Appointment

From: Ramanauskas, Peter [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6492DDC4240C482B891D9F48B06E17F6-PRAMANAU]
Sent: 5/25/2017 4:21:40 PM
To: Beedle, Michael (beedle.michael@epa.gov) [beedle.michael@epa.gov]; Kenneth Zolnierczyk [Zolnierczyk.Kenneth@epa.gov]
BCC: R5Metcalfe-ConfRm-R1600/R5-Metcalfe---16th-Floor [r5metcalfe-confrm-r1600@epa.gov]

Subject: Goodman Center Madison - Citizen Message
Location: R5Metcalfe-ConfRm-R1600/R5-Metcalfe---16th-Floor

Start: 5/25/2017 9:00:00 PM
End: 5/25/2017 9:30:00 PM
Show Time As: Tentative

Ken/Mike,

Please see Maria Powell's message below. Can we get together to quickly discuss? I have some thoughts that I'd like to discuss with you.

Thanks,
Peter

From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
Sent: Thursday, May 25, 2017 9:26 AM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: question about PCB remediation/closure

Peter,

Thank you.

Yes, I know they tested four soil samples for PCBs. As I said below, there are no maps of where they took these four samples and this soil PCB data is not in the files. So we know nothing about where they tested, what they tested, what the detection limits were, etc. There is nothing in any of the reports suggesting that they identified what the sources of PCBs were, where they were, etc.

How can you appropriately assess and remediate a site without knowing the source of the contaminants and how they were used, pathways of release, etc? I believe Wisconsin's NR 700 rules require some of this, but these rules are rampantly ignored at sites in south central Wisconsin. Consequently, we have situations like Madison Kipp--where the PCBs were "discovered" in 2012, after citizens raised questions about them for decades but DNR said they weren't there because they never tested for them. Goodman, of course, has children playing all over it, so the stakes are even higher.

One further question: What entity is responsible to assure that when Goodman does reconstruction inside the building, they handle the PCBs appropriately? The DNR? Goodman? The contractors?

Thanks,
Maria

On 5/24/2017 2:24 PM, Ramanauskas, Peter wrote:
> Hello Ms. Powell,
>
> I did look over the information you provided to Gary & me. Given the
> low PCB levels detected in the building, it appears that the remedial
> actions taken were appropriate (i.e. capping of the residual in the
> original floor by approximately 20 inches of new concrete underlain
> with gravel and the removal, cleaning, and/or encapsulation/marking of
> remaining building columns). Although the owner considered the federal
> PCB cleanup regulations in the actions they took to address the
> contamination found in the building materials that exceeded 1 mg/kg,
> because the as-found concentrations of PCB did not exceed 50 mg/kg,
> they may not have notified U.S. EPA in light of the regulatory

> language at 40 CFR 761.50(b)(3). I see that WDNR did request the
> collection of four soil samples for PCB analysis which resulted in
> non-detects. Sampling is usually biased to suspected source areas, in
> this case visibly oil stained areas. Various Federal PCB Policies and
> Guidance documents may be found here:
> https://www.epa.gov/pcbs/policy-and-guidance-polychlorinated-biphenyl-
> pcbs
>
> Please let me know if you have additional questions.
>
> Regards,
> Peter
>
> -----Original Message-----
> From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
> Sent: Monday, May 22, 2017 8:16 AM
> To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
> Subject: Re: question about PCB remediation/closure
>
> Hi Peter:
>
> I just heard that the Goodman Center is planning to do some remodeling in the building referred to
below--and it reminded me of our exchanges.
> Any chance to look the information over yet?
>
> Thanks,
> Maria
>
> On 5/10/2017 9:52 AM, Maria Powell (MEJO) wrote:
>> FYI, in case you don't already know this, the Goodman Community
>> Center is directly adjacent to Madison Kipp, to the north.
>>
>> On 5/10/2017 9:39 AM, Maria Powell (MEJO) wrote:
>>> Peter,
>>>
>>> Thank you--I appreciate the response. There's no particular rush,
>>> just get back to me when you can.
>>>
>>> Maria
>>>
>>> On 5/9/2017 4:41 PM, Ramanauskas, Peter wrote:
>>>> Hello Ms. Powell,
>>>>
>>>> Thank you for the additional information. I will look it over so I
>>>> can better understand the site history and get back to you. In the
>>>> meantime, I did want to let you know that I will be out of the
>>>> office tomorrow and will review the information you attached when I
>>>> return.
>>>>
>>>> Thank you,
>>>> Peter
>>>>
>>>> -----Original Message-----
>>>> From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
>>>> Sent: Tuesday, May 09, 2017 3:31 PM
>>>> To: Edelstein, Gary A - DNR <Gary.Edelstein@wisconsin.gov>
>>>> Cc: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
>>>> Subject: Re: question about PCB remediation/closure
>>>>
>>>> Thanks Gary, this is helpful. I'm sorry--yes, I mean the
>>>> closure/registry packet on BRRTS:
>>>> http://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=34405
>>>>
>>>> I didn't realize that contaminated in-place building material
>>>> didn't need to be part of this document--so thanks for clarifying that.
>>>> According to the closure request report, in 2005 a previous
>>>> consultant gathered four shallow soil samples and had them tested
>>>> for PCBs and reported that "none of the samples contained
>>>> detectable concentrations."
>>>> See attached, pg. 18. This PCB data isn't included with the other
>>>> data, nor are maps of where the samples were taken, etc (unless I
>>>> am missing it). They didn't test any other media or do any PCB
>>>> testing after 2005.
>>>>
>>>> Given the past uses of the building, the fact that PCBs were found
>>>> throughout the building, past uses of the building, and that it was
>>>> to be developed into a community center, it seems they would have
>>>> tested more thoroughly in the soils there. But I don't know what

>>>> the policies/guidances are on this, if any.
>>>>
>>>> Mr. Ramanauskas, can you clarify this and my previous questions?
>>>>
>>>> Thanks,
>>>> Maria
>>>>
>>>> On 5/9/2017 10:55 AM, Edelstein, Gary A - DNR wrote:
>>>>> Hello Maria,
>>>>>
>>>>> As stated in our guidance, our Program doesn't regulate in-place
>>>>> PCB contaminated building material. I believe you were referring
>>>>> to our guidance when you mentioned the 2014 MOU. If not, our
>>>>> guidance is here:
>>>>>
>>>>> http://prodoasext.dnr.wi.gov/inter1/pk_rr_doc_public$doc.QueryView
>>>>> B
>>>>> yKe
>>>>> y?P_DOCUMENT_SEQ_NO=16150&Z_CHK=62798
>>>>>
>>>>> EPA regulates such material under TSCA. I've cc'd Peter
>>>>> Ramanauskas at EPA Region 5, who can hopefully respond to your
>>>>> questions directly.
>>>>>
>>>>> As far as a closure package is concerned, to what are you
>>>>> referring? A package submitted to our Program for contaminated
>>>>> soil and/or groundwater cleanup? If so, again, the contaminated
>>>>> in-place building material need not be part of such a package if
>>>>> the PCB contamination never reached or was not found in any
>>>>> environmental media, e.g., soil or groundwater.
>>>>>
>>>>> Please let me know if you have any further questions.
>>>>>
>>>>> Thanks, Gary E
>>>>>
>>>>> -----Original Message-----
>>>>> From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
>>>>> Sent: Monday, May 08, 2017 3:06 PM
>>>>> To: Edelstein, Gary A - DNR
>>>>> Subject: question about PCB remediation/closure
>>>>>
>>>>> Hello Gary:
>>>>>
>>>>> I have a question about DNR/EPA regs regarding PCBs. I have the
>>>>> DNR/EPA One Cleanup MOU from 2014.
>>>>>
>>>>> I'm looking at PCB data (7 aroclors) from wood columns and floors
>>>>> of the Goodman Center before it was redeveloped in 2008. See
>>>>> attached data.
>>>>>
>>>>> For the floors, the consultant closure summary report said that
>>>>> "All identified PCB-contaminated surfaces within the main building
>>>>> have been either cleaned or encapsulated" and " the entire
>>>>> production floor of the main building approximately 20 inches."
>>>>> For the wood columns, it says:
>>>>> "The bottom sections of the wooden support columns were cut off at
>>>>> an elevation approximately 18 inches above the new concrete floor
>>>>> and replaced with steel supports. RBE then washed the remaining
>>>>> upper portions of the wood columns with a cleaning solution to
>>>>> remove the 100-year accumulation of industrial grime. During
>>>>> construction, columns
>>>>> C6 and D6 were encased in cinder blocks. Retesting of the
>>>>> remaining portions of wood columns C8, D7, D8, and D12 showed that
>>>>> residual PCB concentrations exceeded 1 mg/kg only at column D-12.
>>>>> Column
>>>>> D-12 was therefore wrapped and covered with a new layer of wood
>>>>> trim. The columns with residual PCB contamination were labeled as
>>>>> PCB-contaminated before they were covered."
>>>>>
>>>>> The PCB data is not in the closure package, nor is there any
>>>>> mention of their presence in the building in the closure
>>>>> package--unless I am missing it.
>>>>>
>>>>> Is there anything else they should have included? I'm trying to
>>>>> understand how this process works.
>>>>>
>>>>> Thanks,
>>>>> Maria Powell

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>>>>>