



May 22, 2023

AMIN BHIMANI  
MILWAUKEE CLARK INC.  
2434 WEST NATIONAL AVE  
MILWAUKEE WI 53204  
*{electronically sent to [AYSS786@GMAIL.COM](mailto:AYSS786@GMAIL.COM)}*

Subject: Review of Site Investigation Work Plan:  
Clark Gas Station  
4751 N. Santa Monica Blvd., Milwaukee, WI  
DNR BRRTS Activity # 03-41-589630  
DNR FID # 241574850

Dear Mr. Bhimani:

The Wisconsin Department of Natural Resources (DNR) has reviewed the Site Investigation Work Plan (SIWP) dated September 15, 2022 and an Addendum to the SIWP (Addendum) dated November 2, 2022 for the Clark Gas Station site referenced above (Site). The SIWP and Addendum were submitted on your behalf by OM Enterprises Inc. (OME). A review fee as per Wisconsin Administrative (Wis. Admin.) Code ch. NR749 was provided with the SIWP. Please excuse the time delay in receiving this letter which is due to an administrative error.

The DNR reviewed the SIWP on October 13, 2022 and determined it was incomplete as per the requirements of Wis. Admin. Code § NR 716.09. On October 14, 2022 the DNR emailed a summary of additional information required to make a determination on the SIWP. This request included (abbreviated):

- A figure depicting the former area of where residual soil and groundwater contamination from closed site 03-41-000450 is located in relation to the proposed boring/wells in the SIWP. It was also advised to show the location of samples from the 2022 tank system site assessment (TSSA) that exceeded NR 720 residual contaminant levels.
- Provide a narrative on how the locations of the 4 borings/wells will aid in the site investigation objectives of determining degree and extent of contamination from the recent release and how they will be used to evaluate the new discharge in relation to the residual contamination from the closed site. It was noted the closest proposed boring/well to either contaminated sample location (S-1 & S-11) collected in the 2022 TSSA is 30 feet as measured from the scaled figure in the SIWP.
- Provide disposal documentation of soil transported to landfill as noted in the 2022 TSSA.
- In an email to me on 9/29/22, OM Enterprises Inc. proposed to rehab the abandoned well B-1/MW-1 associated with 03-41-000450 in lieu of drilling/installing proposed well MW-4. It is the DNR's experience rehabilitating a monitoring well full of bentonite

On November 2, 2022 the Addendum was submitted to the DNR by OME. The Addendum was reviewed by the DNR on December 1, 2022.

The DNR determined the SIWP and Addendum has not provided all the information required in Wis. Admin. Code § NR 716.07 *Site Investigation Scoping* or Wis. Admin. Code § NR 716.07 *Site Investigation Work Plan*. The DNR has the following comments on the SIWP and the Addendum:

- The SIWP and the Addendum are not tailored to the investigation of the new hazardous substance discharge reported on April 20, 2022. Site investigation planning should follow the Site Investigation Scoping section of Wis. Admin. Code § NR 716.07 to formulate a site conceptual model and focus the investigation to the new hazardous substance discharge. This can be an iterative process starting out much simpler than the workplans submitted.
- The SIWP and Addendum contain much information that is not typically necessary for site investigation of a hazardous substance discharge from an underground storage tank system that has previously been investigated and remediated. Wis. Admin. Code § NR 716.01 states, “Nothing in this Chapter shall be construed to require plans or reports that are more detailed or complex than is justified by the known scope of contamination or the complexity of the site or facility. The large amount of extraneous information in the SIWP and Addendum makes it difficult for the DNR to review and provide guidance. Future submittals should limit the amount of information provided to meet the requirements of Wis. Admin. Code § NR 716 with consideration to the complexity of the hazardous substances discharge.
- Figures provided were not to scale, this is a requirement of Wis. Admin. Code ch. NR 716.
- Monitoring well construction must follow requirements in Wis. Admin. Code ch. NR 141.

If you wish to resubmit a revised SIWP to the DNR for review and comment, please provide an additional fee for review. If you choose to proceed without further DNR review and comment, you are reminded that all future submittals will need to be completed per the appropriate Wis. Admin. Code requirements. To assist you in SIWP and site investigation report (SIR) submittals in the future:

- Link to SIWP checklist <https://dnr.wi.gov/files/PDF/forms/4400/4400-316.pdf>.
- Link to SIR checklist <https://dnr.wi.gov/files/PDF/forms/4400/4400-317.pdf>.

If you have any questions regarding the content of this letter, please feel free to contact me at (715) 701-9383 or by email at [johnt.hunt@wisconsin.gov](mailto:johnt.hunt@wisconsin.gov).

Sincerely,



John T. Hunt  
Hydrogeologist  
Remediation & Redevelopment Program

CC: Raghu Singh, OM Enterprises Inc. ([raghuom@gmail.com](mailto:raghuom@gmail.com))