

Reviewer: Sturm
Site Name: Former Mirro Plant #2

Review Date: 8-16-10
Region: NE

See RR5242 for instructions. * Denotes DNR follow up. ** Denotes RP/property owner follow up.

File Review:

1. Review the file and BRRTS, identify the following:

Address/ City/Zip Code: 2401 Mirro Dr., Manitowoc, WI

County Parcel Identification Number (PIN): 052-809-401-010.00 FID Number: 436041100

Current Property Owner: Skana Aluminium

Original RP: Newall Operating Company

Has the property been transferred since the restriction was recorded/condition applied?

No Yes

How was site selected for audit?

Complaint Received Regional Priority Other: _____
 Compliance Follow-up Action Code 52
 Age of Remedy Action Code 56

Date of:

Final Closure 1-31-03
 Certificate of Completion _____
 Remedial Action Plan Approval _____
 General Liability Clarification Letter _____
 Green Space Grant _____
 Local Gov't Unit (LGU) letter(*type varies*) _____

Check all continuing obligations applied at case closure or RAP approval or letter to LGU:

<input type="checkbox"/> Industrial Land-Use Restriction	220
<input checked="" type="checkbox"/> Pavement, Soil or Other Cover	222
<input type="checkbox"/> Structural Impediment	224
<input type="checkbox"/> Vapor mitigation (sub-slab pressurization system (SSDS) or other)	226
<input type="checkbox"/> Site Specific Condition (describe below)	228
<input type="checkbox"/> LGU directed to take action	230
<input checked="" type="checkbox"/> Residual soil contamination > RCL/SSRCL	232
<input type="checkbox"/> Monitoring well (needs abandonment)	234
<input type="checkbox"/> GW > ES (on GIS Registry)	236
<input type="checkbox"/> Vapor Migration (standard paragraph re. future potential)	xxx (not tracked)
<input type="checkbox"/> Other Performance Standard	86

Describe any site-specific requirements that the site owner and/or responsible party needed to address. Maintain Cap over residual contamination

Is the site on the GIS Registry? Yes No - Add it to the GIS Registry*

Were neighboring properties affected by a continuing obligation?

No

Yes - Are these properties listed on the GIS Registry?

Yes No Update the GIS Registry, use form 4400-246 for affected properties*.

Was a maintenance plan required at closure?

- NA
 No
 Yes Is it in the file or PDF or missing ?

**If none was required, offer the property owner the template model with inspection log, and note in the file/audit that one was provided on the audit date.*

Was/were the appropriate restriction(s) recorded with the Register of Deeds?

- NA No Yes

Has a restriction been amended, or been nullified by DNR?

- No Yes
If Yes: Was BRRTS updated? (95) No * Yes
Was the GIS Registry PDF updated? No * Yes

Site Visit:

2. Contact the site owner to get appropriate clearance for access.

3. Walk the site (ideally with the owner or responsible party) to review the site conditions against the conditions documented at closure/other to verify or change answers to questions in #1.

4. With the site owner/RP (if possible), review and answer the following for DNR RR records:

Did the site owner know about the continuing obligation(s)?

- Yes No

Have site conditions changed since closure that would affect either a deed restriction or other restrictions or requirements associated with the site?

- No
 Yes Explain. _____

Examples: a building has been razed and investigation and remediation occurred, excavation or residential development has occurred in a restricted area

Is an asphalt cap or soil cap/cover removed or in disrepair?

- No/NA
 Yes Should it be replaced or repaired? No Yes **

If a performance standard was the final remedy, has it been altered?

- No/NA
 Yes Describe _____

If Yes - Was DNR notified? Yes No

Have local zoning changes occurred since closure?

- No/NA
 Yes If Yes - Does it appear to impact the effectiveness of the restriction?
 No
 Yes Describe: _____

Is soil monitoring needed to determine if the final remedy has been modified such that a direct contact threat exists?

- No
 Yes** Describe: _____

For example, an asphalt cap has been removed or is in disrepair or a new contaminated site is present upgradient, etc.

Has additional monitoring or remediation been done since the site was closed?

- No
 Yes Describe: A Monitoring well was installed adjacent to the capped area

Does a new threat to public health or the environment exist (e.g. new sources or exposure routes)?

- No
 Yes If Yes - Does sampling need to be performed?
 No
 Yes** Describe what should be done to address the problem, and by whom:

Is the vapor mitigation system or sub-slab depressurization system (SSDS) operating as designed? (pressure gradient being maintained)

- NA
 Yes
 No** – if not, describe any follow up needed.

Have any of the exposure assumptions used for closure changed at this site?

- NA
 No
 Yes - if yes, describe any follow up needed.

Has the land use at this site changed such that a vapor intrusion pathway may now exist?

- No
 Yes - If Yes, describe any follow up needed. _____

Compliance and Follow-up:

5. Identify compliance and any follow up needed.

Is the site in compliance with the continuing obligations/closure approval document?

Yes

No - Describe what's not in compliance: _____

(May depend on extent of non-compliance, non-maintenance of remedy or changed ownership/conditions. If case is out of compliance, it should be prioritized by the region, for new casework or enforcement, as needed.)

If the site is not in compliance, what are the reasons? _____

Has the maintenance agreement required at closure been followed?

NA

Yes

No Describe: _____

6. **Are additional actions by the RP or property owner warranted at the site? *(The intent is to return site to compliance with continuing obligation. If further remedial action is needed, we'll need to determine if the site meets the reopening criteria.)*

No

Yes Describe action and identify who's responsible:

7. *Does the site require follow up by DNR?

No

Yes

- contact or enforcement to return site to compliance with continuing obligation
- updating BRRTS *(check all codes that apply on pg. 5)*
- updating the GIS Registry (adding or modifying a packet)
- reopen site

8. *Attach photographs of the site, documenting site conditions.



9. *Identify and update any applicable codes.

Add to BRRTS:	BRRTS Code	Meaning
x	185	Closure Compliance Review completed
	186	Closure Compliance Review follow up needed
	187	Closure Compliance Review follow up completed
	50	Site conditions merit placement on GIS Registry
	51	Deed notice (<i>if code was missing</i>)
	52	Deed restriction (<i>if code was missing</i>)
	95	Deed instrument conditions met (<i>for audits, use if deed restriction was updated by filing a deed notice</i>)
	101	GIS Registry PDF modified – date DNR letter sent
	104	Site removed from GIS Registry – date DNR letter sent
	56	Land Use Control applied (<i>use with codes 220-230</i>)
	220	Soil at industrial use level
	222	Cap/cover/engineered containment system (<i>pavement, soil cover, etc.</i>)
	224	Structural impediment (<i>buildings or other structures</i>)
	226	Vapor mitigation/other vapor control (<i>SSDS or other pressure control system</i>)
	228	Site-specific (<i>identify in comment field</i>)
	230	LGU was directed to take a protective action
	232	Site closed with residual soil contamination > RCLs or SS RCLs (<i>use with codes 222 and 224, at a minimum</i>)
	234	Monitoring well needs to be abandoned
	236	Site closed with groundwater contamination > ES

10. Add a copy of this audit to the case file, and send one to Central Office.