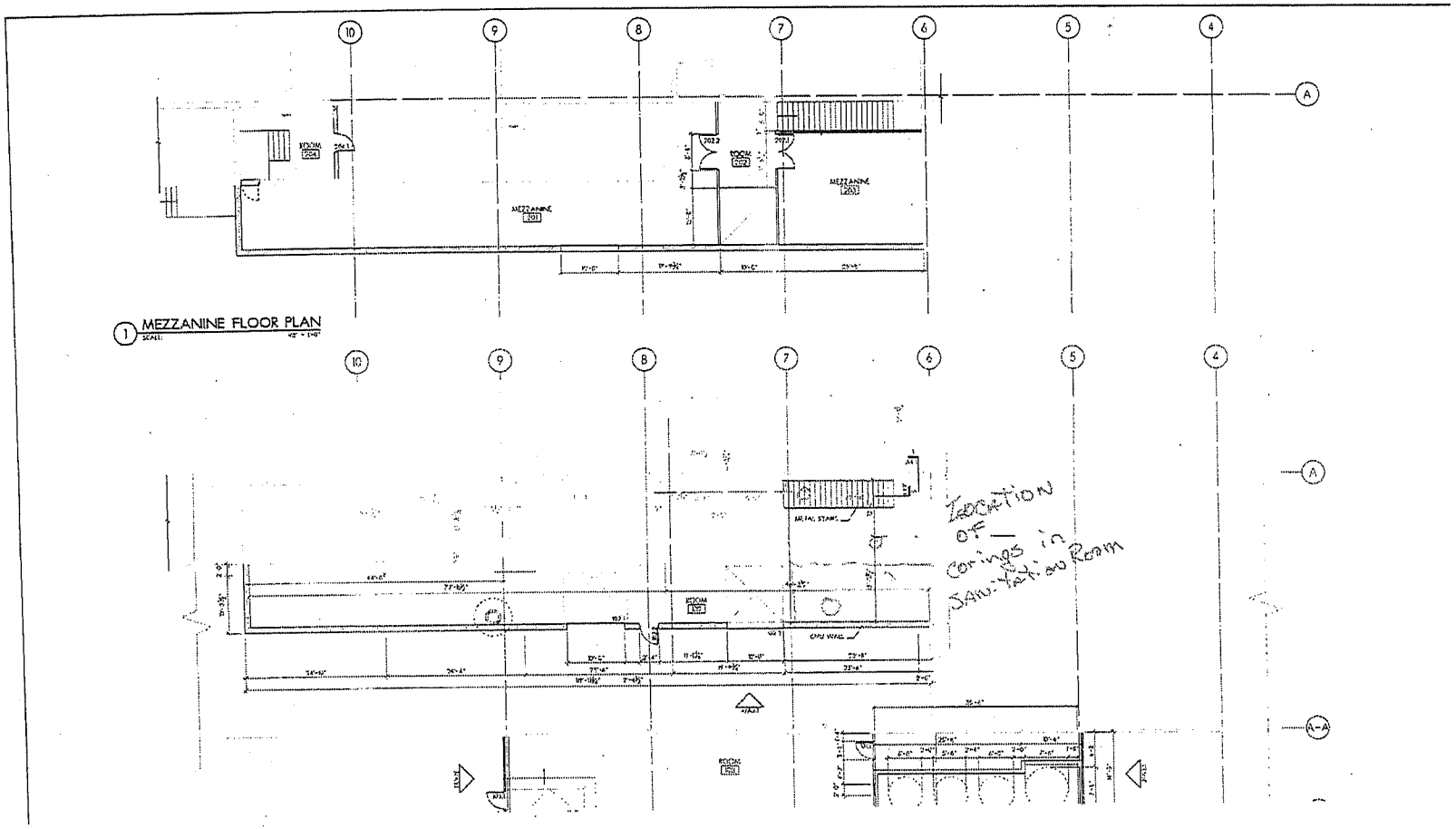
Compound	Reporting Limit		Sample Result
Methyl-t-butyl Ether	25	<	25
Benzene	25	<	25
Toluene	25	<	25
Ethylbenzene	25	<	25
m+p-Xylene	50	<	50
o-Xylene	25	<	25
1,3,5-Trimethylbenzene	25	<	25
1,2,4-Trimethylbenzene	25	<	25
Dibromofluoromethane			**108%**
Toluene-D8			**101%**
4-Bromofluorobenzene			**97.0%**

Method Reference: Modified 8260
WI Lab Certification #113289110

E.C.C.S.
2525 Advance Road
Madison, WI 53718
Phone: (608)221-8700
Fax: (608)221-4889

Approved by:

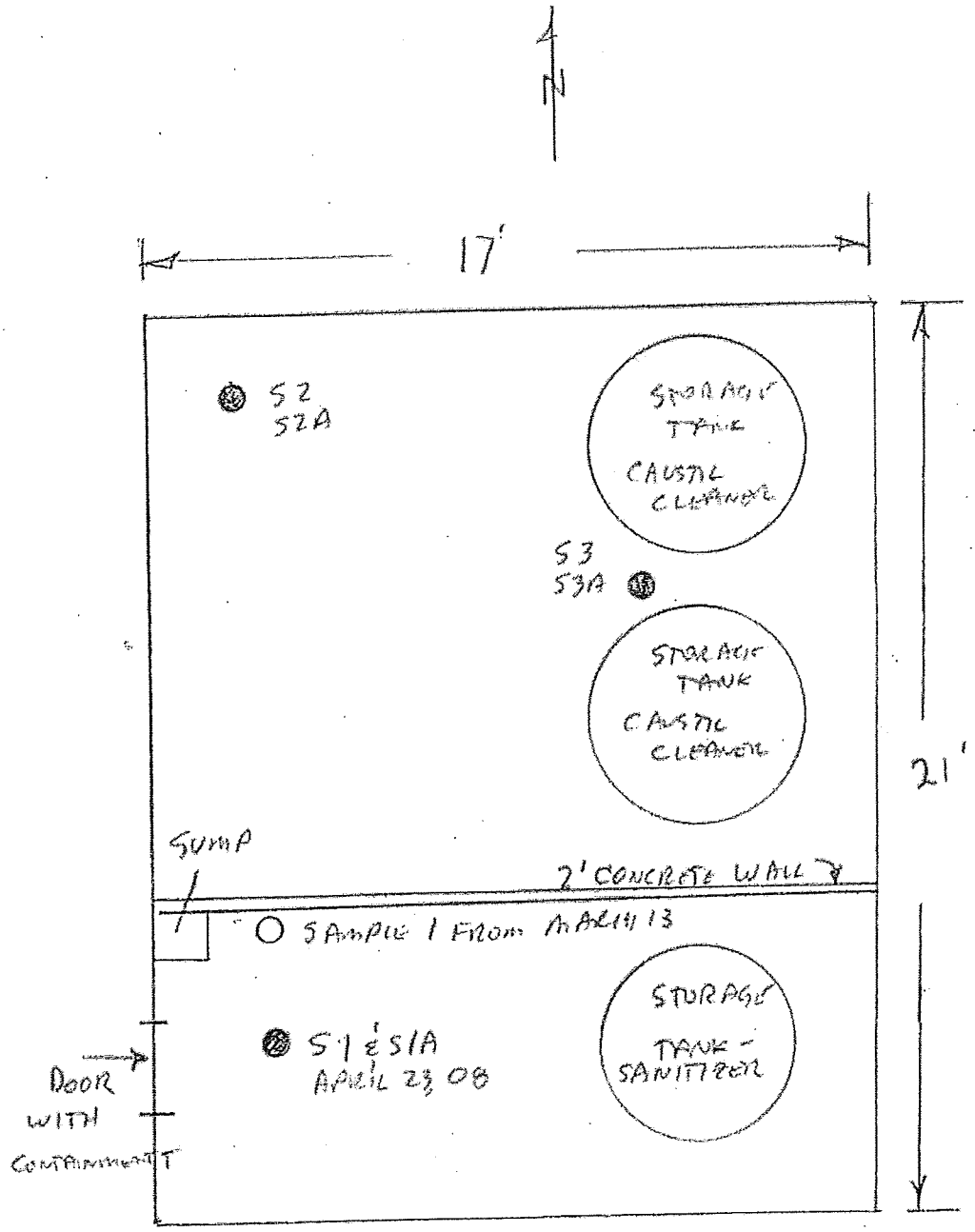
Date: 4/29/08


1 MEZZANINE FLOOR PLAN
MEZZANINE
ROOM
METAL STAIRS
LOCATION OF — Corings in Sani-Tation Room

IVERTECH LLC

Sheet No. 1 of 1
Job Number C 7353

TITLE FRITO LAY CLEANING STORAGE ROOM
SUBJECT HAM AUGER LOCATION MAP
PREPARED BY DCT DATE 4/10/08 CHECKED BY _____ DATE _____



SAMPLE 1 ○ MARCH 13, 2008 LOCATION

S1 & 1A ● APRIL 23, 2008 LOCATION

DiMaggio, Janet H - DNR

From: DiMaggio, Janet H - DNR
Sent: Wednesday, April 30, 2008 2:02 PM
To: 'Dennis Iverson'
Cc: Richard Arrowood; Carroll, Lisa M {FLNA}; Joe Martino
Subject: RE: Frito Lay-Beloit

Thank you, Dennis, for sending the information requested. After looking at the documents, no action is required. A BRRTs number will be assigned in the near future and it will go on RR Sites map under the No Action Required module. You will not receive a formal letter unless a General Liability Clarification Letter is requested.

If you have any questions, please let me know.

Janet DiMaggio, P.G.
Advanced Hydrogeologist
South Central Region
Wisconsin Department of Natural Resources
(☎) phone: (608) 275-3295
(☎) fax: (608) 275-3338
(✉) e-mail: janet.dimaggio@wisconsin.gov

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Cc: Richard Arrowood; Carroll, Lisa M {FLNA}; Joe Martino
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