



July 17, 2020

MR. CHRIS MARX, DIRECTOR OF PUBLIC WORKS  
CITY OF CHILTON  
42 SCHOOL STREET  
CHILTON WI 53014

Subject: Review of Site Investigation Work Plan  
Chilton Plating Co Inc.  
420 E. Main Street, Chilton, WI 53014  
BRRTS #: 02-08-000040

Dear Mr. Chris Marx:

On June 8, 2020, the Wisconsin Department of Natural Resources (DNR) received the "Additional Site Investigation Work Plan" (Report) prepared for the City of Chilton by The Sigma Group, Inc (Sigma). 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

Environmental investigation activities have been conducted on the property since 1988 to identify potential and known contamination associated with the long-term use of the site for the Chilton Plating Company and petroleum usage on the southern parcel (415 E. Main St.). The site includes the four parcels all currently owned by the City of Chilton and is adjacent to the South Branch of the Manitowoc River. Investigations have included soil, groundwater, vapor and sediment analysis with the most current sampling event having occurred in 2018. The investigations have identified the following contaminants of concern (COC) for soil, groundwater, and/or sediment on the property: Chlorinated volatile organic compounds (CVOCs), petroleum volatile organic compounds (PVOCs), inorganics including nickel, lead, cyanide, magnesium, and chromium.

Site has historically operated as the Chilton Plating Company from 1960 until 2008; the buildings have remained vacant since that time. Portions of the site have also been occupied by a salvage yard, machine shop, and bulk oil/gas station. The City of Chilton is planning on redeveloping the property, the site buildings will likely be demolished prior to redevelopment.

### SIWP Summary

The current SIWP was submitted with a fee and plans to delineate and define the extents of CVOC, PVOC, nickel, lead, cyanide, and chromium in the soil and groundwater on the property and in the sediment within the South Branch of the Manitowoc River. Further investigation to determine source of methyl-tert-butyl-ether (MTBE) in the groundwater is included in the SIWP. Manganese was identified in three wells over the

Enforcement Standard (ES) and Preventive Action Limit (PAL). Manganese investigation needs to be included in the SIWP.

Due to the long-term use of the site as a plating facility, there is a potential for PFAS impacts on the property. PFAS sampling will be conducted in samples collected from the northern portion of the site as well as in the groundwater.

#### DNR Review of the SIWP

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

#### A. Site Investigation Scoping

1. General comments:
  - a. The final report will need to include all historic sampling data in the data tables.
  - b. Cyanide RCLs on the data tables are missing and should be included in future reports.
  - c. The DNR suggest including MTBE in the Analytical Legend on Figure 5 for wells SMW-3 and CPMW-03.
  - d. The BRRTS numbers are not associated with the correct addresses in the introduction & within the report. This should be corrected for the next document review.
  - e. Samples west of the existing building on Figure 5 and Table 5 of the sampling plan do not match. The DNR recommends clarifying which samples will be collected.

#### B. Evaluation of Environmental Media

1. Soil
  - a. The DNR recommends additional soil sampling along the west property boundary and in the northwest corner of the property to define the degree and extent of VOCs and metals onsite and offsite.
  - b. The DNR recommends additional soil sampling for Nickel in the area south of MW-8.
  - c. Cyanide impacts are at SGP-16 and B-1 through B-11, but not above soil to groundwater in SGP-19. The DNR recommends additional soil sampling in the area northwest and southwest of MW-9 and west of SGP-16 to define the degree and extent of cyanide on the property.
2. Groundwater
  - a. Manganese exceedances were observed in wells GSMW103, CPMW-02, and CPMW-04A. Further investigation of manganese over ES and PAL exceedances is required.
3. Vapor
  - a. Current SIWP does not properly address utility investigation for impacts as potential pathways for COCs & VI Pathway. Due to the potential of vapor intrusion impacts to neighboring properties, a work plan for utility investigation should be provided in accordance to the guidance document RR-880.

#### C. Receptors

- The potential or known impacts to receptors must be evaluated, including on-site and nearby utilities (Wis. Admin. Code § NR 716.07(7)). See note in the Vapor section.

D. Other DNR Comments

1. In addition, please keep in mind that depending upon the results of the sampling, it may be necessary to expand the sampling to define the degree and extend of the contamination.
2. 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).
3. All NR 700 submittals must be submitted in an electronic version and paper version. Both the electronic and paper versions must be identical and complete. At this time, due to COVID-19, a paper version is not required for submission.

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) 424-7890 or [kevin.mcknight@wisconsin.gov](mailto:kevin.mcknight@wisconsin.gov).

Sincerely,



Kevin McKnight  
Project Manager – Hydrogeologist  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

cc: Stephen Meer, The Sigma Group, Inc ([smeer@thsigmagroup.com](mailto:smeer@thsigmagroup.com))