

CERTIFIED MAIL

July 16, 2018

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

Jerome Keck
P.O. Box 232
Clyman, WI 53016

SUBJECT: Interim Action Approval with Continuing Obligations
Keck Farm, W5797 Freitag Lane, Watertown, WI 53094
DNR BRRTS Activity #: 02-28-000945

Dear Mr. Keck:

The Department is planning on conducting interim actions at your property, including but not limited to groundwater monitoring and inventorying, re-development, and surveying of monitoring wells. The specific scope of work is detailed in the Department's March 2018 Specifications/Scope of Work – Keck Farm. This letter serves as the interim action approval with continuing obligations. Per s. 292.12 (2), Wis. Adm. Code, the Wisconsin Department of Natural Resources (DNR) is requiring conditions concurrent with these interim actions to ensure protectiveness of human health, safety, welfare and the environment. You, future property owners and occupants of the property must comply with the continuing obligations as explained in this letter. Please read over this letter closely to ensure that you comply with the conditions. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents or leases this property from you. For residential property transactions, you may be required to make disclosures under s. 709.02, Wis. Stats.

Your property was used for disposal of drums containing chlorinated solvents, most notably trichloroethylene (TCE), between 1970 and 1971. The drums were disposed slightly north of the former residence and in four areas along the section line east of the farmstead, as shown on the attached map, **Figure 1**. While the drums and much of the soil contamination appears to have been removed around 1990, there is limited information to confirm the extent of the removal, and additional soil sampling conducted in 1991 and 2004 confirmed that TCE-impacted soil remains on your property. Furthermore, significant TCE impacts have been documented in shallow groundwater and remains on your property. The extent of TCE impacts in shallow groundwater is not as well understood as the extent in deeper groundwater. Meanwhile, shallow groundwater contamination is more likely to lead to vapor intrusion into buildings than deep groundwater contamination.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Conditions.

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Groundwater contamination is present at or above ch. NR 140, Wis. Adm. Code enforcement standards. DNR approval is required before constructing or reconstructing a drinking water well.
- Remaining contamination could result in vapor intrusion if future construction activities occur. Future construction includes expansion or partial removal of current buildings as well as construction of new buildings. Vapor control technologies will be required for occupied buildings,

unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that vapor control technologies are not needed.

The DNR fact sheet "Continuing Obligations for Environmental Protection," RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

Listing on Database

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web) at <http://dnr.wi.gov/topic/Brownfields/wrrd.html>, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, at the same web address.

DNR approval prior to well construction or reconstruction is required, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

All site information is also on file at the South Central Regional DNR office, at 3911 Fish Hatchery Rd., Fitchburg, WI 53711. This letter and other recent document can be found as a Portable Document Format (PDF) in BRRTS on the Web.

Conditions

Compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wis. Stats. to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to:

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
3911 Fish Hatchery Rd.
Fitchburg, WI 53711

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)
Soil contamination may remain in the "areas of suspected dumping" as indicated on the attached Site Map, **Figure 1**, August 1989. If soil from these areas is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval.

In addition, all current and future owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

The approximate extent of groundwater contamination greater than Wis. Adm. Code ch. NR 140 enforcement standards on this contaminated property is shown on the attached Groundwater Contamination Map, **Figure 2**, June 2018. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats., s. NR 726.15, s. NR 727.07, Wis. Adm. Code)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Future Concern: TCE and other chlorinated solvents potentially remain in soil and/or shallow groundwater at the locations shown on the attached figures (Site Map and Potential Groundwater Contamination Areas) at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. Therefore, before a building is constructed and/or an existing building is modified, the property owner must notify the DNR at least 45 days before the change. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR agrees that vapor control technologies are not needed.

General Wastewater Permits for Construction Related Dewatering Activities

The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction related dewatering activities, including utility and building construction.

If you or any other person plan to conduct such activities, you or that person must contact that program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids and oil and grease, a general permit for Pit/Trench Dewatering may be needed.

In Closing

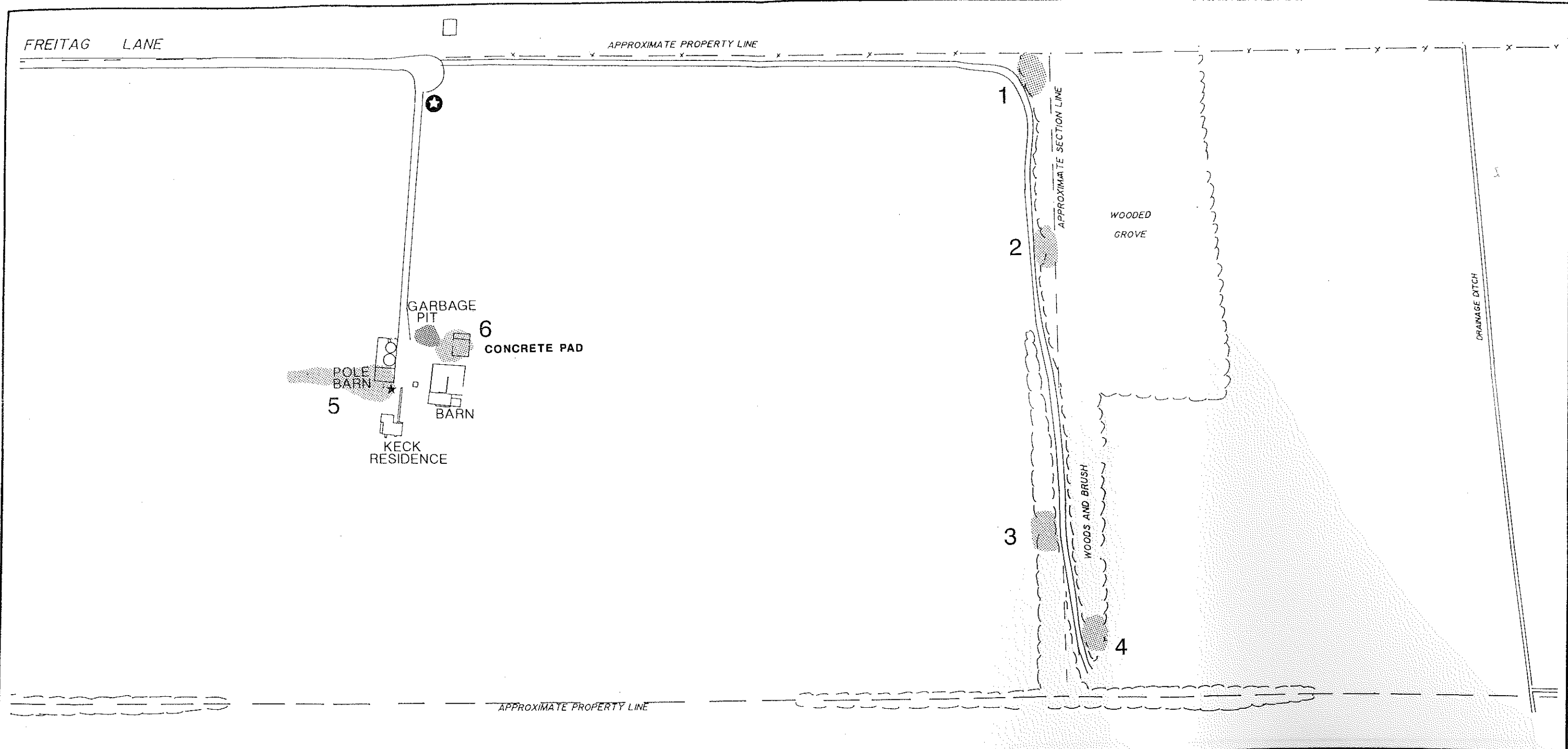
The DNR appreciates your cooperation. If you have any questions regarding this decision or anything outlined in this letter, please contact Jason Lowery by telephone at (608) 267-7570 or via e-mail at jason.lowery@wisconsin.gov.

Sincerely,



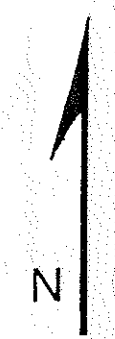
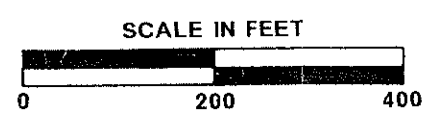
Steve Martin
South Central Team Supervisor
Remediation & Redevelopment Program

Attachments: Figure 1: Site Map
Figure 2: Potential Groundwater Contamination Areas



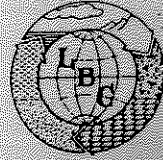
LEGEND

- ★ KECK OLD WELL
- ⊛ KECK NEW WELL
- ▨ AREA OF SUSPECTED DUMPING



CHRYSLER CORPORATION
KECK FARM SITE, WATERTOWN, WISCONSIN

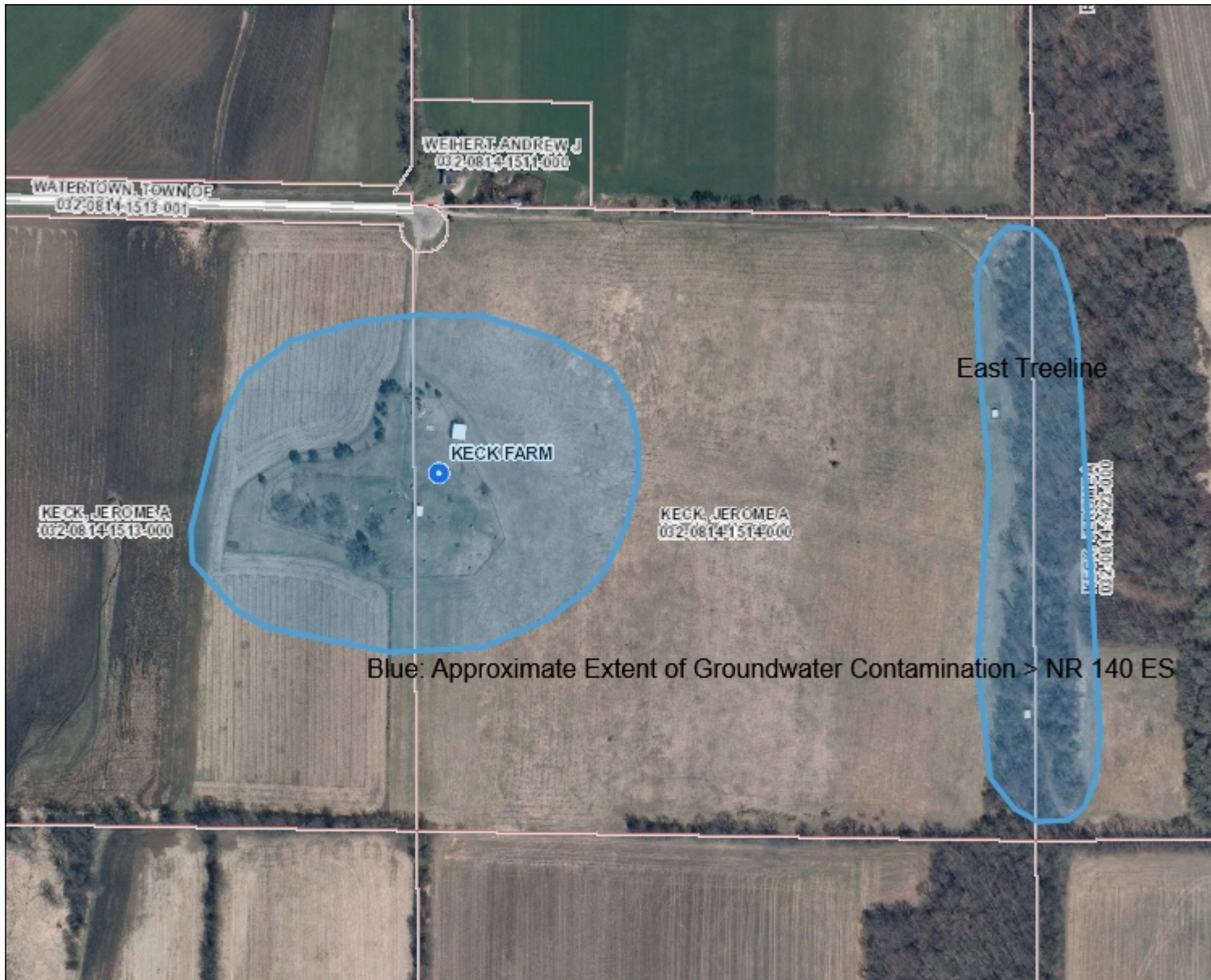
SITE MAP

DATE	REVISED	PREPARED BY:
		 <p>LEGGETTE, BRASHEARS & GRAHAM, INC. Professional Ground-Water Consultants North Park Corporate Center 1210 West County Road E. St. Paul, MN 55112 612-490-1405</p>

DATE: AUGUST, 1989 FIGURE 1



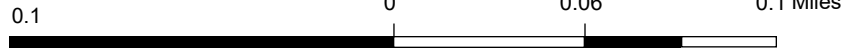
Figure 2: Groundwater Contamination Map



Blue: Approximate Extent of Groundwater Contamination > NR 140 ES

Legend

- Open Site (ongoing cleanup)
- Closed Site (completed cleanup)
- Municipality
- State Boundaries
- County Boundaries
- Major Roads**
- Interstate Highway
- State Highway
- US Highway
- County and Local Roads**
- County HWY
- Local Road
- + Railroads
- Tribal Lands



NAD_1983_HARN_Wisconsin_TM

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1: 3,960



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Note: Not all sites are mapped.

Notes

June 2018