



June 10, 2016

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

SUBJECT: Review of "Request for Case Closure Evaluation"
WI DOT Lake Arterial – Auto Wreckers, 4043 S. Pennsylvania Avenue, St. Francis, WI
WDNR BRRTS Activity #: 02-41-000269
FID #: 241469250

Dear Mr. Melton:

The Department of Natural Resources has received the 'Request for Closure Evaluation' (dated April 11, 2016) submitted for the property identified above. A review fee was paid to the DNR to provide a written response as to whether closure of this site with continuing obligations (inclusion of the property on the DNR's GIS registry, requiring the property to have a 'low occupancy' use, and requiring a fence) would be appropriate at this time.

In order for this case to obtain closure, you will need to document that the site investigation and any necessary remediation or mitigation activities have been completed. On March 6, 2015, the DNR requested that your environmental consultant prepare a work plan outlining how the investigation and cleanup of this site will be completed. The work plan was to include compiled soil and groundwater data, an interpretation as to the degree and extent of contamination at this site, a determination whether potentially contaminated near-surface soils on the southern parcel were adequately investigated, a determination as to whether PCB contamination is regulated under the Toxic Substances Control Act (TSCA), and an assessment of the risk caused by vapor intrusion. As none of this information was presented, the DNR cannot make a determination as to the completeness of the site investigation, and cannot determine whether this site is ready for closure. It is recommended that your consultant provide the information requested in DNR's March 6, 2015, letter with a work plan for completing necessary actions to obtain closure.

The DNR provides the following comments on the information that was presented within the Request:

- 1) Sample data obtained in 2015 confirmed the presence of soil and groundwater contamination at this property. The DNR concurs that the property will need to be included on the DNR's GIS registry as a condition of closure. However, all analytical data for samples collected at this site will need to be compiled and analyzed to determine the degree and extent of contamination at this site. Historic data cannot be discounted without an explanation as to why it no longer reflects site conditions. The analysis of sample data must determine whether valid comparisons can be made between historic and newly collected data. You will need to determine if the samples collected in 2015 suggest that a new release(s) has occurred at the property and, if so, what additional investigation will be required to address them.

- 2) Recent soil analytical data indicates that contaminant concentrations exceed direct contact Residual Contaminant Levels (RCLs). This contamination will need to be remediated, capped, or otherwise mitigated in order to obtain closure.
- 3) You are responsible for determining whether PCB contamination at your property is regulated under TSCA. The cleanup of TSCA regulated PCB contamination must meet the requirements of both the EPA and the DNR. If regulated under TSCA, you may request that the EPA and DNR follow the coordinated approval process which would allow the DNR to oversee the cleanup of this site. Information on determining TSCA applicability and the coordinated approval process is found in DNR publication RR-786, "PCB Remediation in Wisconsin under the One Cleanup Program Memorandum of Agreement". This document can be found at <http://dnr.wi.gov/files/pdf/pubs/rr/rr786.pdf>.

Based on recent correspondence with the EPA, the outdoor auto storage area would likely be considered a 'low occupancy' use. However, the use of a fence and continual use as a 'low occupancy' property by itself will not satisfy the DNR's requirements for closure. At a minimum, the DNR would require you to remediate or cap soil contaminated with PCBs at concentrations greater than direct contact RCLs. Analytical data collected during previous phases of the investigation must be considered when determining whether the proposed land use would be protective.

- 4) The DNR has not been presented with enough information to determine whether offsite investigation is required. The DNR will not generally require a property owner to define the extent of contaminated fill material or buried waste beyond their property boundaries if the material was placed prior to them obtaining the property. The limits of groundwater contamination, soil contamination caused by a release originating on your property, and impacted soil vapor will need to be investigated even if it extends beyond your property boundaries.
- 5) A vapor assessment will need to be conducted following the procedure outlined in DNR publication RR-800, "Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin". This document can be accessed at <http://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf>. An accurate assessment cannot be completed until the extent of groundwater and soil contamination at the site is determined. Subslab samples will need to be collected at buildings where the assessment suggests that a risk of vapor intrusion exists. The investigation or mitigation of indoor air quality may not be required where a vapor intrusion risk is identified as long as similar petroleum products are being used inside the building.

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

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