



May 8, 2017

KIETH M. GASKILL, LPG
ENVIRONMENTAL FORENSICS INVESTIGATIONS, INC.
N16 W23390 STONE RIDGE DR, SUITE G
WAUKESHA, WI 53188

Subject: TRACER FOR HYDROGEOLOGIC INVESTIGATION APPROVAL

Dear Mr. Gaskill:

The Wisconsin Department of Natural Resources (DNR), Division of Water, Bureau of Drinking Water and Groundwater, is conditionally approving your request to inject a limited quantity of sodium chloride solution for the purpose of conducting hydrogeologic investigation. This investigation is being conducted to support the design of a remedial action plan to treat legacy PCE contamination (BRRTS#: 02-54-221852).

Project Description: The proposal is to inject a total of approximately 57 pounds of food grade sodium chloride dissolved in 2,000 gallons of potable water (which will produce a concentration of approximately 3,400 ppm, or about 1/10 the salt content of sea water). The project will utilize an existing infiltration gallery installed in the former excavation basin in the area of the initial PCE release. The objective is to determine if this infiltration gallery will serve as an effective means to introduce and distribute remedial amendments to the underlying fractured Platteville Dolomite, and whether the substrates will migrate into the deeper St. Peter Sandstone formation. The migration of the salt solution will be tracked by measuring electrical conductivity within an extensive array of permanent and temporary monitoring wells completed in both formations. No public or private potable wells are known to exist in the direction of regional groundwater flow, which is to the southeast of the site toward the Rock River.

The Bureau of Drinking Water and Groundwater finds that the proposed tracer investigation poses little risk to local public and private drinking water systems and the regional drinking water aquifers. The request is approved subject to the conditions listed below.

Approval Conditions:

1. Water used to mix tracer injectate solutions shall come from a source that complies with the water quality standards for safe drinking water established in Chapter NR 809, Wis. Admin. Code.
2. The minimum amount of sodium chloride will be utilized as necessary to conduct the investigation. The weight of sodium chloride solute to be injected may be increased by up to 25% without further Department approval.
3. The injection will take place only at the proposed location. Injection at any alternative location will require a separate review and approval.

4. Any complaints or reports of potential water supply contamination shall be immediately reported to the Department. Contact Brian Austin, of the DNR's Bureau of Drinking Water and Groundwater program, at 608-266-3415 and by e-mail at Brian.Austin@wisconsin.gov should any such report need to be made.
5. Should the Department determine that a potable water supply has become contaminated as a result of the tracer injection activities, you will be responsible for remediating the contamination, and for providing an alternative supply of potable water to the users of the water system until such time as use of the water system is restored or until a permanent alternative potable water supply is installed.

Approval Constraints: This request was reviewed in accordance with s. NR 812.05 (4), Wis. Admin. Code, and is approved subject to the conditions listed above. The Department reserves the right to order changes to the approval or make additions to the conditions of approval should conditions arise making such action necessary. The Department may also void this approval if it determines that approval conditions are not being observed.

This approval is valid for two years from the date of the approval. If injection activities have not commenced within two years, the approval shall become void and a new application must be made and approved prior to initiating dye injection activities.

Department approval is based upon the representation that the project description submitted to the DNR was complete and accurately represented the activities being approved. Any approval of activities that do not fairly represent the project because the submittal was incomplete, inaccurate or of insufficient scope and detail is voidable at the option of the Department.

Appeal Rights: If you believe that you have a right to challenge this decision, you should know that the Wisconsin Statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. To request a contested case hearing pursuant to s. 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. Requests for contested case hearings must be made in accordance with ch. NR 2, Wis. Admin. Code. Filing a request for a contested case hearing does not extend the 30 day period for filing a petition for judicial review. For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you must file your petition with the appropriate circuit court and serve the petition on the Department within 30 days after the decision is mailed. A petition for judicial review must name the Department of Natural Resources as the respondent.

Any questions regarding the conditions or recommendations contained in this action should be directed to Brian Austin, WDNR Groundwater program, at 608-266-3415

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

For the Secretary

Brian P. Austin, P.E.
Bureau of Drinking Water and Groundwater
(608) 266-3415

cc: Jeffrey Ackerman – WDNR Bureau for Remediation and Redevelopment (via Email)
Bruce Rheineck – WDNR Bureau of Drinking Water and Groundwater (via Email)