



May 30, 2012

Mr. Mark Meunier, SPHR
Madison Kipp Corporation
201 Waubesa Street
Madison WI 53704

Subject: Conditional Approval: May 2012 Work Plan for Polychlorinated Biphenyl Investigation

Dear Mr. Meunier:

The Department has completed its review of the Madison Kipp (MKC) May 2012 Work Plan for Polychlorinated Biphenyl (PCB) Investigation. We have several conditions and required changes to the proposal. These issues were discussed at our face-to-face meeting on May 29, 2012. Based on our review, and that followup discussion, here are the Department's comments and required modifications to the workplan:

1. Source of PCBs/Waste Oils – Documentation of Source

Page 6 - The term oils is used, is there any additional information concerning the source of these oils? Further, can the quantities of oils spread be estimated as well as who did the spreading, over what time frame and frequency? We expect that the questions posed to you in our May 4 letter be addressed by MKC through interviews with current and former employees, as well as other sources of historic information.

Page 6 - It is stated that oils were only spread on the north parking lot, what is the source of this information? There are other past gravel parking lots particularly on the western portion of the site that were also oiled and will require investigation.

Page 7 - Specific to the oil warehouse – what was its function, to store waste oil or oil product for use? Other than the warehouse how were materials (hydraulic oil, Stoddard solvent, etc) stored? Were waste solvents or other waste liquids stored in the warehouse? Also, given the distribution of solvent related soil contamination is it known if waste solvents were also spread on site either through incorporation into the waste oil or separately? Again, MKC should interview current and former employees in an attempt to ascertain this information.

DNR Required Action: All questions asked by DNR in this and our May 4 letter shall be answered to the extent possible, in the PCB sampling report.

2. Miscellaneous Clarifications

Page 7 - Note the current building configuration came after 1968, it appears building additions were done on west side in 1977 and 1980. Please correct this in the final report.

Page 9 – There needs to be a written clarification of the role of the cooling tower as a quench tank, its function and period of use. This should be part of the site investigation report for the comprehensive investigation.

3. Off-Site Soil Sampling – Additional Work Tasks

For the PCB investigation as part of this immediate action, the following additional off site soil sampling is required.

Marquette Street:

Page 14 and Figure 4-1- Add two soil samples at two sampling locations per residential lot (total of four samples per residence) at 146, 150, 154, 162, 166 and 202 South Marquette Street. The sample depths shall be from 0-1 foot and from 2-4 feet below ground surface. The soil samples shall be analyzed for all study parameters. (Study parameters being PCBs, volatile organic chemicals, polyaromatic hydrocarbons, RCRA metals and total cyanide)

Additional soil sampling shall occur at 102, 110, 114, 118, 126, 128, 130, 134 and 142 South Marquette Street, that were previously sampled at a depth of 6 to 12 inches. Madison Kipp shall sample the backyards at two locations per residence at a depth of 2-4 feet below ground surface for all the study parameters.

Bike Path, Rain Garden and Vicinity to the North:

Add soil sample locations off site to the north along the bike trail, rain garden and storm drain. Add five sampling locations with two soil samples per location at sample depths from 0-1 foot and from 2-4 feet below ground surface. One location shall be in the current rain garden and one location shall be at the exit of the storm drain north of the bike path. Samples to be analyzed for all the study parameters. Also, located the soils removed from the rain garden and adequately test those soils for all study parameters.

Waubesa Street:

Add soil samples along the southwestern building perimeter where the gravel parking existed before the building expansion. Add a single row of soil samples, spaced 20 feet apart, in the area between west building wall and fence line. The sample depth shall be 0-4 feet below ground surface. Add two soil samples per residence at 233, 237, 241, 245, 249, 253, 257 and 265 Waubesa Street. Also add 269 Waubesa to be sampled on east and south property line. The sample depths shall be the 0-1 foot and from 2-4 feet below ground surface. Samples shall be analyzed for all study parameters.

4. Multiple Analyses:

Page 17 – Madison Kipp shall initially analyze 10 percent of all soil samples for PCB homologues. (EPA Method 680) Based on initial analytical results the required homologue analysis frequency may be adjusted by the Department. Madison Kipp shall preserve as frozen all soil samples for possible future analytical needs.

The amended workplan shall provide the required laboratory detection levels for all analyses to be completed.

This completes the Department's review and conditional approval of the PCB immediate action sampling. As discussed, both the Department and USEPA view this as a phased investigation for the ch. NR 708, Wis. Admin. Code, immediate action. Pending the results of this field work, both agencies reserve the right to request additional investigation and remedial tasks. With these required modifications the Department grants conditional approval of the May 2012 Polychlorinated Biphenyl Work Plan. In response to these Department-required changes, a new sampling map and narrative will be required. The new map should clearly denote the location of the bike path, the SVE system, and the community center. The sampling map should be provided by June 4,

2012. The revised narrative can be submitted as part of the PCB sampling report. However, preparations for field work can begin as soon as possible. If you have questions about this letter or the PCB sampling effort please contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to be 'LH', with a long horizontal flourish extending to the right.

Linda Hanefeld
South Central Region Remediation and Redevelopment Team Leader
608-275-3310