



December 10, 2021

Tyler Krupp
Threshold Development Group
1954 Atwood Avenue
Madison WI 53704

Subject: Post-Closure Modification Initial Approval
AND Approval to Manage Contaminated Soil under Wis. Admin. Code § NR 718.12 on Site
Classic Cleaners, 3918 Monona Drive, Madison WI 53704
DNR BRRTS Activity # 02-13-368525

Dear Mr. Krupp:

On November 17, 2021, SCS Engineers submitted a Materials Management Plan and Post-Closure Modification Request (Request) to the Wisconsin Department of Natural Resources (DNR) on your behalf. DNR received all applicable technical assistance and database fees for providing review and response, in accordance with Wis. Admin. Code § NR 749.04(1).

DNR has reviewed the Request and offers a preliminary approval of the Materials Management Plan and Post-Closure Modification. The preliminary approval is subject to compliance with the conditions listed in this letter. The Request covers redevelopment plans, anticipated changes to the continuing obligations, and soil management. Should any future changes to your redevelopment plans significantly change the proposed soil management activities in this Request, a new request for approval must be submitted to DNR.

It is our understanding that your redevelopment project covers three parcels: 251/0710-093-0302-6 (the former Classic Cleaners property with addresses of 3916, 3918, and 3920 Monona Drive), 251/0710-093-0301-8 (3900 Monona Drive, the former Mike's Lake Edge Mobil, a closed petroleum clean-up site with BRRTS # 03-13-000237), and 251/0710-093-0313-3 (109 Cottage Grove Road). The excavation needed for property redevelopment is expected to remove much of the soil contaminated with tetrachloroethene (PCE). A five-story building is planned, and sub-slab vapor mitigation will be incorporated into the new building construction. The new building will have both commercial space and apartments.

While much of the contaminated soil is planned to be disposed of at licensed facilities off-site, there may be a need to re-use on-site some of the soil that is uncontaminated or has low levels of contamination. This approval allows reuse of uncontaminated soil without restriction and of soil with low levels of contamination under certain conditions.

Characterization of Soil to be Excavated

The Request describes how excavated soils will be managed based on their level of contamination. Soil data from the Classic Cleaners remediation project, the Mike's Lake Edge Mobil file, and the 2020 Phase II Environmental Site Assessment for 3900 Monona Drive have been used to delineate contaminated areas. The data shows that soil can be categorized into three groups: soil that must be pre-treated before disposal at a licensed hazardous waste facility, soil that needs to be handled as a characteristic hazardous waste, and soil with low enough contaminant levels that it may go to a licensed solid waste landfill. Soil that is uncontaminated may be handled without restriction. Soil with low enough contaminant levels that it could go to solid waste landfill may be handled on site under certain conditions. SCS Engineers plans to request a "contained out" decision from DNR to clarify soil disposal requirements. You may choose to do additional sampling to define the soil areas in greater detail and clarify the volumes of soil in each category.

Submittal of a Soil Management Plan

A complete soil management plan, as defined by Wis. Admin. Code §§ NR 718.12(2)(b) and (c), was provided to the DNR.

Notice Provided Prior to Commencing Soil Management Activities

Per Wis. Admin. Code § NR 718.12(2), the DNR was provided with written notice at least seven days prior to commencing the proposed material management.

Preliminary Approval

The Materials Management Plan and Post-Closure Modification Request is given a preliminary approval **subject to the following conditions:**

1. Any previously unreported hazardous substance discharge discovered during contaminated soil management activities must be reported to the DNR following the requirements of Wis. Admin. Code ch. NR 706. Discovery of underground storage tanks, piping, drums, etc. must be reported to DNR within 24 hours and appropriate follow-up actions proposed.
2. Contaminated soil management activities approved by this letter are scheduled to be completed in 2022 and 2023. Notify the DNR if this schedule will change.
3. Threshold Development Group must comply with all applicable provisions of Wis. Adm. Code ch. NR 718.
4. Testing must be done to show the effectiveness of the vapor mitigation measures incorporated into the new building construction. Details of the testing methods and results may be included in the documentation report required below or sent separately within 90 days of project completion.
5. Contaminated soil must be managed according to the approved Materials Management Plan, the requirements of Wis. Admin. Code ch. NR 718, and the Grant of Exemption below.
6. Documentation of contaminated soil management activities must be provided within 90 days of the completion of this project. The documentation must comply with the requirements of Wis.

Admin. Code § NR 724.05(2) and § NR 724.15(3). The DNR will request that incomplete documentation be amended as allowed by Wis. Admin. Code § NR 724.07 (2). Documentation must include:

- a. A cover letter that contains the information required by Wis. Admin. Code § NR 724.05(2)(e)1.
 - b. Owner contact and property location information for the Classic Cleaners site.
 - c. Maps, drawings, cross-sections, and color photos showing how contaminated soil was managed.
 - d. A synopsis of the work conducted and an explanation of how the work complied with the contaminated soil management plan and the conditions in this approval.
 - e. Documentation of excavation and soil placement activities, including the total volume and final location or disposition of excavated materials in the three soil management categories AND including the type, total volume and location of imported clean fill
 - f. A description of any changes made to the planned management activity and an explanation as to why they were necessary.
 - g. Any field observations or results of monitoring conducted during the management activity.
 - h. A description of how new site conditions are protective of human health, safety, welfare and the environment at the former Classic Cleaners.
 - i. A revised cover maintenance plan
 - j. A revised vapor mitigation system maintenance plan
 - k. Certification under the seal of a professional engineer registered in the State of Wisconsin per Wis. Admin. Code ch. NR 712
7. This approval is granted under Wis. Admin. Code § NR 718.12 and applies only to the specific activities described within the submitted Request. Any contaminated soil that is excavated or otherwise disturbed at the Classic Cleaners site, not covered under this or another approval, must be managed in compliance with the requirements of Wis. Admin. Code chs. NR 500 through NR 599. The management of contaminated soil on a property that does not comply with these rules may be considered a hazardous substance discharge or environmental pollution and would be required to be addressed by the process outlined in Wis. Admin. Code chs. NR 700 to NR 799.
8. Threshold Development Group is responsible for obtaining any local, federal or other applicable state permits to carry out the project.

Wis. Admin. Code § NR 718.12 Approval

This letter grants an approval to manage contaminated soil under Wis. Admin. Code § NR 718.12 on site. Approval is based on the compliance with the conditions in this letter and all applicable state requirements.

Grant of exemption to Wis. Admin. Code § NR 718.12 (1) (c)

In considering that a substantial volume of residual contamination will be removed during the redevelopment and that reusing soil with low levels of contamination would not pose a significant additional risk to human health or the environment, the DNR grants an exemption to the location criteria

of Wis. Admin. Code § 718.12 (1) (c) 6 and will allow placement of contaminated soil material that is eligible for disposal at a solid waste landfill on the former Classic Cleaners parcel only at any depth, including at greater than the original depth from which the soil was excavated. Whenever possible, this reused soil should be placed beneath the underground parking area in areas protected by vapor mitigation measures.

Other Information

Continuing obligations for the Classic Cleaners project were imposed in the DNR's May 24, 2021 closure letter. These continuing obligations will remain unchanged until the DNR issues a closure letter addendum after the redevelopment is completed. The DNR expects several of the continuing obligations will need to be modified and/or deleted.

All remediation sites are included in DNR's BRRTS database. All documents and project milestones related to the cleanup of each of the involved sites are listed in the database entry identified by BRRTS # 02-13-368525 and 03-13-000237.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this approval decision, please contact Cindy Koepke at 608-219-2181 or cynthia.koepke@wisconsin.gov.

Sincerely,

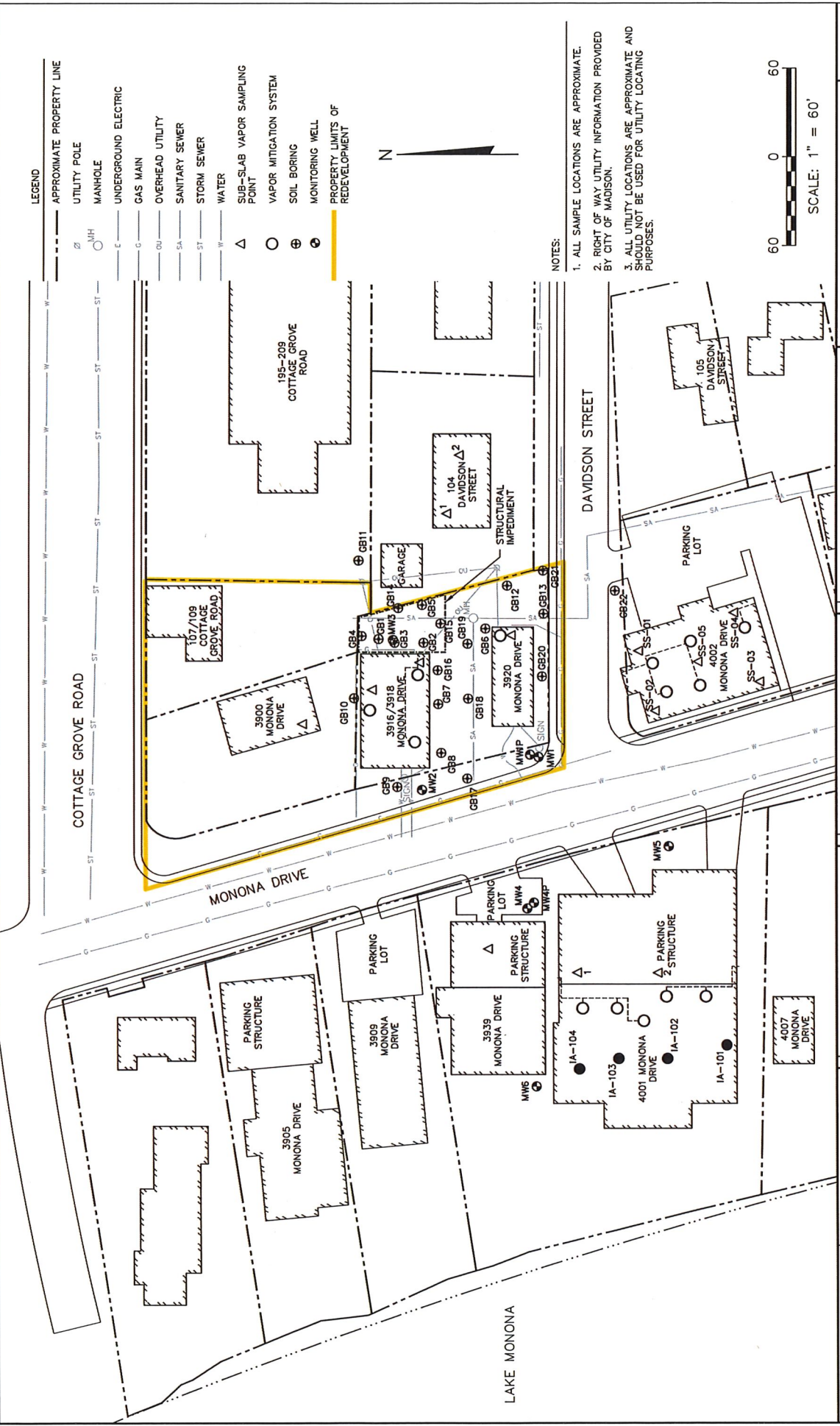


Issac A. Ross
South Central Region Team Supervisor
Remediation & Redevelopment Program
DNR Fitchburg Service Center – Fitchburg, WI

Attachments:

- Figure 2, Detailed Site Map, rev. 11/15/2021

copies by email: Eric Oelkers, SCS Engineer
Ronda Dolphin, responsible party contact for Classic Cleaners
Cindy Koepke, DNR
Jason Scott, WEDC
Janet DiMaggio, DNR



- LEGEND**
- APPROXIMATE PROPERTY LINE
 - UTILITY POLE
 - MH
 - MANHOLE
 - UNDERGROUND ELECTRIC
 - GAS MAIN
 - OVERHEAD UTILITY
 - SANITARY SEWER
 - STORM SEWER
 - WATER
 - △ SUB-SLAB VAPOR SAMPLING POINT
 - VAPOR MITIGATION SYSTEM
 - ⊕ SOIL BORING
 - ⊕ MONITORING WELL
 - PROPERTY LIMITS OF REDEVELOPMENT

NOTES:

1. ALL SAMPLE LOCATIONS ARE APPROXIMATE.
2. RIGHT OF WAY UTILITY INFORMATION PROVIDED BY CITY OF MADISON.
3. ALL UTILITY LOCATIONS ARE APPROXIMATE AND SHOULD NOT BE USED FOR UTILITY LOCATING PURPOSES.



PROJECT NO. 25221209.00	DRAWN BY: KP/AMO	ENGINEER	CLIENT	SITE	FIGURE
DRAWN: 01/05/2004	CHECKED BY: REL	SCS ENGINEERS	THRESHOLD REDEVELOPMENT GROUP	THRESHOLD DEVELOPMENT	2
REVISD: 11/15/2021	APPROVED BY: EO 11/17/2021	2830 DARY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830	1954 ATWOOD AVENUE MADISON, WI 53704	3900 MONONA DRIVE MADISON, WISCONSIN	