State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
3911 Fish Hatchery Road
Fitchburg WI 53711-5397

Tony Evers, Governor Adam N. Payne, Secretary

Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



January 3, 2024

Robert Richardson 4225 A1A South Lot K109 St. Augustine FL 32080

#### KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations

Badgerland Co-op-Bob's Citgo (also known as the former Bob's Citgo)

602 W. Madison Ave., Milton, WI 53563 DNR BRRTS Activity # 03-54-000193

#### Dear Mr. Richardson:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the Badgerland Co-op-Bob's Citgo case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents or leases this property from you. Some COs also apply to other properties or rights of way (ROWs) affected by the contamination; these are identified in the Continuing Obligation Summary section of this letter.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the case closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09 and 726.11, and Wis. Admin. Code ch. NR 140.

The former Bob's Citgo site was investigated for a discharge of hazardous substances and/or environmental pollution from petroleum dispensers and underground storage tanks used during decades of operation as a gas station. Case closure is granted for the petroleum contaminants documented in the case file. The site investigation addressed soil, groundwater, and vapor. The remedial action consisted of tank removal and excavation of contaminated soil. Contamination remains in soil and groundwater at the former pump island and tank bed locations on the property.

The case closure decision and COs required were based on the current use of the site for commercial or industrial purposes. The site is currently zoned Central Business District. Based on the land use and zoning, the site meets



the non-industrial land use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

#### SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following locations:

ADDRESS (MILTON, WI)	COS APPLIED	DATE OF MAINTENANCE PLAN(S)
602 W. Madison Ave. (Source Property) Parcel #257 03100801	Residual soil contamination Cover Residual groundwater contamination Future vapor intrusion risk	October 16, 2023
520 W. Madison Ave. Parcel # 257 003100701	Residual soil contamination Cover Residual groundwater contamination Future vapor intrusion risk	October 16, 2023
Unaddressed property Parcel #257 160006	Residual groundwater contamination Future vapor intrusion risk	Not applicable
614 W. Madison Ave. Parcels # 257 15100601 <u>and</u> 257 15100602	Residual groundwater contamination Future vapor intrusion risk	Not applicable
West Madison Avenue (Highway 59) right-of-way.	Residual soil contamination Missing monitoring well	Not applicable

#### **CLOSURE CONDITIONS**

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wis. Stat. § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter and the maintenance plan dated October 16, 2023 are met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

#### **SOIL**

Continuing Obligations to Address Soil Contamination

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis. Stat. ch. 289)

Soil contamination remains near former pump islands, in the West Madison Avenue ROW, and areas adjacent to the remedial excavation as indicated on the enclosed map (Figure B.2.b., Residual Soil Contamination, 7/13/2022). If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

Cover (for soil) (Wis. Stat. § 292.12(2)(a), Wis. Admin. Code §§ NR 724.13(1) and (2), NR 726.15(2)(d) and/or (e), NR 727.07(1))

The asphalt covers, shown on the enclosed maps (Figure D.2, Area Where Cap is to be Maintained, 7/13/2022; note that there are two maps with the same title and date: one for 602 W. Madison Avenue and one for 520 W. Madison Ave.) shall be maintained in compliance with the enclosed maintenance plans, dated October 16, 2023. The purpose of the covers is to minimize the infiltration of water through contaminated soil and prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The covers approved for this closure was designed to be protective for commercial or industrial land uses. The covers do not extend into the W. Madison Avenue/Highway 59 right-of-way. Before using the property for residential purposes and before taking an action, the property owner must notify the DNR to determine if additional response actions are warranted. A cover intended for industrial land uses or certain types of commercial land uses may not be protective if the property changes to a residential use. This may include, but is not limited to, single or multiple family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover designed for multi-family residential housing use may not be appropriate for use at a single-family residence.

To modify or replace a cover, the property owner must submit a request to the DNR under Wis. Admin. Code ch. NR 727. The DNR approval must be obtained before implementation. The replacement or modified cover must be a structure of similar permeability or be protective of the revised use of the property until contaminant levels no longer exceed Wis. Admin. Code ch. NR 720 groundwater pathway residual contaminant levels and/or direct contact residual contaminant levels (RCLs).

### **GROUNDWATER**

Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells

Residual Groundwater Contamination (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w)) Groundwater contamination which equals or exceeds the enforcement standards for petroleum compounds is present on the source property and on three downgradient parcels, as shown on the enclosed map (Figure B.3.b., Groundwater Isoconcentration, 9/11/2023). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

Monitoring Wells could not be Properly Filled and Sealed (Wis. Admin. Code ch. NR 141 and § NR

726.15(2)(c)1.)

Monitoring well MW-7 located in the West Madison Avenue/Highway 59 right-of-way shown on the enclosed map, (Figure B.3.d, Monitoring Wells, revised 5/13/2022), could not be properly filled and sealed because it was missing due to being paved over, covered or removed during site development activities. Your consultant made a reasonable effort to locate the well and to determine if it was properly filled and sealed. However, the well listed above is not located and remains open. You may be held liable under Wis. Stat. § 292.11 for any problems associated with the monitoring well if it creates a conduit for contaminants to enter groundwater. If any of the groundwater monitoring wells is found, the owner of the property on which the well is located is required to properly fill and seal the well and submit the required documentation to the DNR.

#### **VAPOR**

### Continuing Obligations to Address Vapor Contamination

Vapor intrusion (VI) is the movement of vapors coming from volatile chemicals in the soil or groundwater or within preferential pathways into buildings where people may breathe air contaminated by the vapors.

<u>VI - Future Concern</u>: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable. Petroleum compounds remain in soil and groundwater at the locations shown on the enclosed maps (Figure B.2.b., Residual Soil Contamination, 7/13/2022 and Figure B.3.b., Groundwater Isoconcentration, 9/11/2023) at concentrations that may be of concern for vapor intrusion in the future, if a building is constructed, renovated or expanded in an area where no building currently exists or if an existing building is remodeled. Currently the source property has a vacant convenience store, 520 W. Madison Avenue has a commercial building, and 614 W. Madison has a fire station.

Vapor control technologies are required for new construction or for modification of occupied buildings on the property <u>unless</u> the property owner assesses the vapor pathway and the DNR agrees that vapor control technologies are not needed. <u>The property owner shall maintain the current building use and layout.</u>

See the Other Closure Requirements section for more details.

#### OTHER CLOSURE REQUIREMENTS

Maintenance Plan and Inspection Log (Wis. Admin. Code §§ NR 726.11(2), NR 726.15(1)(d), NR 727.05(1)(b)3., Wis. Admin. Code § NR 716.14(2) for monitoring wells)

The property owner is required to comply with the enclosed maintenance plan dated 10/16/2023 for the cover annually, and to use the inspection log (DNR Form 4400-305) to document the required inspections. The maintenance plan and inspection log are to be kept up-to-date and on-site or at the property owner's office. The property owner shall submit the inspection log to the DNR only upon request.

The limitations on activities are identified in the enclosed maintenance plan(s). The following activities are prohibited on any portion of this property where the cover, current building use and layout are required to be maintained, without prior DNR approval.

- 1. removal of the existing barrier;
- 2. replacement with another barrier;
- 3. excavating or grading of the land surface;
- 4. filling on capped or paved areas;
- 5. plowing for agricultural cultivation;
- 6. construction or placement of a building or other structure;

7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

If removal, replacement or other changes to a cover are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))

DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

General Wastewater Permits for Construction-related Dewatering Activities (Wis. Admin. Code ch. NR 200) The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction-related dewatering activities, including utility work and building construction.

If the property owner or any other person plans to conduct such activities, that person must contact the Water Quality Program and, if necessary, apply for the required discharge permit. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for discharge of *Contaminated Groundwater from Remedial Action Operations* may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids, oil and grease, a general permit for pit/trench *Dewatering Operations* may be needed. Additional information can be obtained by visiting the DNR website at "dnr.wi.gov," search "wastewater general permits."

### DNR NOTIFICATION AND APPROVAL REQUIREMENTS

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2), Wis. Stat. § 292.12(6)):

- Before removing a cover or any portion of a cover
- Before constructing a building and/or modifying use of or the construction of an existing building or changing property use.

Certain activities are limited at closed sites to reduce the risk of exposure to residual contamination via vapor intrusion. For properties with a continuing obligation for addressing the future risk of vapor intrusion when buildings exist at the time of closure approval, changes to the current building use and layout are prohibited without prior DNR approval. This includes any change in building construction, reconstruction or partial demolition. The DNR may require additional actions may be required at that time to re-assess for vapor intrusion and mitigate, as appropriate.

The DNR may require additional investigation and/or cleanup actions if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement. Compliance with the maintenance plan is considered when evaluating the reopening criteria.

#### SUBMITTALS AND CONTACT INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to <a href="mailto:dnr.wi.gov">dnr.wi.gov</a> and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the Remediation and Redevelopment Sites Map by searching "RRSM."

Send written notifications and monitoring well filling and sealing forms to the DNR using the RR Program Submittal Portal at dnr.wi.gov (search "RR submittal portal" or use the direct link: <a href="https://dnr.wi.gov/topic/Brownfields/Submittal.html">https://dnr.wi.gov/topic/Brownfields/Submittal.html</a>). Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (<a href="https://dnr.wi.gov/topic/Brownfields/Contact.html">https://dnr.wi.gov/topic/Brownfields/Contact.html</a>).

#### **CLOSING**

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this this letter, please contact DNR project manager Cindy Koepke at 608-219-2181 or cynthia.koepke@wisconsin.gov.

Sincerely,

Issac A. Ross

South Central Region Team Supervisor Remediation & Redevelopment Program Fitchburg DNR Service Center – Fitchburg, WI

#### Attachments:

Figure B.2.b., Residual Soil Contamination, 7/13/2022

Figure B.3.b., Groundwater Isoconcentration, 9/11/2023

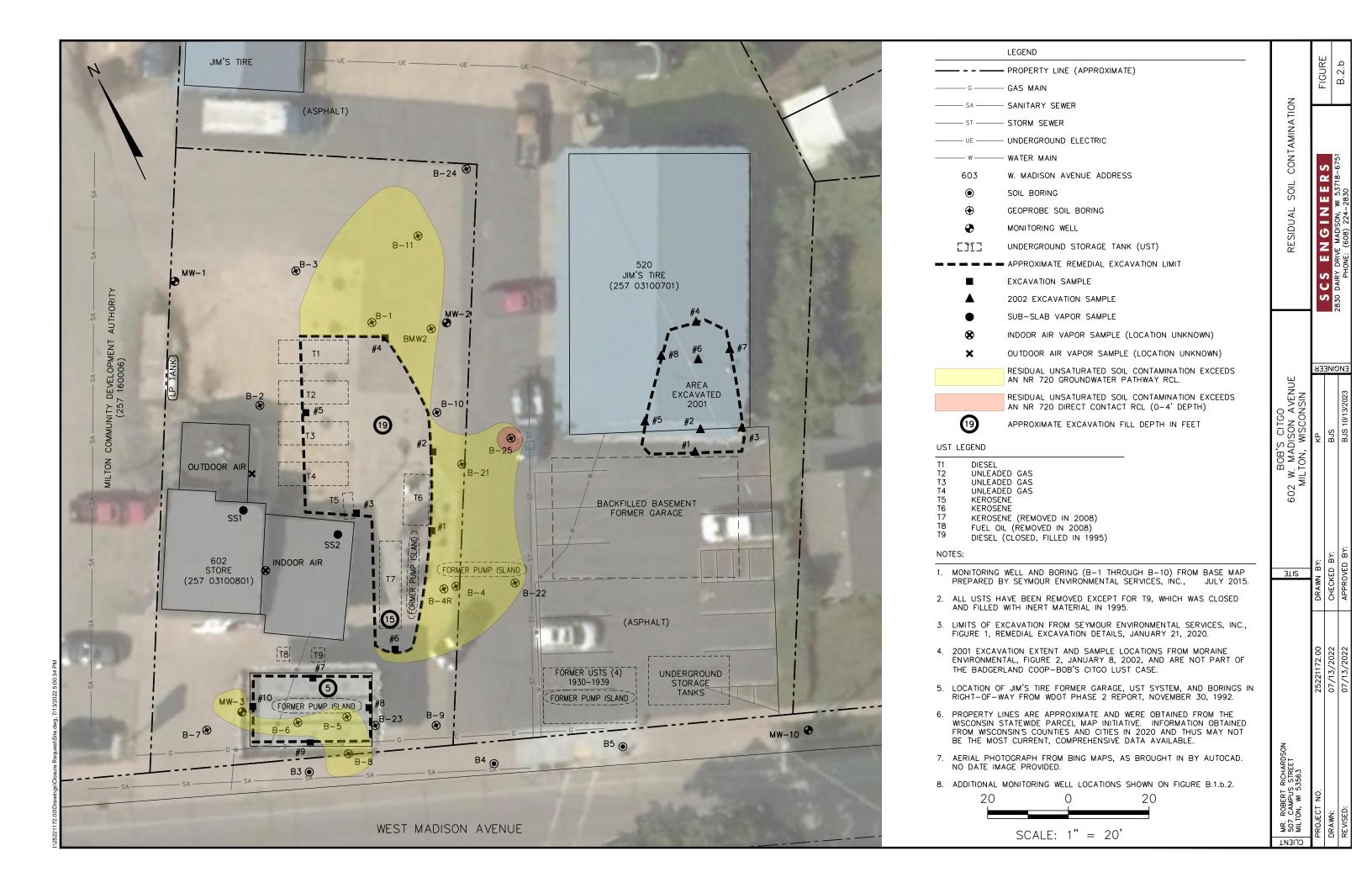
Figure B.3.d, Monitoring Wells, revised 5/13/2022

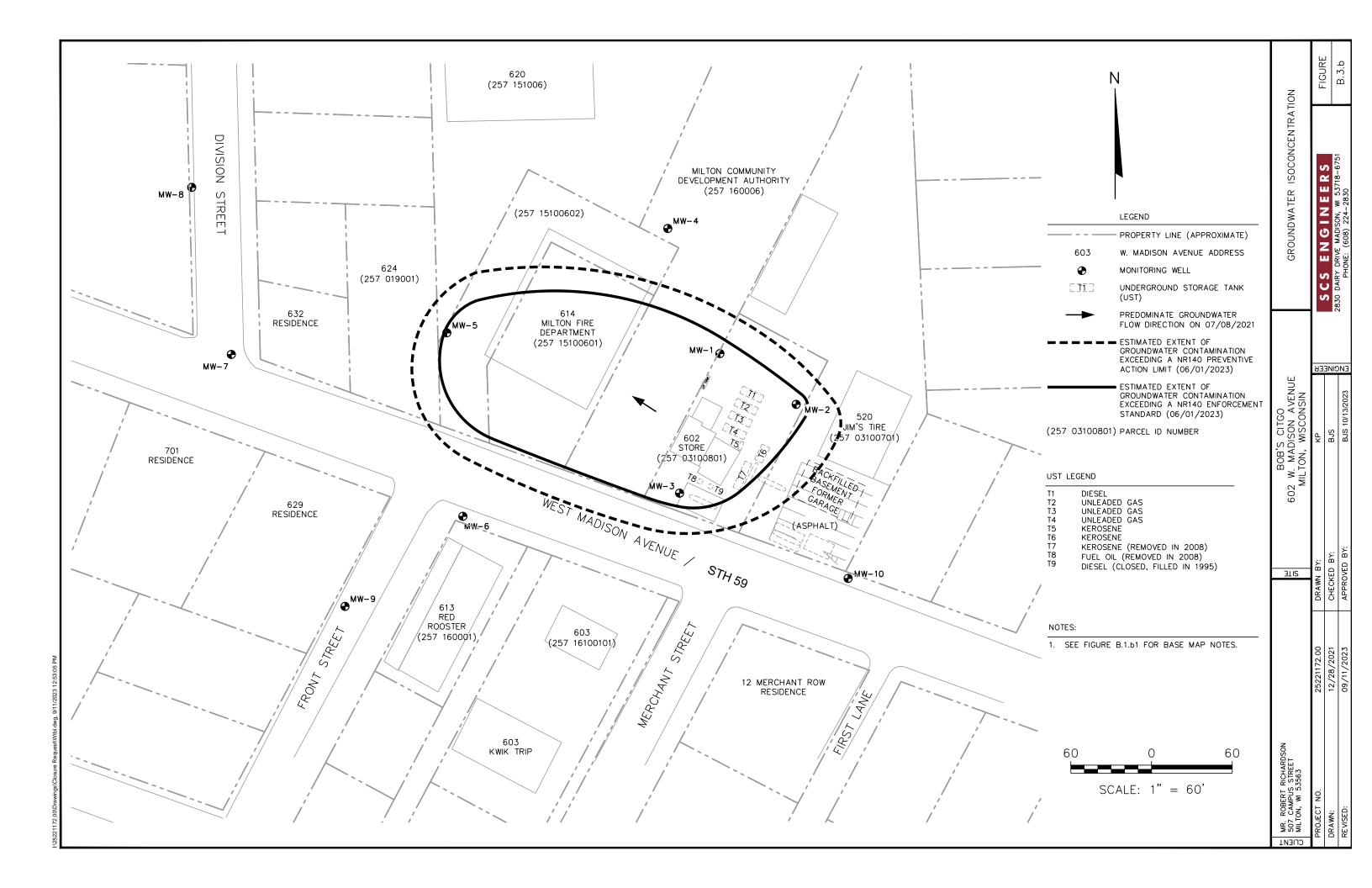
Attachment D, Maintenance Plan, 10/16/2023, for 602 W. Madison Ave.

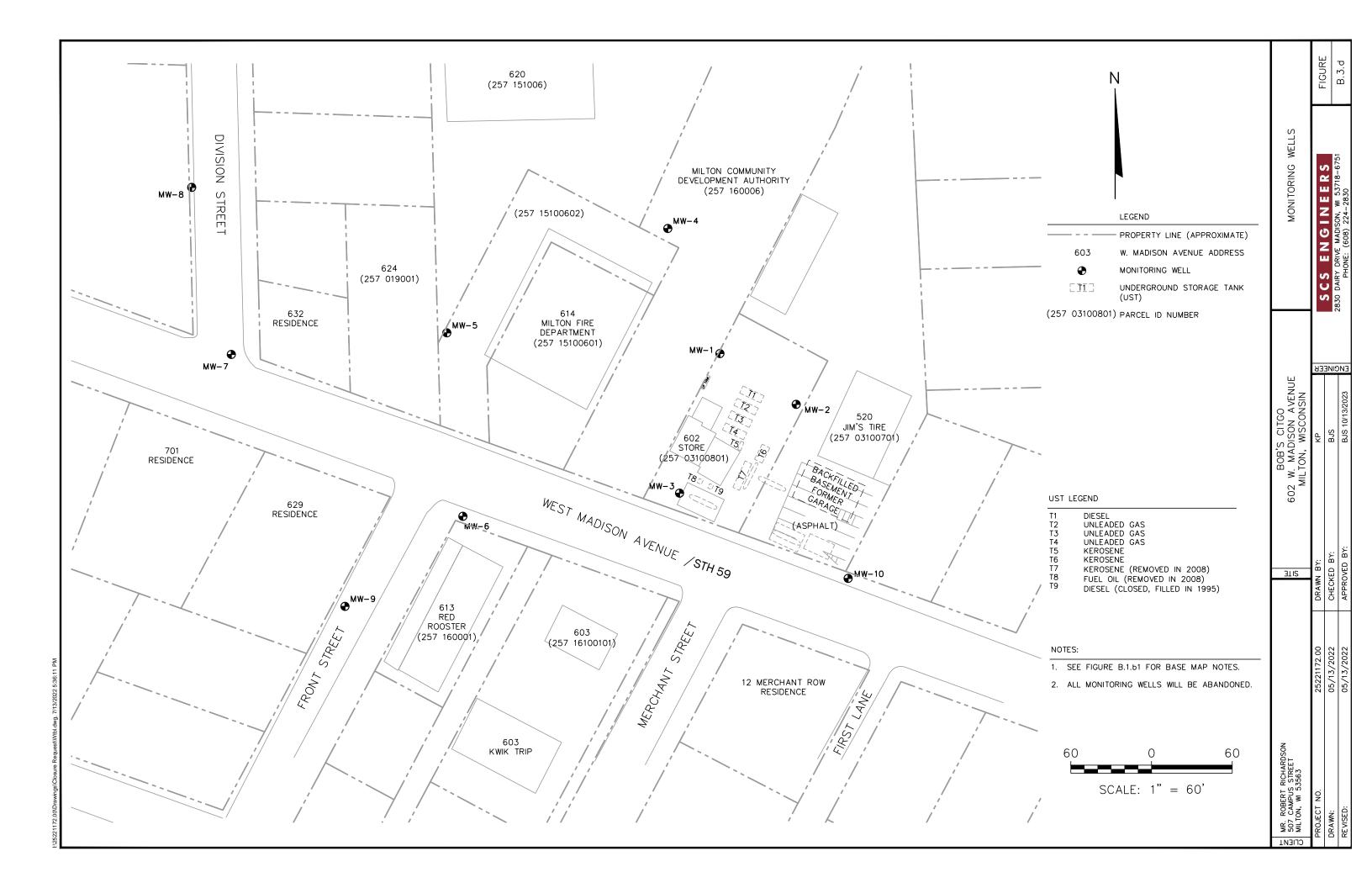
Attachment D, Maintenance Plan, 10/16/2023, for 520 W. Madison Ave

Inspection Log (DNR Form 4400-305), included with maintenance plans above

Copy by email: Betty Socha, SCS Engineers







# COVER OR BARRIER MAINTENANCE PLAN 602 W. MADISON AVENUE

October 16, 2023

Property Located at:

602 W. Madison Avenue, Milton, Wisconsin 53563

BRRTS #03-54-000193

Tax Parcel No. 257 03100801

### INTRODUCTION

This document is the Maintenance Plan for an impervious cover at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing asphalt cover which addresses or occupies the area over the contaminated groundwater plume or soil.

More site-specific information about this property/site may be found in:

- The case file in the Wisconsin Department of Natural Resources (WDNR) South Central Regional office
- At http://dnr.wi.gov/topic/Brownfields/wrrd.html, which includes:
  - BRRTS on the Web (WDNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
  - RR Sites Map for a map view of the site, and
- The WDNR project manager for Rock County.

### D.1. Descriptions:

#### **Description of Contamination**

Soil contaminated by petroleum compounds is located at a depth of 3 to 20 feet at 602 W. Madison Avenue (the source property). Groundwater contaminated by petroleum compounds is located at a depth of 50 to 65 feet. The extent of the soil and groundwater contamination is shown on the attached maps (**Figures B.2.b., B.3.b.,** and **D.2.**).

### Description of the Cover to be Maintained

The cap consists of a combination of asphalt and concrete that are at a minimum of 4 inches thick. It is located at 602 W. Madison Avenue as shown on the attached map (**Figure D.2.**).

### **Cover/Building Purpose**

The asphalt/concrete cover/barrier acts as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the property, commercial, the barrier should function as intended unless disturbed.

### **Annual Inspection**

The asphalt/concrete cap overlying the contaminated soil and groundwater plume and as depicted on **Figure D.2**, will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks, and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age, and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as **D.4. Inspection Log**, Form 4400-305 Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by WDNR representatives upon their request.

### **Maintenance Activities**

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state, and federal law.

In the event the asphalt/concrete cap overlying the contaminated soil and groundwater plume are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the asphalt/concrete cap, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

## Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where pavement is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources:

- 1. removal of the existing barrier;
- 2. replacement with another barrier;
- 3. excavating or grading of the land surface;
- 4. filling on capped or paved areas;
- 5. plowing for agricultural cultivation;
- 6. construction or placement of a building or other structure;
- 7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

If removal, replacement or other changes to a cover are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

#### Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

### **Contact Information**

October 16, 2023

Site Owner and Operator: Robert Richardson

507 Campus Street, Apartment 7

Milton, WI 53563 608-359-3941

Consultant: Betty Socha, Project Manager

SCS Engineers 2830 Dairy Drive Madison, WI 53718 608-212-6664

WDNR: Cindy Koepke, Project Manager

3911 Fish Hatchery Road Madison, WI 53711 608-219-2181

### D.2 Location Map

The attached map (**Figure D.2**) shows the location of the asphalt and concrete cap that requires maintenance on the source property. The extent of residual soil and groundwater contamination and property boundaries are shown on **Figures B.2.b.**, and **B.3.b**.

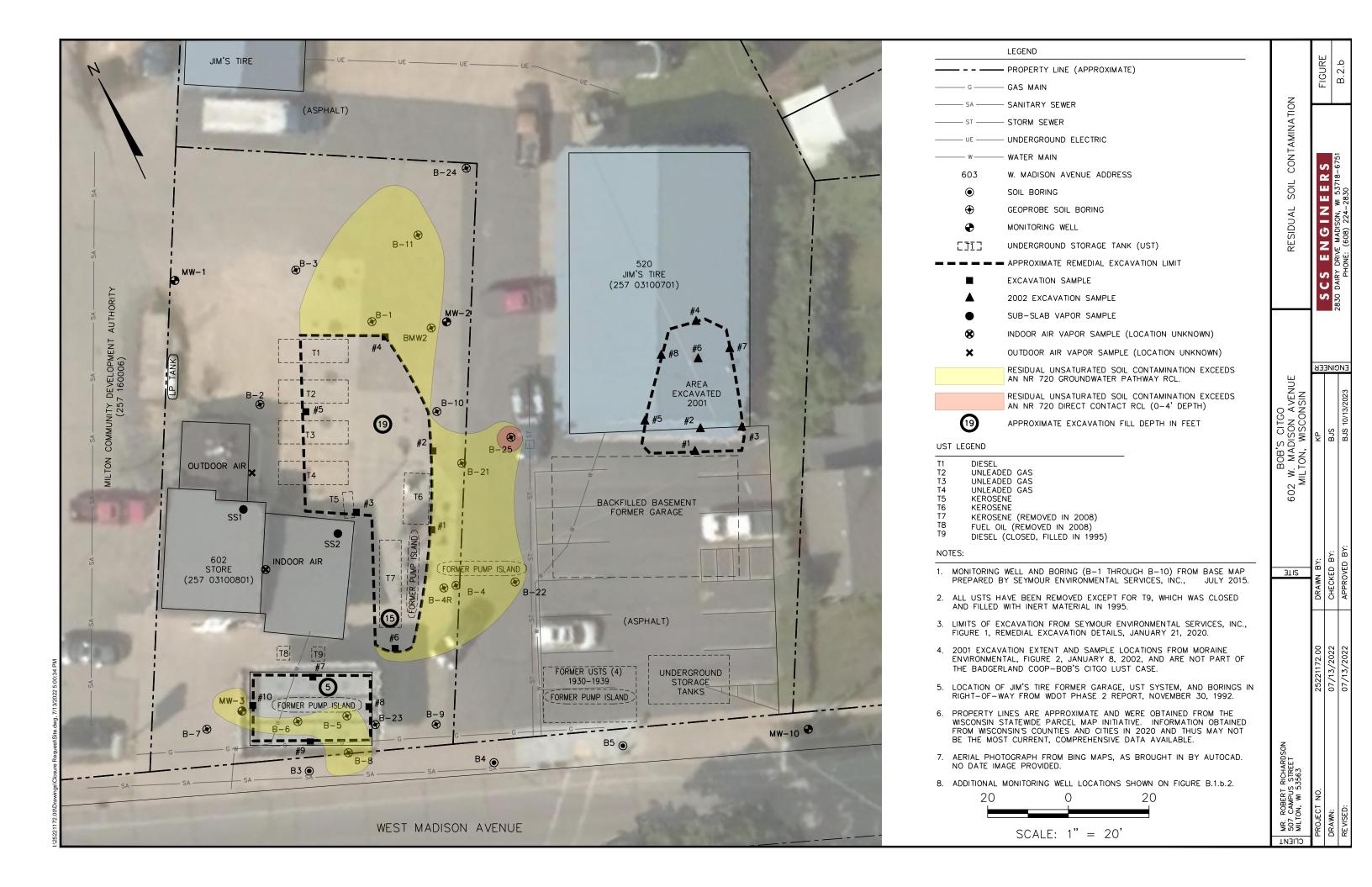
### D.3 Photographs of Cover/Barrier

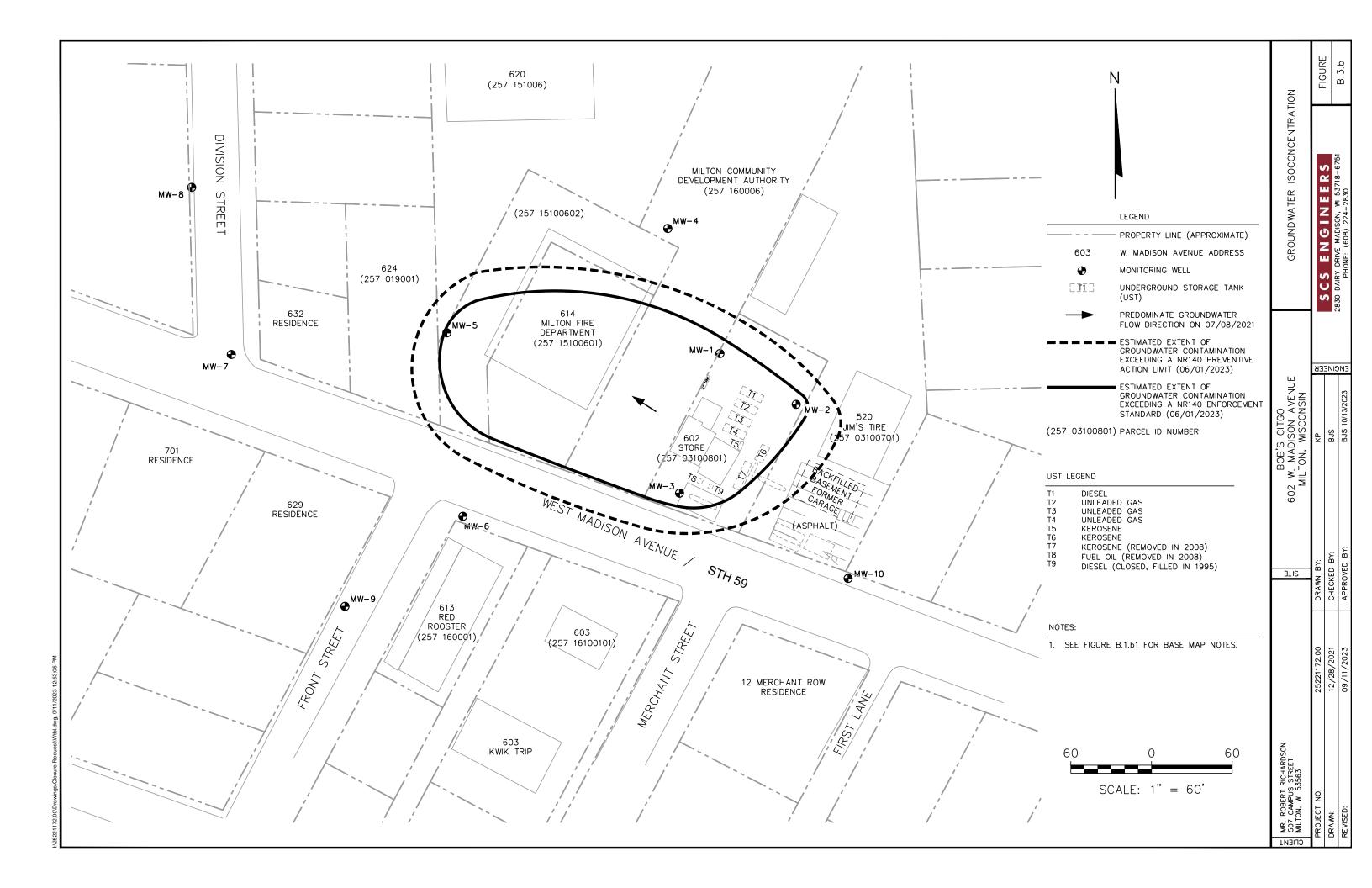
The attached photographs document the condition and extent of the cover/barrier at the time of the closure request.

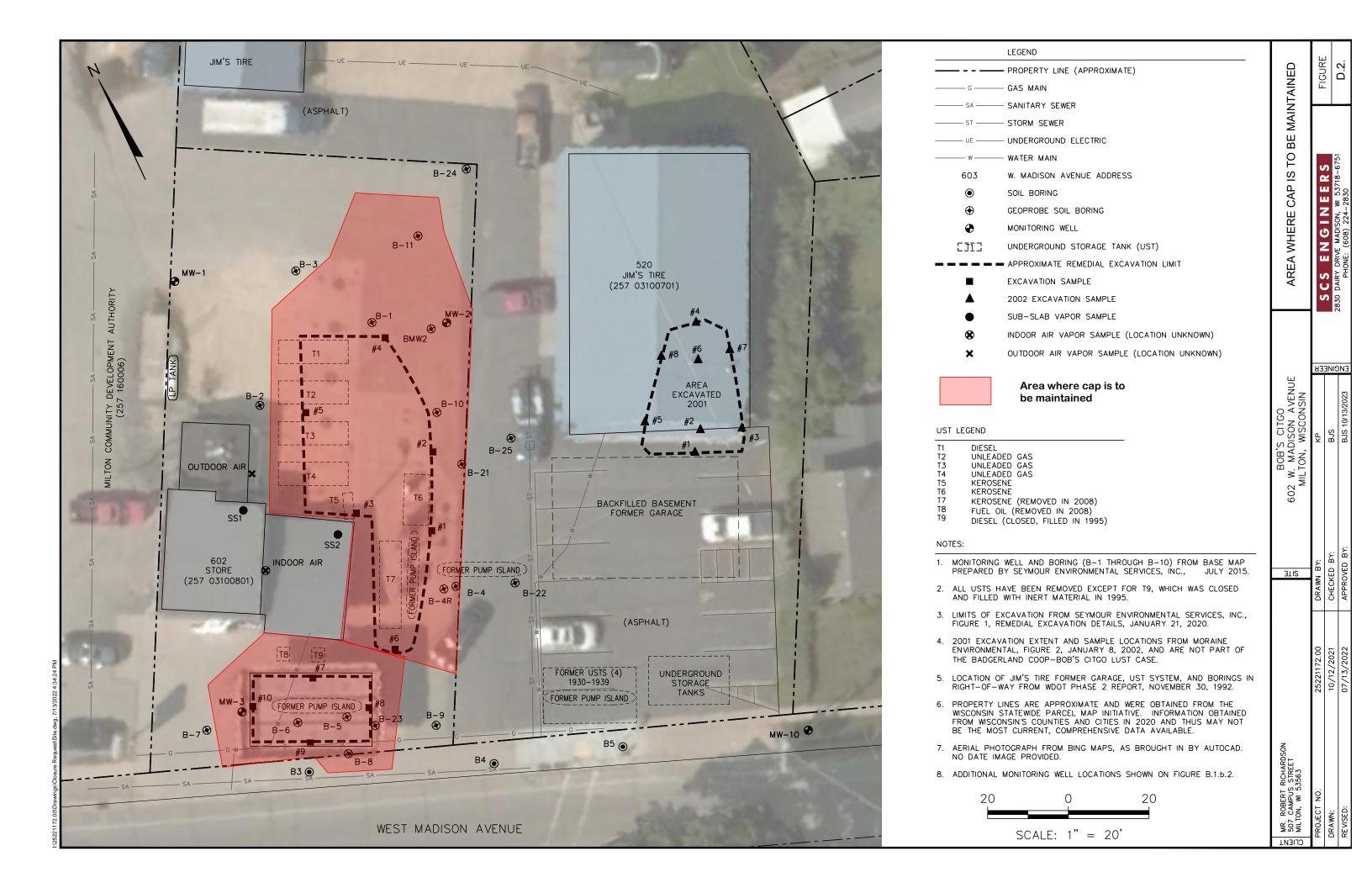
### D.4 Continuing Obligations Inspection and Maintenance Log

The continuing obligations inspection and maintenance log is attached.

I:\25221172.00\Deliverables\Closure Request\Attachment D Maintenance Plan - 602 W. Madison Ave\D.1. Descriptions of Maintenance Actions 602 W Madison Ave.docx







602 W. Madison Ave., Milton, WI



Asphalt cap to be maintained. MW1 in foreground, former Fire Dept. building and W. Madison Ave. in background. Photo taken November 22, 2022.

602 W. Madison Ave., Milton, WI



Asphalt cap to be maintained. MW1 in foreground, former Bob's Citgo building and W. Madison Ave. in background. Photo taken November 22, 2022.

602 W. Madison Ave., Milton, WI



Asphalt cap to be maintained. MW2 in foreground, Jim's Service building in background. Photo taken November 22, 2022.

602 W. Madison Ave., Milton, WI



Asphalt and concrete cap to be maintained. MW3 in foreground, former gasoline pump island area, sidewalk, and W. Madison Ave. in background. Photo taken November 22, 2022.

## State of Wisconsin Department of Natural Resources

dnr.wi.gov

### D.4. INSPECTION LOG - 602 W. MADISON AVE.

### **Continuing Obligations Inspection and Maintenance Log**

Form 4400-305 (R 7/20)

Page 1 of 2

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <a href="http://dnr.wi.gov/botw/SetUpBasicSearchForm.do">http://dnr.wi.gov/botw/SetUpBasicSearchForm.do</a>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name  Badgerland Coop - Bob's Citgo  Inspections are required to be conducted (see closure approval letter):  annually semi-annually other - specify			BRRTS No.				
				03-5	03-54-000193		
			When submittal of this form is required, submit the form electronically to the DNR proj manager. An electronic version of this filled out form, or a scanned version may be se the following email address (see closure approval letter):				
Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or main	recomi	evious nendations emented?	Photographs taken and attached?
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	O Y O N
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	O Y O N
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON

 $\frac{03-54-000193}{\text{BRRTS No.}}$ Badgerland Coop - Bob's Citgo Activity (Site) Name

### D.4. INSPECTION LOG - 602 W. MADISON AVE.

## **Continuing Obligations Inspection and Maintenance Log** Form 4400-305 (R 7/20) Page 2 of 2

{Click to Add/Edit Image}	Date added:	{Click to Add/Edit Image}	Date added:
Title:		Title:	

### COVER OR BARRIER MAINTENANCE PLAN

October 16, 2023

Property Located at:

520 W. Madison, Avenue, Milton, Wisconsin 53563

BRRTS #03-54-000193

Tax Parcel No. 257 03100701

#### INTRODUCTION

This document is the Maintenance Plan for an impervious cover at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing asphalt cover which addresses or occupies the area over the contaminated groundwater plume or soil.

More site-specific information about this property/site may be found in:

- The case file in the Wisconsin Department of Natural Resources (WDNR) South Central Regional office
- At <a href="http://dnr.wi.gov/topic/Brownfields/wrrd.html">http://dnr.wi.gov/topic/Brownfields/wrrd.html</a>, which includes:
  - BRRTS on the Web (WDNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
  - RR Sites Map for a map view of the site, and
- The WDNR project manager for Rock County.

### D.1. Descriptions:

### **Description of Contamination**

Soil contaminated by petroleum compounds is located at an approximate depth of 3 to 20 feet at 520 W. Madison Avenue. Groundwater contaminated by petroleum compounds is located at a depth of 50 to 65 feet. The extent of the soil and groundwater contamination is shown on the attached maps (**Figures B.2.b.** and **B.3.b**).

### Description of the Cover to be Maintained

The cap consists of a combination of asphalt and concrete that are at a minimum of 4 inches thick. It is located at 520 W. Madison Avenue as shown on the attached map (**Figure D.2.**).

#### **Cover/Building Purpose**

The asphalt/concrete cap over the contaminated soil and groundwater plume serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-to-

groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the property, commercial, the barrier should function as intended unless disturbed.

### **Annual Inspection**

The asphalt/concrete cap overlying the contaminated soil and groundwater plume and as depicted on **Figure D.2**, will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as **D.4**, **Form 4400-305**, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by WDNR representatives upon their request.

#### **Maintenance Activities**

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state, and federal law.

In the event the asphalt/concrete cap overlying the contaminated soil and groundwater plume are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the asphalt/concrete cap, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

### Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where pavement is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources:

- 1. removal of the existing barrier;
- 2. replacement with another barrier;
- 3. excavating or grading of the land surface;
- 4. filling on capped or paved areas;
- 5. plowing for agricultural cultivation;
- 6. construction or placement of a building or other structure;
- 7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

If removal, replacement or other changes to a cover are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

#### Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

### **Contact Information**

October 16, 2023

Site Operator and Owner: James Oshel

Jim's Service

520 W. Madison Ave. Milton, WI 53563 608-868-7837

Consultant: Betty Socha, Project Manager

> SCS Engineers 2830 Dairy Drive Madison, WI 53718 608-212-6664

WDNR: Cindy Koepke, Project Manager

> 3911 Fish Hatchery Road Madison, WI 53711

608-219-2181

### D.2 Location Map

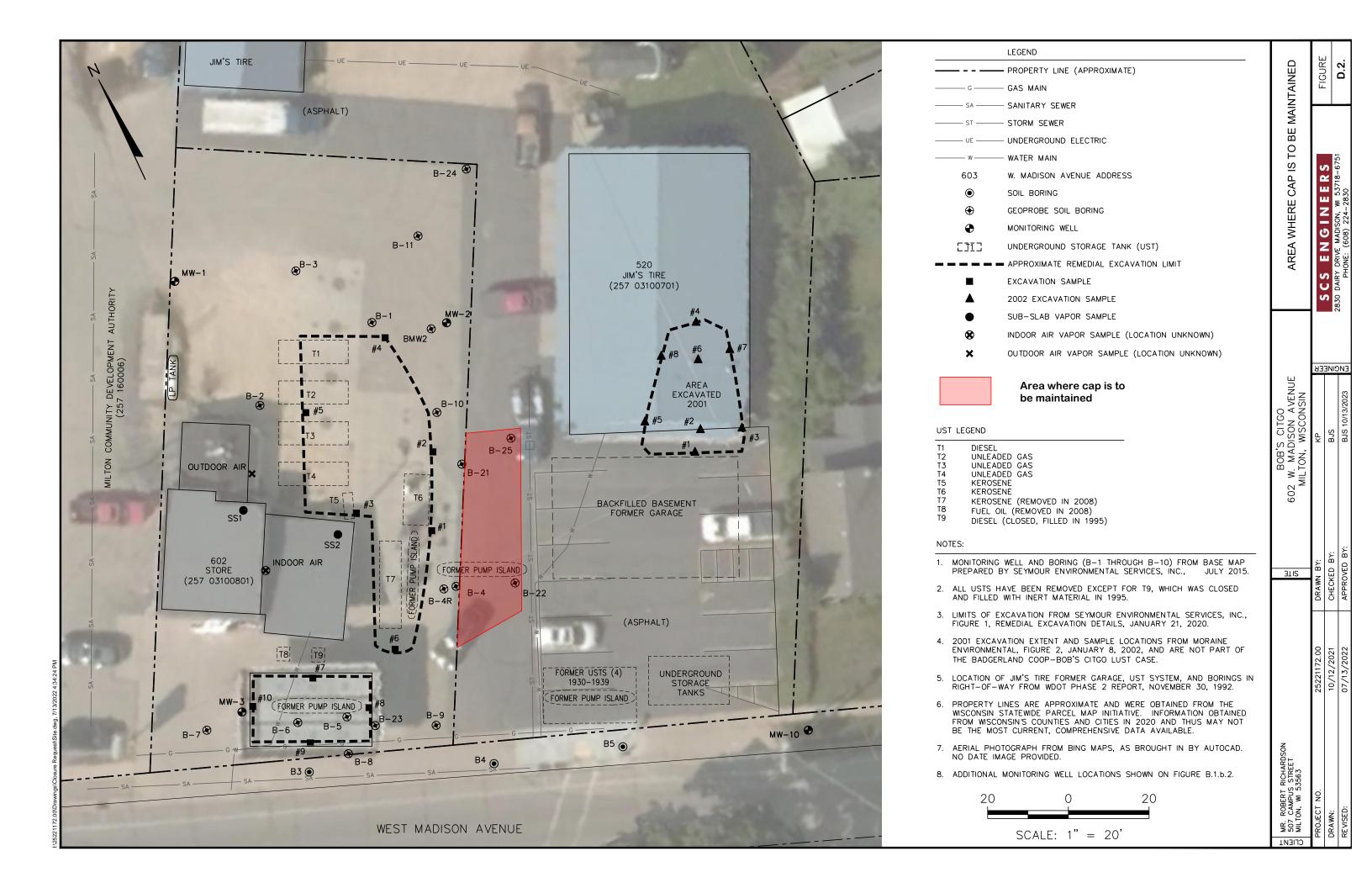
The attached map (**Figure D.2**) shows the location of the asphalt and concrete cap that requires maintenance. The extents of residual soil and groundwater contamination are shown on **Figures B.2.b** and **B.3.b**.

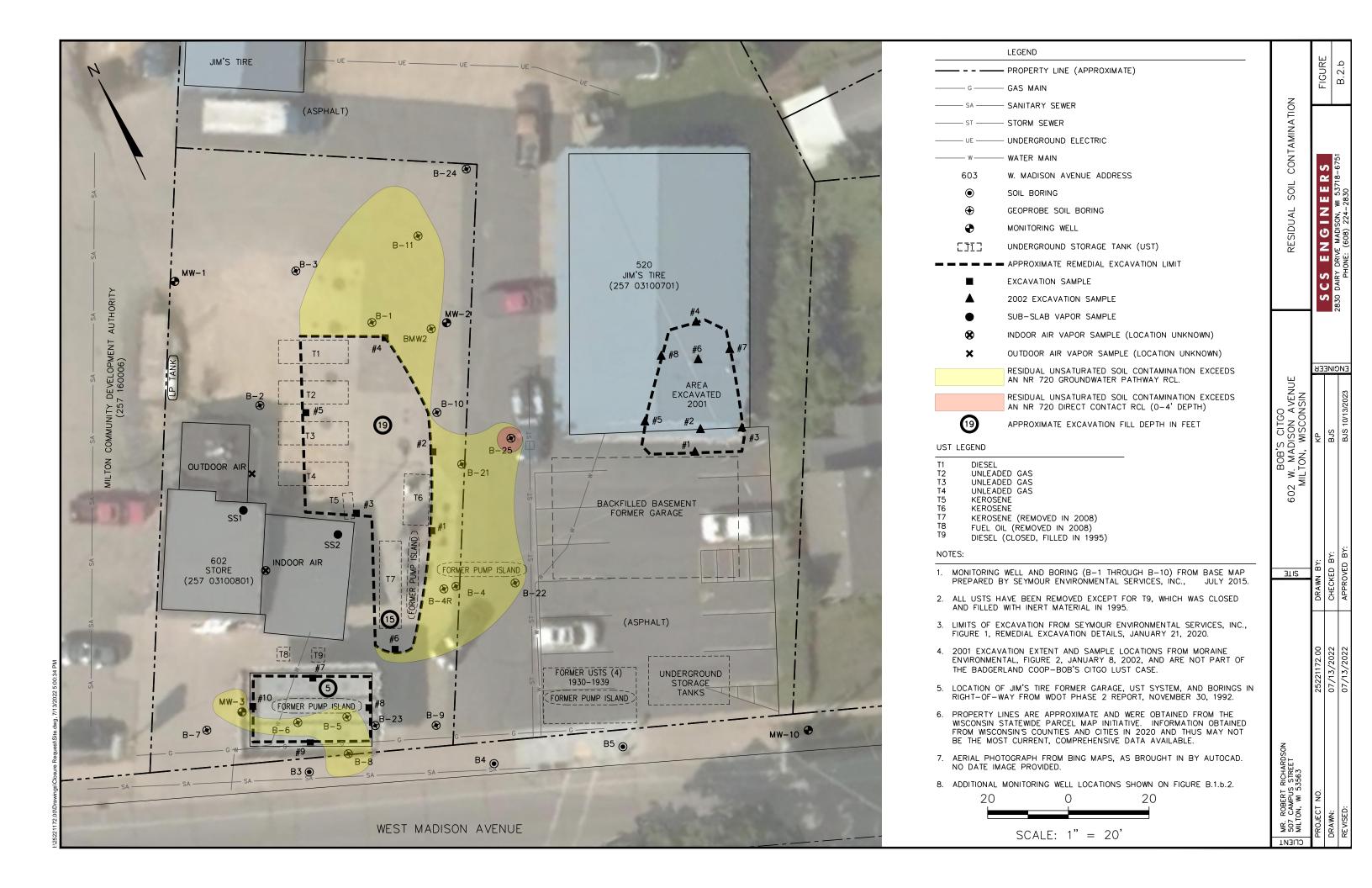
### D.3 Photographs of Cover/Barrier

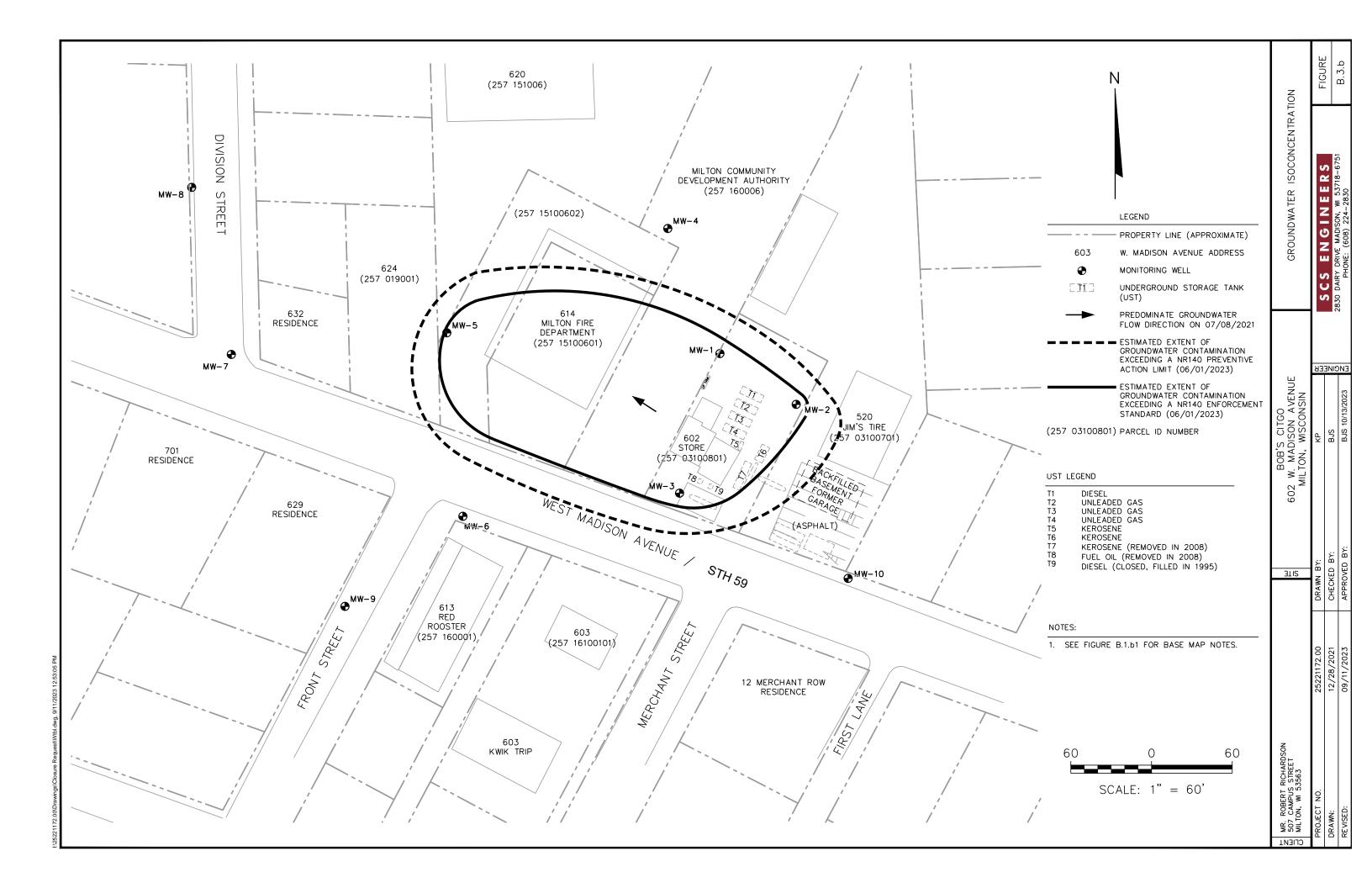
Photographs documenting the condition and extent of the pavement cap are attached.

D.4 Continuing Obligations Inspection and Maintenance Log The inspection log is attached.

I:\25221172.00\Deliverables\Closure Request\Attachment D Maintenance Plan - 520 Madison Ave\D.1 Descriptions of Maintenance Actions 520 W. Madison Ave.docx







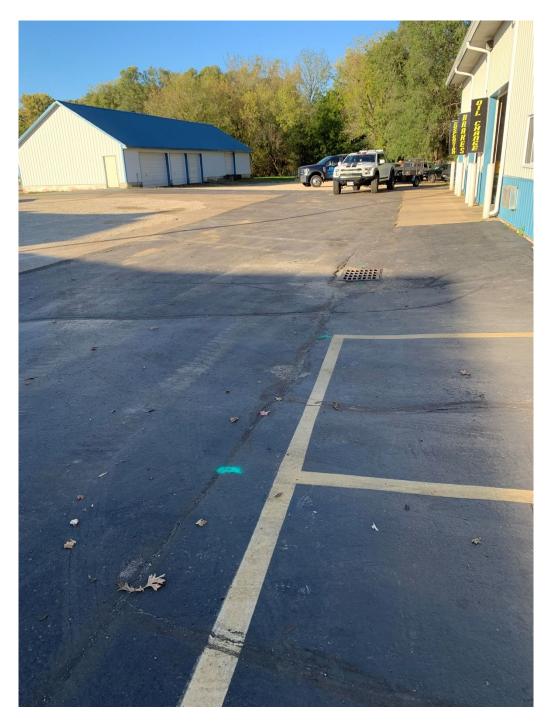
520 W. Madison Ave., Milton, WI



Cap in area of boring B-25.

Photo taken October 18, 2021.

520 W. Madison Ave., Milton, WI



Asphalt cap in area to be maintained.

Photo taken November 22, 2022.

### D.4. INSPECTION LOG - 520 W. MADISON AVE.

State of Wisconsin Department of Natural Resources dnr.wi.gov

### **Continuing Obligations Inspection and Maintenance Log**

Form 4400-305 (R 7/20)

Page 1 of 2

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <a href="http://dnr.wi.gov/botw/SetUpBasicSearchForm.do">http://dnr.wi.gov/botw/SetUpBasicSearchForm.do</a>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

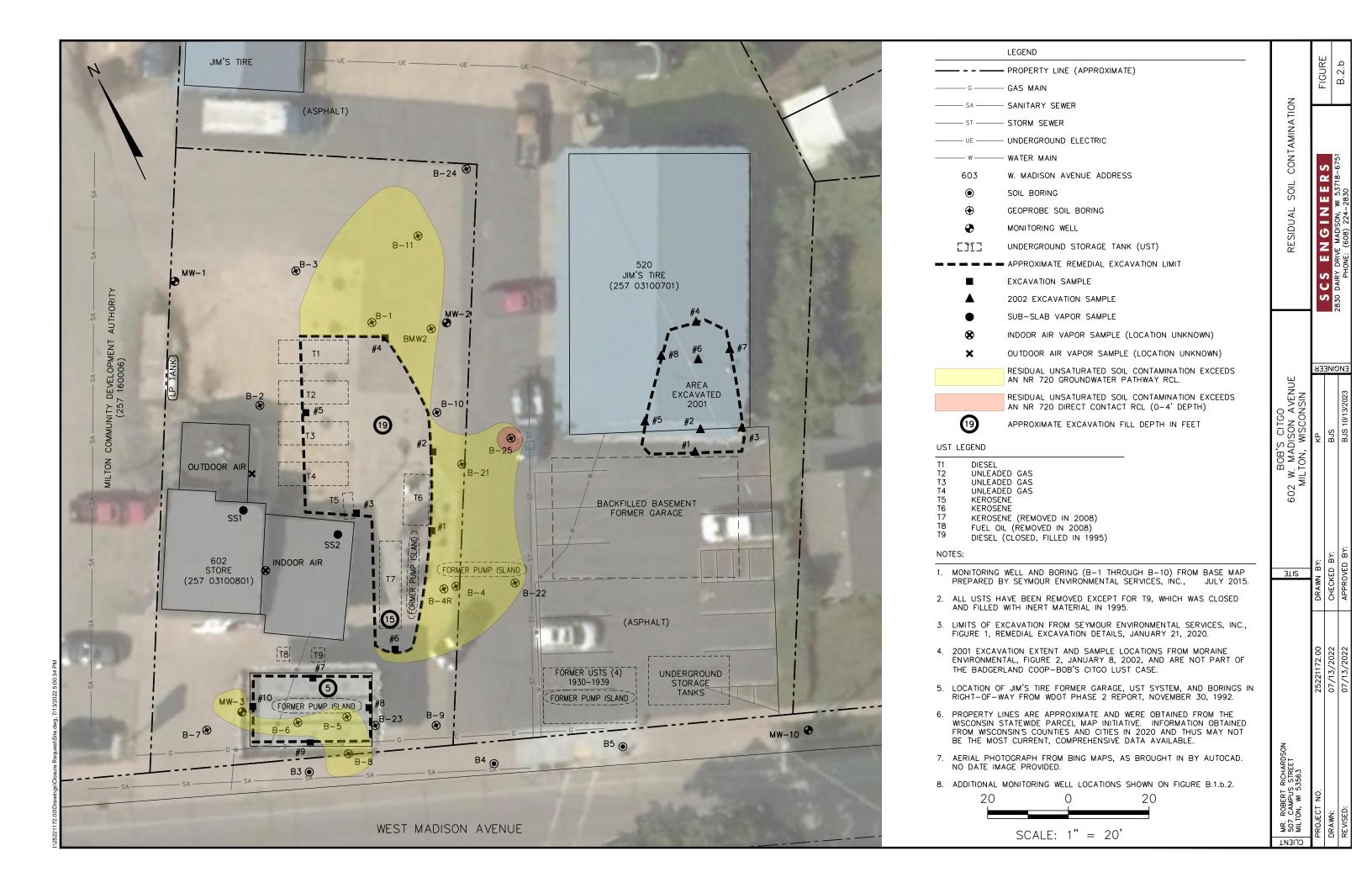
Activity (Site) Name  Badgerland Coop - Bob's Citgo  Inspections are required to be conducted (see closure approval letter):  annually semi-annually other - specify			BRRTS No.				
				03-54-000193			
			When submittal of this form is required, submit the form electronically to the DNR projemanager. An electronic version of this filled out form, or a scanned version may be set the following email address (see closure approval letter):				
Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maint	recomr	evious mendations emented?	Photographs taken and attached?
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			OY	○ N	OY ON

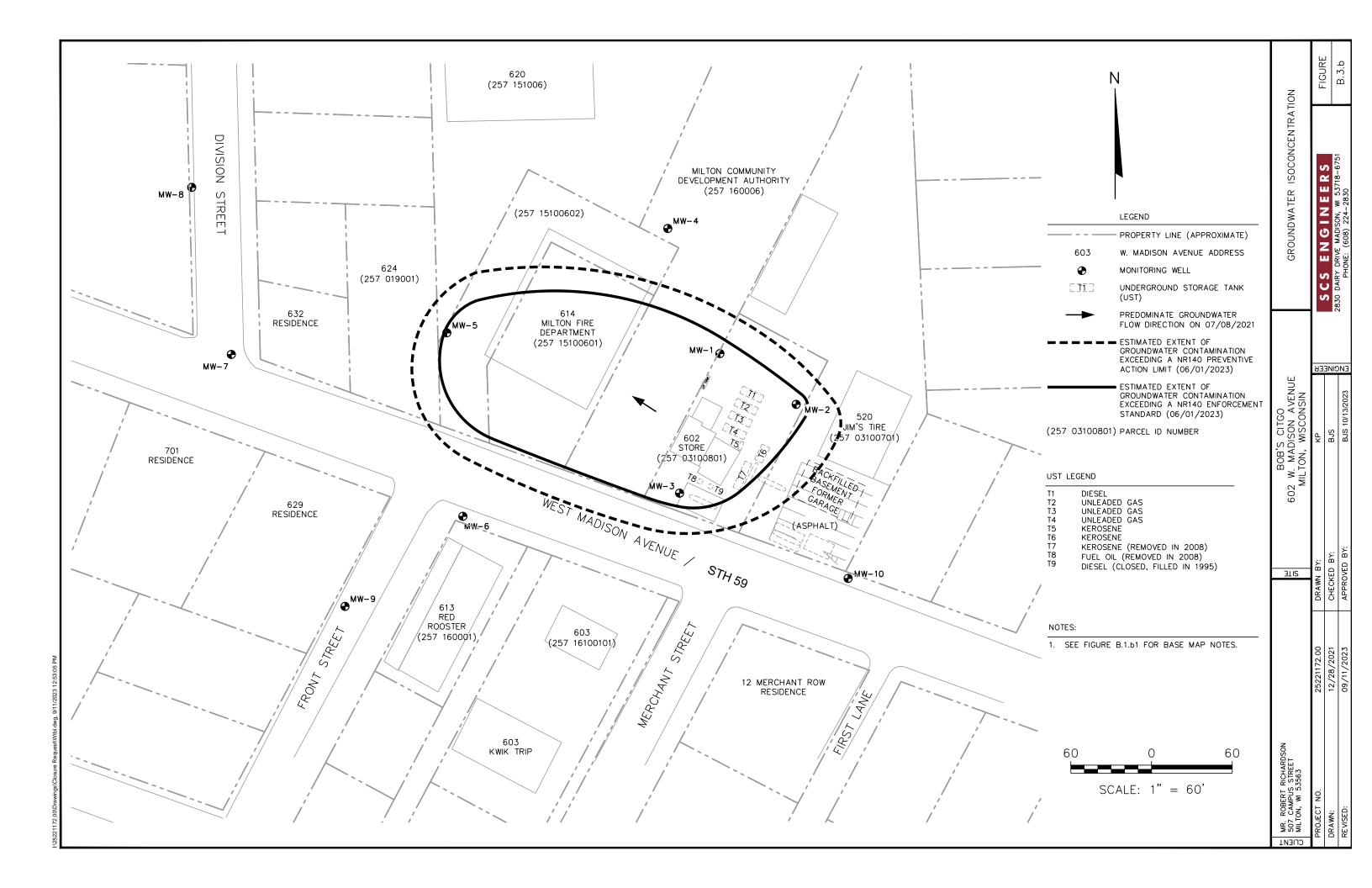
 $\frac{03-54-000193}{\text{BRRTS No.}}$ Badgerland Coop - Bob's Citgo Activity (Site) Name

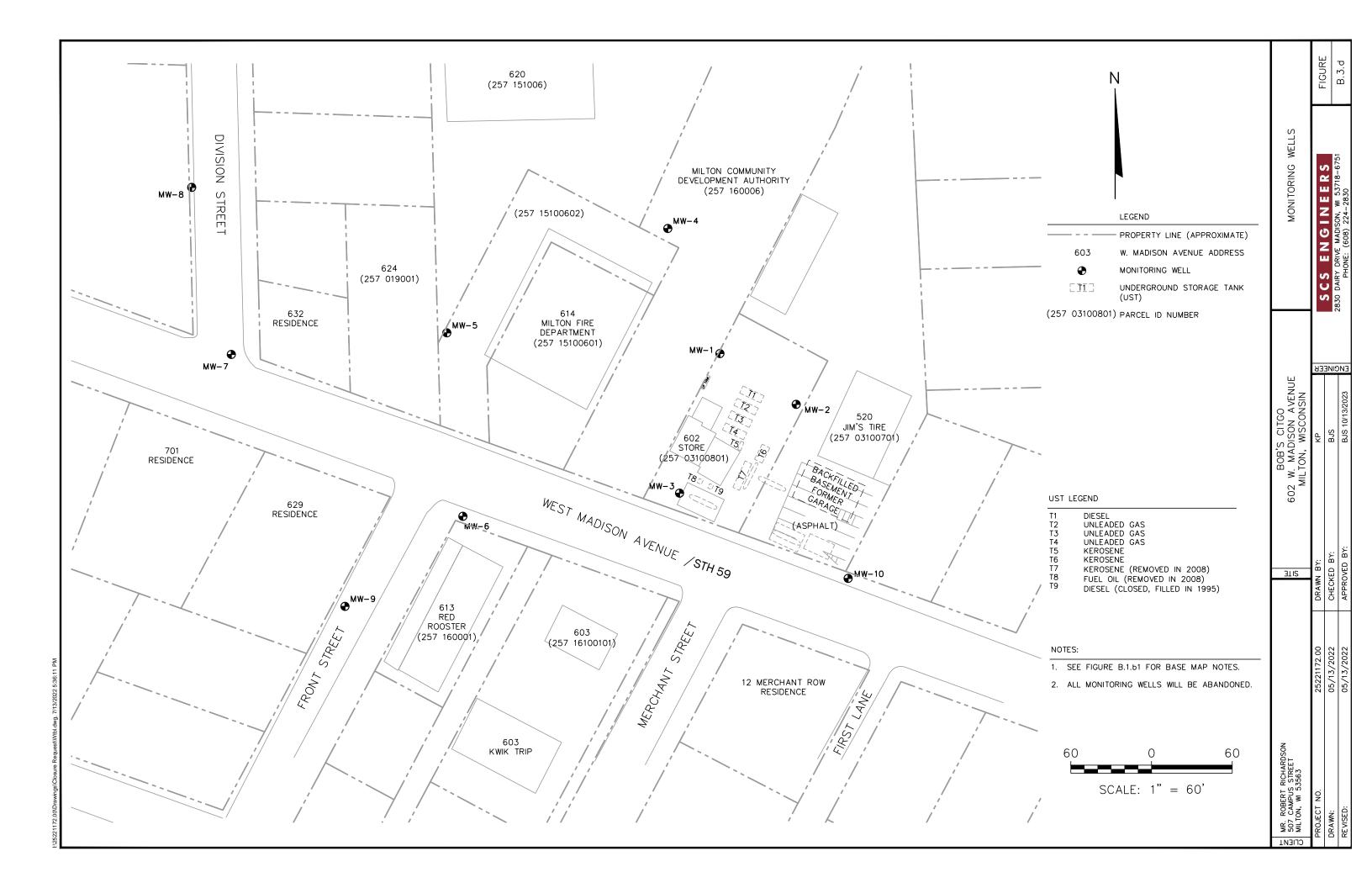
### D.4. INSPECTION LOG - 520 W. MADISON AVE.

**Continuing Obligations Inspection and Maintenance Log** Form 4400-305 (R 7/20) Page 2 of 2

{Click to Add/Edit Image}	Date added:	-	{Click to Add/Edit Image}	Date added:
Title:			Title:	







State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
3911 Fish Hatchery Road
Fitchburg WI 53711-5397

Tony Evers, Governor Adam N. Payne, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463

TTY Access via relay - 711

WISCONSIN
DEPT. OF NATURAL RESOURCES

January 3, 2024

Jim Oshel 520 W. Madison Ave. Milton WI 53563

### KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Continuing Obligations and Property Owner Requirements for 520 W Madison Ave., Milton

Parcel Identification Number: 257 03100701

Final Case Closure for former Bob's Citgo, 602 W. Madison Ave., Milton, Wisconsin

BRRTS #: 03-54-000193

Dear Mr. Oshel:

The purpose of this letter is to notify you that you are responsible for certain continuing obligations applied to your property at 520 W. Madison Avenue, Milton (Property) due to contamination remaining on the Property. The continuing obligations are part of the cleanup and case closure approved by the Wisconsin Department of Natural Resources (DNR) for the former Bob's Citgo site, located at 602 W. Madison Ave., Milton (Site).

The Site is the source of contamination where the original hazardous substance discharge or environmental pollution occurred before contamination migrated to your Property. The continuing obligations that apply to your Property are included in this letter, are stated as conditions in the closure approval letter, and are consistent with Wisconsin Statute (Wis. Stat.) § 292.12 and Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700-799. Continuing obligations are intended to limit exposure to remaining environmental contamination at the Property. These continuing obligations will also apply to future owners of the Property, until the conditions no longer exist.

It is common for properties to have continuing obligations as part of case closure approvals when contamination remains in the environment for a specific reason. Information on the continuing obligations associated with this Site, including the case closure approval letter, is available in the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web at dnr.wi.gov (search "BOTW"). Enter 03-54-000193 in the **Activity Number** field and then click **Search**. Scroll down and click on the **CO Packet** link for information about the completion of the environmental work. The Site may also be seen on the map viewer, RR Sites Map, at dnr.wi.gov (search "RRSM").

The DNR reviewed and approved the case closure request regarding the petroleum contamination in soil and groundwater at this Site, based on information submitted by SCS Engineers. As required by state law, you received notification about the requested case closure from the person conducting the cleanup on November 9, 2023. No further investigation or cleanup is required at this time. However, the case closure decision is conditioned upon long-term compliance with the continuing obligations at the Property.

### Continuing Obligations Applicable to the Property

Continuing obligations associated with the Site are described in the case closure letter to Robert Richardson, dated January 2, 2024 (copy available on request). However, only the following continuing obligations apply to the Property.



#### **SOIL**

### Continuing Obligations to Address Soil Contamination

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis. Stat. ch. 289)

Soil contamination remains near former pump islands, in the West Madison Avenue ROW, and areas adjacent to the remedial excavation as indicated on the enclosed map (Figure B.2.b., Residual Soil Contamination, 7/13/2022). If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

Cover (for soil) (Wis. Stat. § 292.12(2)(a), Wis. Admin. Code §§ NR 724.13(1) and (2), NR 726.15(2)(d) and/or (e), NR 727.07(1))

The asphalt covers, shown on the enclosed maps (Figure D.2, Area Where Cap is to be Maintained, 7/13/2022;) shall be maintained in compliance with the enclosed maintenance plans, dated October 16, 2023. The purpose of the cover is to minimize the infiltration of water through contaminated soil and prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The cover approved for this closure was designed to be protective for commercial or industrial land uses. Before using the property for residential purposes and before taking an action, the property owner must notify the DNR to determine if additional response actions are warranted. A cover intended for industrial land uses or certain types of commercial land uses may not be protective if the property changes to a residential use. This may include, but is not limited to, single or multiple family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover designed for multi-family residential housing use may not be appropriate for use at a single-family residence.

To modify or replace a cover, the property owner must submit a request to the DNR under Wis. Admin. Code ch. NR 727. The DNR approval must be obtained before implementation. The replacement or modified cover must be a structure of similar permeability or be protective of the revised use of the property until contaminant levels no longer exceed Wis. Admin. Code ch. NR 720 groundwater pathway residual contaminant levels and/or direct contact residual contaminant levels (RCLs).

#### **GROUNDWATER**

Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells

Residual Groundwater Contamination (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w)) Groundwater contamination which equals or exceeds the enforcement standards for petroleum compounds is present on the source property and on three downgradient parcels, as shown on the enclosed map (Figure B.3.b., Groundwater Isoconcentration, 9/11/2023). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

#### **VAPOR**

### Continuing Obligations to Address Vapor Contamination

Vapor intrusion (VI) is the movement of vapors coming from volatile chemicals in the soil or groundwater or within preferential pathways into buildings where people may breathe air contaminated by the vapors.

<u>VI - Future Concern</u>: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable. Petroleum compounds remain in soil and groundwater at the locations shown on the enclosed maps (Figure B.2.b., Residual Soil Contamination, 7/13/2022 and Figure B.3.b., Groundwater Isoconcentration, 9/11/2023) at concentrations that may be of concern for vapor intrusion in the future, if a building is constructed, renovated or expanded in an area where no building currently exists or if an existing building is remodeled. Currently the source property has a vacant convenience store, 520 W. Madison Avenue has a commercial building, and 614 W. Madison has a fire station.

Vapor control technologies are required for new construction or for modification of occupied buildings on the property <u>unless</u> the property owner assesses the vapor pathway and the DNR agrees that vapor control technologies are not needed. <u>The property owner shall maintain the current building use and layout.</u>

See the Other Closure Requirements section for more details.

#### OTHER CLOSURE REQUIREMENTS

Maintenance Plan and Inspection Log (Wis. Admin. Code §§ NR 726.11(2), NR 726.15(1)(d), NR 727.05(1)(b)3., Wis. Admin. Code § NR 716.14(2) for monitoring wells)

The property owner is required to comply with the enclosed maintenance plan dated 10/16/2023 for the cover annually, and to use the inspection log (DNR Form 4400-305) to document the required inspections. The maintenance plan and inspection log are to be kept up-to-date and on-site or at the property owner's office. The property owner shall submit the inspection log to the DNR only upon request.

The limitations on activities are identified in the enclosed maintenance plan(s). The following activities are prohibited on any portion of this property where the cover, current building use and layout are required to be maintained, without prior DNR approval:

- 1. removal of the existing barrier;
- 2. replacement with another barrier;
- 3. excavating or grading of the land surface;
- 4. filling on capped or paved areas;
- 5. plowing for agricultural cultivation;
- 6. construction or placement of a building or other structure;
- 7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

If removal, replacement or other changes to a cover are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Pre-Approval is Required for Well Construction (Wis. Admin. Code § NR 812.09 (4) (w))

DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or continuing obligations. This requirement applies to private drinking water wells and high

capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, "Continuing Obligations/Residual Contamination Well Approval Application," to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

<u>Property Owner Responsibilities</u> (Wis. Stat. § 292.12 & § 709.02, Wis. Admin. Code § NR 727.05) The Property owner (you and any subsequent Property owner) is responsible for compliance with the continuing obligations in this letter, pursuant to Wis. Stat. § 292.12. You are required to notify anyone who purchases the Property from you of the responsibility to comply with the continuing obligations in this letter, in accordance with Wis. Admin. Code § NR 727.05 (2). For residential property transactions, you are required to make disclosures under Wis. Stat. § 709.02.

If you lease or rent the Property to an occupant who will be responsible for maintaining a continuing obligation, you must include that responsibility in a lease agreement, in accordance with Wis. Admin. Code § NR 727.05 (3).

Please be aware that failure to comply with the continuing obligations may result in enforcement action by the DNR. The DNR intends to conduct periodic inspections to ensure that the conditions included in this letter, including compliance with referenced maintenance plans, are met.

## DNR Notification (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2))

The Property owner is required to notify the DNR at least 45 days before taking the following actions. The DNR may require additional investigation and/or cleanup actions if necessary to be protective of human health and the environment:

- Before removing a cover or any portion of a cover
- Before constructing a building and/or modifying the construction of an existing building

Please send written notifications to Cindy Koepke, the DNR project manager using the RR Program Submittal Portal at dnr.wi.gov (search "RR submittal portal"). Questions on using this portal can be directed to the contact below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (<a href="https://dnr.wi.gov/topic/Brownfields/Contact.html">https://dnr.wi.gov/topic/Brownfields/Contact.html</a>). More information on submitting electronic documents can be found in the DNR publication "Guidance for Electronic Submittal for the Remediation and Redevelopment Program" (RR-690), available at dnr.wi.gov (search "RR-690").

The DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" explains a property owner's responsibility for continuing obligations on their property. This fact sheet should have been sent to you when you received a notification letter before the case closure request was submitted to the DNR. You may obtain a copy at dnr.wi.gov by searching "RR-819."

Under Wis. Stat. § 292.13 owners of properties affected by contamination from another property are generally exempt from investigating or cleaning up a hazardous substance discharge that migrated onto a property from another property. However, the exemption under Wis. Stat. § 292.13 does not exempt the property owner from the responsibility to maintain a continuing obligation placed on the property in accordance with Wis. Stat. § 292.12. To maintain this exemption, that statute requires the current property owner and any subsequent property owners to meet the conditions in the statute, including:

- Granting reasonable access to the DNR, responsible party, or their contractors;
- Avoiding interference with response actions taken; and
- Avoiding actions that make the contamination worse (e.g., demolishing a structure and causing or worsening the discharges to the environment).

The DNR appreciates your cooperation to restore the environment at this site. If you have questions or concerns regarding the Site or this letter, please contact Cindy Koepke, the DNR Project Manager, at 608-219-2181 or cynthia.koepke@wisconsin.gov.

Sincerely,

Issac A. Ross

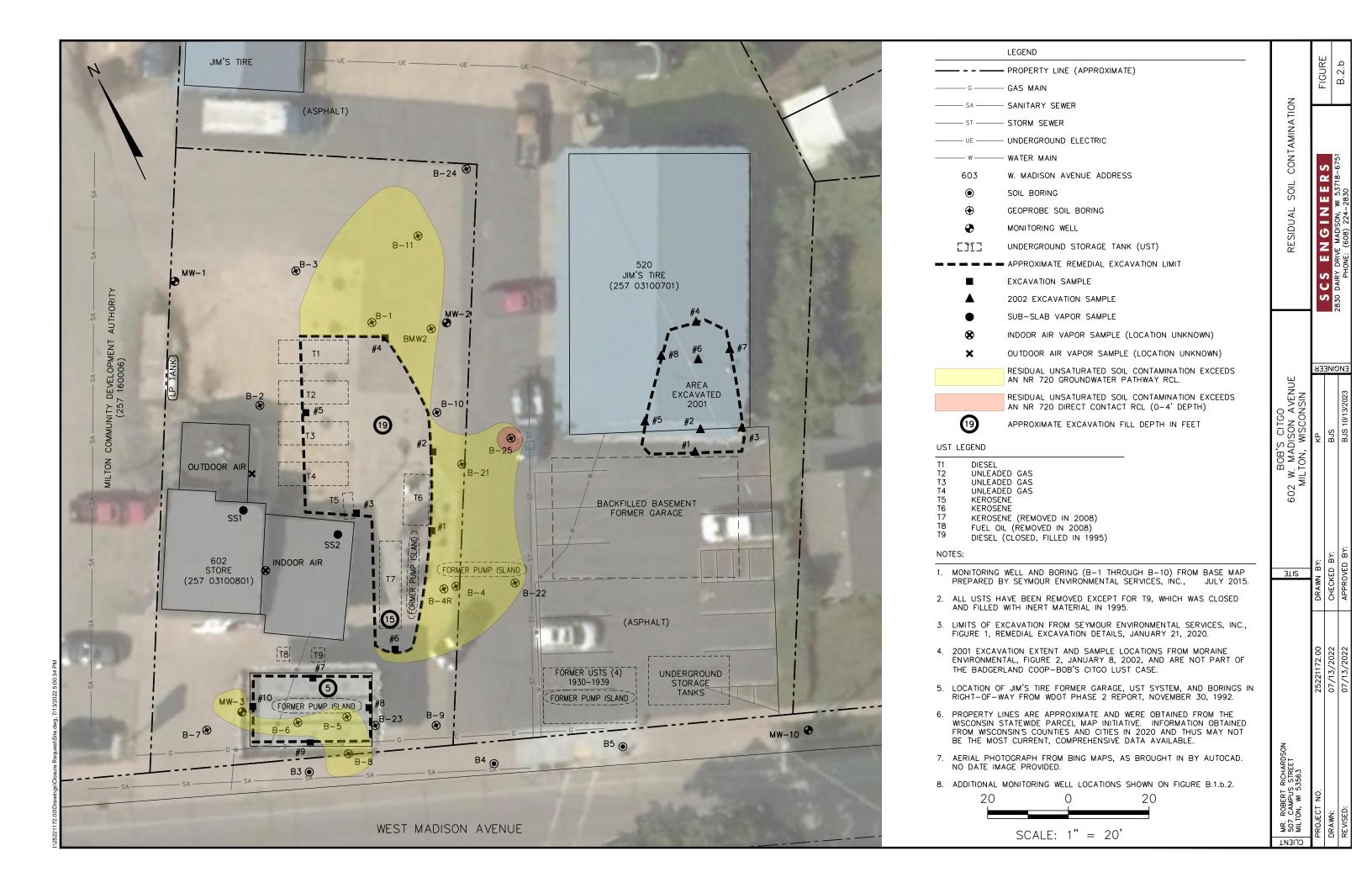
South Central Region Team Supervisor Remediation & Redevelopment Program Fitchburg DNR Service Center – Fitchburg, WI

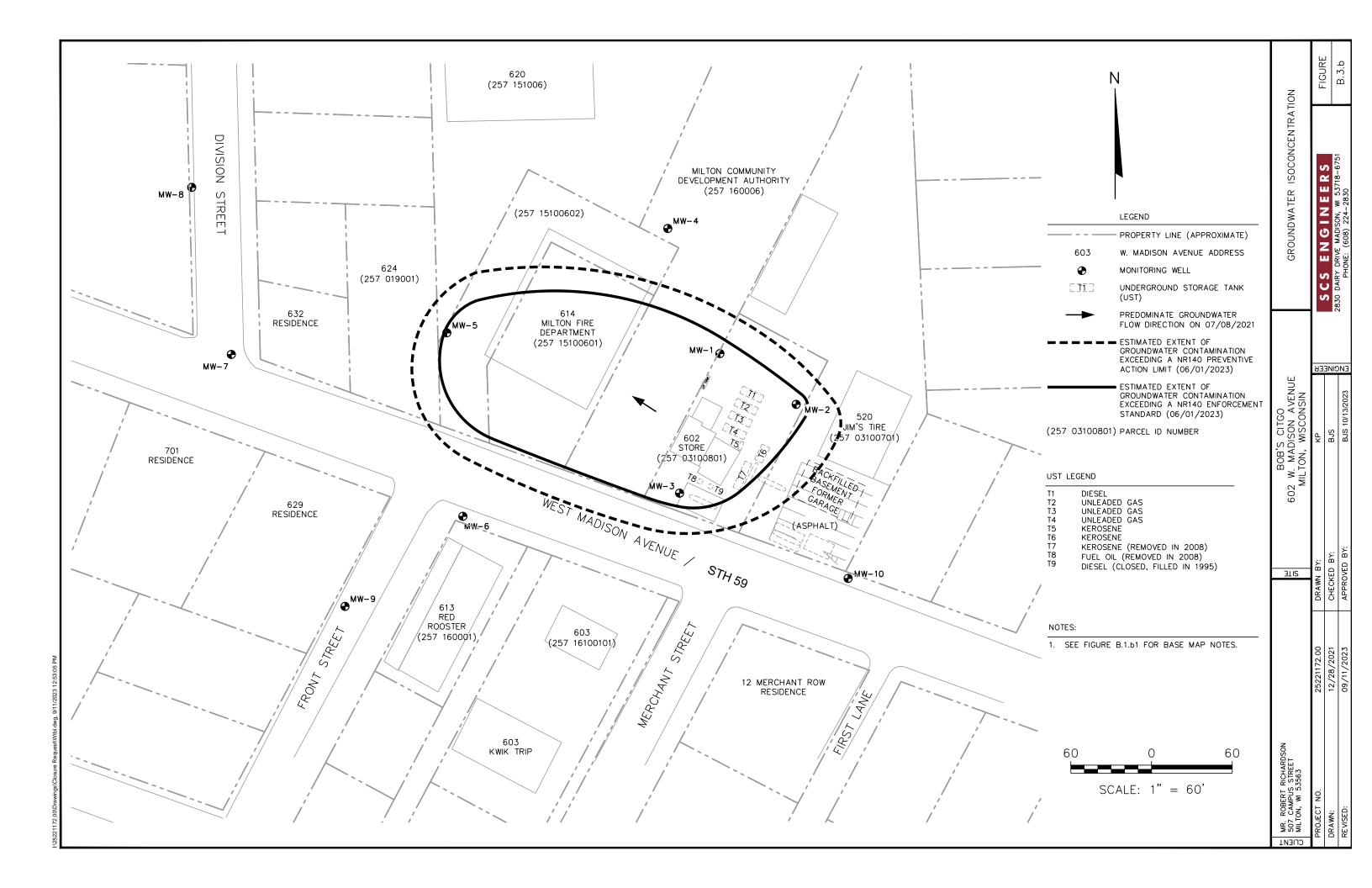
Attachments:

Figure B.2.b., Residual Soil Contamination, 7/13/2022 Figure B.3.b., Groundwater Isoconcentration, 9/11/2023 Attachment D, cover maintenance plan with map and inspection form

cc: Robert Richardson

Betty Socha – SCS Engineers





### COVER OR BARRIER MAINTENANCE PLAN

October 16, 2023

Property Located at:

520 W. Madison, Avenue, Milton, Wisconsin 53563

BRRTS #03-54-000193

Tax Parcel No. 257 03100701

#### INTRODUCTION

This document is the Maintenance Plan for an impervious cover at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing asphalt cover which addresses or occupies the area over the contaminated groundwater plume or soil.

More site-specific information about this property/site may be found in:

- The case file in the Wisconsin Department of Natural Resources (WDNR) South Central Regional office
- At <a href="http://dnr.wi.gov/topic/Brownfields/wrrd.html">http://dnr.wi.gov/topic/Brownfields/wrrd.html</a>, which includes:
  - BRRTS on the Web (WDNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
  - RR Sites Map for a map view of the site, and
- The WDNR project manager for Rock County.

# D.1. Descriptions:

## **Description of Contamination**

Soil contaminated by petroleum compounds is located at an approximate depth of 3 to 20 feet at 520 W. Madison Avenue. Groundwater contaminated by petroleum compounds is located at a depth of 50 to 65 feet. The extent of the soil and groundwater contamination is shown on the attached maps (**Figures B.2.b.** and **B.3.b**).

### Description of the Cover to be Maintained

The cap consists of a combination of asphalt and concrete that are at a minimum of 4 inches thick. It is located at 520 W. Madison Avenue as shown on the attached map (**Figure D.2.**).

#### **Cover/Building Purpose**

The asphalt/concrete cap over the contaminated soil and groundwater plume serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-to-

groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the property, commercial, the barrier should function as intended unless disturbed.

### **Annual Inspection**

The asphalt/concrete cap overlying the contaminated soil and groundwater plume and as depicted on **Figure D.2**, will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as **D.4**, **Form 4400-305**, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by WDNR representatives upon their request.

#### **Maintenance Activities**

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state, and federal law.

In the event the asphalt/concrete cap overlying the contaminated soil and groundwater plume are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the asphalt/concrete cap, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

# Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where payement is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources:

- 1. removal of the existing barrier;
- 2. replacement with another barrier;
- 3. excavating or grading of the land surface;
- 4. filling on capped or paved areas;
- 5. plowing for agricultural cultivation;
- 6. construction or placement of a building or other structure;
- 7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

If removal, replacement or other changes to a cover are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

#### Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

#### **Contact Information**

October 16, 2023

Site Operator and Owner: James Oshel

Jim's Service

520 W. Madison Ave. Milton, WI 53563 608-868-7837

Consultant: Betty Socha, Project Manager

> **SCS** Engineers 2830 Dairy Drive Madison, WI 53718 608-212-6664

WDNR: Cindy Koepke, Project Manager

> 3911 Fish Hatchery Road Madison, WI 53711

608-219-2181

# D.2 Location Map

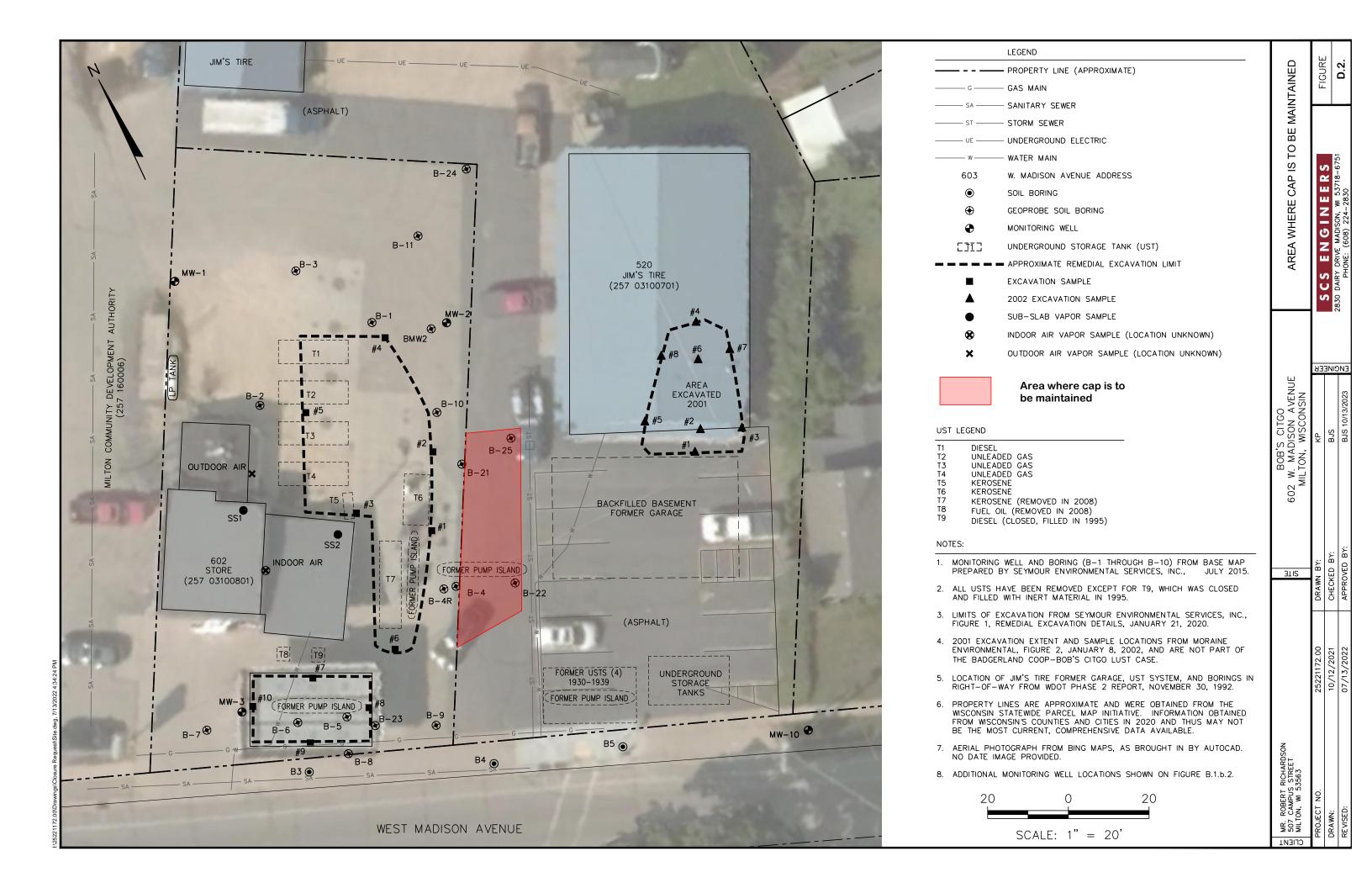
The attached map (Figure D.2) shows the location of the asphalt and concrete cap that requires maintenance. The extents of residual soil and groundwater contamination are shown on Figures B.2.b and B.3.b.

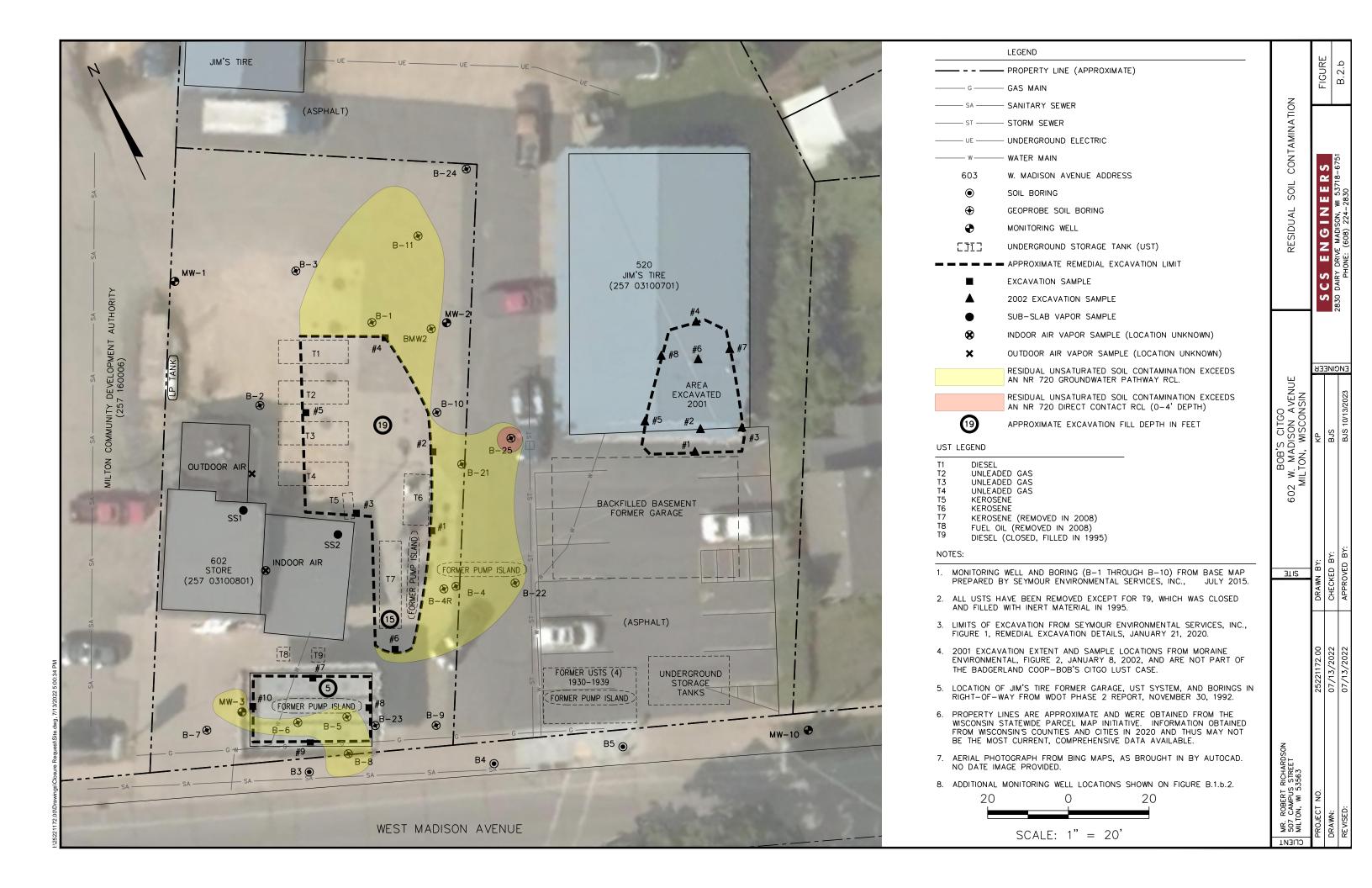
# D.3 Photographs of Cover/Barrier

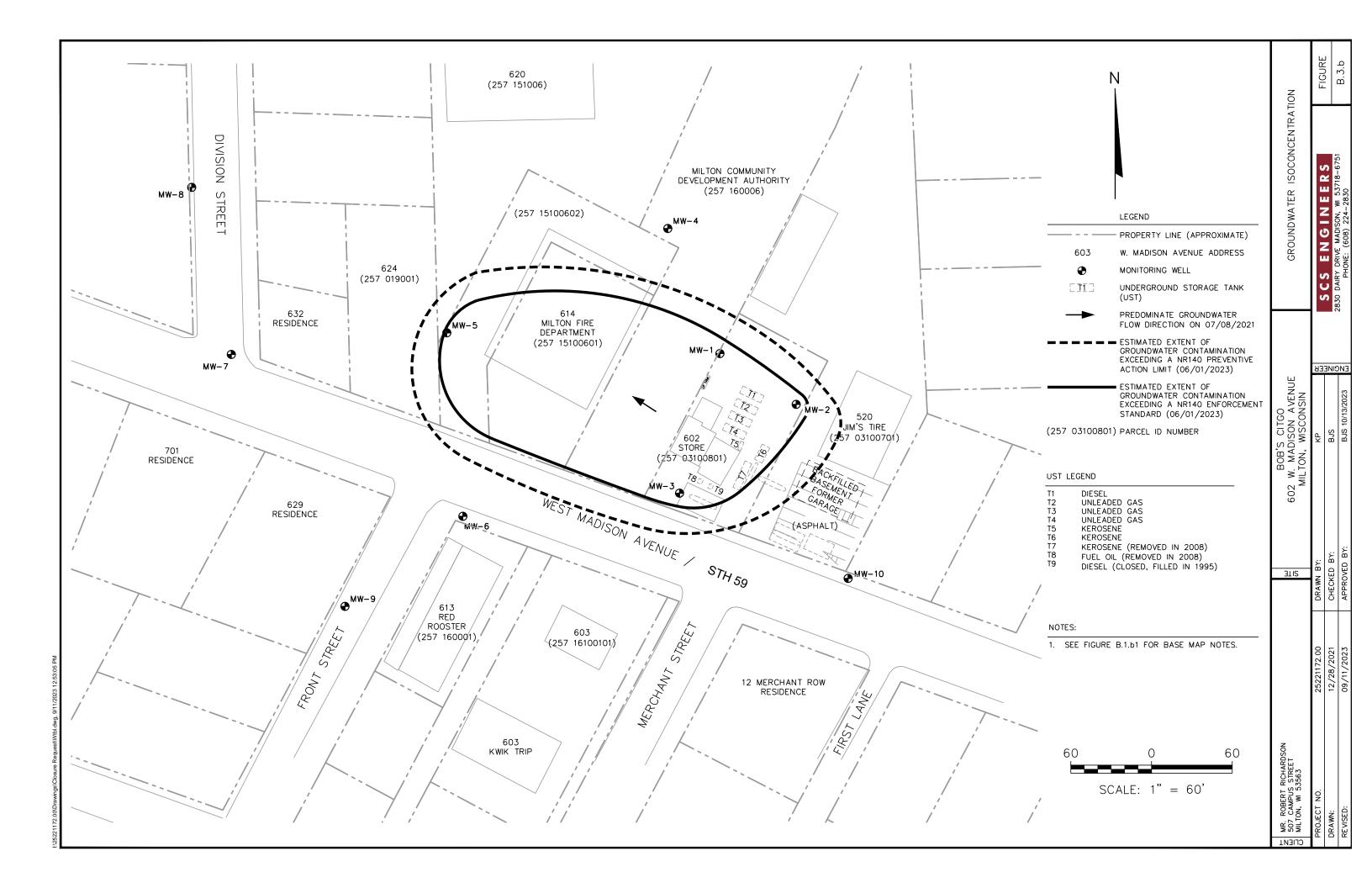
Photographs documenting the condition and extent of the pavement cap are attached.

D.4 Continuing Obligations Inspection and Maintenance Log The inspection log is attached.

I:\25221172.00\Deliverables\Closure Request\Attachment D Maintenance Plan - 520 Madison Ave\D.1 Descriptions of Maintenance Actions 520 W. Madison Ave.docx







# D.3 MAINTENANCE PLAN PHOTOGRAPHS

520 W. Madison Ave., Milton, WI

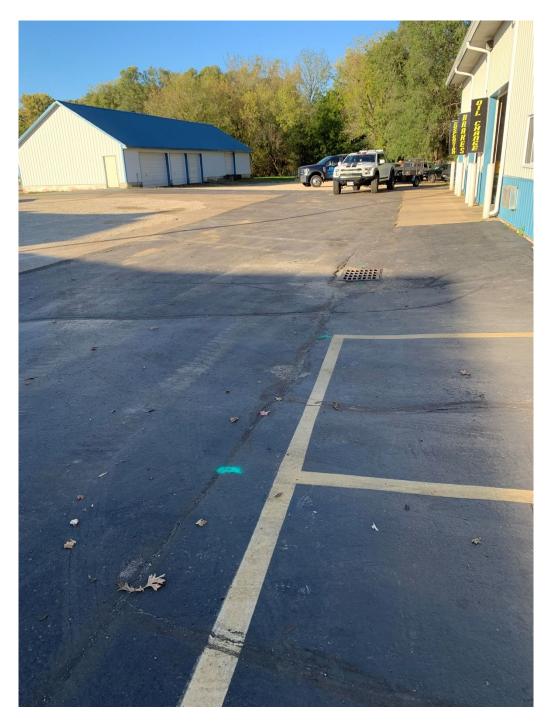


Cap in area of boring B-25.

Photo taken October 18, 2021.

# **D.3 MAINTENANCE PLAN PHOTOGRAPHS**

520 W. Madison Ave., Milton, WI



Asphalt cap in area to be maintained.

Photo taken November 22, 2022.

## D.4. INSPECTION LOG - 520 W. MADISON AVE.

State of Wisconsin Department of Natural Resources dnr.wi.gov

# **Continuing Obligations Inspection and Maintenance Log**

Form 4400-305 (R 7/20)

Page 1 of 2

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <a href="http://dnr.wi.gov/botw/SetUpBasicSearchForm.do">http://dnr.wi.gov/botw/SetUpBasicSearchForm.do</a>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name				BRRTS No.					
Badgerland Coop - Bob's Citgo				03-54-000193					
Inspections are required to be conducted (see closure approval letter):  annually semi-annually other – specify				When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent the following email address (see closure approval letter):					
Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maint	recomr	evious mendations emented?	Photographs taken and attached?		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			OY	○ N	OY ON		

 $\frac{03-54-000193}{\text{BRRTS No.}}$ Badgerland Coop - Bob's Citgo Activity (Site) Name

# D.4. INSPECTION LOG - 520 W. MADISON AVE.

**Continuing Obligations Inspection and Maintenance Log** Form 4400-305 (R 7/20) Page 2 of 2

{Click to Add/Edit Image}	Date added:	-	{Click to Add/Edit Image}	Date added:
Title:			Title:	

## COVER OR BARRIER MAINTENANCE PLAN

October 16, 2023

Property Located at:

520 W. Madison, Avenue, Milton, Wisconsin 53563

BRRTS #03-54-000193

Tax Parcel No. 257 03100701

#### INTRODUCTION

This document is the Maintenance Plan for an impervious cover at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing asphalt cover which addresses or occupies the area over the contaminated groundwater plume or soil.

More site-specific information about this property/site may be found in:

- The case file in the Wisconsin Department of Natural Resources (WDNR) South Central Regional office
- At <a href="http://dnr.wi.gov/topic/Brownfields/wrrd.html">http://dnr.wi.gov/topic/Brownfields/wrrd.html</a>, which includes:
  - BRRTS on the Web (WDNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
  - RR Sites Map for a map view of the site, and
- The WDNR project manager for Rock County.

# D.1. Descriptions:

## **Description of Contamination**

Soil contaminated by petroleum compounds is located at an approximate depth of 3 to 20 feet at 520 W. Madison Avenue. Groundwater contaminated by petroleum compounds is located at a depth of 50 to 65 feet. The extent of the soil and groundwater contamination is shown on the attached maps (**Figures B.2.b.** and **B.3.b**).

### Description of the Cover to be Maintained

The cap consists of a combination of asphalt and concrete that are at a minimum of 4 inches thick. It is located at 520 W. Madison Avenue as shown on the attached map (**Figure D.2.**).

#### **Cover/Building Purpose**

The asphalt/concrete cap over the contaminated soil and groundwater plume serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-to-

groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the property, commercial, the barrier should function as intended unless disturbed.

### **Annual Inspection**

The asphalt/concrete cap overlying the contaminated soil and groundwater plume and as depicted on **Figure D.2**, will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as **D.4**, **Form 4400-305**, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by WDNR representatives upon their request.

#### **Maintenance Activities**

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state, and federal law.

In the event the asphalt/concrete cap overlying the contaminated soil and groundwater plume are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the asphalt/concrete cap, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

# Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where payement is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources:

- 1. removal of the existing barrier;
- 2. replacement with another barrier;
- 3. excavating or grading of the land surface;
- 4. filling on capped or paved areas;
- 5. plowing for agricultural cultivation;
- 6. construction or placement of a building or other structure;
- 7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

If removal, replacement or other changes to a cover are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

#### Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

#### **Contact Information**

October 16, 2023

Site Operator and Owner: James Oshel

Jim's Service

520 W. Madison Ave. Milton, WI 53563 608-868-7837

Consultant: Betty Socha, Project Manager

> **SCS** Engineers 2830 Dairy Drive Madison, WI 53718 608-212-6664

WDNR: Cindy Koepke, Project Manager

> 3911 Fish Hatchery Road Madison, WI 53711

608-219-2181

# D.2 Location Map

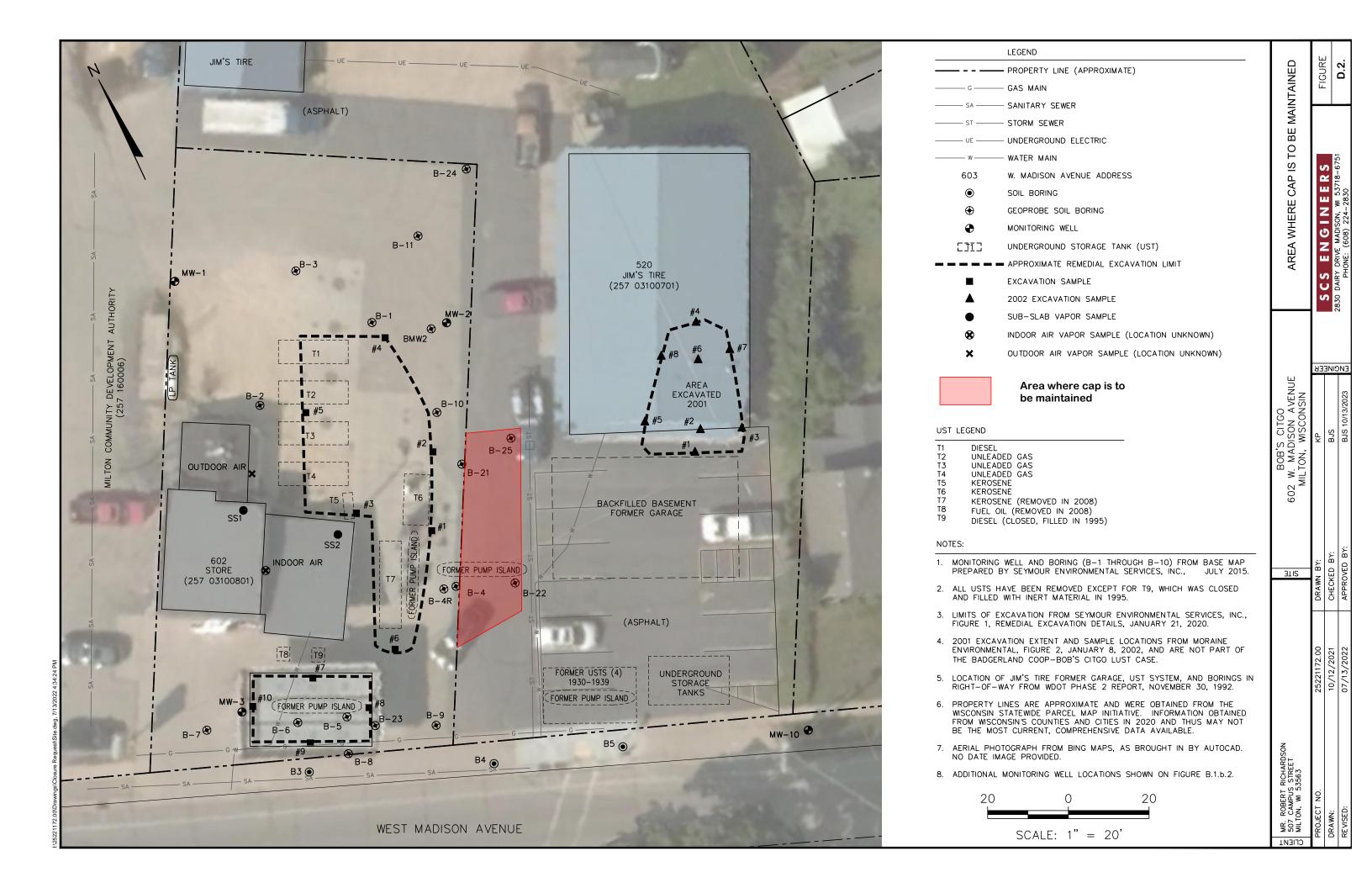
The attached map (Figure D.2) shows the location of the asphalt and concrete cap that requires maintenance. The extents of residual soil and groundwater contamination are shown on Figures B.2.b and B.3.b.

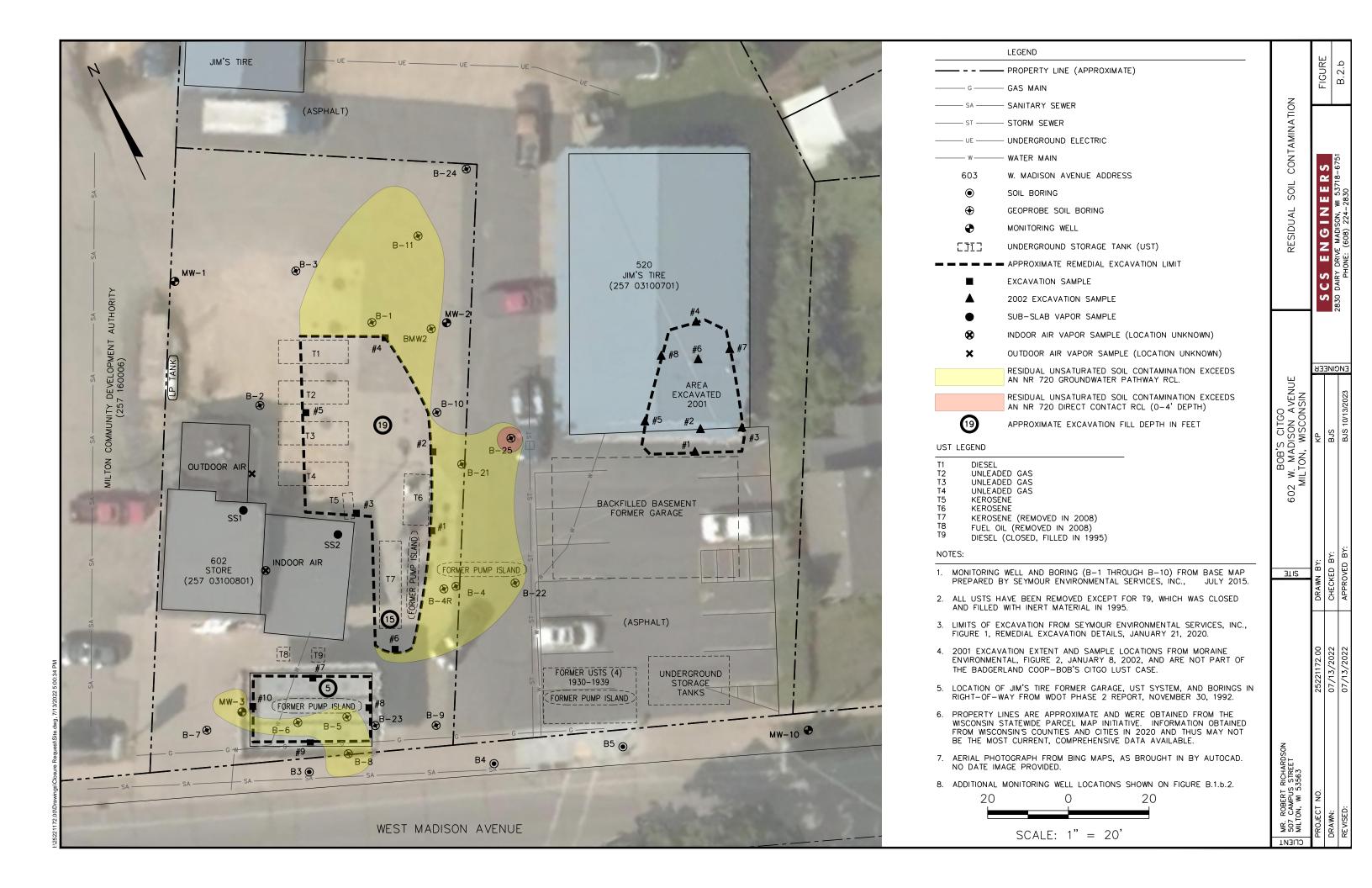
# D.3 Photographs of Cover/Barrier

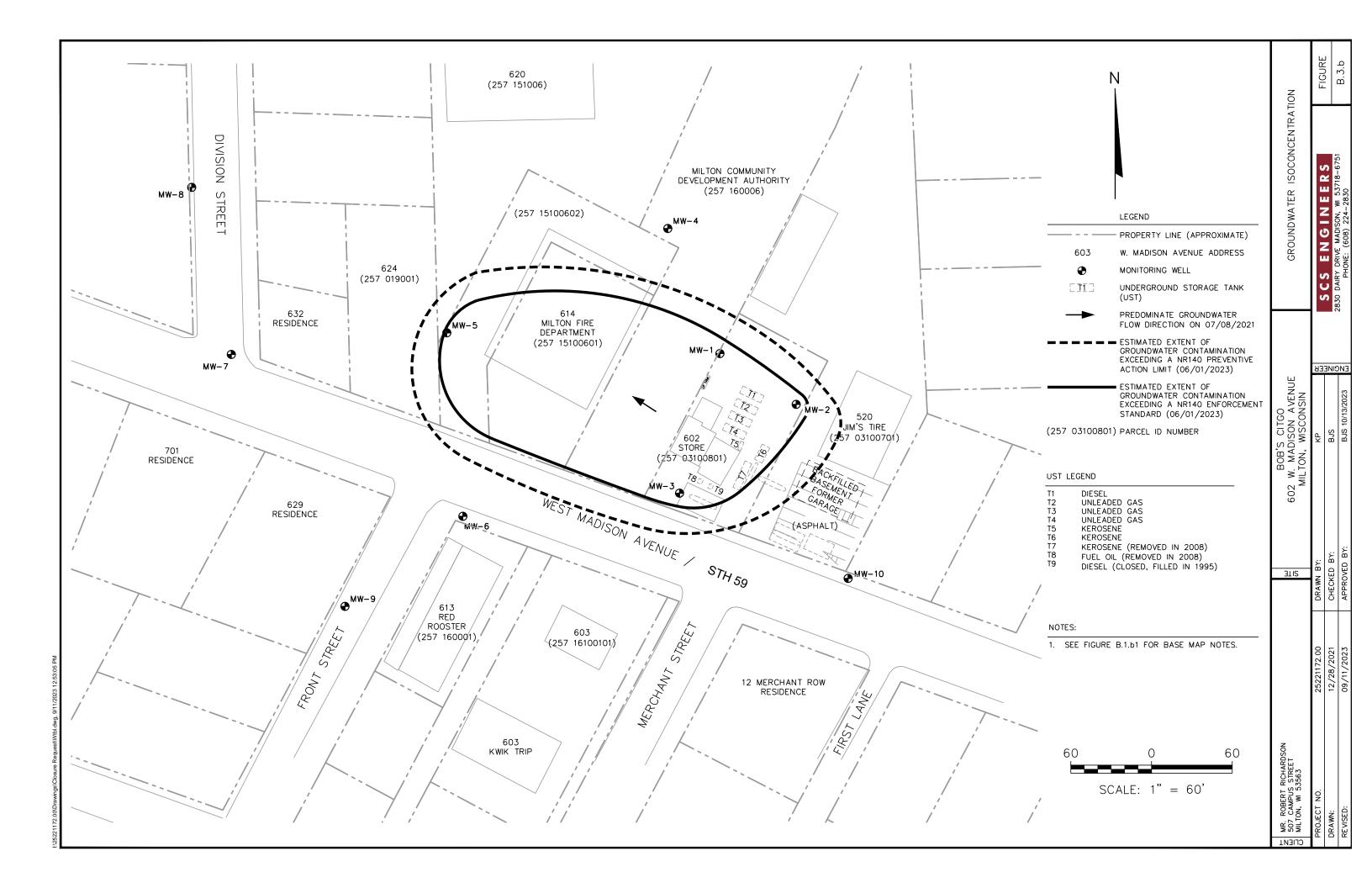
Photographs documenting the condition and extent of the pavement cap are attached.

D.4 Continuing Obligations Inspection and Maintenance Log The inspection log is attached.

I:\25221172.00\Deliverables\Closure Request\Attachment D Maintenance Plan - 520 Madison Ave\D.1 Descriptions of Maintenance Actions 520 W. Madison Ave.docx







# D.3 MAINTENANCE PLAN PHOTOGRAPHS

520 W. Madison Ave., Milton, WI

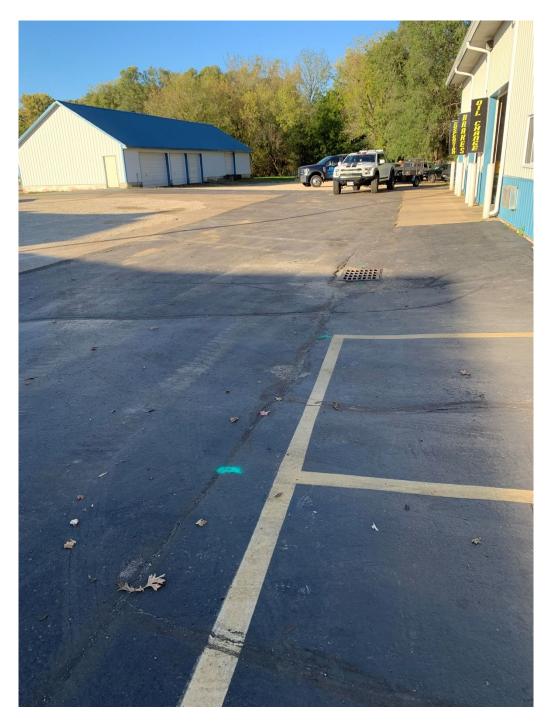


Cap in area of boring B-25.

Photo taken October 18, 2021.

# **D.3 MAINTENANCE PLAN PHOTOGRAPHS**

520 W. Madison Ave., Milton, WI



Asphalt cap in area to be maintained.

Photo taken November 22, 2022.

## D.4. INSPECTION LOG - 520 W. MADISON AVE.

State of Wisconsin Department of Natural Resources dnr.wi.gov

# **Continuing Obligations Inspection and Maintenance Log**

Form 4400-305 (R 7/20)

Page 1 of 2

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <a href="http://dnr.wi.gov/botw/SetUpBasicSearchForm.do">http://dnr.wi.gov/botw/SetUpBasicSearchForm.do</a>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name				BRRTS No.					
Badgerland Coop - Bob's Citgo				03-54-000193					
Inspections are required to be conducted (see closure approval letter):  annually semi-annually other – specify				When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent the following email address (see closure approval letter):					
Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maint	recomr	evious mendations emented?	Photographs taken and attached?		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			ΟY	○ N	OY ON		
		monitoring well cover/barrier for soil sediment cap other:			OY	○ N	OY ON		

 $\frac{03-54-000193}{\text{BRRTS No.}}$ Badgerland Coop - Bob's Citgo Activity (Site) Name

# D.4. INSPECTION LOG - 520 W. MADISON AVE.

**Continuing Obligations Inspection and Maintenance Log** Form 4400-305 (R 7/20) Page 2 of 2

{Click to Add/Edit Image}	Date added:	-	{Click to Add/Edit Image}	Date added:
Title:			Title:	

State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 3911 Fish Hatchery Road Fitchburg WI 53711-5397

Tony Evers, Governor Adam N. Payne, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463

TTY Access via relay - 711



January 3, 2024

Jenny Salvo City of Milton 710 S. Janesville St. Milton WI 53563

#### KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Continuing Obligations and Property Owner Requirements for 614 W. Madison Avenue

and adjacent unaddressed parcel, Milton WI 53563

Parcel Identification Numbers: 257 15100601, 257 15100602, and 257 160006

Final Case Closure for Badgerland Co-op-Bob's Citgo (also known as the former Bob's

Citgo), 602 W. Madison Ave., Milton, WI 53563

DNR BRRTS Activity # 03-54-000193

Dear Ms. Salvo:

The purpose of this letter is to notify you that you are responsible for certain continuing obligations applied to your properties at 614 W. Madison Avenue and the adjacent unaddressed parcel, Milton (referred to collectively as the Property and made up of the parcel numbers shown above) due to remaining contamination. The continuing obligations are part of the cleanup and case closure approved by the Wisconsin Department of Natural Resources (DNR) for the former Bob's Citgo site, located at 602 W. Madison Avenue, Milton (referred to in this letter as the Site).

The Site is the property where the original hazardous substance discharge or environmental pollution occurred before contamination migrated to the Property. The continuing obligations that apply to the Property are included in this letter, are stated as conditions in the closure approval letter, and are consistent with Wisconsin Statute (Wis. Stat.) § 292.12 and Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700-799. Continuing obligations are intended to limit exposure to remaining environmental contamination at the Property. These continuing obligations will also apply to future owners of the Property, until the conditions no longer exist.

It is common for properties to have continuing obligations as part of case closure approvals when contamination remains in the environment for a specific reason. Information on the continuing obligations associated with the Site, including the case closure approval letter, is available in the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web at dnr.wi.gov (search "BOTW"). Enter 03-54-000193 in the **Activity Number** field and then click **Search**. Scroll down and click on the **CO Packet** link for information about the completion of the environmental work. The Site may also be seen on the map viewer, RR Sites Map. at dnr.wi.gov (search "RRSM").

The DNR reviewed and approved the case closure request regarding the petroleum contamination in soil and groundwater at the former Bob's Citgo, based on information submitted by SCS Engineers. As



required by state law, you received notification about the requested case closure from the person conducting the cleanup on November 9, 2023. No further investigation or cleanup is required at this time. However, the case closure decision is conditioned upon long-term compliance with the continuing obligations at the Property.

# Continuing Obligations Applicable to the Property

Continuing obligations associated with the Site are described in the case closure letter to Robert Richardson, dated January 2, 2024 (copy available on request). However, only the following continuing obligations apply to your Property.

#### GROUNDWATER

Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells

Residual Groundwater Contamination (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w)) Groundwater contamination which equals or exceeds the enforcement standards for petroleum compounds is present on the source property and on three downgradient parcels, as shown on the enclosed map (Figure B.3.b., Groundwater Isoconcentration, 9/11/2023). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

#### **VAPOR**

Continuing Obligations to Address Vapor Contamination

Vapor intrusion (VI) is the movement of vapors coming from volatile chemicals in the soil or groundwater or within preferential pathways into buildings where people may breathe air contaminated by the vapors.

<u>VI - Future Concern</u>: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable.

Petroleum compounds remain in soil and groundwater at the locations shown on the enclosed maps (Figure B.2.b., Residual Soil Contamination, 7/13/2022 and Figure B.3.b., Groundwater Isoconcentration, 9/11/2023) at concentrations that may be of concern for vapor intrusion in the future, if a building is constructed, renovated or expanded in an area where no building currently exists or if an existing building is remodeled. Currently the source property has a vacant convenience store, 520 W. Madison Avenue has a commercial building, and 614 W. Madison has a building currently housing a fire station.

Vapor control technologies are required for new construction or for modification of occupied buildings on the property <u>unless</u> the property owner assesses the vapor pathway and the DNR agrees that vapor control technologies are not needed. <u>The property owner shall maintain the current building use and layout</u>.

#### OTHER CLOSURE REQUIREMENTS

<u>Pre-Approval is Required for Well Construction</u> (Wis. Admin. Code § NR 812.09 (4) (w)) DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or continuing obligations. This requirement applies to private drinking water

wells and high capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, "Continuing Obligations/Residual Contamination Well Approval Application," to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form is available at dnr.wi.gov by searching "3300-254." Additional casing may be necessary to help prevent contamination of the well.

<u>Property Owner Responsibilities</u> (Wis. Stat. § 292.12 & § 709.02, Wis. Admin. Code § NR 727.05) The Property owner (you and any subsequent Property owner) is responsible for compliance with the continuing obligations in this letter, pursuant to Wis. Stat. § 292.12. You are required to notify anyone who purchases the Property from you of the responsibility to comply with the continuing obligations in this letter, in accordance with Wis. Admin. Code § NR 727.05 (2). For residential property transactions, you are required to make disclosures under Wis. Stat. § 709.02.

If you lease or rent the Property to an occupant who will be responsible for maintaining a continuing obligation, you must include that responsibility in a lease agreement, in accordance with Wis. Admin. Code § NR 727.05 (3).

Please be aware that failure to comply with the continuing obligations may result in enforcement action by the DNR. The DNR intends to conduct periodic inspections to ensure that the conditions included in this letter, including compliance with referenced maintenance plans, are met.

DNR Notification (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2))

The Property owner is required to notify the DNR at least 45 days before taking the following actions. The DNR may require additional investigation and/or cleanup actions if necessary to be protective of human health and the environment.:

• Before constructing a building and/or modifying the construction of an existing building

Certain activities are limited at closed sites to reduce the risk of exposure to residual contamination via vapor intrusion. For properties with a continuing obligation for addressing the future risk of vapor intrusion when buildings exist at the time of closure approval, changes to the current building use and layout are prohibited without prior DNR approval. This includes any change in building construction, reconstruction or partial demolition. The DNR may require additional actions may be required at that time to re-assess for vapor intrusion and mitigate, as appropriate.

Please send written notifications to Cindy Koepke, the DNR project manager, using the RR Program Submittal Portal at dnr.wi.gov (search "RR submittal portal). Questions on using this portal can be directed to the contact below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts," and select the EPA tab (<a href="https://dnr.wi.gov/topic/Brownfields/Contact.html">https://dnr.wi.gov/topic/Brownfields/Contact.html</a>). More information on submitting electronic documents can be found in the DNR publication "Guidance for Electronic Submittal for the Remediation and Redevelopment Program" (RR-690), available at dnr.wi.gov (search "RR-690").

The DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" explains a property owner's responsibility for continuing obligations on their property. This fact sheet should have been sent to you when you received a notification letter before the case closure request was submitted to the DNR. You may obtain a copy at dnr.wi.gov by searching "RR-819."

Under Wis. Stat. § 292.13 owners of properties affected by contamination from another property are generally exempt from investigating or cleaning up a hazardous substance discharge that migrated onto a property from another property. However, the exemption under Wis. Stat. § 292.13 does not exempt the property owner from the responsibility to maintain a continuing obligation placed on the property in accordance with Wis. Stat. § 292.12. To maintain this exemption, that statute requires the current property owner and any subsequent property owners to meet the conditions in the statute, including:

- Granting reasonable access to the DNR, responsible party, or their contractors;
- Avoiding interference with response actions taken; and
- Avoiding actions that make the contamination worse (e.g., demolishing a structure and causing or worsening the discharges to the environment).

The DNR appreciates your cooperation to restore the environment at this site. If you have questions or concerns regarding the Site or this letter, please contact Cindy Koepke, the DNR Project Manager, at 608-219-2181 or cynthia.koepke@wisconsin.gov.

Sincerely,

Issac A. Ross

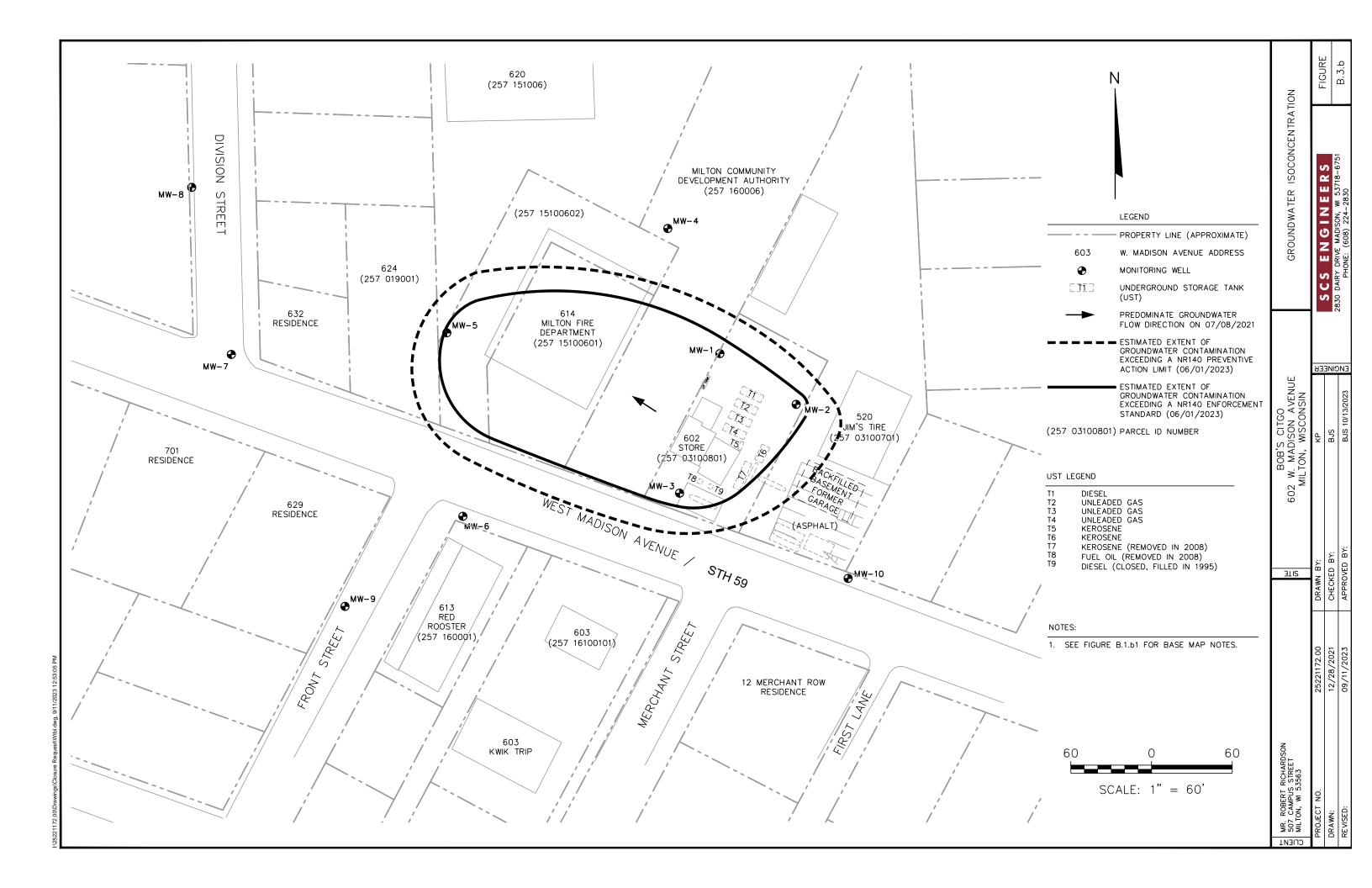
South Central Region Team Supervisor Remediation & Redevelopment Program

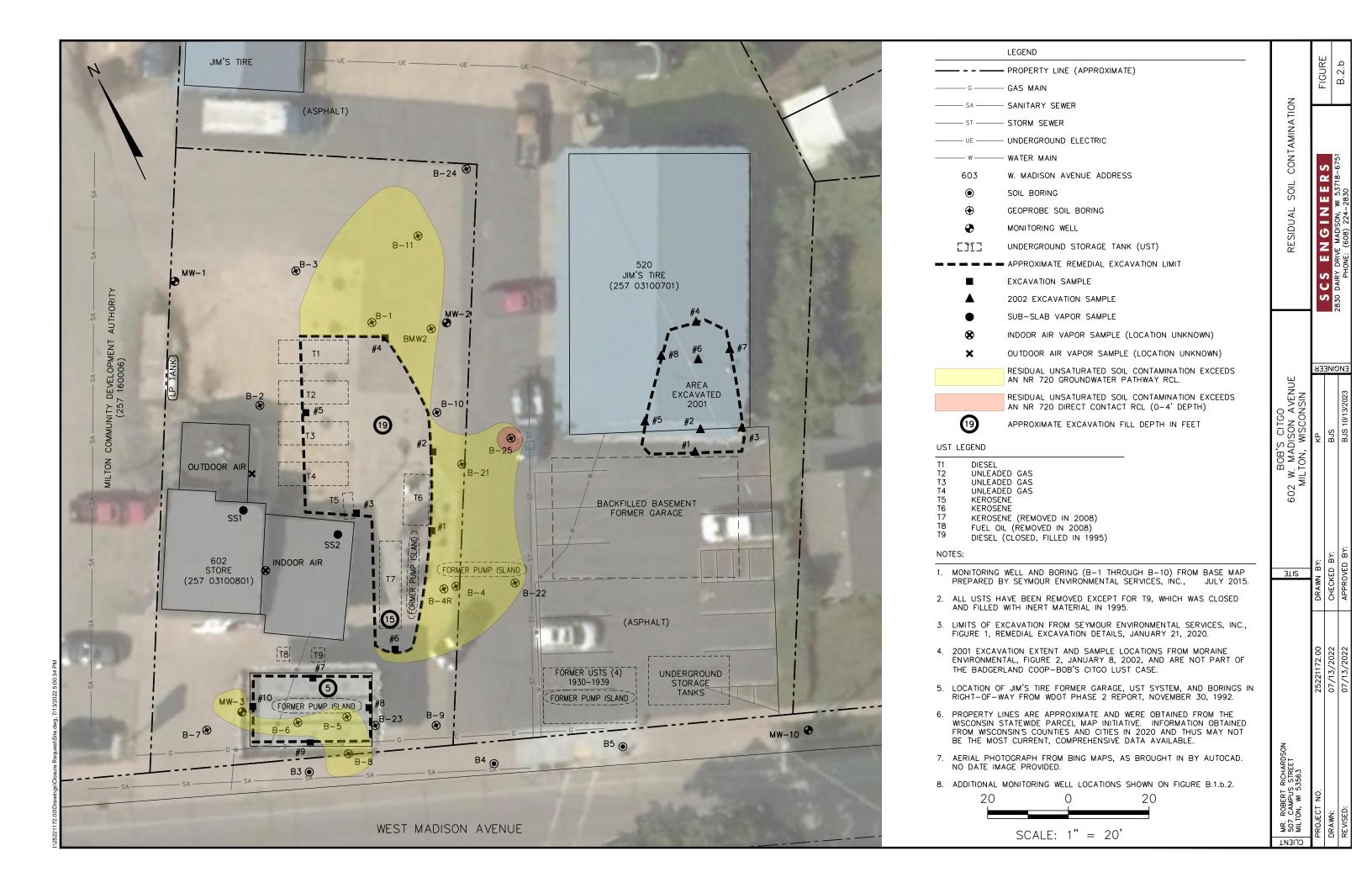
Fitchburg DNR Service Center - Fitchburg, WI

Attach.: Figure B.3.b., Groundwater Isoconcentration, 9/11/2023 Figure B.2.b., Residual Soil Contamination, 7/13/2022

cc: Robert Richardson

Betty Socha – SCS Engineers





State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
3911 Fish Hatchery Road
Fitchburg WI 53711-5397

Tony Evers, Governor Adam N. Payne, Secretary Telephone 608-266-2621

Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



January 3, 2024

Mark Langer, Public Works Director City of Milton 150 Northside Drive Milton WI 53563

SUBJECT: Notice of Closure Approval with Continuing Obligations for Right-of-Way Holders

For West Madison Avenue/Connecting Highway 59

Case Closure for former Bob's Citgo, 602 W. Madison Ave., Milton WI

BRRTS #: 03-54-000193

Dear Mr. Langer:

The Wisconsin Department of Natural Resources (DNR) recently approved the completion of the response actions conducted at the site identified above (the Site). This letter describes how that approval applies to the right-of-way (ROW) at 602 W. Madison Ave, Milton and at the former location of MW-7. As the ROW holder, you are responsible for complying with continuing obligations for any work you conduct in the ROW.

State law—Wisconsin Statute (Wis. Stat.) ch. 292— directs parties responsible for the discharge of a hazardous substance or environmental pollution to take necessary actions to restore the environment to the extent practicable and minimize harmful effects from the discharge to the air, lands or waters of this state. The law allows some contamination to remain in the environment if it does not pose a threat to public health, safety, welfare or the environment.

On October 11, 2023, the City of Milton received information from SCS Engineers about the petroleum contamination from the Site remaining in the soil beneath the West Madison Avenue ROW, and about the continuing obligations necessary to limit exposure to remaining contamination. On December 14, 2023, DNR was informed that monitoring well MW-7 was missing, apparently paved over during recent street reconstruction.

#### APPLICABLE CONTINUING OBLIGATIONS

The continuing obligations that apply to this ROW are described below and are consistent with Wis. Stat. § 292.12 and Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700 to 799.

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis. Stat. ch. 289)

Soil contamination remains near former pump islands, in the West Madison Avenue ROW, and areas adjacent to the remedial excavation as indicated on the enclosed map (Figure B.2.b., Residual Soil Contamination, 7/13/2022). If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.



Monitoring Wells could not be Properly Filled and Sealed (Wis. Admin. Code ch. NR 141 and § NR 726.15(2)(c)1.)

Monitoring well MW-7 located in the West Madison Avenue/Highway 59 right-of-way shown on the enclosed map, (Figure B.3.d, Monitoring Wells, revised 5/13/2022), could not be properly filled and sealed because it was missing due to being paved over, covered or removed. SCS Engineers made a reasonable effort to locate the well and to determine if it was properly filled and sealed. However, the well listed above is not located and remains open. You may be held liable under Wis. Stat. § 292.11 for any problems associated with the monitoring well if it creates a conduit for contaminants to enter groundwater. If any of the groundwater monitoring wells are found, the owner of the property on which the well is located is required to properly fill and seal the well and submit the required documentation to the DNR.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

### ADDITIONAL INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to <a href="mailto:dnr.wi.gov">dnr.wi.gov</a> and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the Remediation and Redevelopment Sites Map by searching "RRSM."

Send written notifications and inspection logs to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal." Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab.

If you have questions or concerns regarding this letter, please contact the DNR project manager, Cindy Koepke, at 608-219-2181 or cynthia.koepke@wisconsin.gov.

Sincerely,

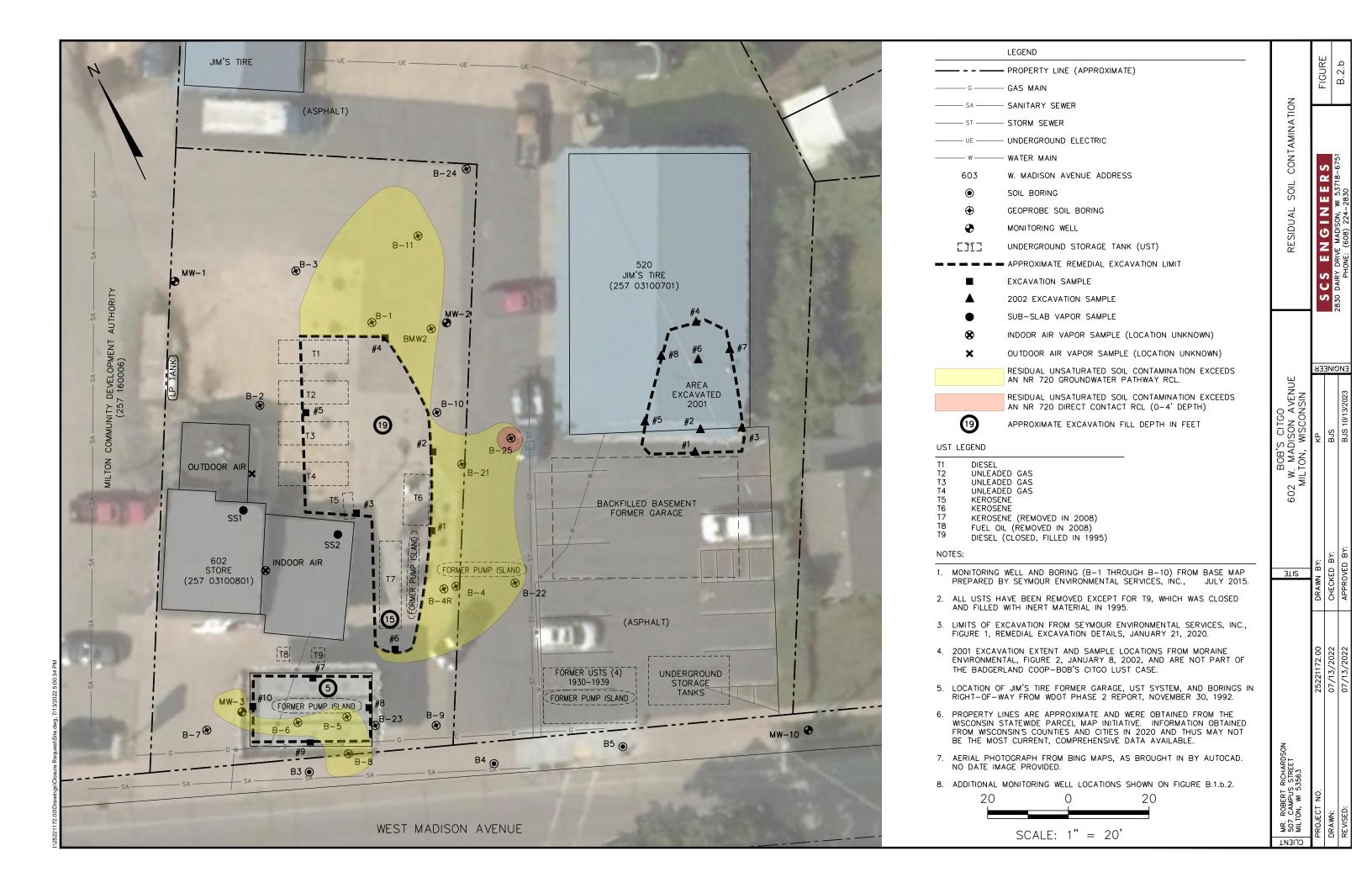
Issac A. Ross

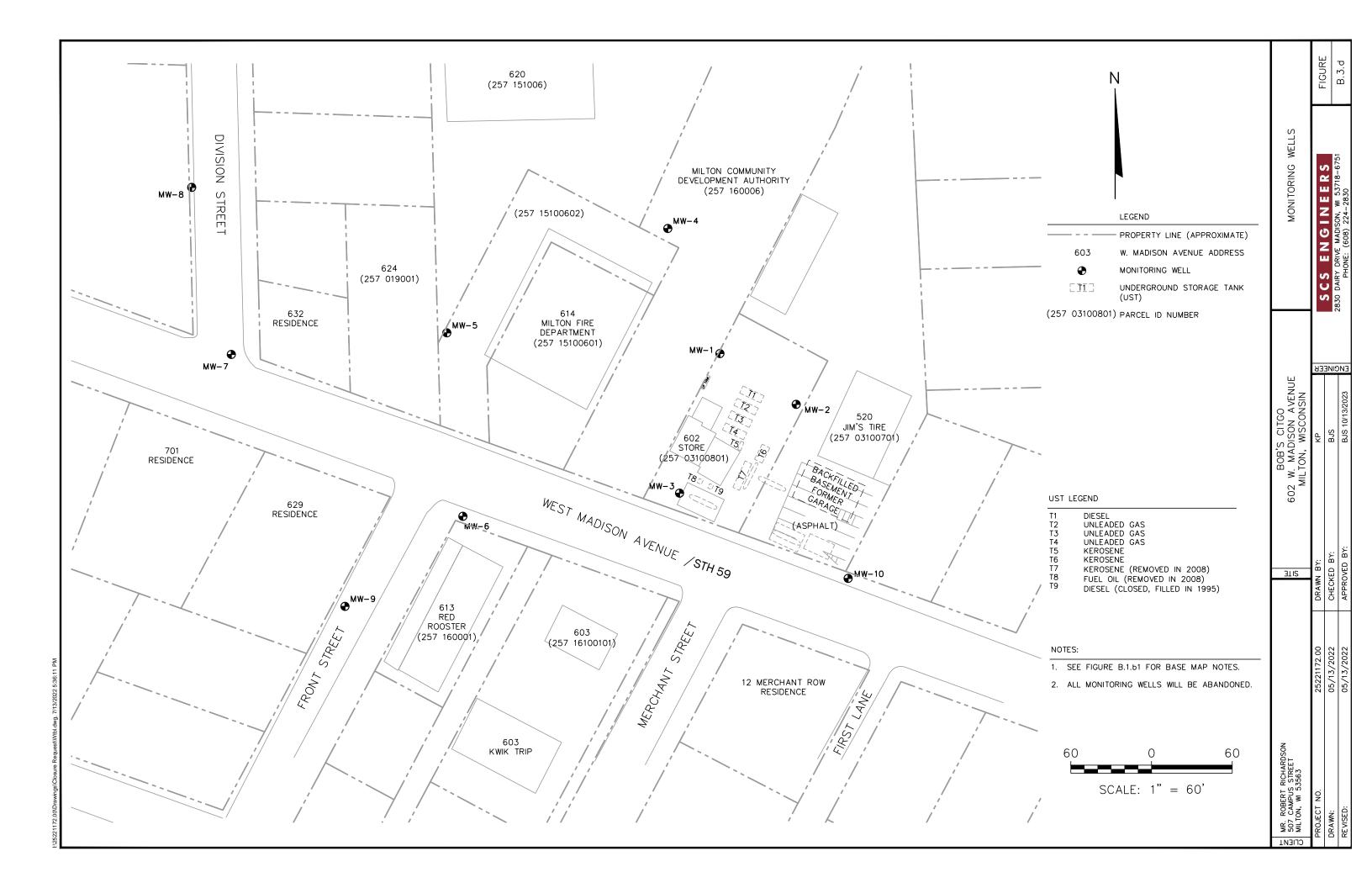
South Central Region Team Supervisor Remediation & Redevelopment Program Fitchburg DNR Service Center – Fitchburg, WI

Attachment(s):

Figure B.2.b., Residual Soil Contamination, 7/13/2022 Figure B.3.d, Monitoring Wells, revised 5/13/2022

cc: Robert Richardson
Betty Socha – SCS Engineers





# COVER OR BARRIER MAINTENANCE PLAN 602 W. MADISON AVENUE

October 16, 2023

Property Located at:

602 W. Madison Avenue, Milton, Wisconsin 53563

BRRTS #03-54-000193

Tax Parcel No. 257 03100801

### INTRODUCTION

This document is the Maintenance Plan for an impervious cover at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing asphalt cover which addresses or occupies the area over the contaminated groundwater plume or soil.

More site-specific information about this property/site may be found in:

- The case file in the Wisconsin Department of Natural Resources (WDNR) South Central Regional office
- At http://dnr.wi.gov/topic/Brownfields/wrrd.html, which includes:
  - BRRTS on the Web (WDNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
  - RR Sites Map for a map view of the site, and
- The WDNR project manager for Rock County.

## D.1. Descriptions:

### **Description of Contamination**

Soil contaminated by petroleum compounds is located at a depth of 3 to 20 feet at 602 W. Madison Avenue (the source property). Groundwater contaminated by petroleum compounds is located at a depth of 50 to 65 feet. The extent of the soil and groundwater contamination is shown on the attached maps (**Figures B.2.b., B.3.b.,** and **D.2.**).

### Description of the Cover to be Maintained

The cap consists of a combination of asphalt and concrete that are at a minimum of 4 inches thick. It is located at 602 W. Madison Avenue as shown on the attached map (**Figure D.2.**).

## **Cover/Building Purpose**

The asphalt/concrete cover/barrier acts as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the property, commercial, the barrier should function as intended unless disturbed.

## **Annual Inspection**

The asphalt/concrete cap overlying the contaminated soil and groundwater plume and as depicted on **Figure D.2**, will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks, and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age, and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as **D.4. Inspection Log**, Form 4400-305 Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by WDNR representatives upon their request.

### **Maintenance Activities**

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state, and federal law.

In the event the asphalt/concrete cap overlying the contaminated soil and groundwater plume are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the asphalt/concrete cap, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

## Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where pavement is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources:

- 1. removal of the existing barrier;
- 2. replacement with another barrier;
- 3. excavating or grading of the land surface;
- 4. filling on capped or paved areas;
- 5. plowing for agricultural cultivation;
- 6. construction or placement of a building or other structure;
- 7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

If removal, replacement or other changes to a cover are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

### Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

## **Contact Information**

October 16, 2023

Site Owner and Operator: Robert Richardson

507 Campus Street, Apartment 7

Milton, WI 53563 608-359-3941

Consultant: Betty Socha, Project Manager

SCS Engineers 2830 Dairy Drive Madison, WI 53718 608-212-6664

WDNR: Cindy Koepke, Project Manager

3911 Fish Hatchery Road Madison, WI 53711 608-219-2181

## D.2 Location Map

The attached map (**Figure D.2**) shows the location of the asphalt and concrete cap that requires maintenance on the source property. The extent of residual soil and groundwater contamination and property boundaries are shown on **Figures B.2.b.**, and **B.3.b**.

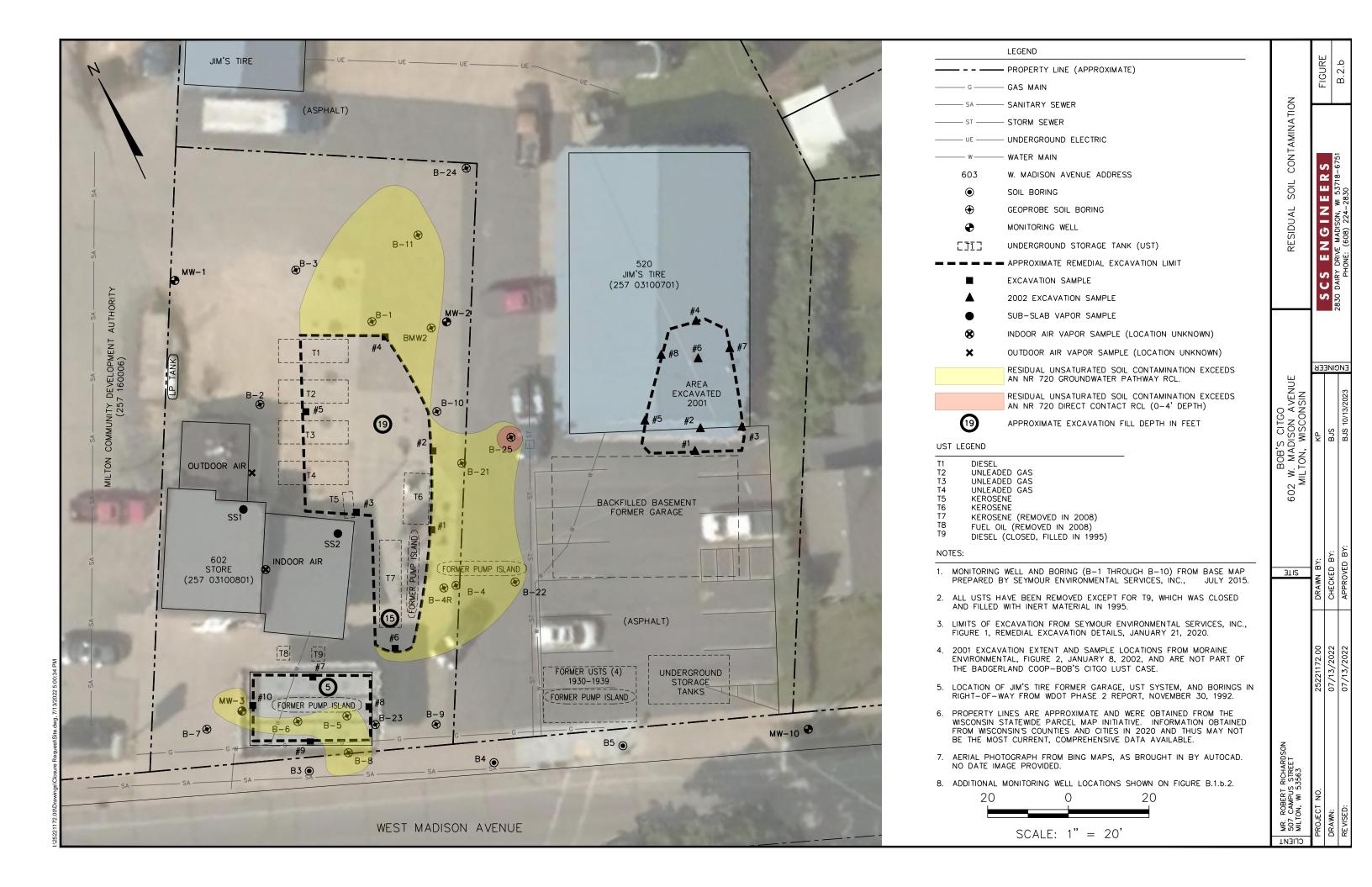
## D.3 Photographs of Cover/Barrier

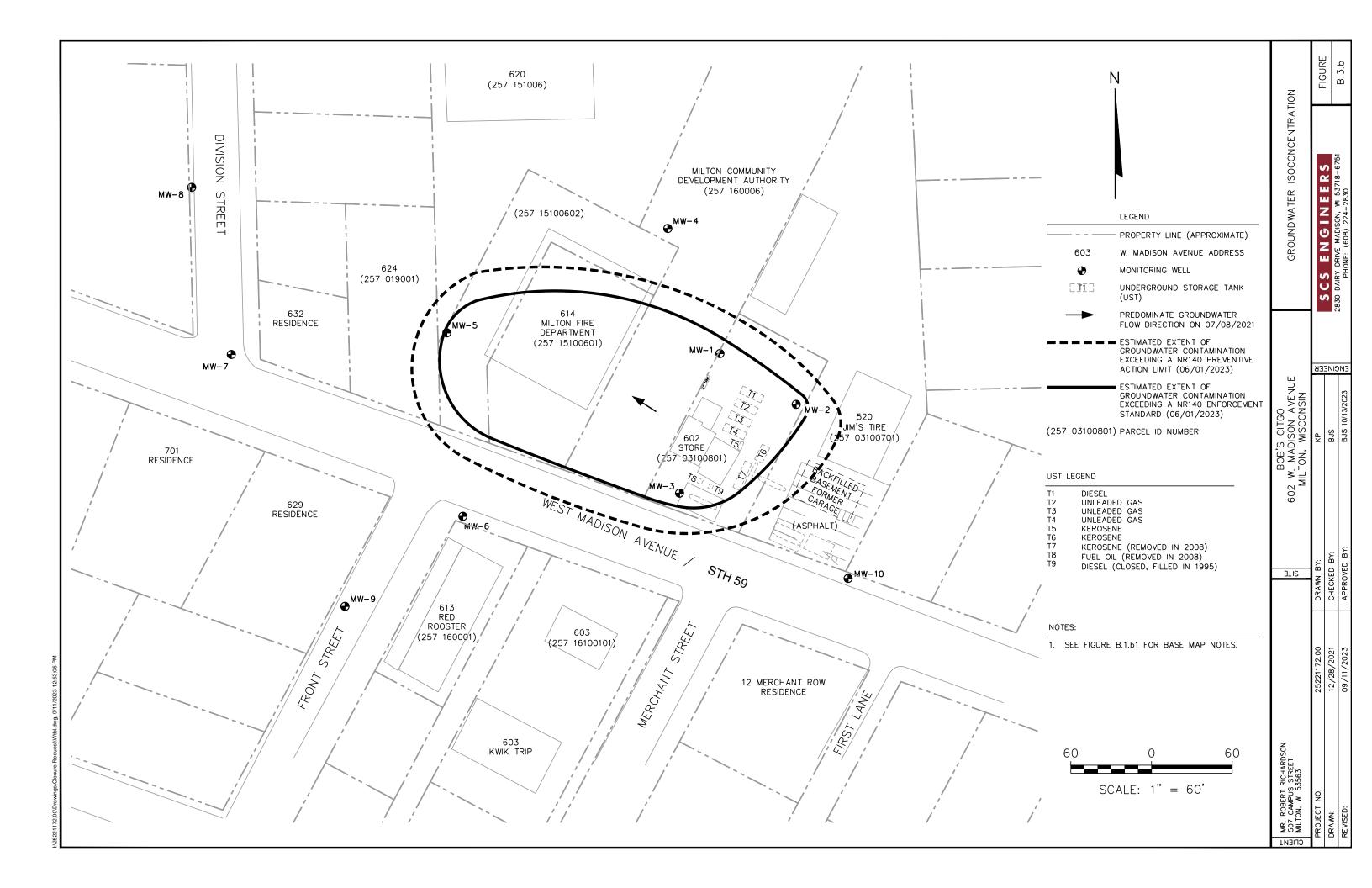
The attached photographs document the condition and extent of the cover/barrier at the time of the closure request.

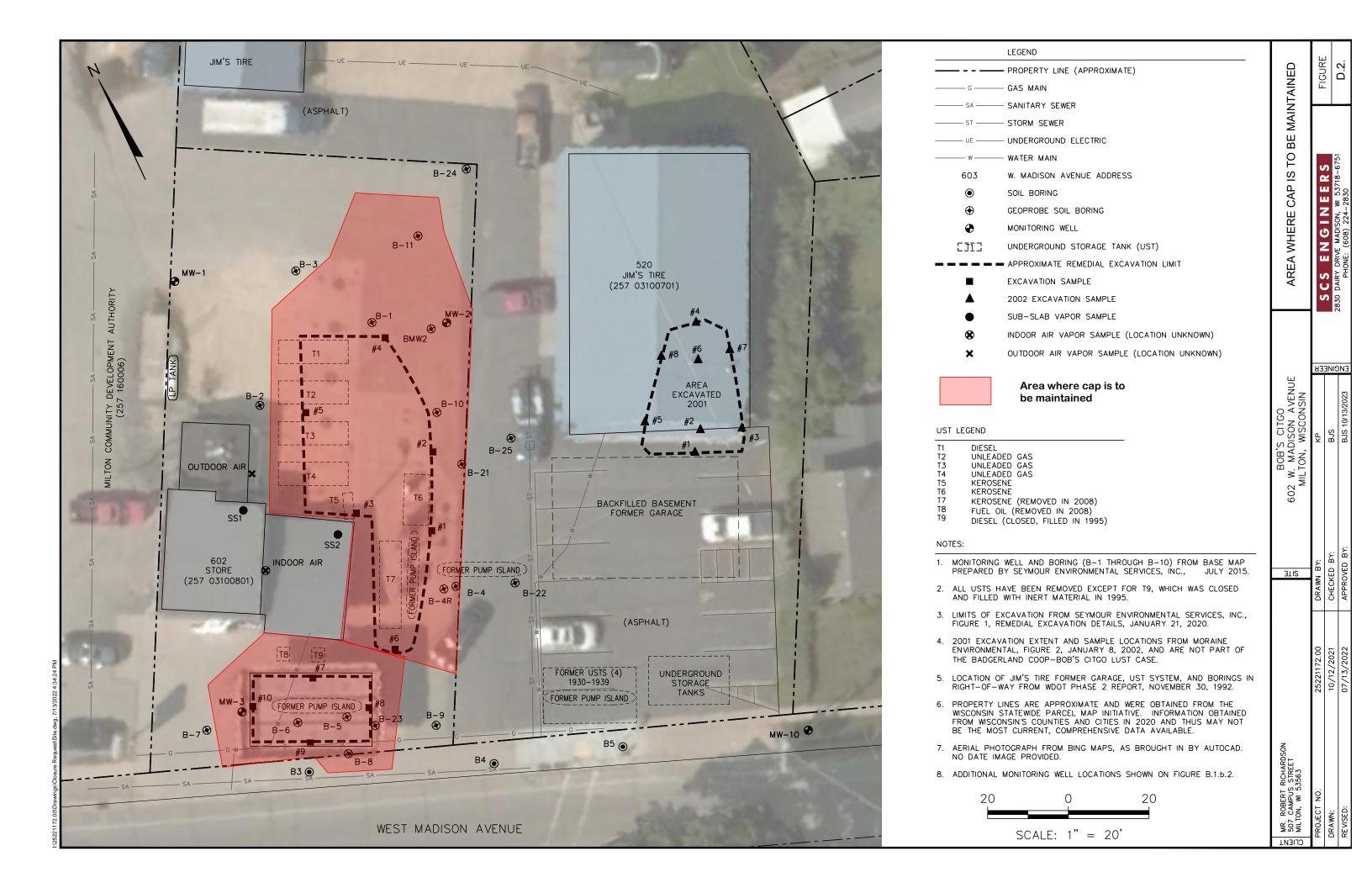
## D.4 Continuing Obligations Inspection and Maintenance Log

The continuing obligations inspection and maintenance log is attached.

I:\25221172.00\Deliverables\Closure Request\Attachment D Maintenance Plan - 602 W. Madison Ave\D.1. Descriptions of Maintenance Actions 602 W Madison Ave.docx







602 W. Madison Ave., Milton, WI



Asphalt cap to be maintained. MW1 in foreground, former Fire Dept. building and W. Madison Ave. in background. Photo taken November 22, 2022.

602 W. Madison Ave., Milton, WI



Asphalt cap to be maintained. MW1 in foreground, former Bob's Citgo building and W. Madison Ave. in background. Photo taken November 22, 2022.

602 W. Madison Ave., Milton, WI



Asphalt cap to be maintained. MW2 in foreground, Jim's Service building in background. Photo taken November 22, 2022.

602 W. Madison Ave., Milton, WI



Asphalt and concrete cap to be maintained. MW3 in foreground, former gasoline pump island area, sidewalk, and W. Madison Ave. in background. Photo taken November 22, 2022.

## State of Wisconsin Department of Natural Resources

dnr.wi.gov

## D.4. INSPECTION LOG - 602 W. MADISON AVE.

## **Continuing Obligations Inspection and Maintenance Log**

Form 4400-305 (R 7/20)

Page 1 of 2

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <a href="http://dnr.wi.gov/botw/SetUpBasicSearchForm.do">http://dnr.wi.gov/botw/SetUpBasicSearchForm.do</a>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site					BRRTS No.		
Badgerland	d Coop - Bob's C	Citgo			03-5	4-000193	
Inspections	<ul><li>annual</li><li>semi-a</li></ul>	conducted (see closure a ly nnually - specify	approval letter):	When submittal of this form is required, submanager. An electronic version of this filled of the following email address (see closure app	out form, or a scanned	ally to the E version m	ONR project ay be sent to
Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or main	recom	evious nendations emented?	Photographs taken and attached?
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	O Y O N
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	O Y O N
		monitoring well cover/barrier for soil sediment cap other:			O Y	○ N	OY ON

 $\frac{03-54-000193}{\text{BRRTS No.}}$ Badgerland Coop - Bob's Citgo Activity (Site) Name

## D.4. INSPECTION LOG - 602 W. MADISON AVE.

## **Continuing Obligations Inspection and Maintenance Log** Form 4400-305 (R 7/20) Page 2 of 2

{Click to Add/Edit Image}	Date added:	{Click to Add/Edit Image}	Date added:
Title:		Title:	

## **Data Tables**

Tables that follow are for reference only and were not included in the Department's closure documentation sent to affected parties

(Results are in µg/L)

Sample	Date	Lab Notes	Benzene	Ethylbenzene	МТВЕ	Toluene	TMBs	Xylenes	Naphthalene	Other VOC	Cs .
MW-1	11/4/2010		6,950	2,380	912	17,000	1,564	11,140	426	ND	
	3/3/2011		8,700	2,810	914	18,300	2,136	13,650	478	Methylene Chloride	113 *
					<u> </u>	· <u> </u>		· · · · · · · · · · · · · · · · · · ·		n-Propylbenzene	208
	9/15/2011		7,550	2,540	867	15,300	2,153	12,160	640	NA	
	8/15/2013		6,600	2,630	302	15,600	2,226	11,890	663	NA	
	9/11/2013		5,170	2,230	<u>184</u>	13,200	1,889	10,300	525	Isopropylbenzene	73.6
						·				n-Propylbenzene	185
	5/28/2015		5,620	2,060	<u>160</u>	12,800	1,854	9,360	<u>567</u>	NA	
	6/24/2017		6,970	2,980	390	17,100	2,224	12,880	<u>734</u>	NA	
	10/23/2017		5,170	2,940	222	14,000	2,324	13,170	711	NA	
	7/8/2021		2,420	2,890	<11.3	1,800	2,576	10,800	579	NA	
	5/10/2022		3,650	2,830	<28.2	3,830	2,171	11,700	649	NA	
MW-2	3/11/2011		5,260	3,270	<u>284</u>	11,100	2,887	15,270	529	Isopropylbenzene	101
										Methylene Chloride	66.5 *
										n-Propylbenzene	294
	9/15/2011		4,760	3,720	<u>280</u>	10,900	3,238	16,550	<u>891</u>	NA	
	8/15/2013		NA	NA	NA	NA	NA	NA	NA	NA	
	9/11/2013		<u>1,810</u>	2,930	<u>37.3</u>	<u>2,660</u>	<u>3,155</u>	11,020	828	Isopropylbenzene	150
										n-Propylbenzene	406
										p-Isopropyltoluene	11.3
										sec-Butylbenzene	19.6 J*
	5/28/2015		2,020	3,400	<u>49.6</u>	2,560	3,843	14,150	<u>826</u>	NA	
	6/24/2017		2,310	3,300	60.6 J	480	<u>5,160</u>	12,950	1,560	NA	
	10/23/2017		1,080	2,310	<24.2	<u>204</u>	4,055	8,640	928	NA	
	7/8/2021		335	2,000	<45.2	57.1	3,861	7,360	964	NA	
	5/10/2022		1,990	4,290	<56.5	157	4,597	16,800	985	NA	

(Results are in µg/L)

		Lab				tesons are in µg/					
Sample	Date	Notes	Benzene	Ethylbenzene	MTBE	Toluene	TMBs	Xylenes	Naphthalene	Other VO	Cs
MW-3	3/3/2011		<u>3,150</u>	3,230	<76.2	10,500	2,888	14,130	<u>589</u>	Isopropylbenzene	105
						<u> </u>				n-Propylbenzene	284
										Methylene Chloride	65.6 *
	9/15/2011		2,670	2,610	74.30	6,420	2,932	10,660	680	NA	
	8/15/2013		2,290	3,760	562	1,750	3,411	15,650	926	NA	
	9/11/2013		2,290	2,580	<u>532</u>	1,120	2,393	11,030	684	Isopropylbenzene	93.3
			·			· · · · · · · · · · · · · · · · · · ·				n-Propylbenzene	230
	5/28/2015		1,360	3,040	<24.2	<u>719</u>	3,342	12,610	<u>831</u>	NA	
	6/24/2017		1,100	2,900	28.6 J	68.3	3,063	9,208	743	NA	
	10/23/2017		1,760	2,730	58.3 J	<u>163</u>	3,515	9,630	884	NA	
	7/8/2021		1,220	2,330	<28.2	35.3	4,227	4,170	813	NA	
	5/10/2022		2,030	3,120	59.3 J1	73.7	4,099	9,880	936	NA	
MW-4	9/15/2011		<0.41	<0.54	<u>154</u>	<0.67	<1.80	<2.63	<0.89	1,2-Dichloroethane	2.3
										Chloromethane	0.33
	8/15/2013		<0.34	<0.34	210	<0.34	<0.69	<1.03	<0.37	NA	
	9/11/2013		<0.50	<0.50	154	<0.44	<1.00	<1.32	<2.5	1,2-Dichloroethane	1
										Isopropylbenzene	1.4
	5/28/2015		<0.40	<0.39	<u>95.0</u>	<0.39	<0.84	<1.25	<0.42	NA	
	6/24/2017		<0.40	<0.39	0.68 J	<0.39	<0.84	<1.25	<0.42	NA	
	10/23/2017		<0.40	<0.39	<u>21.7</u>	<0.39	<0.84	<1.25	<0.42	NA	
	5/10/2022		<0.30	<0.33	7.7	<0.29	<0.81	<1.0	<1.1	NA	
MW-5	9/15/2011		623	58.5	<u>776</u>	6.3	<9.0	271	<4.4	ND	
	8/15/2013		3,930	1,330	270	969	<u>486</u>	2,890	307	NA	
	9/11/2013		3,220	1,080	<u>216</u>	737	338.8	2,152	209	Isopropylbenzene	36.6
										n-Propylbenzene	78.3
	5/28/2015		2,170	917	<u>105</u>	1,690	900	3,920	275	NA	
	6/24/2017		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
	10/23/2017		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	2.6	NA	
	7/8/2021		<u> 16.6</u>	26.5	<b>4.7</b> J1	2.1	23.1	63.8	6.9	NA	
	5/10/2022		2,120	1,670	34.5 J1	<u>736</u>	1,023	5,930	482	NA	
	11/22/2022		2,230	1,780	<u>31.4</u> J1	1,120	1,656	7,020	488	NA	
	6/1/2023		1,820	1,790	28.1 J	859	1,837	7,780	501	NA	

(Results are in µg/L)

Sample	Date	Lab Notes	Benzene	Ethylbenzene	МТВЕ	Toluene	TMBs	Xylenes	Naphthalene	Other VO	Cs
MW-6	9/15/2011		<u>289</u>	75.6	<u>53.8</u>	1.7	27.2	6.9	<u>19.2</u>	Isopropylbenzene n-Propylbenzene	7.3 7.3
	8/15/2013		4.1	1.2	5.3	<0.34	<0.69	<1.03	< 0.37	NA	
	9/11/2013		208	121	3.2	11.3	35.0	162.1	20.0	Isopropylbenzene n-Propylbenzene	6.5 13.1
	5/28/2015		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
	6/24/2017		1,060	<u>1,360</u>	109	<u>166</u>	870	3,164	<u>354</u>	NA	
	10/23/2017		103	98.7	4.1	7.9	65.3	160	22.2	NA	
	7/8/2021		5.1	4.1	<1.1	<0.29	0.60 J1	1.9 JI	<1.1	NA	
	5/10/2022		615	<u>895</u>	ון 11.3	25.6	<u> 192.8</u>	<u>787</u>	304	NA	
	11/22/2022		11.1	32.1	<1.1	0.78 J1	6.9	22.6	5.0	NA	
	6/1/2023		<0.30	<0.33	<1.1	<0.29	<0.81	<1.0	<1.9	NA	
лW-7	9/11/2013		<u>56.6</u>	<0.50	125	<0.44	<1.00	<1.32	<2.5	1,2-Dichloroethane	1.1
	5/28/2015		18.8	1.3	126	<0.39	<0.84	5.2	1.7	NA	
	6/24/2017	(2)	244	8.2	96.9	3.2	<1.67	3.0	2.7	NA	
	10/23/2017		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
	5/10/2022		<0.30	<0.33	<1.1	<0.29	<0.81	<1.0	<1.1	NA	
MW-8	9/11/2013		12.8	<0.50	4.30	<0.44	<1.00	<1.32	<2.5	ND	
	5/28/2015		0.75 J	<0.39	10.30	<0.39	1.6	<1.25	0.67 J	NA	
	6/24/2017		<u>2.1</u>	12.2	2.30	0.441	<0.84	3.0	<u>14.4</u>	NA	
	10/23/2017		<0.40	<0.39	2.90	<0.39	<0.84	<1.25	<0.42	NA	
лW-9	9/11/2013		<0.50	<0.50	1.1	<0.44	<1.00	<1.32	<2.5	ND	
	5/28/2015		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
	6/24/2017		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
	10/23/2017		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
MW-10	9/11/2013		<0.50	<0.50	<0.49	<0.44	<1.00	<1.32	<2.5	ND	
	5/28/2015		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
	6/24/2017		<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	
	10/23/2017	(1)(2)	<0.40	<0.39	<0.48	<0.39	<0.84	<1.25	<0.42	NA	

(Results are in µg/L)

Sample	Date	Lab Notes	Benzene	Ethylbenzene	МТВЕ	Toluene	TMBs	Xylenes	Naphthalene	Other VOCs	i
Trip Blank	7/8/2021		<0.30	<0.33	<1.1	<0.29	<0.81	<1.0	<1.1	NA	
	5/10/2022		<0.30	<0.33	<1.1	<0.29	<0.81	<1.0	<1.1	NA	
	11/22/2022		<0.30	<0.33	<1.1	<0.29	<0.81	<1.0	<1.1	NA	
	6/1/2023		<0.30	<0.33	<1.1	<0.29	<0.81	<1.0	<1.9	NA	
NR 140 Enforcemen	nt Standards (ES	is)	5	700	60	800	480	2,000	100	1,2-Dichloroethane sec-Butylbenzene Isopropylbenzene n-Propylbenzene p-Isopropyltoluene Methylene Chloride Chloromethane	5 NE NE NE NE 0.5 30
NR 140 Preventive A	Action Limits (PA	ALs)	0.5	140	12	160	96	400	10	1,2-Dichloroethane sec-Butylbenzene Isopropylbenzene n-Propylbenzene p-Isopropyltoluene Methylene Chloride Chloromethane	0.5 NE NE NE NE 5 3

#### Abbreviations:

 $\mu$ g/L = micrograms per liter or parts per billion (ppb) TMBs = 1,2,4- and 1,3,5-trimethylbenzenes

-- = Not Applicable

MTBE = Methyl tert-butyl ether VOCs = Volatile Organic Compounds NA = Not Analyzed NE = No Standard Established ND = Not Detected

#### Notes:

NR 140 ESs - Wisconsin Administrative Code (WAC), Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards from July 2023.

NR 140 PALs - WAC, Chapter NR 140.10 Table 1 - Public Health Groundwater Quality Standards from July 2023.

**Bold+underlined** values meet or exceed NR 140 ESs.

Italic+underlined values meet or exceed NR 140 PALs.

If both the result and the PAL or ES are above the limit of detection but below the limit of quantitation, the result is not considered a PAL or ES exceedance under NR 140.14(3)(c).

\* = methylene chloride is a common laboratory contaminant. The methylene chloride detections are attributed to laboratory contamination and not representative of groundwater quality.

#### Laboratory Notes:

J = Estimated concentration below quantitation limit

J1 = Estimated concentration at or above the Limit of Detection (LOD) and below the Limit of Quantitation (LOQ).

(1) = Lab flagged sample for insufficient preservation pH

(2) = Lab flagged sample for headspace in sample

 Created by:
 AJR
 Date:
 7/22/2021

 Last revision by:
 AJR
 Date:
 6/7/2023

 Checked by:
 REO
 Date:
 6/7/2023

 Proj Mgr QA/QC:
 BJS
 Date:
 7/18/2023

I:\25221172.00\Deliverables\Closure Request\Attachment A Tables\[Table A.1. Groundwater Analytical Table-VOCs.xlsx]GW VOCs

## Table A.2. Soil Analytical Results Table - PVOCs & Naphthalene and Lead Badgerland Coop - Bob's Citgo - Milton, Wisconsin / SCS Engineers Project #25221172.00

(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	PID (ppm)	Lab Notes	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	1,2,4- & 1,3,5-TMB Combined	МТВЕ	Naphthalene	Lead (mg/kg)
B-1	8/24/2005	16-20	902		<200	14,600	6,240	68,800	57,300	20,000	77,300	<200	NA	5.43
		27	30.3		<25	<25	<25	<50	<25	<25	<50	<25	NA	1.26
B-2	8/24/2005	16-20	3.8		<25	<25	<25	<50	<25	<25	<50	<25	NA	0.552
B-3	8/24/2005	12-16	19.3		<25	<25	<25	<50	33.7	<25	33.7	<25	NA	4
B-4	8/24/2005	6-8	75		<u>1,720</u>	2,780	460	19,950	10,500	3,820	14,320	<25	NA	13.3
B-5	8/24/2005	6-7	67		<u>1,190</u>	<u>15,400</u>	<u>7,450</u>	<u>76,100</u>	44,800	13,900	<u>58,700</u>	<200	NA	15.6
B-6	8/24/2005	6-7	27		<u>1,370</u>	1,040	144	4,020	1,670	493	<u>2,163</u>	44	NA	11.8
B-7	4/6/2011	18	4.3		<25.0	<25.0	<25.0	<75.0	56.1	<25.0	56.1	<25.0	<25.0	NA
	4/6/2011	20	45		<25.0	<25.0	<25.0	219.4	252	81.1	333.1	<25.0	44.8	NA
B-8	4/6/2011	7	750		<u>618</u>	1,180	<100	4,770	13,300	4,620	17,920	<100	<u>5,770</u>	NA
B-9	4/6/2011	10	1.8		<25.0	<25.0	<25.0	76.6	46	<25.0	46	<25.0	<25.0	NA
B-10	4/6/2011	16-20	8		<25.0	<25.0	<25.0	<75.0	<25.0	<25.0	<50.0	<25.0	<25.0	NA
	4/6/2011	20-24	15		<25.0	64.7	56.7	345.8	286	85.6	371.6	<25.0	184	NA
B-11	4/6/2011	18			<26.9	<26.9	<26.9	<80.7	<26.9	<26.9	<53.8	<26.9	<26.9	NA
	4/6/2011	20	560		2,170	42,200	12,200	180,500	89,900	29,800	119,700	<1000	14,700	NA
MW-1	10/25/2010	23.5-25	2.1		<25.0	<25.0	<25.0	<75.0	<25.0	<25.0	<50.0	<25.0	<25.0	NA
	10/25/2010	53*	1,650		1,040	989	3,780	4,690	1,430	411	<u>1,841</u>	147	<u>726</u>	NA
MW-2	2/23/2011	15	75		<25.0	<25.0	<25.0	88.1	82.2	<25.0	82.2	<25.0	42.1	NA
MW-3	2/23/2011	3-5	25		<25.0	<25.0	<25.0	68.6	37.9	<25.0	37.9	<25.0	<25.0	NA
	2/23/2011	13-15	>2,000		1,920	33,300	14,600	146,300	104,000	37,200	141,200	<500	17,500	NA
	2/23/2011	23-25	25		<25.0	156	75.2	710	461	156	617	<25.0	176	NA
#1	10/30/2019	18			<u>608</u>	<u>8,780</u>	<u>3,810</u>	40,600	19,600	6,040	<u>25,640</u>	<62.5	2,730	NA
#2	10/30/2019	20			<u>4,310</u>	90,500	44,000	628,000	323,000	102,000	425,000	<1000	39,600	NA
#3	10/30/2019	16			<25.0	255	184	1,966	864	248	1112	<25.0	116 J	NA
#4	10/30/2019	12			<25.0	34.8 J	<b>44.7</b> J	206	40.5 J	<25.0	40.5 J	<25.0	<40.0	NA
#5	10/30/2019	18			<25.0	<25.0	<25.0	<75.0	<25.0	<25.0	<50.0	<25.0	<40.0	NA
#6	10/31/2019	14			<25.0	132	<25.0	310.3	1,360	434	1,794	<25.0	328	NA
#7	10/31/2019	5			<25.0	34.6 J	<25.0	275	174	39.3 J	213.3	<25.0	80.5 J	NA
#8	10/31/2019	5			64.1 J	294	135	938	592	176	768	<25.0	126 J	NA
#9	10/31/2019	5			<25.0	<25.0	<25.0	<75.0	<25.0	<25.0	<50.0	<25.0	<40.0	NA
#10	11/1/2019	5			<25.0	<25.0	<25.0	<75.0	<25.0	<25.0	<50.0	<25.0	<40.0	NA

## Table A.2. Soil Analytical Results Table - PVOCs & Naphthalene and Lead Badgerland Coop - Bob's Citgo - Milton, Wisconsin / SCS Engineers Project #25221172.00

(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	PID (ppm)	Lab Notes	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	1,2,4- & 1,3,5-TMB Combined	МТВЕ	Naphthalene	Lead (mg/kg)
B4R	10/18/2021	14.5-15	363		<u>193</u>	619	<28.5	1,860	1,120	340	<u>1,460</u>	<28.5	384	NA
B21	10/18/2021	12.5-15	1167		128 JI	<u>6,010</u>	168	16,200	20,700	6,760	27,460	<66.8	4,180	NA
B22	10/18/2021	8-10	0.0		<31.8	<31.8	<31.8	<95.3	<31.8	<31.8	<63.6	<31.8	<31.8	NA
	10/18/2021	19-20	173		<u>907</u>	<u>34,100</u>	32,000	138,000	78,200	27,000	105,200	<u>1,350</u>	12,000	NA
B23	10/18/2021	3-4	0.8		59.5 J1	<32.6	<32.6	<97.9	<32.6	<32.6	<65.2	<32.6	<32.6	NA
	10/18/2021	14-14.5	3.6		<27.9	<27.9	<27.9	<83.6	<27.9	<27.9	<55.8	<27.9	<27.9	NA
B24	10/18/2021	3-4	1.3		<30.2	<30.2	<30.2	<90.5	<30.2	<30.2	<60.4	<30.2	<30.2	NA
	10/18/2021	19-20	0.0		<26.2	<26.2	<26.2	<78.6	<26.2	<26.2	<52.4	<26.2	<26.2	NA
B25	10/18/2021	3-4	43.1	(1)	<284	1,050	568 J1	3,620	5,300	2,860	<u>8,160</u>	<284	<u>5,540</u>	NA
	10/18/2021	10-12	177		<31.0	154	<31.0	403	400	244	644	<31.0	<u>665</u>	NA
	10/18/2021	14-15	9.8		<27.4	<27.4	<27.4	<82.2	94.8	<27.4	94.8	<27.4	33.4 J1	NA
Trip Blank	10/18/2021				<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<50.0	<25.0	<25.0	NA
NR 720 Groundwe Default Dilution F	,	RCLs with	a Wisco	nsin-	5.1	1,570	1,107.2	3,960	(4	a)	1,378.7	27	658.2	27
NR 720 Non-Indu	trial Direct Co	ntact RCI	_S		1,600	8,020	818,000	260,000	219,000	182,000	NE	63,800	5,520	400
NR 720 Industrial	Direct Contac	t RCLs			7,070	35,400	818,000	260,000	219,000	182,000	NE	282,000	24,100	800
CAS No.					71-43-2	100-41-4	108-88-3	1330-20-7	95-63-6	108-67-8		1634-04-4	91-20-3	7439-92-1

#### Abbreviations:

µg/kg = micrograms per kilogram or parts per billion (ppb) mg/kg - milligrams per kilogram or parts per million (ppm) CAS No. = Chemical Abstracts Service Number PID = Photoionization Detector ppm = parts per million

RCLs = Residual Contaminant Levels

MTBE = Methyl-tert-butyl ether
TMB = Trimethylbenzene
VOCs = Volatile Organic Compounds

NA = Not Analyzed NE = No Standard Established

-- = Not Applicable

#### Notes

**Bold+underlined** values exceed an NR 720 RCL, as of December 2018.

\* All samples except MW1 at 53 feet are unsaturated.

(a) NR 720 Groundwater Pathway RCLs for 1,2,4 and 1,3,5 Trimethylbenzene Combined = 1,378.7

Results above the limit of detection and below the limit of quantitation (J flag) are not considered an RCL exceedance under NR 720.07(2)(c)

#### Laboratory Notes/Qualifiers:

- J = Compound detected below limit of quantitation.
- J1 = Estimated concentration at or above the Limit of Detection (LOD) and below the Limit of Quantitation (LOQ).
- (1) Surrogates a,a,a-Trifluorotoluene (S) = D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

 Created by:
 AJR
 Date:
 10/27/2021

 Last revision by:
 JR
 Date:
 5/10/2022

 Checked by:
 BJS
 Date:
 7/9/2022

 Proj Mgr QA/QC:
 BJS
 Date:
 9/9/2023

I:\25221172.00\Deliverables\Closure Request\Attachment A Tables\[Table A.2. Soil Analytical Results Table-PVOCs & Naphthalene and Lead.xlxx]Soil PVOCs

## Table A.3. Residual Soil Contamination Table - PVOCs & Naphthalene Badgerland Coop - Bob's Citgo - Milton, Wisconsin / SCS Engineers Project #25221172.00

(Results are in µg/kg, except where noted otherwise)

Sample	Date	Depth (feet)	PID (ppm)	Lab Notes	Benzene	Ethylbenzene	Toluene	Xylenes	1,2,4-TMB	1,3,5-TMB	1,2,4- & 1,3,5-TMB Combined	MTBE	Naphthalene
B-1	8/24/2005	16-20	902		<200	14,600	<u>6,240</u>	68,800	57,300	20,000	77,300	<200	NA
B-4	8/24/2005	6-8	75		<u>1,720</u>	2,780	460	19,950	10,500	3,820	14,320	<25	NA
B-5	8/24/2005	6-7	67		<u>1,190</u>	<u>15,400</u>	<u>7,450</u>	<u>76,100</u>	44,800	13,900	<u>58,700</u>	<200	NA
B-6	8/24/2005	6-7	27		<u>1,370</u>	1,040	144	4,020	1,670	493	<u>2,163</u>	<u>44</u>	NA
B-8	4/6/2011	7	750		<u>618</u>	1,180	<100	<u>4,770</u>	13,300	4,620	17,920	<100	<u>5,770</u>
B-11	4/6/2011	20	560		<u>2,170</u>	42,200	<u>12,200</u>	180,500	89,900	29,800	119,700	<1000	14,700
MW-1	10/25/2010	53*	1,650		1,040	989	<u>3,780</u>	4,690	1,430	411	<u>1,841</u>	<u>147</u>	<u>726</u>
MW-3	2/23/2011	13-15	>2,000		<u>1,920</u>	33,300	<u>14,600</u>	146,300	104,000	37,200	141,200	<500	17,500
#1	10/30/2019	18			<u>808</u>	<u>8,780</u>	<u>3,810</u>	40,600	19,600	6,040	<u>25,640</u>	<62.5	<u>2,730</u>
#2	10/30/2019	20			<u>4,310</u>	<u>90,500</u>	44,000	628,000	323,000	102,000	425,000	<1000	39,600
#6	10/31/2019	14			<25.0	132	<25.0	310.3	1,360	434	1,794	<25.0	328
B4R	10/18/2021	14.5-15	363		<u>193</u>	619	<28.5	1,860	1,120	340	<u>1,460</u>	<28.5	384
B21	10/18/2021	12.5-15	1167		128 J1	<u>6,010</u>	168	16,200	20,700	6,760	27,460	<66.8	<u>4,180</u>
B22	10/18/2021	19-20	173		<u>907</u>	<u>34,100</u>	32,000	138,000	78,200	27,000	105,200	<u>1,350</u>	12,000
B25	10/18/2021	3-4	43.1	(1)	<284	1,050	568 J1	3,620	5,300	2,860	<u>8,160</u>	<284	<u>5,540</u>
	10/18/2021	10-12	177		<31.0	154	<31.0	403	400	244	644	<31.0	<u>665</u>
NR 720 Groundw Default Dilution F		RCLs with	a Wisco	nsin-	5.1	1,570	1,107.2	3,960	(	a)	1,378.7	27	658.2
NR 720 Non-Indu	strial Direct Co	ntact RCL	_S		1,600	8,020	818,000	260,000	219,000	182,000	NE	63,800	5,520
NR 720 Industrial	Direct Contact	RCLs			7,070	35,400	818,000	260,000	219,000	182,000	NE	282,000	24,100
CAS No.					71-43-2	100-41-4	108-88-3	1330-20-7	95-63-6	108-67-8		1634-04-4	91-20-3

#### Abbreviations:

 $\mu g/kg$  = micrograms per kilogram or parts per billion (ppb) CAS No. = Chemical Abstracts Service Number

-- = Not Applicable

PID = Photoionization Detector ppm = parts per million

RCLs = Residual Contaminant Levels

MTBE = Methyl-tert-butyl ether TMB = Trimethylbenzene

PVOCs = Petroleum Volatile Organic Compounds

NA = Not Analyzed NE = No Standard Established

## Table A.3. Residual Soil Contamination Table - PVOCs & Naphthalene Badgerland Coop - Bob's Citgo - Milton, Wisconsin / SCS Engineers Project #25221172.00

#### Notes:

**Bold+underlined** values exceed an NR 720 RCL, as of December 2018.

\* All samples except MW1 at 53 feet are unsaturated.

(a) NR 720 Groundwater Pathway RCLs for 1,2,4 and 1,3,5 Trimethylbenzene Combined = 1,378.7

Results above the limit of detection and below the limit of quantitation (J flag) are not considered an RCL exceedance under NR 720.07(2)(c)

#### Laboratory Notes/Qualifiers:

J1 = Estimated concentration at or above the Limit of Detection (LOD) and below the Limit of Quantitation (LOQ).

(1) - Surrogates a,a,a-Trifluorotoluene (S) = D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

 Created by:
 AJR
 Date:
 10/27/2021

 Last revision by:
 JR
 Date:
 5/10/2022

 Checked by:
 BJS
 Date:
 7/9/2023

 Proj Mgr QA/QC:
 BJS
 Date:
 9/9/2023

I:\25221172.00\Deliverables\Closure Request\Attachment A Tables\[Table A.3. Residual Soil Contamination Table-PVOCs.xlsx]Soil PVOCs

## Table A.4. Vapor Analytical Table (Detected PVOCs) Badgerland Coop - Bob's Citgo - Milton, Wisconsin / SCS Engineers Project #25221172.00

(Results are in ppbV)

Sample	Date	Benzene	Ethylbenzene	Toluene	1,2,4- Trimethylbenzene	1,3,5- Trimethylbenzene	m-Xylene & p-Xylene	o-Xylene
CAS#		71-43-2	100-41-4	108-88-3	95-63-6	108-67-8	179601-23-1	95-47-7
SS-1	6/9/2015	<0.085	<0.085	<0.085	<0.085	<0.085	<0.17	<0.085
	3/9/2016	<0.17	<0.17	<0.17	<0.17	<0.17	<0.34	<0.17
	6/29/2016	<0.085	<0.085	<0.085	<0.085	<0.085	<0.17	<0.085
SS-2	6/9/2015	<0.085	<0.085	<0.085	0.32	<0.085	<0.17	<0.085
	3/9/2016	<0.17	<0.17	<0.17	<0.17	<0.17	<0.34	<0.17
	6/29/2016	0.27 F	0.15 F	0.70	0.18 F	0.090 F	0.60	0.17 F
Indoor	6/9/2015	0.37	0.55	1.5	0.67	0.36	2.1	0.57
	6/29/2016	0.64	0.37	2.0	0.36	0.14 F	1.5	0.40
Outdoor	6/9/2015	0.45	0.36	1.6	0.66	0.33	1.2	0.49
Small Commercia	l Indoor Air	4.9	11	5,200	63	63	100	100
Vapor Action Leve	el							
Small Commercia Vapor Risk Screen		160	360	170,000	2,100	2,100	3,400	3,400

#### Abbreviations:

µg/m³ = micrograms per cubic meter of air ppbV = parts per billion by volume CAS # = Chemical Abstracts Service Number

#### Notes:

- 1. Samples were collected in 6-liter summa canisters over 30-minute period and analyzed using the US EPA TO-15 analytical method.
- 2. Indoor Air Vapor Action Levels (VALs) are May 2023 US EPA "Resident" Regional Screening Levels (RSLs) assuming a 1 x 10<sup>5</sup> excess lifetime cancer risk for carcinogens or hazard index of 1 for non-carcinogens.
- 3. Sub-Slab Vapor Risk Screening Levels (VRSLs) are Indoor Air VALs divided by an attenuation factor (AF) of 0.03 small commercial buildings.
- 4. <u>Bold+underlined</u> values meet or exceed small commercial sub-slab VRSLs.

### Laboratory Notes/Qualifiers:

F = result is between the limit of detection (LOD) and limit of quantitation (LOQ)

 Created by:
 AJR
 5/27/2022

 Last Rev by:
 BJS
 9/9/2023

 Checked by:
 LMH
 10/16/2023

 Proj Mgr QA/QC:
 BJS
 10/17/2023

I:\25221172.00\Deliverables\Closure Request\Attachment A Tables\[Table A.4. Vapor Analytical Table (Detected PVOCs).xlsx]Vapor Intrusion

## **ATTACHMENT A**

## **Data Tables**

DNR Site Name: Badgerland Coop – Bob's Citgo Address: 602 W. Madison Ave., Milton, WI 53563 BRRTS No. 03-54-000193

## A.5. Other Media of Concern – Not Applicable

There is no other media of concern such as sediment or surface water at the site.

## Table A.6. Water Level Elevations Bob's Citgo, Milton, Wisconsin / SCS Engineers Project #25221172.00

				Depth to Wat	er in feet bel	ow top of well	casing			
	MW1	MW2	MW3	MW4	MW5	MW6	MW7	MW8	MW9	MW10
Measurement Date										
11/4/2010	53.15									
3/3/2011	53.92	51.18	54.02							
9/15/2011	54.85	59.17	54.67	55.9	57.85	57.06				
8/15/2013	55.92	51.3	52.68	57.45	60.77	59.14				
9/11/2013	55.16	48.01	52.06	57.1	60.23	58.77	60.86	64.39	59.61	61.29
5/28/2015	57.51	50.25	55.51	58.95	62.76	60.84	63.54	67.17	61.91	64.56
6/24/2017	53.78	48.35	53.81	52.91	56.86	59.16	61.03	64.72	60.29	62.24
10/23/2017	54.65	46.36	51.78	56.2	58.59	57.49	59.08	62.75	58.05	59.57
7/8/2021	52.46	47.61	51.73	53.75	54.83	54.43	55.50	59.09	54.16	56.48
10/19/2021	53.56	50.21	52.54							57.89
5/10/2022	55.31	PRODUCT	53.67	56.65	58.63	58.05	59.45	62.97	57.97	60.36
11/22/2022		54.1	55.01		60.18	59.35				
6/1/2023	57.67	55.52	57.28	58.71	60.88	59.66	61.42	64.96	59.63	61.87
			Groun	d Water Eleva	ition in feet a	bove mean se	ea level (ams	l)	•	•
Well Number	MW1	MW2	MW3	MW4	MW5	MW6	MW7	8WM	MW9	MW10
Top of Casing Elevation* (feet amsl)	874.49	873.75	874.81	874.59	875.04	874.85	875.26	878.45	874.57	876.37
Screen Length (ft)	15.00	15.00	15.00	15.00	15.00	15.00	15.00	15.00	15.00	15
Total Depth (ft from top of casing)	62.40	61.90	62.80	63.30	63.70	64.30	69.50	73.60	65.60	69.1
Top of Well Screen Elevation (ft)	827.09	826.85	827.01	826.29	826.34	825.55	820.76	819.85	823.97	822.27
Measurement Date										
11/4/2010	821.34									
3/3/2011	820.57	822.78	821.03							
9/15/2011	819.64	814.79	820.38	818.7	817.35	817.74				
8/15/2013	818.57	822.66	822.37	817.15	814.43	815.66				
9/11/2013	819.33	826.12	822.99	817.5	814.97	816.03	814.4	814.06	814.96	815.39
5/28/2015	816.98	823.85	819.54	815.65	812.44	813.96	811.72	811.28	812.66	812.12
6/24/2017	820.71	825.76	821.24	821.69	818.34	815.64	814.23	813.73	814.28	814.44
10/23/2017	819.84	827.62	823.27	818.4	816.61	817.31	816.18	815.7	816.52	817.11
7/8/2021	822.03	826.14	823.08	820.84	820.21	820.42	819.76	819.36	820.41	819.89
10/19/2021	820.93	823.54	822.27							818.48
5/10/2022	819.18	PRODUCT	821.14	817.94	816.41	816.80	815.81	815.48	816.60	816.01
11/22/2022		819.65	819.80		814.86	815.50				
6/1/2023	816.82	818.23	817.53	815.88	814.16	815.19	813.84	813.49	814.94	814.50
Bottom of Well Elevation (ft)	812.09	811.85	812.01	811.29	811.34	810.55	805.76	804.85	808.97	807.27

#### Notes:

Depth to water measurements and groundwater elevations prior to 7/8/2021 are from Seymour Environmental reports.

Red indicates free product present; elevation not corrected for product.

Blank indicates well not installed, or water level not measured.

 Created by:
 BJS
 Date:
 7/25/2021

 Last revision by:
 JJK
 Date:
 6/2/2023

 Checked by:
 BJS
 Date:
 6/2/2023

 Proj Mgr QA/QC:
 BJS
 Date:
 6/2/2023

<sup>\*</sup>Wells MW1-MW6, & MW19 were resurveyed 7/8/2021. Wells MW2, MW3, MW5 & MW10 casings were cut down 0.2' on 7/8/2021.

## Table A.7. Slug Test Parameters and Test Results Badgerland Coop - Bob's Citgo - Milton, Wisconsin / SCS Engineers Project #25221172.00

	DTW (static)	H(0)	Н	b	d	L	T	r(c)	r(w)	r(sk)	K
	Depth to water from top of casing (ft)	Initial Displacement (ft)	static column height (ft)	Aquifer saturated thickness (ft)	Depth to top of screen from water or top of confined unit (ft)	Submerged screen length (ft)	Transducer depth (ft)	Casing Radius (ft)	Well Radius (ft)	(ff)	(cm/sec)
MW1	53.56	1.567	8.84	100	0.00	8.84	7.92	0.0833	0.35	0.35	2.08E-04
MW2	50.21	2.591	11.69	100	0.00	11.69	8.90	0.0833	0.35	0.35	1.69E-04
MW3	52.54	2.282	10.26	100	0.00	10.26	8.96	0.0833	0.35	0.35	5.79E-04
MW10	57.89	1.378	11.21	100	0.00	11.21	9.55	0.0833	0.35	0.35	0.2003

#### Notes:

DTW Static - Measured prior to testing on 10/19/2021.

H(0) - see slug test data. Difference between measurement at initiation of test & static measurement.

Saturated thickness - Assumed 100 ft (sandy till & outwash)

Screen length - 15' across the water table. Actual saturated screen interval length used for unconfined aquifer analysis.

Transducer depth - Depth taken from data logger recording ~5 seconds before initiation of test. See data logger files for each test.

Casing radius - 0.09 for Sch. 40 PVC, 0.08 for Sch. 80 PVC (wells >50 ft deep).

Well borehole radius - 0.6875 (assumed to be installed with 8-1/4" auger)

Prepared by: JK 1/10/2022 Checked by: REL 1/10/2022