

Mr. Greg Michael Wisconsin Department of Natural Resources 141 NW Barstow Street Waukesha, WI 53188-3789

Mr. Binyoti Amungwafor Wisconsin Department of Natural Resources 1027 W. St. Paul Avenue Milwaukee, WI 53233

### EXTENSION REQUEST: INFILTRATION/INJECTION TEMPORARY EXEMPTION FORMER TAXMAN INVESTMENTS CO (ONE-HOUR VALET DRYCLEANERS) 1214 WEST WELLS STREET, MILWAUKEE, WISCONSIN BRRTS NO. 02-41-152248

Dear Mr. Michael and Mr. Amungwafor:

As a follow-up to our recent electronic mail (e-mail) communication, Ramboll US Consulting, Inc. (Ramboll), on behalf of Marquette University (Marquette), is requesting an extension of the *Infiltration/Injection Temporary Exemption Request* issued on July 24, 2020, for the injection of remedial material into the subsurface at the former One-Hour Valet/TAXMAN site (BRRTS No. 02-41-152248) (the "site") located at 1214 West Wells Street in Milwaukee, Wisconsin. An electronic mail (e-mail) extension request was originally submitted to the Wisconsin Department of Natural Resources (WDNR) on June 10, 2021, which was prior to the permit expiring on July 24, 2021, as specified in the original approval (Specific Item 11). On July 13, 2021, the previous WDNR project manager for the site, Mr. Issac Ross, responded to the request asking if any changes, besides the expiration date, would be required. Ramboll replied later that day and confirmed the only change was the expiration date (Attachment A).

In a July 27, 2021 response e-mail (Attachment A), Mr. Ross requested that a formal request be submitted ("one pager or e-mail"). Ramboll provided Mr. Ross with the formal extension request in an e-mail on July 29, 2021. Mr. Ross responded to this formal request in an e-mail dated August 20, 2021, indicating that the WDNR was recommending that the extension request be held pending evaluation of groundwater analytical results collected after the June 2021 injection event. Mr. Ross indicated that the extension request would then be re-evaluated (Attachment B).

Two groundwater sampling events were conducted (October 2021 and April 2022) after the June 2021 injection was completed. Based on the April 2022 groundwater sampling results, an additional injection event is proposed. Ramboll submitted a request via e-mail on May 16, 2022, asking the WDNR to re-evaluate the previously submitted extension requests.

May 23, 2022

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Ref. 1690005819



Ramboll is requesting that the original July 24, 2020 *Infiltration/Injection Temporary Exemption Request* approval be extended to August 31, 2022, to allow for performance of a supplemental injection event tentatively scheduled for July/August of 2022. The proposed scope of work for the supplemental injection is a replication of the event completed in June 2021. The proposed carbon amendment materials (diluted ABC<sup>®</sup> formula) and/or KB-1 bioaugmentation bacteria culture are the same materials covered by the existing approval. In addition, the materials would be introduced to the subsurface utilizing the existing injection wells installed in 2020 (Figure 1). No additional injection locations are being proposed as part of this extension request. Please note that Marquette will not be seeking reimbursement under the Dry Cleaner Environmental Response Fund (DERF) for the supplemental injection work.

We appreciate your consideration of this extension request. If you have any questions, please do not hesitate to contact us at any time.

Yours sincerely,

Paul Lindquist Managing Consultant

D 262 901 3510 plindquist@ramboll.com

Jeanne M. Tarvin, PG, CPG REH Americas Country Market Director

D 262 901 0085 jtarvin@ramboll.com

James L. Hutchens, PE Senior Managing Consultant

D 763 400 9961 jlhutchens@ramboll.com

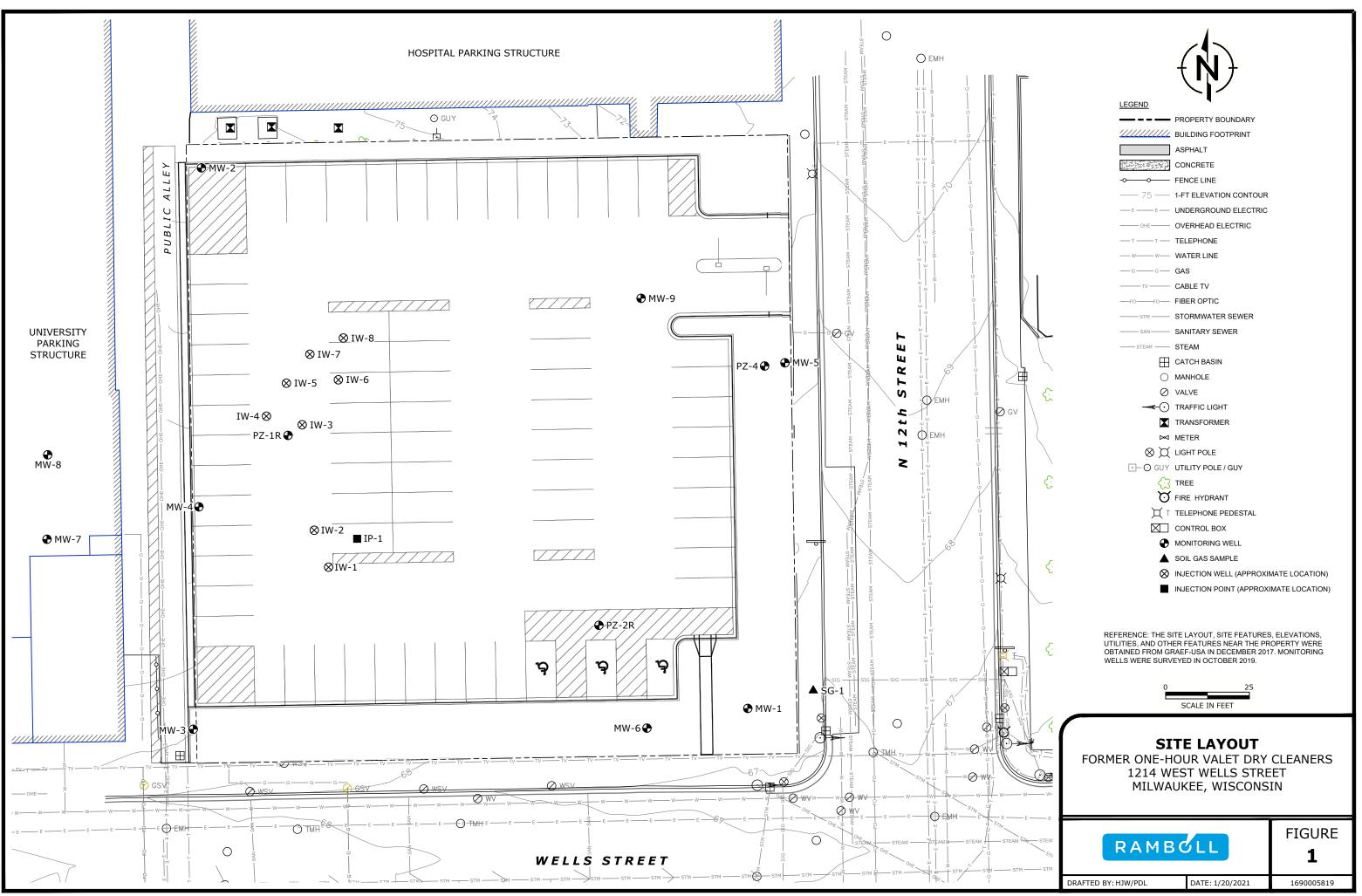
cc: Joel Smullen, Marquette University (electronic copy)

### Enclosures

Figure 1: Site Layout Attachment A: Electronic Mail Correspondence Concerning Extension Request Attachment B: Electronic Mail Correspondence: Formal Extension Request



FIGURE 1 SITE LAYOUT



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# ATTACHMENT A

**ELECTRONIC MAIL CORRESPONDENCE CONCERNING EXTENSION REQUEST** 

## **Paul Lindquist**

From:	Ross, Issac A - DNR <issac.ross@wisconsin.gov></issac.ross@wisconsin.gov>
Sent:	Tuesday, July 27, 2021 9:59 AM
То:	Paul Lindquist; Amungwafor, Binyoti - DNR
Cc:	Smullen, Joel; Jeanne Tarvin; Susan Petrofske
Subject:	RE: BRRTS 02-41-152248: Injection Field Work Notification and Extension Request

Much appreciated Paul, thank you. That shouldn't be an issue. Do you mind putting together and sending a formal request for the extension that includes the reasons for the extension. It can be a brief one pager or email. If for any reasons changes have/do occur, please be sure to include those in this or future amendments. We'll add the request to our site file so it is in our records and provide an official response for yours.

Please don't hesitate reach out with any questions/concerns.

Thanks,

Issac

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Issac Ross Cell: (414) 750-7140 Issac.Ross@Wisconsin.gov

From: Paul Lindquist <PLINDQUIST@ramboll.com>
Sent: Tuesday, July 13, 2021 3:58 PM
To: Ross, Issac A - DNR <Issac.Ross@wisconsin.gov>; Amungwafor, Binyoti - DNR <Binyoti.Amungwafor@wisconsin.gov>
Cc: Smullen, Joel <joel.smullen@marquette.edu>; Jeanne Tarvin <jtarvin@ramboll.com>; Susan Petrofske
<SPETROFSKE@ramboll.com>
Subject: RE: BRRTS 02-41-152248: Injection Field Work Notification and Extension Request

Good afternoon Issac and Binyoti,

Thank for the reply and do not worry about the delay.

Concerning the extension request, you are correct, the only change would be the expiration date to July 24, 2022. Thanks again.

Paul Lindquist Managing Consultant

D 262-901-3510 M 612-209-8676 plindquist@ramboll.com

From: Ross, Issac A - DNR <<u>Issac.Ross@wisconsin.gov</u>>
Sent: Tuesday, July 13, 2021 3:51 PM
To: Paul Lindquist <<u>PLINDQUIST@ramboll.com</u>>; Amungwafor, Binyoti - DNR <<u>Binyoti.Amungwafor@wisconsin.gov</u>>
Cc: Smullen, Joel <<u>joel.smullen@marquette.edu</u>>; Jeanne Tarvin <<u>jtarvin@ramboll.com</u>>; Susan Petrofske

### <<u>SPETROFSKE@ramboll.com</u>>

Subject: RE: BRRTS 02-41-152248: Injection Field Work Notification and Extension Request

Good Afternoon Paul,

I apologize for the delay. I have discussed this with Binyoti and we do not have any additional questions/concerns for the July 14 injection activities. Please keep us updated should anything change or if you have any questions or concerns. We will keep an eye out for the report once submitted.

As for the extension request - would anything be changing from the original request other than the expiration date?

Thanks,

Issac

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Issac Ross Cell: (414) 750-7140 Issac.Ross@Wisconsin.gov

From: Paul Lindquist <<u>PLINDQUIST@ramboll.com</u>>
Sent: Tuesday, June 29, 2021 4:23 PM
To: Ross, Issac A - DNR <<u>Issac.Ross@wisconsin.gov</u>>; Amungwafor, Binyoti - DNR <<u>Binyoti.Amungwafor@wisconsin.gov</u>>
Cc: Smullen, Joel <<u>joel.smullen@marquette.edu</u>>; Jeanne Tarvin <<u>jtarvin@ramboll.com</u>>; Susan Petrofske
<<u>SPETROFSKE@ramboll.com</u>>
Subject: RE: BRRTS 02-41-152248: Injection Field Work Notification and Extension Request

Good afternoon Issac and Binyoti;

I hope you had a great weekend.

I wanted to follow-up on the original e-mail sent on Thursday, June 10, 2021 regarding the planned injection activities scheduled for Wednesday, July 14, 2021 (see e-mail below). Please let us know if you have any questions or need any additional information.

Thanks.

Paul Lindquist Managing Consultant

D 262-901-3510 M 612-209-8676 plindquist@ramboll.com



From: Susan Petrofske <<u>SPETROFSKE@ramboll.com</u>> Sent: Thursday, June 10, 2021 8:56 AM To: Ross, Issac A - DNR <<u>Issac.Ross@wisconsin.gov</u>>; Amungwafor, Binyoti - DNR <<u>Binyoti.Amungwafor@wisconsin.gov</u>> Cc: Smullen, Joel <<u>joel.smullen@marquette.edu</u>>; Jeanne Tarvin <<u>jtarvin@ramboll.com</u>>; Paul Lindquist <<u>PLINDQUIST@ramboll.com</u>>

Subject: BRRTS 02-41-152248: Injection Field Work Notification and Extension Request

Issac and Binyoti,

Ramboll US Consulting, Inc. (Ramboll), on behalf of Marquette University (Marquette), is providing the Wisconsin Department of Natural Resources (WDNR) with the notification of a planned supplemental carbon amendment injection event scheduled to take place on July 14, 2021 at the Former Taxman Site/One Hour Valet site (BRRTS# 02-41-152248) in Milwaukee. The injection work is being conducted in accordance with the Infiltration/Injection Temporary Exemption approval issued by the WDNR on July 24, 2020. It is estimated that a combined total of 300 gallons of carbon amendment solution (55 gallons of ABC® formula diluted with approximate 245 gallons of water) will be introduced into the previously constructed injection wells (IW-1 through IW-8). The injection activities will be documented in the semi-annual groundwater monitoring report prepared following completion of the October 2021 groundwater sampling event.

We are also requesting that the existing exemption approval, which is set to expire on July 24, 2021, be extended for an additional 12 months. This will allow adequate time to evaluate the results of the October 2021, and possibly April 2022, semi-annual groundwater monitoring events to determine if an additional supplemental treatment is warranted.

Please let us know if you have any questions or need additional information to support the extension request.

Regards,

#### Susan Petrofske

Senior Managing Consultant

D +1 (262) 901-3501 spetrofske@ramboll.com

Ramboll 234 W. Florida Street Fifth Floor Milwaukee, WI 53204 USA https://ramboll.com



# **ATTACHMENT B**

**ELECTRONIC MAIL CORRESPONDENCE:** FORMAL EXTENSION REQUEST

## **Paul Lindquist**

From: Sent: To: Cc: Subject:	Ross, Issac A - DNR <issac.ross@wisconsin.gov> Friday, August 20, 2021 11:59 AM Paul Lindquist Amungwafor, Binyoti - DNR; Smullen, Joel; Jeanne Tarvin; Susan Petrofske RE: BRRTS 02-41-152248: Formal Infiltration/Injection Temporary Exemption Extension Request</issac.ross@wisconsin.gov>
Follow Up Flag:	Follow up
Flag Status:	Flagged

### Good Morning,

I apologize for the delay as I'd been away from the office. Thanks for submitting the injection extension request which expired July 24, 2021. Upon review, the DNR is recommending that the extension request be held until the evaluation and submittal of groundwater data from the 202106024 injection event at which time the extension will be re-evaluated.

Please do not hesitate to reach out with additional questions/concerns.

Thanks,

Issac

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Issac Ross Cell: (414) 750-7140 Issac.Ross@Wisconsin.gov

From: Paul Lindquist <PLINDQUIST@ramboll.com>
Sent: Thursday, July 29, 2021 8:43 AM
To: Ross, Issac A - DNR <Issac.Ross@wisconsin.gov>
Cc: Amungwafor, Binyoti - DNR <Binyoti.Amungwafor@wisconsin.gov>; Smullen, Joel <joel.smullen@marquette.edu>; Jeanne Tarvin <jtarvin@ramboll.com>; Susan Petrofske <SPETROFSKE@ramboll.com>
Subject: BRRTS 02-41-152248: Formal Infiltration/Injection Temporary Exemption Extension Request

Good morning Issac,

The purpose of this e-mail is to formally request an extension of the Infiltration/Injection Temporary Exemption approval granted by the WDNR on July 24, 2020. Please note that this is a follow-up to our June 10, 2021 e-mail which also included a request for this extension. In accordance with Specific Condition Item 14 of the approval letter, the June 10, 2021 request was made prior to the approval expiring on July 24, 2021. As requested in your July 27, 2021 e-mail, we are providing this e-mail as a formal request for this extension.

Ramboll US Consulting, Inc. (Ramboll), on behalf of Marquette University (Marquette), is requesting that the Infiltration/Injection Temporary Exemption approval be extended an additional 12 months (through July 24, 2022). This extension is being requested to allow for the potential performance of future supplemental carbon amendment injection event(s), should they be deemed necessary based the semi-annual groundwater monitoring data. The proposed carbon amendment materials (diluted ABC® formula) and/or KB-1 bioaugmentation bacteria culture are the same materials covered by existing approval. In addition, the materials would be introduced to the subsurface

utilizing the existing injection wells. No additional injection locations are being proposed as part of this extension request.

We appreciate your consideration/approval of this request and will continue to keep you apprised regarding future remedial activities at the site.

Kind regards,

#### **Paul Lindquist**

Managing Consultant 1692722 - Great Lakes

D 262-901-3510 M 612-209-8676 plindquist@ramboll.com

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