



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

June 19, 2013

REPLY TO THE ATTENTION OF:

LC-8J

Linda Hanefeld
NR Region Program Manager
Wisconsin Department of Natural Resources
Fitchburg Service Center
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711

Re: PCB issues at Madison Kipp Corporation

Dear Linda,

During our April 10, 2013 meeting with Madison Kipp Corporation (Kipp), I explained to Kipp that PCBs found below the plant floor, at levels up to 20,000 ppm, would be too high to consider for risk based disposal. This was based on the opinion of one of U.S. EPA's risk assessors. At that time, Kipp questioned this statement and I agreed to get a second opinion. A second risk assessor was consulted and maintained the same conclusion that 20,000 ppm is too high to remain in place. The primary reason is that unacceptably high exposure levels would exist if institutional controls and/or engineered barriers fail.

U.S. EPA expects that Kipp will address the sub slab PCB contamination and provide an alternative remedy for both the long and short term. During our meeting, a suggestion was made to Kipp that construction of a slurry wall could be used as a temporary barrier and was dismissed by Kipp because of space constriction on the Western property border. Kipp should be considering an alternative remedy such as the use of sheet piling in place of using a slurry wall. U.S. EPA expects this issue will be formally addressed by Kipp through a workplan that is specifically concerned with sub slab PCB contamination.

Kipp also expressed problems with being able to conduct a removal of this material because it is beneath the plant floor and their need to maintain operation of heavy equipment. Regardless of the ultimate remedy, Kipp first needs to sample and identify the boundaries of sub slab PCB contamination and establish if PCBs are migrating. It is critical for Kipp to clear up this issue in order to even consider the use of a long term remedy. Again, this would need to be addressed through a workplan for sub slab PCB contamination.

A second major PCB issue at Kipp is the finding that PCBs have impacted ground water. The explanation given by Kipp is that this is a result of soil boring drawdown. Data needs to be provided that clearly establishes the validity of this claim. Kipp should contact WDNR/U.S. EPA as early as possible with a proposal of how they will gather data to back up this claim.

At this point in time the most urgent PCB issue for Kipp is to complete removal at the residential properties. Kipp's next priorities should be to assemble a workplan that address the sub slab contamination and collecting data on PCB groundwater contamination.

Our next scheduled meeting with Kipp is on June 26, 2013. I anticipate that we can convey these concerns to Kipp at that time. If you have any concerns or questions, call me at (312) 353-9687.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth J. Zolnierczyk".

Kenneth Zolnierczyk
Chemicals Management Branch