

From: Norman, Michele R - DNR
Sent: Wednesday, April 22, 2020 2:09 PM
To: Buss, Pamela E - DNR
Cc: Fassbender, Judy L - DNR; Amadi, Eric A - DNR
Subject: RE: Connell/Beazer

Hi Pam – In response to your email, you and DOJ can access Connell’s revised Remedial Action Options Report (RAOR), dated March 16, 2020, from the RR Program’s on-line database, BRRTS on the Web at:

<https://dnr.wi.gov/botw/GetActivityDetail.do?siteId=4405600&adn=0241553761>

The DNR’s comments related to Beazer’s response, dated March 6, 2020, are provided below:

We met with our regional VPLE peer review group and discussed Beazer’s letter of March 6, 2020. Beazer’s letter was in response to the DNR’s January 8, 2020 letter in which we requested additional information regarding completion of the site investigation and implementation of an interim action.

Beazer did not conduct any additional investigation as requested in the DNR’s January 8, 2020 letter, but rather re-stated why the additional investigation is not needed. The DNR’s repeated requests for action to complete the site investigation and an interim action are not being completed by Beazer. Based on information provided by Beazer, the VPLE review group could not conclude that the degree and extent of groundwater contamination is defined (e.g. increasing concentrations at MW-134). However, Beazer should proceed with interim action (as previously recommended) to address the expanding groundwater plume. The VPLE review group also provided the following comments:

A revised remedial action options report (RAOR) is needed:

1. The RAOR must comply with Wis. Admin. Code ch. NR 722 and address previous DNR comments.
2. Discuss, identify and illustrate the proposed remedial actions.
 - Describe how the remedy will result in the reduction or control, or both, of the identified contamination.
 - In particular, discuss how the residual tar (NAPL) will not continue to act as a source and continue to impact the groundwater.
3. Include updated figures (iso-concentration maps and cross-sections) and data tables that incorporate all the site investigation (SI) data collected to-date.
 - Request cross-sections through impacted areas -- specifically in the areas of the 4 additional borings: B-01-18, B-02-18, B-03-18, B-04-18 and use adjacent borings, if possible, to delineate the degree and extent of contamination.

On each of the cross-sections, indicate the proposed remedy in relation to the identified contamination.

For example, show the depth of proposed excavations and the reduction of source areas as a result of the proposed action.

Any data gaps will need to be addressed by pre-remedial design sampling that may also be used for addressing data gaps and completing the site investigation.

4. Discuss plans for post-remediation groundwater sampling to evaluate the effectiveness of the remedial action.
Identify monitoring wells, sampling parameters, and sampling frequency.
5. Include a schedule for the remedial action
Provide information related to how the proposed remedial action will be implemented in coordination with Connell and their planned remedial action.

Please let us know if you have questions.

Thank you, Michele

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Michele Norman

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From: Buss, Pamela E - DNR <Pamela.Buss@wisconsin.gov>

Sent: Friday, April 17, 2020 10:32 AM

To: Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>; Fassbender, Judy L - DNR <Judy.Fassbender@wisconsin.gov>

Subject: Connell/Beazer

Hi Judy & Michele,

Can you please provide me with the following two documents so I can share with DOJ:

1. Connell's 3/13/20 revised plan submittal
2. Comments on Beazer's 3/6/20 letter

Thank you!
Pam

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Pamela Buss

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