

From: [McIlheran, Adam S - DNR](#)
To: [Don Gallo](#)
Cc: [Hughes, Audra A - DNR](#); [Alessi, Timothy G - DNR](#); [Heidi Woelfel](#); [Angela Henke](#); [Margaret Kidder](#)
Subject: Continuing Obligations Information Request Response, Clare Central, 1003/1033 W. Atkinson Ave., Milwaukee, WI - BRRTS # 02-41-549867/06-41-560680
Date: Monday, August 19, 2024 5:08:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Don,

Regarding your email request earlier today, you are correct that likely continuing obligations for the Clare Central site will include maintenance of the engineered cap and vapor mitigation systems, since they were part of the proposed remedies planned and implemented for the site. The 2021 Remedial Actions Options Report or the Remedial Design Report should have included the anticipated or proposed continuing obligations likely to be implemented for the site. You consultant, GZA would probably have a better understanding of the most current assessment of the scope of continuing obligations, including cap or VMS maintenance plans, since it is my understanding they will be submitting the Remedial Documentation Report for the site soon. So you may want to contact them in that regard. Regarding the scope or detail in maintenance plan continuing obligations, expectations for those are described in the DNR guidance on cap maintenance plans, [RR-980](#) and the DNR guidance on vapor mitigation system maintenance plans [RR-981](#).

In regards to an example for the scope of various standard continuing obligations, the DNR Guidance on Continuing Obligations [RR-606](#) includes descriptions of the types and scope of each possible C.O. with a table in Appendix A. Since each site and associated closure letter is unique to that particular site and date, there is not a typical closure letter in the guidance. Your consultant, GZA, should be able to provide you with examples of past closure letters for sites with C.O.s similar to those likely planned for the Clare Central site if you desire a general understanding of how those C.O.s are described.

I hope this information is helpful for your planning purposes.

Regards,

Adam

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