State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1155 Pilgrim Road
Plymouth, WI 53073

Scott Walker, Governor Cathy Stepp, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



## MEMORANDUM

DATE:

January 23, 2015

TO:

File

FROM:

Lee Delcore, Hydrogeologist

SUBJECT:

PECFA # 53143-6208-04-A DNR BRRTS # 03-30-003487

Drakes Automotive, Inc./David Drake, 8004 22nd Ave., Kenosha

On September 9, 2014, the Department received a Tank System Site Assessment (TSSA) report for 8004 22<sup>nd</sup> Avenue, Kenosha, WI. The TSSA and removal activities were bid and funded through the PIF Tank Removal Program, administered through the Department. The property is subject to a lien for the tank removal and associated work.

A closed Leaking Underground Storage Tank (LUST) activity identified as Drake Automotive (BRRTS # 03-30-003487, PECFA# 53143-6208-04) exists on the same parcel. That activity was closed on March 8, 2002 and is included on the Department's geographic information system used to notify the public of residual contamination and continuing obligations. PECFA reimbursement was received for some of the activities at the site.

Based on a review of the case file for the closed activity, it is noted that over 4,000 tons of soil were excavated and disposed of at a landfill in 1994 as part of the remediation of the site. Confirmation samples were taken identifying residual contaminant levels. A completely new tank and dispensing system were installed at the site after the excavation and a business operated as a gasoline station at the site until about 2010.

The TSSA report contained soil analytical results identifying contamination above NR 700 Residual Contaminant Levels in the soil at location SS-14, with the sample depth identified as 3 feet below land surface (bls). Comparing the map provided with the TSSA with the post-remediation map from the closed case, soil in the area of SS-14 was excavated and backfilled with clean fill to ~6 feet bls. Based on that result, the contamination at SS-14 is being considered a new release from an ineligible tank system.

The Department will establish a new activity number (BRRTS number) for the new release and an RP letter will be issued to the current owner. Under the current rules, the new release would not be eligible for PECFA Funding. As a Notification for Hazardous Substance Discharge Form was not provided with the TSSA, a form was created with the information provided and the last known address of the Responsible Party. It is recognized that the current owner has essentially abandoned the property, is tax delinquent, and a property transaction is imminent. The prospective property owner should be made aware of the responsibility associated with the newly created LUST case as well as any continuing obligations related to the closed case. The current GIS registry packet includes an unrecorded Declaration of Restriction, which has some substantial errors that will need to be corrected and addressed by the current or future property owner and/or the Department.



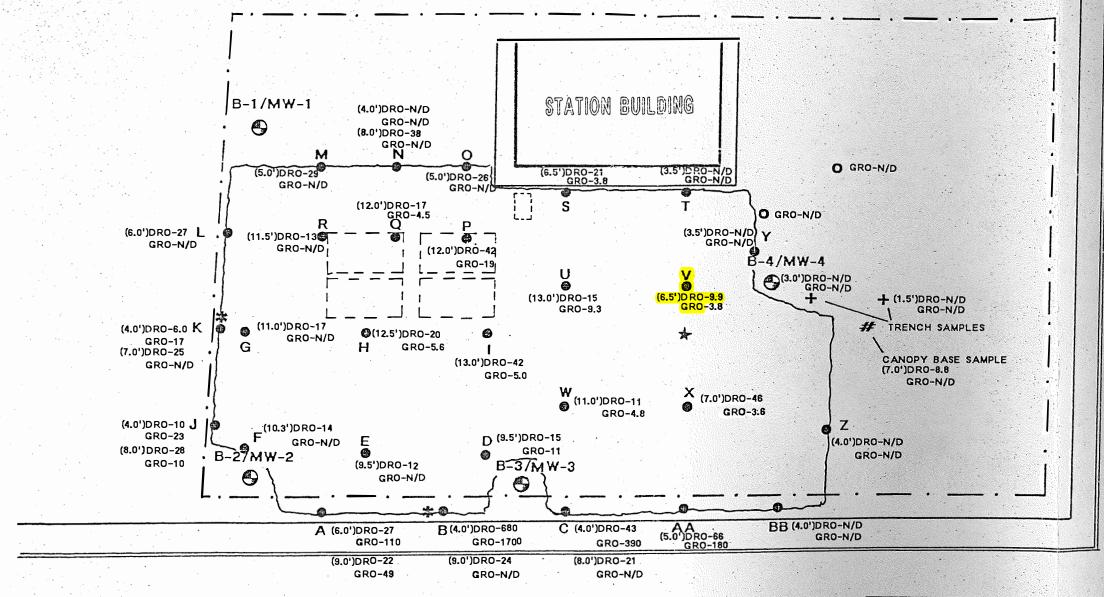
State of Wisconsin
Department of Natural Resources
dur wi gov

# Notification For Hazardous Substance Discharge (Non-Emergency Only)

dnr.wi.gov				Form 4400-225 (09/13) Page 2 of 2			
4. Hazardous Substance	Information						
Identify hazardous substan	ce discharged (che	ck all that apply):					
☐ VOC's		Diesel	PERC (D	Ory Cleaners)			
PAH's		☐ Fuel Oil	RCRA Hazardous Waste				
_		☐ Gasoline	Leachate	e			
Metals (specify):		Hydraulic Oil					
Arsenic Arsenic		☐ Jet Fuel	Fertilizer				
Chromium		Mineral Oil	∐ Pesticide	e/Herbicide/Insecticide(s)			
Cyanide		☐ Waste Oil	Other (s	naciful:			
Lead			Unknow				
PCB's		Petroleum-Unknown Type					
5. Impacts to the Environ	ment Information						
Enter "K" for known/confirm	ned or "P" for potent						
Air Contamination		Sanitary Sewer Cont	amination	X Soil Contamination			
Co-Contamination (Pet	roleum &	Contamination in Rig	•	Storm Sewer			
Non-Petroleum)		Fire Explosion Threa	t	Surface Water Contamination			
Contamination Within 1		Free Product		Within 100 ft of Private Well			
Contaminated Private \		Groundwater Contan		Within 1000 ft of Public Well			
Contaminated Public V		Off-Site Contamination	on				
Contamination in Fract		Other (specify):					
Contamination was discover							
	ent ∐ Site		ther - Describe:				
Date 08/13/2014	Date		Date				
Lab results:	sults will be faxed ι	ıpon receipt 🔀 Lab result	ts are attached				
		on of immediate actions taken to	halt the release	e and contain or cleanup			
hazardous substances that	have been discharg	<b>jed.</b> Translatija sa kalangana					
6. Federal Energy Act Red	quirements (Section	on 9002(d) of the Solid Waste	Disposal Act (S	WDA))			
For all confirmed releases		Source	1 _	Cause			
from UST's occurring after	☐ Tank		☐ Spi	ill			
9/30/2007 please provide the following information:			□ Ov	erfill			
the following information.	□ Dispenser		☐ Co	rrosion			
	Submersible	Turbine Pump	Ph	ysical or Mechanical Damage			
Does not apply.	Delivery Prob	lem	☐ Ins	tallation Problem			
Does not apply.	Other (specify	):		ner (does not fit any of above)			
			Un	known			
Contact information to re	port non-emerger	ncy releases in DNR's five re	gions are as fo	llows:			
Northeast Region (FAX: 9	920-662-5197); Atte	ention R&R Program Associ	iate: DNRRRNE	R@wisconsin.gov			
		City of Waupun - see South C Outagamie, Shawano, Sheboyga		Green Lake, Kewaunee, Manitowoc,			
· · · · · · · · · · · · · · · · · · ·		ntion R&R Program Associa	=	-			
	•	Forest, Florence, Iron, Langlade		_			
Sawyer, Taylor, Vilas, Wa	shburn counties	· · · · · · · · ·					
	=	Attention R&R Program As of Waupun only), Grant, Green					
Rock, Sauk, Walworth co							
= =		ention R&R Program Assoc	iate: UNRRRSE	_K@wisconsin.gov			
Kenosha, Milwaukee, Ozaukee, Racine, Washington, Waukesha counties							

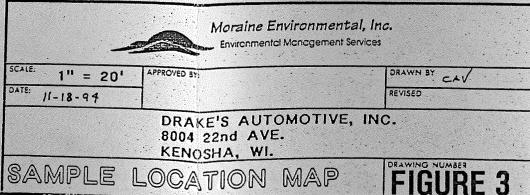
West Central Region (FAX: 715-839-6076); Attention -- R&R Program Associate: DNRRRWCR@wisconsin.gov Adams, Buffalo, Chippewa, Clark, Crawford, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Pepin, Pierce, Portage, St. Croix, Trempealeau, Vernon, Wood counties

80TH STREET



## 22ND AVENUE

- \* -GEOPHYSICAL SAMPLE LOCATION
- \* -MICROBIAL SAMPLE LOCATION
- # -CANOPY BASE SAMPLE
- O -PIPING SAMPLE LOCATION



-MONITORING WELL LOCATION

[]] -FORMER UST LOCATION

-SOIL SAMPLE LOCATION

---- -EXCAVATION BOUNDARY

## TABLE 3 OVEREXCAVATION LABORATORY AND ORGANIC VAPOR METER (OVM) SCREENING RESULTS DRAKE'S AUTOMOTIVE SERVICE, INC.

Sample ID Date	Location	Depth Below Ground Surface	OVM Value (ppm)	GRO (mg/kg)	DRO (mg/kg)	Benzene ug/kg	Ethyl Benzene ug/kg	Methyl- Tert Butyl Ether ug/kg	Toluene ug/kg	1,2,4- Trimethyl Benzene ug/kg	1,3,5- Trimethyl Benzene ug/kg	Xylenes ug/kg	Lead mg/kg	1,2 DCA ug/kg
1 10-11-94	A-EAST WALL	6'	216	110	27	4200	23,000	ND	ND	9900	<b>2</b> 800	37000	17	ND
2 10-11-94	A-EAST WALL	9'	<b>27</b> 9	49	22	46,000	ND	ND	ND	ND	ND	ND	9.7	NA
3 10-11-94	B-EAST WALL	4'	464	1700	680	ND	18,000	ND	3800	73,000	25,000	74,000	15	ND
4 10-11-94	B-EAST WALL	9'	1 <b>7</b> 8	ND	24	160	6.5	3.9	5.4	5.9	2.0	15.5	5,2	NA
5 10-11-94	C-EAST WALL	4'	454	390	43	ND	3200	ND	400	8500	3500	10,000	7.7	ND
6 10-11-94	C-EAST WALL	8'	ND	ND	21	2.5	1.7	ND	1.7	ND	ND	2.1	11	NA
7 10-11-94	MEOH BLANK			ND	NA	ND	ND	ND	ND	ND	ND	ND	NA	NA
8 10-11-94	D-BASE	9.5'	ND	11	15	1.2	ND	ND	ND	1.9	ND	2.8	11	ND
9 10-11-94	E-BASE	9.5'	ND	ND	12	5.0	1.8	ND	ND	ND	ND	3.9	10	NA
10 10-11-94	F-BASE	10'3"	ND	ND	14	18	5.8	ND	ND	3.8	ND	17	11	ND
1 10 <b>-12-</b> 94	G-BASE	11'	ND	ND	17	ND	ND	ND	ND	ND	ND	ND	12	ND
2 10-12-94	H-BASE	12.5'	1.0	5.6	20	15	ND	ND	ND	3.4	1.7	2.9	12	NA
3 10-12-94	J-SOUTH WALL	4'	151	23	10	ND	89	ND	ND	130	<b>2</b> 90	160	9.3	NA
4 10-12-94	J-SOUTH WALL	8'	106	10	. 28	9700	6.3	ND	ND	1.2	ND	35	11	1.4
5 10-1 <b>2-</b> 94	K-SOUTH WALL	4'	39	17	6.0	5.3	ND	ND	ND	ND	ND	23	19	ND
6 10-12-94	K-SOUTH WALL	7'	ND	ND	25	ND	ND	ND	ND	ND	ND	ND	11	NA
7 10-12-94	MEOH BLANK			ND	NA	ND ·	ND	ND	ND	ND	ND	ND	NA	NA
8 10 <b>-12-</b> 94	L-SOUTH WALL	6'	ND	ND	27	ND	ND	ND	ND	ND	ND	ND	11	ND

EEY:

ppm - parts per million

mg/kg - miligrams/kilogram (equivalent to ppm)

ug/kg - micrograms/kilogram (equivalent to parts per hillion)

NA - Not Analyzed

ND - No Detection

OVM results in ppm - "instrument units as isobutylene"

Shaded = Concentrations above the NR 720 Interim Cleanup Guidelines

## TABLE 3 (continued) OVEREXCAVATION LABORATORY AND ORGANIC VAPOR METER (OVM) SCREENING RESULTS DRAKE'S AUTOMOTIVE SERVICE, INC.

Sample ID Date	Location	Depth	OVM	GRO (mg/kg)	DRO (mg/kg)	Benzene ug/kg	Ethyl Benzene ug/kg	Methyl- Tert Butyl Ether ug/kg	Toluene ug/kg	1,2,4- Trimethyl Benzene ug/kg	1,3,5- Trimethyl Benzene ug/kg	Xylene ug/kg	Lead mg/kg	1,2 DCA ug/kg
9 10-12-94	M-WEST WALL	5'	ND	ND	<b>2</b> 9	ND	ND	ND	ND	ND	ND	ND	8.9	ND
10 10-12-94	N-WEST WALL	4'	ND	ND	ND	ND	ND	ND	ND	1.2	ND	1.5	ND	NA
11 10-12-94	N-WEST WALL	8'	ND	ND	38	ND	ND	ND	ND	ND	ND	ND	9.3	ND
12 10-12-94	O-WEST WALL	5'	ND	ND	26	ND	ND	ND	ND	ND	ND	ND	9.6	ND
13 10-12-94	I-BASE	13'	ND	5.0	42	ND	ND	ND	ND	2.1	ND	3.3	11	ND
14 10-12-94	P-BASE	12'	140	19	42	16,000	ND	ND	ND	ND	ND	ND	9.5	ND
15 10-12-94	Q-BASE	12'	3.0	4.5	17	26	ND	ND	ND	1.6	1.5	2.3	9.9	NA
16 10-12-94	R-BASE	11.5'	ND	ND	13	ND	ND	ND	ND	ND	ND	ND	9.4	NA
1 10-13-94	S-WEST WALL	6.5'	0.5	3.8	21	ND	ND	ND	ND	ND	ND	ND	9.8	ND
2 10-13-94	T-WEST WALL	3.5'	<b>7</b> .0	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.2	NA
3 10-13-94	U-BASE	13'	1.0	9.3	15	ND	ND	ND	ND	1.9	ND	3.3	10	ND
4 10-13-94	V-BASE	<mark>6.5'</mark>	ND	3.8	9.9	1.2	ND	2.4	ND	ND	ND	1.2	9.9	NA
5 10-13-94	W-BASE	11'	ND	4.8	11	ND	ND	ND	ND	ND	ND	ND	9.5	NA
6 10-13-94	X-BASE	7'	ND	3.6	46	ND	ND	ND	ND	ND	ND	ND	9.2	ND
7 10-13-94	MEOH BLANK			ND	NA	ND	ND	ND	ND	ND	ND	ND	NA	NA
1 10-14-94	Y-NORTH WALL	3.5'	17.0	ND	ND	ND	ND	ND	ND	ND	ND	1.4	13	NA
2 10-14-94	Z-NORTH WALL	4'	5.0	ND	ND	ND	9.4	ND	ND	1.7	2.7	<b>2</b> .9	4.0	ND
3 10-14-94	AA-EAST WALL	5'	425.0	180	66	790	9800	ND	ND	24,000	6300	32,000	8.0	NA
4 10-14-94	BB-EAST WALL	4'	103.0	ND	ND	ND	73	ND	ND	ND	ND	5.0	ND	ND
5	MEOH BLANK			ND	NA	ND	ND	ND	ND	ND	ND	ND	NA	NA

ppm - parts per million
mg/kg - milligrams/kilogram (equivalent to ppm)
ug/kg - milligrams/kilogram (equivalent to parts per billion)
NA - Not Analyzed
ND - No Detection
OVM results in ppm + "instrument units as isobutylene"
Shaded = Concentrations above the NR 720 Interim Cleanup Guidelines

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TABLE 1	SOIL FIELD SCREENING &	GRO/DI	RO LAB	ORATO	RY ANA	LYTICAL RES	SULTS-FOR PE	TROLEUM PI	RODUCTS
Sample ID	Sample Location & Soil/Geologic	Sa	mple Colle	ction Metl	hod	Depth Below Tank/Piping	Field Screening	GRO	DRO
#	Description	Grab	Shelby Tube	Direct Push	Split Spoon	(feet)	Result (ppm)	(mg/kg)	(mg/kg)
SS-1	Tank Bed / 3/8" Stone	<b>✓</b>				2' BLS	0.2		
SS-2	Tank Bed / 3/8" Stone	V				2' BLS	0.8		
SS-3	Tank Bed / 3/8" Stone	$\overline{V}$				2' BLS	3.5		
SS-4	Tank Bed / Brown Silty Sand	$\checkmark$				3' BLS	1.5		
SS-5	Tank Bed / Brown Silty Sand	$\checkmark$				2' BLS	0		
SS-6	Tank Bed / Brown Silty Sand	<b>✓</b>				2' BLS	1.4		
SS-7	Tank Bed / Brown Silty Sand	<b>✓</b>				2' BLS	1.4		
SS-8	Tank Bed / Brown Silty Sand	<b>✓</b>				2' BLS	1.8		
SS-9	Piping Trench / Brown Silty Sand	<b>√</b>				3' BLS	3.3		
SS-10	Piping Trench / Brown Silty Sand	\				3' BLS	2.7		
SS-11	Piping Trench / Brown Silty Sand	$\checkmark$				3' BLS	1.9		
SS-12	Piping Trench / Brown Silty Sand	<b>√</b>				3' BLS	2.6		
SS-13	Piping Trench / Brown Silty Sand	<b>√</b>				3' BLS	10.6		
<mark>55-14</mark>	Piping Trench / Brown Silty Sand	<b>✓</b>				3'BLS	<mark>1,504</mark>		

## TABLE 2 SOIL LABORATORY ANALYTICAL RESULTS-FOR PETROLEUM PRODUCTS

Sample ID #	BENZENE	TOLUENE	ETHYLBENZENE	MTBE	TRIMETHYL - BENZENES (TOTAL)	XYLENES (TOTAL)	NAPHTHALENE
	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
SS-1	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-2	< 25	< 25	< 25	< 25	65.6	< 25	114
SS-3	< 25	< 25	< 25	< 25	26.1J	< 25	< 25
SS-4	< 25	< 25	< 25	50.0J	40.0J	< 25	114
SS-5	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-6	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-7	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-8	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-9	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-10	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-11	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-12	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-13	< 25	< 25	< 25	< 25	< 25	< 25	< 25
SS-14	< 200	< 200	3,570	(501J)	55,200	(11,030)	5,890

### K. TANK-SYSTEM SITE ASSESSMENT INFORMATION

$\square$	As a tank-system site assessor	certified under Wis.	<ol> <li>Admin. Code sect</li> </ol>	on Comm 5.83,	it is my opinion th	at there is no indication	of a release
of	a regulated substance to the env	vironment.					

□ Sampling at the site indicates there has been a release to the environment. Pursuant to Wis. Admin. Code section Comm 10.585 (2) (a) and Wis. Stats. section 292.11 (2) (a), the owner or operator or contractor performing work under chapter Comm 10 shall immediately report any release of a regulated substance to the Wisconsin Department of Natural Resources. Failure to do so may result in forfeitures of a minimum of \$10 and a maximum of \$5000 for each violation under Wis. Stats. section 101.09 (5). Each day of continued violation and each tank are treated as separate offenses.

Brian J	. Baile	y
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Tank-System Site Assessor Name (print)

ank-System Site Assessor Signature

1279084

Certification Number #

715-675-9784

Tank-System Site Assessor Telephone Number

7 ~ / /

REI Engineering, Inc.

Company Name

# TABLE 1 SOIL SAMPLE ANALYTICAL RESULTS U.S. PETROLEUM INC - SABRA REHMAN 8004 22ND STREET KENOSHA, WI

	Date>	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	8/13/14	
	,	Sample ID>	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	SS-10	SS-11	SS-12	SS-13	SS-14
	Sample De	epth (Feet)>	2	2	2	3	2	2	2	2	3	3	3	3	3	3
	Non-	NR 140														
1	Industrial	Groundwater														
Petroleum VOC's (mg/kg)	Not-To-	Pathway														
}	Exceed DC	<u>Protection</u>														
	RCL	(DF=2)														
Benzene	1.49	0.0051	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	<0.025	< 0.025	< 0.025	< 0.025	< 0.200
Ethylbenzene	7.47	1.57	<0.025	< 0.025	<0.025	< 0.025	< 0.025	<0.025	< 0.025	< 0.025	< 0.025	<0.025	< 0.025	<0.025	< 0.025	3.57
Toluene	818	1.1072	< 0.025	< 0.025	< 0.025	< 0.025	<0.025	<0.025	< 0.025	< 0.025	<0.025	<0.025	< 0.025	< 0.025	<0.025	<0.200
Xylenes (Total)	258	3.9400	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	<0.025	< 0.025	< 0.025	< 0.025	< 0.025	<0.025	< 0.025	< 0.025	11.03
Methyl tert Butyl Ether	59.4	0.027	< 0.025	< 0.025	<0.025	0.050 <sup>3</sup>	< 0.025	<0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	<0.025	$0.501^{J}$
1,2,4-Trimethylbenzene	89.8	NS	< 0.025	0.066	0.026 <sup>J</sup>	0.040 <sup>J</sup>	< 0.025	<0.025	< 0.025	< 0.025	< 0.025	< 0.025	<0.025	<0.025	< 0.025	41.0
1,3,5-Trimethylbenzene	182	NS	< 0.025	< 0.025	<0.025	<0.025	< 0.025	< 0.025	< 0.025	<0.025	< 0.025	< 0.025	<0.025	< 0.025	< 0.025	14.2
Trimethylbenzenes (Total)	NS	1.3793	< 0.025	<0.025	<0.025	<0.025	<0.025	<0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	<0.025	< 0.025	55.2
Naphthalene	5.15	0.6587	< 0.025	< 0.025	< 0.025	0.114	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	5.89

## Notes:

NR720 Standards Obtained From WDNR Online Excel Database

RCL - NR 720 Proposed Soil Residual Contaminant Level

DC - Direct Contact

< - Concentration below listed laboratory detection limit

NS - No Standard

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

	Bold	Exceeds Non-Industrial Not-To-Exceed DC RCL
	Outline	Exceeds Industrial Not-To-Exceed DC RCL
_	Italic	Exceeds NR 140 Groundwater Pathway Protection