

5H Site Remediation update

- DNR review of the SEH site plan has been completed - DNR correspondence from DNR (attached)
- Site excavation for underground piping uncovered more contaminated soils the week of April 24th. This material was hauled off site and disposed of like the original contaminated soil
- The area where it was encountered is not new and was from the same general area as before – it was noted and SEH was informed. SEH is reaching out to DNR to inform them of most recent activities just in case a testing location or two should be move based on recent findings
- SEH has secured a drill rig and crew for 5-17-23 to collect samples and carry out the site testing plan



March 9, 2023

Heart of the Valley Metropolitan Sewerage District
Brian Helminger, District Director
801 Thilmany Road
Kaukauna, WI 54130
Via Electronic Mail Only to brian.helminger@hvmsd.org

Subject: Review of Site Investigation Work Plan
Heart of the Valley Sewerage District – Splitter Structure
801 Thilmany Road, Kaukauna, WI
BRRTS #02-45-590936

Dear Mr. Helminger:

On January 30, 2023, the Wisconsin Department of Natural Resources (DNR) received the “Site Investigation Work Plan” (SIWP) prepared for the Heart of the Valley Sewerage District – Splitter Structure by Short Elliot Hendrickson, Inc. (SEH) on your behalf. The SIWP was submitted with a fee for DNR review and response. The submittal of a SIWP is required per Wis. Admin. Code § NR 716.09 as this site is subject to regulation under 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

The site is comprised of two (2) parcels totaling approximately 6.3 acres and is developed with the Heart of the Valley Metropolitan Sewerage District (HOVMSD) facility. During the construction of the Filter Splitter Structure, suspected petroleum-impacted soils were identified by HOVMSD’s general contractor during excavation activities. The soil contamination was first identified based on visual and olfactory evidence, and soil sampling results for a sample collected on October 20, 2022 revealed concentrations of volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and Resource Conservation and Recovery Act (RCRA) 8 Metals above applicable WAC NR 720 Residual Contaminant Levels (RCLs). Benzene was the only VOC detected at a concentration exceeding its protection of groundwater RCL. For PAHs, benzo(a)pyrene was detected at a concentration exceeding its non-industrial direct contact RCL, and chrysene was detected at a concentration exceeding its protection of groundwater RCL. Additionally, one RCRA metal, arsenic was detected at a concentration of 4.3 milligrams per kilogram (mg/kg), which exceeds its direct contact and protection of groundwater RCLs but does not exceed its established Background Threshold Value (BTV) of 8.3 mg/kg.

The soil contamination was identified along the northeastern boundary of the Filter Splitter Structure excavation at a depth between 6 and 8 feet bgs. The excavation for the Filter Splitter Structure was approximately 25 feet by 20 feet by 8 feet in depth. A total of 144.04 tons of soil was excavated and disposed off-site from the excavation, of which a small portion was the impacted soils. The excavation was completed in November 2022.

SIWP Summary

The SIWP proposes the installation of up to six (6) soil borings to depths of approximately 12 feet bgs or until bedrock is encountered. Two (2) of the boreholes are proposed to be installed approximately 10 feet from the identified soil contamination; the four (4) remaining borings are proposed to be installed approximately 20 feet from the identified contamination. Based on field observations, up to three (3) of the soil borings will be

converted into temporary monitoring wells. The SIWP proposes soil samples collected from the borings be submitted for laboratory analysis for VOCs, PAHs, and arsenic. Groundwater samples collected from the temporary monitoring wells will be submitted for laboratory analysis of VOCs.

DNR Review of the SIWP

Following the DNR's review of the SIWP, the DNR requests you proceed with the proposed work, while incorporating the following comments:

- Soil Boring Locations: one (1) soil boring should be installed as near the identified soil contamination as possible. This boring should be converted into a temporary well. DNR recommends the additional borings being installed in roughly a semi-circle around the area of identified soil contamination, as discussed with your consultant on March 8, 2023. Locations of temporary wells should be evaluated based on field observations made during soil boring advancement.
- Soil Analytical: Laboratory analysis of soil samples for arsenic is not warranted as the detection in the previous soil sample was below the BTV.
- Groundwater Analytical: The need for PAH analysis of groundwater samples should be evaluated based on soil sample analytical results.
- Based on the data collected, additional soil sampling and groundwater monitoring may be necessary, including installation of NR 141-compliant permanent monitoring wells.
- DNR has evaluated the emerging contaminant scoping statement included in the SIWP and concurs that sampling for emerging contaminants is not warranted at this time.

Other DNR Comments

- Sampling results must be sent to the DNR and property owner(s), including owners of off-site properties from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14).
- All NR 700 submittals must be submitted in an electronic version.
- You will need to submit a complete Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. within 60 days after completion of the field investigation and receipt of laboratory data. Depending on the results of the investigation, a No Further Action (NFA) request may be an option for this site and can be proposed for evaluation after receipt of sample results.

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). Furthermore, 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 the work plan, by April 30, 2023.
- 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) 362-2072 or David.Neste@wisconsin.gov.

Sincerely,



David Neste
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources