## McKelvey, Jonathan N - DNR

From: O'Connell, Theodore <TOConnell@trccompanies.com>

**Sent:** Monday, January 31, 2022 3:59 PM **To:** McKelvey, Jonathan N - DNR

**Cc:** Alessi, Timothy G - DNR; TeBeest, Sharlene - DOT; Haak, Daniel

**Subject:** RE: [EXTERNAL] Bristol Garage 02-30-563385

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Hi Jonathan,

Thank you for your review of this case. I will review your comments and let you know if I have any questions. We look forward to working with you.

Ted

Ted O'Connell Senior Project Manager



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From: McKelvey, Jonathan N - DNR < Jonathan. McKelvey@wisconsin.gov>

Sent: Monday, January 31, 2022 3:16 PM

**To:** O'Connell, Theodore <TOConnell@trccompanies.com> **Cc:** Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>

Subject: [EXTERNAL] Bristol Garage 02-30-563385

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

Good afternoon Ted,

After a preliminary review of your Case Closure submittal, the DNR would like to request the following:

The contamination identified during the site investigation does not appear to be related to the reported discharge. The following is needed to complete the conceptual site model:

• Case Closure Documentations Revisions:

- General Site Information and Site History
- BRRTS activity name on submittal should match the name for the activity on BRRTS
- BRRTS activity name listed on submittal as *WI DOT Bristol Garage*. This should be changed to reflect the BRRTS activity name as listed on BRRTS, *Bristol Garage*.
- Describe how and when site contamination was discovered.
- TRC indicated that two vehicle hoists were investigated as a part of the investigation, however, contaminants of concern related to a former vehicle hoist were not evaluated. Provide an explanation of the sampling locations and parameters and/or remove the language suggesting the vehicle hoist is a source.
- Site Investigation Summary (Form 4400-202)
- Soil
- B.i: Describe degree and extent of soil contamination. Relate this to known or suspected sources and known and potential receptors:
- During TRC's investigation, selenium (at GP-8, GP-9, and GP-10) was detected above Wis. Admin. Code ch. NR 720 (NR 720) groundwater pathway residual contaminant levels (RCLs). It appears that selenium may not be directly related to the discharge and is likely related to background conditions. Provide a discussion on how the selenium detected in the Right-of-Way does not pose an environmental risk and could be considered background conditions. This should also be updated in the "Remedial Actions Implemented and Residual Levels at Closure

E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure." section of the Closure Form

Lead was detected in GP-14 at 2-4' above the Background Threshold Value and above NR 720 groundwater
pathway RCLs. It appears that arsenic may not be directly related to the discharge and is likely related to
background conditions. Provide a discussion on how the lead detected in the Right-of-Way does not pose an
environmental risk and could be considered background conditions. This should also be updated in the
"Remedial Actions Implemented and Residual Levels at Closure

E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure." section of the Closure Form

- Groundwater
- C.i: Describe degree and extent of groundwater contamination.
- During the Site Investigation only one round of groundwater samples was collected from GP-3 and GP-4. GP-4
  detected arsenic above the NR 140 Preventative Action Limit and is located in a low area of the site. Provide an
  explanation why the arsenic impacts do not pose an environmental risk and could be considered background
  conditions.
- NR 140 PAL exemption request should be removed if the arsenic exceedance at GP-4 is related to background conditions and not associated with the reported discharge.

- **Tables and Figures**
- Table 5.ii
- The box under "ROW" that indicates that an ROW has been affected should be unchecked as the ROW is the source property.
- Modification to existing maps
- Confirm parcel boundaries on included figures to depict all 5 parcels with parcel numbers.

If you have any questions please do not hesitate to contact me.

Thank you,

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Jonathan McKelvey

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