State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

Scott Walker, Governor Cathy Stepp, Secretary

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March 6, 2015

Mr. Howard Melton St. Francis Auto Wreckers 4043 S. Pennsylvania Avenue St. Francis, WI 53235

SUBJECT:

Review of Case File and Request to Complete Additional Work

WI DOT Lake Arterial - Auto Wreckers, 4043 S. Pennsylvania Avenue, St. Francis, WI

WDNR BRRTS Activity #: 02-41-000269

FID #: 241469250

Dear Mr. Melton:

On July 1, 2014, the Wisconsin Department of Natural Resources (WDNR) requested that you provide an update regarding any work recently conducted to address the open environmental case at the above site. It was also requested that you submit a work plan for completing any remaining activities required to obtain closure. Timm Speerschneider of DeWitt Ross & Stevens S.C replied to this request and submitted documentation of past sampling events and remediation activities. It is apparent from the review of these reports and other documentation in the case file that a significant amount of investigation and remediation activities, including an Environmental Protection Agency (EPA) sponsored removal action on the vacant parcel, have already been conducted. However additional actions must be taken to complete the investigation and remediation at this property before this case can be closed. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who can prepare a work plan to move forward with completing the cleanup of this property. The following items must be considered as the consultant prepares the work plan:

- 1) A substantial number of soil samples have been collected from throughout the site. Sample data will need to be compiled, compared to current standards, and the horizontal and vertical limits of contamination defined. Each of the various contaminants discovered at this site, including volatile organic compounds, polycyclic aromatic hydrocarbons, metals, and PCBs will need to be addressed in this manner. Additional soil samples will need to be collected if the limits of contamination cannot be determined by the available data.
- 2) A memo addressed to St. Frances Auto Wreckers from Michael J. Ellenbecker of the WDNR, dated August 4, 1992, noted that he had observed stained soils and pools of an oil-like material during an inspection of the salvage yard. A determination is needed as to whether the sampling conducted on the southern parcel is sufficient to identify and investigate any impacts from the observed surface spills.
- 3) A determination needs to be made as to whether PCB contamination is regulated by the Environmental Protection Agency (EPA) under the Toxic Substances Control Act (TSCA). If the PCB waste is TSCA regulated, the cleanup and management of PCB impacted soils will need to satisfy both the EPA and WDNR requirements.



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- 4) Groundwater analytical data will need to be compiled, compared to applicable standards, and used to determine the limits of groundwater contamination at the site. Data must be presented to indicate how the groundwater contaminant plume has changed over time, how it relates to calculated groundwater flow direction, and if the extent of contamination has been defined. It will need to be determined whether the existing monitoring well network is adequately positioned to identify any potential groundwater impacts on the property, including potential impacts indicated by elevated TCLP trichloroethene concentrations measured in soil samples collected on the vacant portion of the property.
- 5) An assessment must be conducted to determine if residual contamination will pose a risk to onsite or neighboring buildings through vapor intrusion. Defining the extent of soil and groundwater contamination will be necessary to fully assess this risk.

The above comments are intended to provide you and your consultant guidance as to how to move forward with completing the site investigation and are based on currently available information. Additional activities, beyond those listed above, may be required to complete the investigation. The conclusions of the site investigation may suggest that active remediation or performance standards (such as a soil barrier) will be required to address residual contamination and to meet the requirements for case closure. A request for closure can be prepared and submitted to the Department once all required remedial actions are completed.

Steps to Take

The following information provides the timeframes and <u>required</u> steps to take. Unless otherwise approved by DNR in writing you must complete the work by the timeframes specified.

- 1. Within 60 days, by May 5, you must submit a work plan for resuming the investigation and remediation activities required to obtain closure. The work plan must comply with the requirements in the NR 700 Wis. Adm. Code rule series and should adhere to current DNR technical guidance documents. If you do not take action within this time frame, the DNR may initiate enforcement action against you.
- 2. You must initiate the activities outlined in the work plan within 90 days of submitting it. If a fee for DNR review of the work plan has been submitted, these outlined activities must begin within 60 days after receiving DNR comments.

In the future, if you want a formal written response from the department on a specific submittal, or if you require additional technical assistance, please be aware that a fee is required in accordance with ch. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you must complete the site investigation and cleanup to maintain your compliance with the spills law and chapters NR 700 through NR754.

All correspondence regarding this site should be sent to:

Ms. Victoria Stovall
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, WI 53212

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Unless otherwise directed, submit one paper copy and one electronic copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers shown at the top of this letter.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding any of the above items, please contact me at (414) 263-8541 or by email at paul.grittner@wisconsin.gov.

Sincerely,

Paul Grittner Hydrogeologist

Remediation & Redevelopment Program

cc: Timm Speerschneider, DeWitt Ross & Stevens S.C., 2 E. Mifflin Street, Suite 600, Madison,

Wisconsin 53703

SER File