



March 23, 2018

Mr. Joe Carroll  
City of Platteville  
75 N. Bonson Street  
Platteville WI 53818

Subject: Response to Technical Assistance Request, Remedial Action Design Report (Including Vapor Mitigation Plan), Materials Management Plan, and Post Closure Modification for the Pioneer Ford Properties, Platteville, WI  
BRRTS Numbers 02-22-576632 and 02-22-553286

Dear Mr. Carroll:

Technical assistance requests dated February 2018 for the former Pioneer Ford Properties were submitted on your behalf by Ayres Associates. Fees were received on February 21, 2018 for providing review and response in accordance with s. NR 749.04(1), Wisconsin Administrative Code. The reports outline the redevelopment approach of six consolidated parcels located at 50 and 70 S. Water Street, 45 and 75 S. Oak Street, and 85 S. 2<sup>nd</sup> Street, hereafter referred to as 'the Property' which are currently abandoned and blighted in downtown Platteville.

The Department of Natural Resources, hereafter referred to as 'the Department' has reviewed your requests and offers an **approval** of the proposed actions to excavate contaminated soils, install a passive vapor mitigation system, and replace the cap at 50 S. Water Street (former Speedy Loan site) with some additional considerations.

The Department reviewed the following documents to make this determination:

- *"Phase I Environmental Site Assessment, ASTM Practice E1527-13" Former Pioneer Ford Properties, 50 & 70 S. Water St., 45 & 75 S. Oak St., and 85 S. 2<sup>nd</sup> St., Platteville, Wisconsin 53818 prepared by Ayres Associates and dated September 2015.*
- *"Phase II Site Assessment Report" Former Pioneer Ford Properties, 50 & 70 S. Water Street, 45 & 75 S. Oak Street, and 85 S. 2<sup>nd</sup> Street, Platteville, Wisconsin prepared by Ayres Associates and dated October 2015.*
- *"Remedial Action Design Report Soil, Vapor, and Groundwater Remediation" Former Pioneer Ford Properties, 50 & 70 S. Water Street, 45 & 75 S. Oak Street, and 85 S. 2<sup>nd</sup> Street prepared by Ayres Associates and dated February 2018.*
- *"Materials Management Plan" Former Pioneer Ford Properties, 50 & 70 S. Water Street, 45 & 75 S. Oak Street, and 85 S. 2<sup>nd</sup> Street, Platteville, Wisconsin prepared by Ayres Associates and dated February 2018.*
- *Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request, Wisconsin Department of Natural Resources Form 4400-237 (R 9/15) prepared by Ayres Associates and dated February 19, 2018.*

The Department provides the following summary and opinions concerning the Property:

- The Property had the following former uses: lumberyard, feed company, auto repair shops, carpenter shop, junk yard, grocery, retail store, the Pioneer Ford Automotive show room and service buildings, and drycleaner.
- Phase I and Phase II Site Assessments were completed and submitted to the Department in September 2017 and October 2017.
- Laboratory analyses contained in the reports show soil and groundwater contamination. Vapor assessment through two sub-slab sampling events with six total sampling locations showed no volatile organic compound (VOC) concentrations above the residential vapor risk screening level (VRSL).
- The former buildings, except for 75 S. Oak Street, have been demolished leaving the slabs in place. Paved areas are currently located across most of the remaining surface.
- Three underground storage tanks (gasoline and fuel oil) located at 75 S. Oak Street and 85 S. 2<sup>nd</sup> Street are reported closed and filled with inert material (Email communication dated March 6, 2018 from Ayers Associates).
- Mixed use multi-story buildings with residential apartment units and commercial business is proposed for this 1.91-acre site.

### **The Site Assessment Activities**

Nineteen soil probes and three soil borings were advanced at the site in August 2015 for the Phase II Assessment. One soil sample from each probe and boring was analyzed for polycyclic aromatic hydrocarbons (PAHs), Resource Conservation Recovery Act (RCRA) metals, and volatile organic compounds (VOCs). PAHs were detected above industrial, non-industrial, or protection of groundwater pathway standards in the upper six feet of the soil interval throughout the project area. Low level detections of some metals and VOCs were also detected. Two soil samples were collected and submitted for polychlorinated biphenyls (PCB) analysis. PCBs were not detected in any of the samples.

Three groundwater monitoring wells (MW-1 through MW-3) were installed in the three soil borings. The wells were installed side to down-gradient of the former drycleaner site (50 S. Water Street, former Speedy Loan site, BRRTS # 02-22-553286) and analyzed for VOCs, PAHs and dissolved RCRA metals. Low level exceedences above the enforcement standard for some VOCs and metals were observed

A total of six subsurface vapor probes were also installed in locations where the future residential units are proposed and down gradient of the former drycleaner site. Three sub-slab vapor pins were installed through an existing floor slab (70 S. Water Street) adjacent to the former drycleaner property (50 S. Water Street) and sampled in September 2017. In December 2017, three additional sub-slab probes were installed and sampled outside the building slab and beneath the asphalt parking lot near wells MW-1, MW-2, and MW-3 which had VOC exceedences. In both events, there were no VOC exceedences above the residential VRSL.

### **Proposed Remedial Action and Soil Management Activities**

Initial site redevelopment activities resulted in the demolition of site buildings except the 75 S. Oak Street building located on the southwest corner of the main part of the Property. Slabs remain from the removed structure as do retaining walls, parking lots, and driveways which currently act as an impermeable barrier inhibiting infiltration to groundwater. The Department issued a letter dated November 6, 2012, *Final Case Closure with Continuing Obligations*, which required a cap as a continuing obligation to be maintained on the former Speedy Loan property located at 50 S. Water Street (BRRTS site reference number 02-22-553286). A post-closure modification request was submitted to address a change in the cap and is included in this review.

Demolition of the remaining features, except for the 75 S. Oak Street building, is proposed. The building at 75 S. Oak Street will be incorporated into the design of the redevelopment project. Soil excavation and site grading activities are proposed in the February 2018 Materials Management Plan. An engineered cap consisting of the

buildings, clean fill, parking lots, hard surfaces (walkways or driveways, and landscaping) were the proposed remedial action for the Property. Site elevations vary across the site and exhibit over 30 feet of drop from the northwest corner to the southeast corner of the Property. Site regrading is needed for the redevelopment and will require a net fill soil balance of 1,100 cubic yards (approximately 3,100 cubic yards of cut material and approximately 4,200 cubic yards of fill material). Most of the impacted soils are proposed to remain on site. The impacted soils are to be placed at lower elevation grades with either clean soils placed/compacted as engineered fill above them, or with hard surfaces placed above the impacted soils. These remedial actions and soil management activities are approved subject to the “Conditions of Approval” listed later in this document.

Groundwater exceedances were detected below the future building. Proper abandonment of site wells MW-1, MW-2, and MW-3 was requested and is approved to accommodate construction of the new building.

### **Soil Vapor Management System Plan**

Potential vapor accumulation in the redeveloped residential site will be managed with engineering controls including a passive sub-slab vapor depressurization system and geomembrane vapor barrier placed below new floor slabs in the new building. The source for the VOC exceedances in groundwater is presumed to be the former drycleaner at 50 S. Water Street. The Department approves the Soil Vapor Management System Plan (Appendix A in the February 2018 Remedial Action Design Report) with conditions.

- **Design:**
  - A 4-inch riser pipe can service ~4,000 square feet of area in a passive system. If 4-inch riser is needed to fit the building design, consider adding two additional riser locations to ensure the passive system works to effectively ventilate the sub-slab vapors.
  - Confirm that the riser pipes will be located in a warm wall within the building. This ensures warmth that creates the stack effect, which is needed to move sub-slab air up and away in a passive vent system.
- **Performance Verification:**
  - Specify times when sub-slab vapor samples will be collected post-construction and if the passive ventilation system will be allowed to vent during this time.
    - Samples shall be collected ~1 to 3 months and ~6 to 12 months after construction, with at least one sampling event during the heating season.
    - Samples shall be collected when passive system has not been allowed to vent to show what the vapor concentrations would be without mitigation.
    - Samples shall be collected under standard heating, ventilation, and air conditioning (HVAC) operations.
  - If the passive system is going to vent during sub-slab sampling, first measure differential pressure in the permanent probes (over several seasons) to verify the passive system is able to ventilate the subsurface.

### **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.

**Conditions of Approval**

The review and approval of an environmental investigation by the Department is authorized under sec. NR 724.07(2), Wisconsin Administrative Code. Based upon the information reviewed, **the Department hereby approves the remedial action option** proposed in the February 2018 Remedial Action Design Report. This approval is subject to compliance with all applicable state statutes and administrative rules, including Chapter 292, Wis. Stats. (Remedial Action), and Chapters 700-750, Wis. Adm. Code (Investigation and Remediation of Environmental Contamination). The Material Management Plan was reviewed for compliance with s. NR 718.12, Wis. Adm. Code, to allow excavated contaminated soil to be reused on-site as backfill with conditions.

The Remedial Action, Materials Management Plan, and Post-Closure Modification are approved subject to the following conditions:

- 1) Field screening and visual and olfactory observations of excavated soils will be conducted to determine if there is potential volatile organic compound contamination or other forms of contamination. Soils suspected of contamination must be segregated, analyzed, and, if necessary, treated, stored or disposed of according to the analytical results.
- 2) The source area of the chlorinated compound contamination (50 S. Water Street) needs additional investigation. Additional investigative work or explanation of the site conditions is needed to address the contamination levels observed in these areas. A report shall be submitted within 90 days of substantial completion of the redevelopment project and include the following:
  - a) The VOC impacted soils at 50 S. Water Street shall be delineated. Documentation shall be submitted to the Department. Use of information from the Department's Speedy Loan case file (BRRTS # 02-22-553286), borings installed as part of the Pioneer Ford Phase II, as well as additional new borings may be needed to define the limits of impacted fill that need to be removed.
  - b) Soil confirmation samples shall be taken to document any residual soil contamination remaining.
  - c) The VOC contaminated source material shall be segregated, tested, and properly disposed off-site.
  - d) Bill of lading for landfill disposal of the source material shall be submitted.
- 3) On-site management of excavated soil that will be used as back-fill in the redevelopment shall be completed within one year of the effective date of this letter unless a written extension of this condition is obtained from the Department.
- 4) Excavated material shall be managed in conformance with the approved materials management plan except for the VOC contaminated soils as noted in 2) above. The Department shall be notified within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the Department. That material must be segregated and tested to determine appropriate disposal options.
- 5) If areas of unanticipated soil contamination or discovery of underground storage tanks, piping, drums, etc. are encountered, the City of Platteville and the Department shall be notified within 24 hours. Appropriate action has been proposed to conduct methods to investigate, evaluate and deal with the situation.
- 6) PAHs have been detected above industrial, non-industrial, or protection of groundwater standards in the upper six feet or shallow soil interval throughout the project area. Excavated soils will be assumed to have soil PAH concentrations greater than non-residential direct contact residual contaminant levels (RCLs) and will remain on-site under a cap or be disposed off-site in a licensed landfill.
- 7) The owner of the Property is responsible for obtaining any local, federal or other applicable state permits to carry out this project. The project will involve the disturbance of more than one acre of land, therefore a stormwater permit may be required. Contact the Department's Stormwater Manager to determine what, if any, permit is needed.
- 8) The requirements for contaminated soil management as part of an interim or remedial action, s. NR 718.12(2)(d) and (e), Wis. Adm. Code, shall be complied with.
- 9) One replacement well shall be installed in the courtyard of the new building as close as possible to the locations of MW-2 and MW-3. The proposed location shall be submitted to the Department prior to installation. Quarterly monitoring shall commence 60-90 days after completion of site redevelopment.

- 10) The Owner shall submit a site construction documentation report to the Department within 90 days of substantial completion of the redevelopment project. The report shall contain the following items:
- a) As-built plan sheets documenting compliance with the above conditions of approval;
  - b) A narrative description of how the above conditions were accomplished including relevant documentation;
  - c) Color photographs documenting construction aspects addressed in this approval;
  - d) Documentation of excavation and soil placement activities. The report shall include the description of the total volume and location of relocated material; and
  - e) A letter under the seal of a professional engineer or architect registered in the State of Wisconsin and professional hydrogeologist as defined by NR 712.03(1), Wis. Adm. Code, certifying that the project has been constructed in substantial compliance with the above conditions and explaining any deviations from the approved plans.

If you have any questions regarding this letter, please contact Janet DiMaggio at (608) 275-3295.

Sincerely,



Steve L. Martin  
South Central Region Team Supervisor  
Remediation and Redevelopment Section

Attachment: Figure 2 – Site Map Former Pioneer Ford Properties, August 2015, Ayres Associates.

cc: Ben Peotter, Ayres Associates, 5201 E. Terrace Drive, Suite 200, Madison, WI 53718



Source: Platteville Parcel Finder, 2015



Figure 2 – Site Map  
 Former Pioneer Ford Properties  
 50 & 70 S. Water St., 45 & 75 S. Oak St.  
 Platteville, Wisconsin  
 August 2015

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