



November 17, 2021

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

SUBJECT: Review of Site Investigation Status Update & Request for Technical Assistance  
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 (DNR) has reviewed the September 7, 2021 “Site Investigation Status Update & Request for Technical Assistance” (SIR/TA) submitted by Moraine Environmental, Inc. for the site identified above. The intent of the SIR/TA was to document recent investigation activities conducted at the site and to demonstrate that no further or sampling should be required to complete the site investigation. The SIR/TA also maintains that maintaining current property use and fencing around at the southern parcel would be a sufficient interim action to ensure conditions remain protective until a final remedy can be implemented. A review fee was paid for a technical discussion of the status of the site. The DNR participated in this meeting on November 12, 2021 and has prepared this written summary of the topics discussed.

- 1) Additional sampling will need to be conducted to complete the site investigation. At a minimum, the following items must be completed before the site investigation could be considered complete:
  - a. At least one additional sampling round of sub-slab samples must be collected at 3975 S Pennsylvania Avenue to assess the vapor intrusion risk. Sampling should be conducted during the heating season. Conducting multiple sampling events at residential properties where soil vapor poses a potential risk to indoor air is recommended in DNR guidance document RR-800, “Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin”. Three rounds of sampling are recommended without a technical explanation as to why fewer will assess this risk.
  - b. The potential migration of contamination off-site through storm water must be assessed per Wis. Admin. Code § NR716.11(5)(a). Unconsolidated contaminated material is exposed at the surface within the southern portion of the property. The potential for PCB contamination to migrate via stormwater off the site must be assessed by collecting stormwater and sediment samples at each outfall where runoff potentially leaves the site. This will be necessary to demonstrate that the interim actions proposed for this site (maintaining a fence, continuing to operate the business, limiting employee exposure, etc.) are enough to ensure that conditions remain protective until a final remedy can be implemented.

- c. Wis. Admin. Code § NR 716.11(3)a requires that the site investigation define the degree and extent of all contamination, which includes PFAS contamination in groundwater. As noted in the SIR/TA, the downgradient extent of groundwater contaminated with PFAS has not been determined. The DNR also recognizes that there is currently not enough data to confirm or reasonably estimate the extent of PFAS contamination. The site investigation cannot be approved until this has been completed.

The DNR understands the difficulty in investigating this contaminant and the lack of receptors in the immediate area. However, neither of these facts negates the requirement to complete the site investigation.

As you are aware there are various ongoing environmental investigations being conducted in the vicinity of your site. Additional information and analytical data may be obtained from these sites in the future that could be used to help demonstrate the extent of PFAS groundwater contamination. Not all data necessary to define the groundwater plume may be made available however, and you may still need to collect groundwater samples from wells that you install and sample to complete the investigation.

- 2) As stated in the August 17, 2020 letter sent to you by the DNR, the requirement to evaluate emerging contaminants, including PFAS, applies to all sites that have not received a final case closure letter. PFAS contamination has been identified and is being investigated within the northern (vacant) portion of the site. The potential for these compounds to have been discharged at the southern portion of the site must also be assessed, especially if the current site is planned to be separated into two separate cases. An evaluation explaining whether the presence of PFAS needs to be investigated on the southern portion of the site must be provided to the DNR to review before the site investigation or a request for closure can be approved.
- 3) The DNR previously requested various corrections to the analytical tables and figures provided with the site investigation report. With the exception given below, the tables were corrected as requested.

Contaminant concentrations not listed on the soil analytical table in the June 2004 "Site Reassessment Report" indicate that the concentration was below a given threshold. The tables in the SIR should be changed to reflect this by noting that the concentration is less than that threshold (e.g., <1.4).

- 4) Wis. Admin. Code § NR 720.05(2) requires soil with contaminant concentrations greater than residual contaminant levels to either be remediated or capped. This site will not close until one of these actions (or a combination) has addressed soil contamination at this site. A remedial action options report, consistent with the requirements of Wis. Admin. Code § NR 722.13, must be provided to the DNR that will outline a strategy for addressing residual soil contamination on both the northern and southern portions of the site. It is recommended that a review fee accompany this report. The DNR will then work with you to ensure that the proposed actions will meet applicable requirements for addressing residual contamination. DNR approval of the proposed final remedial option would be documented in the file and would provide assurances (to yourself and future property owners) that there is means of obtaining case closure.

An interim action must be undertaken to prevent contact with residual contamination if the approved remedial action cannot be undertaken on the southern (auto wrecker) portion of the

site due to the difficulties of relocating business operations. Previously proposed interim actions included:

- a. maintaining the fence that surrounds most of the property,
- b. using signage to warn people away from the property,
- c. and ensuring that current work practices (which require little worker time outside the building) are followed.

If these actions are regularly conducted the DNR would not pursue the completion of a remedial action until the property is redeveloped or the property use is proposed to change. As required by Wis. Admin. Code § NR 708.15(3)e, an inspection and maintenance plan will need to be prepared that describes the features to be maintained and the procedures that will continue to be followed to limit access to the property. The plan will need to be submitted to the DNR for review. You will be required to conduct the actions outlined in the plan until approved by the DNR to do otherwise.

The DNR is not currently requesting specific interim actions be conducted to address a direct contact at the north parcel or drainage swale areas. However, the need to install or maintain a cap over residual soil contamination in these locations must be assessed as part of the remedial action options report to determine where barriers will need to be constructed and/or maintained prior to case closure.

- 5) The remedial action options report may also need to discuss how groundwater, vapor, or stormwater contamination will be addressed if the results of sampling outlined in item 1) above dictate that need to do so.
- 6) The DNR can open separate cases for the northern (4005 S Pennsylvania Avenue) and southern (4043 S Pennsylvania Avenue) parcels that currently make up the site. Each site will then need to be investigated and closed separately.

We appreciate your continued efforts to restore the environment at this site. The DNR will continue what assistance it can by guiding you towards the completion of a site investigation that complies with the requirements of NR 716 in a manner that is as efficient as possible. If you have any questions regarding any of the above items, or would like to discuss the status of this site in more detail, please contact me at (262) 574-2166 or by email at [paul.grittner@wisconsin.gov](mailto:paul.grittner@wisconsin.gov).

Sincerely,



Paul Grittner  
Hydrogeologist  
Remediation & Redevelopment Program

cc: Dave Lennon, Moraine Environmental, Inc., 766 Tower Dr., Fredonia, WI 53021  
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