

From: James, Andrew G - DNR
Sent: Thursday, January 6, 2022 8:03 AM
To: Dick Lyster
Cc: wca2
Subject: RE: Requested Revisions to Closure Submittal - Winners Circle Automotive - BRRTS # 03-39-168015
Attachments: 4400-202 Case Closure Request Form Sec 4 L.pdf

Good Morning,

DNR has received the requested revisions and is requesting an additional revision to the closure form 4400-202. The page numbering and text do not line up and must be adjusted so that the original closure form 4400-202 and requested revised pages of this form, match numerically, alphabetically and the text/sections match from one page to the next. The result being, when DNR compiles the final closure packet, the original form 4400-202 includes the requested revisions, and the form numerically and alphabetically proceeds from section 1A to 4N, with each page in numerical order. Below I have highlighted the section DNR is requesting be revised from our original request for revisions.

Revisions to the closure request

1. Form 4400-202
 - a. Pg 1
 - i. Activity Name: Winners Circle Automotive
 - ii. WTM X: 554330 WTM Y: 367669
 - b. Pg 11 (CO Table)
 - i. 5 xiii. – Check for Source Property
 - c. Section 4.L
 - i. Remove all language and state, “This section is Not Applicable, no PAL exemption needed”.

Below is the form 4400-202 you had originally submitted. Page 10 contains the above highlighted revision that DNR has requested. As you see below, page 10 starts with section 4.J on top. The revised page that you provide should be numbered page 10 and begin with section 4.J.

- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).

Soil contamination in the unsaturated zone was remediated by operation of an engineered remediation system consisting of soil vapor extraction from ten wells located in the source area. No direct contact exceedances were detected at this site, so direct contact was not identified as a concern.

Groundwater concentrations were anticipated to decline due to the removal of the source area concentrations via the remediation system, and this was demonstrated to occur. Groundwater contaminant concentrations continue to decline due to natural attenuation.

Vapors in the unsaturated zone were removed through operation of the soil vapor extraction system at the site. However, the groundwater is still contaminated, and potential off-gassing is occurring from the remaining contamination. Because petroleum vapors biodegrade rapidly in aerated soils, the DNR allows vapor intrusion to be ruled out if aerated soil conditions are present in the zone within 5-feet horizontally and vertically beneath a building. Due to the sandy soils in the upper geologic unit at this site which extends down into the water table at 20 to 25 feet bgs, MSA believes aerated soil conditions are present meeting this criteria. In addition, operation of the SVE system further promoted aeration of the soils at this site.

- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.

The SVE system has already been abandoned and system hardware has been removed from the site as of November 2019.

- L. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.

An ES exemption will be required at closure of this site due to ES exceedances in the last sample round for the listed compounds and locations: At MW-2 for total trimethylbenzenes and naphthalene; at MW-3 for total trimethylbenzenes and naphthalene; at MW-6 for benzene; at MW-6P, MW-7P, MW-8P, and MW-10P for methyl tert butyl ether.

Attached is MSA's 12/13/21, revision which DNR is requesting to be adjusted. As stated above, this version begins with section 4.I and is numbered "Page 12 of 20" instead of beginning with section 4.J on "Page 10 of 18". Resubmitting the entire form 4400-202 including the requested revisions should correct the text and page numbering problem, or you can just modify form 4400-202 page 10 from the original closure submittal to correct section 4.L as requested while making sure the sections, pages and text subsequently match.

If you have any questions, please let me know.

Sincerely,
Andy James

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Andy James
Hydrogeologist
Remediation & Redevelopment Program
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Andrew.James@wisconsin.gov



From: Dick Lyster <dlyster@msa-ps.com>
Sent: Monday, December 13, 2021 1:52 PM
To: James, Andrew G - DNR <andrew.james@wisconsin.gov>
Cc: wca2 <wcabmw2@gmail.com>
Subject: RE: Requested Revisions to Closure Submittal - Winners Circle Automotive - BRRTS # 03-39-168015

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Mr. James: Hello, I have attached the revised form 4400-202: Page 1, Page w/ 5 xiii, page w/ Section 4 L, and revised Table A.1 (4 attached pdfs).
These correspond to Revisions 1.a, b and c and Revision 2 in your email of August 9.
Thank you



Richard Lyster, PG, CPG | Team Leader

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From: James, Andrew G - DNR <andrew.james@wisconsin.gov>
Sent: Friday, December 10, 2021 10:29 AM
To: Dick Lyster <dlyster@msa-ps.com>
Cc: wca2 <wcabmw2@gmail.com>
Subject: RE: Requested Revisions to Closure Submittal - Winners Circle Automotive - BRRTS # 03-39-168015

Mr. Lyster,
Thanks for the update. I will be able to review these and the documents submitted on 12/7/21, sometime next week. Thank you and have a nice weekend.

Thank you,
Andy James

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Andy James

Hydrogeologist

Remediation & Redevelopment Program

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From: Dick Lyster <dlyster@msa-ps.com>

Sent: Wednesday, December 8, 2021 9:39 AM

To: James, Andrew G - DNR <andrew.james@wisconsin.gov>

Cc: wca2 <wcabmw2@gmail.com>

Subject: RE: Requested Revisions to Closure Submittal - Winners Circle Automotive - BRRTS # 03-39-168015

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Andy: Good morning, attached are the two remaining figures that needed revision per the 8/9/21 email. This completes submitting the revised 6 figures (I sent the other 4 yesterday). These two include these statements and changes on figures highlighted below:

1. Map B.2.a
 - a. Please indicate on this map that C5, C7, C8, C9 data from previous consultant is unavailable
2. Map B.2.b
 - a. Please indicate on this map that C5, C7, C8, C9 data from previous consultant is unavailable

This should complete the figure revisions and submitting items 5 through 10.



Richard Lyster, PG, CPG | Team Leader

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From: James, Andrew G - DNR <andrew.james@wisconsin.gov>

Sent: Monday, August 9, 2021 3:27 PM

To: Dick Lyster <dlyster@msa-ps.com>

Cc: wca2 <wcabmw2@gmail.com>

Subject: Requested Revisions to Closure Submittal - Winners Circle Automotive - BRRTS # 03-39-168015

Mr. Lyster,

Below are the revisions DNR is requesting to the closure packet. Once the revisions have been made please just submit the revised pages, not the entire closure request. If you have any questions or concerns please let me know.

Thanks,

Andy James

Revisions to the closure request

1. Form 4400-202
 - a. Pg 1
 - i. Activity Name: Winners Circle Automotive
 - ii. WTM X: 554330 WTM Y: 367669
 - b. Pg 11 (CO Table)
 - i. 5 xiii. – Check for Source Property
 - c. Section 4.L
 - i. Remove all language and state, “This section is Not Applicable, no PAL exemption needed”.
2. Table A.1
 - a. Total Xylene standard is incorrect. PAL/ES should equal 400/2000ug/L respectively.
3. Table A.2
 - a. Missing Sample C5, C7, C8, C9 data (found in 8/14/1997 Advent Phase 2 assessment or the addendum/additional investigation by Advent)
 - b. Label DC as non-industrial DC (not as residential DC)
4. Table A.3
 - a. Missing samples B1, B3,
 - b. Label DC as non-industrial DC (not residential)
5. Map B.1.b.1
 - a. Add the Eastern property line boundary for the Source parcel (115 Ormsby). The Marquette County GIS map shows this to be intersecting a portion of the historic building that was onsite.
6. Map B.2.a
 - a. Include MW-3 in the soil to GW pathway exceedance delineation and if in your professional opinion you feel it is warranted, include B-4 & MW-4 in the delineation as well
 - b. Label the delineation “Estimated extent of soil contamination exceeding the Soil to GW pathway”
 - c. Add the Eastern property line boundary for the Source parcel (115 Ormsby). The Marquette County GIS map shows this to be intersecting a portion of the historic building that was onsite.

7. Map B.2.b

- a. Label the delineation “Estimated extent of soil contamination exceeding the Soil to GW pathway”
 - i. This delineation should match Figure B.2.a
 - b. Include only the borings from table A.3 on this map
 - c. Include MW3 in the residual soil contamination delineation.
 - d. Add the Eastern property line boundary for the Source parcel (115 Ormsby). The Marquette County GIS map shows this to be intersecting a portion of the historic building that was onsite.
8. Map B.3.b
- a. Include a PAL delineation and add this label to the Legend
 - b. Must include MW-4 in the ES plume.
9. Map B.3.d
- a. Please indicate the status of the wells on this map (ie well already abandoned, will be abandoned upon approval, Lost well etc)
10. Map F.3
- a. Put a callout arrow/text box indicating location of the source Property
11. Attachment F.4
- a. Please have this signed (the consultant may assert that the information is true to the best of their knowledge and sign for the RP)
12. Attachment G
- a. G-E – 133 W. Vallette St.
 - i. The signed certified receipt included at the bottom of this attachment is for the Everett Property at 128 W. Vallette. Please include the signed receipt for the Ellis property at 133 W. Vallette St.
 - b. G-F – 125 W. Vallette St.
 - i. Please include the signed certified mail receipt if one is available.

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Andy James

Hydrogeologist Remediation & Redevelopment Program

Wisconsin Department of Natural Resources

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Green Bay, WI 54313

Cell: 715-527-0114

Andrew.James@wisconsin.gov



- I. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration (e.g., stable or receding groundwater plume).

The SVE system was shut down in December of 2013. Since that time, groundwater contaminant concentrations have continued to show steadily decreasing concentrations in the source area wells MW-2 and MW-3, as can be seen in the compiled data table A.1., attached. At MW-3, the benzene concentration went from a high of 8,400 ug/L to less than 8 ug/L in the most recent sample round. Similar decreases are present for all of the BTEX compounds and naphthalene in this well. Similar decreases were observed at MW-2 and MW-4. At MW-4, there were no NR 140 enforcement standard exceedances in the last sample round. At well MW-6, concentrations are erratic, and may be influenced by water table elevations, but even in this well the BTEX concentrations have shown significant decreases in recent sampling completed from 2017 through 2019, well after the remediation system was shut down. MSA attributes the decreasing trends in these wells to natural attenuation processes.

MTBE concentrations in the piezometer wells are somewhat more problematic. At MW-7P, the MTBE concentrations appear to have stabilized at 120 to 150 ug/L. At MW-8P, MTBE has stabilized at 1,100 ug/L in the 2018 to 2019 sampling. Likewise, at MW-10P, MTBE appears to have stabilized in the 300 to 390 ug/L range. The only piezometer well without a stable MTBE concentration is MW-6P, in which MTBE gradually increased from 10 ug/L in December 2014 to 130 ug/L in November 2019. However, this well is located in the center of the contaminant plume, and with decreasing source concentrations and stable to decreasing concentrations further downgradient, MSA believes this well will likely stabilize within the near future. As the upper sand unit is not used as an aquifer in this area of the Village of Oxford (based on conversations with Roos Well Drilling), the remaining petroleum contamination in this unit is not a water supply well concern.

- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).

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Groundwater concentrations were anticipated to decline due to the removal of the source area concentrations via the remediation system, and this was demonstrated to occur. Groundwater contaminant concentrations continue to decline due to natural attenuation.

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- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.

The SVE system has already been abandoned and system hardware has been removed from the site as of November 2019.

- L. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.

This section is Not Applicable, no PAL exemption needed

- M. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.

No vapor sampling to evaluate the vapor intrusion pathway was conducted at this site.