



May 5, 2023

Mr. Don Johnston
Director of Environmental Quality
US Venture
425 Better Way
Appleton, WI 54915
Via Electronic Mail Only to: DJohnston@usventure.com

Subject: Site Investigation Work Plan Review
US Oil Milwaukee Central Terminal - Tank 305
9451 North 107th Street Milwaukee, Wisconsin
BRRTS #: 02-41-558813, FID #: 24101770

Dear Mr. Johnston:

On March 16, 2023, the Wisconsin Department of Natural Resources (DNR) completed the review of the “Site Investigation Work Plan, US Oil, Milwaukee Central Terminal – Tank 305, 9451 North 107th Street, Milwaukee, Wisconsin”. Endpoint Solutions (Endpoint) submitted the Site Investigation Work Plan (SIWP) on your behalf with a fee, in accordance with Wis. Admin. Code § NR 749.04 (1), for DNR review and written response. The DNR reviewed the SIWP for regulatory compliance with Wis. Admin. Code ch. NR 716 and provides conceptual approval of the SIWP with feedback, as outlined below.

Background

The SIWP is in response to a 2000-gallon gasoline release on December 18, 2018. The release was contained in the Tank 305 containment dike. Most of the free product was pumped out using a vacuum truck. Endpoint initially placed four borings (GP-1 through GP-4) to depths of 8 feet below ground surface. Borings GP-1, GP-3 and GP-4 were sampled outside of the estimated impacted area. Only one boring GP-2 was located inside the impacted area. Two soil samples were collected from the unsaturated soil column and analyzed for volatile organic compounds (VOCs). At boring GP-1, contamination was identified above Wis. Admin. Code ch. NR 720 residual contaminant levels (RCLs). Endpoint submitted a request for a ‘No Action Required’ determination to the DNR and it was not approved per the DNR’s letter, dated August 8, 2022.

Proposed Scope of SIWP

- Soil and Groundwater Assessment (Figure 4 – Proposed Boring Locations). Endpoint proposes to advance seven borings around Tank 305 within the containment dike. The borings will be located northwest, northeast, east and southwest of Tank 305. Three (3) borings will be converted into Wis. Admin. Code ch. NR 141 complaint monitoring wells.
- Groundwater sampling - Groundwater samples will be collected from all wells for an additional quarter after installation and initial sampling. The groundwater samples will be analyzed for petroleum volatile organic compounds (PVOCs) and naphthalene.

Review of the SIWP

- Soil sampling – The SIWP states that “the samples submitted to the laboratory will be chosen based on visual staining and/or obvious odors”. Additionally, the DNR recommends that soil samples should be collected to delineate the contamination vertically.
- Boring locations - The DNR recommends shifting a sample location south of GP-1 to further define this area.

Emerging Contaminants

The DNR has reviewed the Emerging Contaminant Scoping Statement submitted on April 25, 2023. Based on the information provided, the DNR is not requiring further assessment or investigation of emerging contaminants at this time.

Next Steps

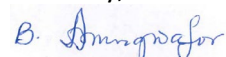
In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

1. Site investigation activities must begin within 60 days after receiving DNR approval of the SIWP, per Wis. Admin. Code § NR 716.11(2r).
2. Sampling results must be reported to the DNR on appropriately formatted data tables within 10 days of receiving the data, per Wis. Admin. Code § NR 716.14(2).
3. Submit a comprehensive site investigation report within 60 days after completion of the field investigation and receipt of laboratory data, per Wis. Admin. Code § NR 716.15. This report should be presented after the source(s) and degree and extent of contamination are defined, per Wis. Admin. Code § NR 716.01. Submit the applicable review fee if you would like to request a DNR review and response.

The site investigation can be an iterative process and additional data results may indicate further assessment is needed to define the degree and extent of contamination. Until requirements are met, your site will remain “open”, and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. Once additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions concerning this SIWP approval, please contact me at 414.208.5874 or e-mail me at Binyoti.Amungwafor@wisconsin.gov

Sincerely,



Binyoti F. Amungwafor
Hydrogeologist
Southeast Region, Remediation & Redevelopment Program

Attachment: Figure 4, Proposed Boring Locations

cc: Mr. Travis J. Manser, Endpoint Solutions, travis@endpointcorporation.com

B - Benzene
 E - Ethylbenzene
 N - Naphthalene
 1,3,5-TMB (Trimethylbenzene)
 ND - No Contaminant Detection

GP - 2	
0 - 2' (U)	2 - 4' (U)
ND	ND

APPROXIMATE REPORTED
 EXTENT OF GASOLINE FREE
 PRODUCT

SOURCE OF SPILL

GP - 3	
0 - 2' (U)	2 - 4' (U)
ND	ND

GP - 1		
	0 - 2' (U)	4 - 6' (U)
B	0.076	<0.015
E	2.38	0.037 "J"
N	2.08	<0.12
1,3,5-TMB	2.9	0.0234 "J"

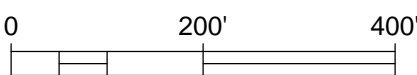
GP - 4	
0 - 2' (U)	2 - 4' (U)
ND	ND

FACILITY BOUNDARY

SOIL BORING LOCATION

PROPOSED SOIL BORING LOCATION

PROPOSED MONITORING WELL LOCATION



PROPOSED BORING LOCATIONS

US VENTURE - MILWAUKEE CENTRAL TERMINAL
 9471 N. 107TH STREET
 MILWAUKEE, WISCONSIN 53224

Endpoint Solutions

6871 S. Lovers Lane
 Franklin, WI 53132

Phone: (414) 427-1200 Fax: (414) 427-1259
 DRAWN BY: MLP/SVG DATE: 02/08/2023
 REVIEWED BY: TJM PROJECT NO: 014-004-028

Figure 4

P:\US Venture - 014\004 - Milwaukee Central Terminal\CADD\004-028\Fig.04_014-004-028 Proposed Boring Locations.dwg

SOURCE: MCLIO