From:	McIlheran, Adam S - DNR
To:	Lesko, Robin A - DNR
Subject:	FW: Information Request for RAOR Review, CNH Lakeside Property, Mount Pleasant, WI, FID 252004170
Date:	Monday, October 31, 2022 8:38:10 AM
Attachments:	Table 7 REV CNH Groundwater Monitoring Plan.pdf 20221031_BTF.pdf

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Rob,

Please add this email and table to BRRTS as a AC99.

Thanks,

Adam

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Adam McIlheran
Phone: (414) 207-2179
Adam.McIlheran@wisconsin.gov

From: Julie A Zimdars <Julie.Zimdars@ramboll.com>
Sent: Friday, October 28, 2022 3:20 PM
To: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Cc: Nathaniel R Keller <Nate.Keller@ramboll.com>; troy.williams@cnhind.com; Tomasi, Pete <ptomasi@foley.com>
Subject: FW: Information Request for RAOR Review, CNH Lakeside Property, Mount Pleasant, WI, FID 252004170

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Hi Adam – Our responses to your questions are underlined below.

Please let us know if you have further questions.
Thanks!
Julie

From: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Sent: Monday, October 17, 2022 11:33 AM
To: Julie A Zimdars <Julie.Zimdars@ramboll.com>
Subject: Information Request for RAOR Review, CNH Lakeside Property, Mount Pleasant, WI, FID 252004170

Julie,

A few items came up in my review that could use some clarification. They are:

Proposed site-specific cap modification process:

- Would this process apply only to the site prior to all cases onsite included in the cap being closed? After that they usually have to follow the Post Closure Modification process.

  Yes, CNH would apply this procedure to cap modifications prior to requesting closure of the applicable BRRTS cases. Once these cases are closed, a cap modification would follow NR 727 Post Closure Modification process.

- The language appears to state that a NR 718 exemption would not be required when criteria warrant it. Please clarify if that is the intent.

  CNH's intent is to use existing soil sampling data to demonstrate on-site management of soil is acceptable, and to conduct "like-on-like" type of management. In some cases, the material has already been approved for placement under the cap via previous NR718 submittals, so movement under the cap is consistent with these previous NR718 submittals. The previously characterized fill soil existing under the cap that may be proposed to be relocated to a similar location and depth under the cap is expected to be approved and so a notification to WDNR versus a formal submittal, fee and awaited review would expedite and streamline the process. The same logic also applies to characterized soil outside the cap that may be proposed to be moved to similar location and depth outside the cap. CNH is suggesting that a framework of requirements and a notification process would be established and provided to WDNR in these cases. We understand that moving soil to within 300 feet of the lake does not fall in the streamlined notification-type approach nor would we expect a streamlined approach to be used for other soil management that's not "like-on-like".

- Clarify what WAC Code or Statute you are citing as allowing this site-specific process. It does not appear to fall under Wis. Stat. Ch. 292.12(6), for instance.

  We believe this is authorized by **NR 724.05(2)(d)2 and NR 724.05 (3)(a).** We are proposing this "prior-to-closure" site-specific cap modification process given this is a large site with a large cap area and understanding that CNH proposes to develop the site in a step-wise approach versus a large-scale one-time development plan. The intent is to keep WDNR informed of cap modifications that may occur but not be restrictive or burdensome to the development process (for CNH or WDNR). WDNR could potentially assist in referencing or providing examples of similar sites where a process such as this was used (large site with a cap, developed in a step-wise approach). Under NR 724.05 General Submittal Requirements specifically **NR 724.05 (3) (a) Level of Detail** is cited which 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". Also a streamlined approach is cited under, **NR 724.05(2)(d)2.** "At sites or facilities where multiple remedial or interim actions are taken, all of the following requirements apply: The design report required by NR 724.09 and the design plans and specifications required by NR 724.11 that are prepared for subsequent remedial or interim actions may include the design

details for the subsequent action **without repeating** design work that was included in previous submittals to the department for other remedial or interim actions."

Proposed groundwater monitoring plan:

- Table 7 (Revised Table 7 attached):
  - State what analyses will performed on samples collected from LBMW-2, table is blank in that cell.

    The table has been revised to include analysis for PCBs, PAHs and arsenic and lead.

-
  - Why does table indicate "likely" analyses, and not what is planned or requested for approval?

    The table has been revised to substitute "planned" for "likely".

-
  - CFMW-3 and CFMW-4: are these active wells to be used for monitoring? They do not appear to be included on the table. Were they, or will they be abandoned?

    CFMW-3 and CFMW-4 monitoring wells are active for use as water level monitoring only, since there is another well nearby each of these that is being monitored for chemical parameters. They have been included in the revised table. If either well is damaged beyond repair in the near term or in the future, it will be abandoned and not replaced.

Emerging contaminants evaluation:

- If an emerging contaminants evaluations has not been complete for the open cases included in the RAOR, that should be submitted. If it has been completed, identify in which submitted document. 1,4 dioxane was present in groundwater and was planned to be sampled as part of groundwater monitoring. Clarify what is believed to be the source of 1,4, dioxane previously detected on-site and which open case or cases it is associated with.

  CNH will soon be submitting a formal response with the emerging contaminants evaluation for WDNR review. CNH has sampled for one emerging contaminant 1,4 dioxane, a stabilizer for chlorinated compounds. 1,4 dioxane was sampled at select wells in known areas of chlorinated impacts in groundwater. It was detected above the PAL but below the ES in the area of the Industrial Chemical Storage (ICS) BRRTS case, and so it appears to be a potential contaminant of concern with this BRRTS, a possible source being the chlorinated chemical spill area. We will be monitoring for 1,4 dioxane at all wells in the ICS and Former AST vault area in Fall 2022. The intent is to assess whether it is or is not a contaminant of concern for these 2 open BRRTS cases that have CVOC groundwater impacts. Based on these results, we will attempt to narrow down sampling for 1,4 dioxane in 2023 to only wells that have PAL exceedances (note on this plan added to revised Table 7).

Other items:

- It was not clearly stated in the maintenance plan if vegetation will be removed from RCA

material cover of the inner track area or that herbicide will/will not be used.

CNH's intent is to have the use of the RCA material of the inner track substantially manage the establishment of vegetation. In the case where some areas are not used as much and vegetation is established, a herbicide will be used in those locations and only as needed. This "as-needed" application of herbicide will be added to the maintenance plan.

- Clarify what the total volume or planned estimated total volume of PCB-impacted material placed under the Upland Cap will be. It was not clear if that was shown in the RAOR tables or a past submittal.

The estimated total volume of PCB-impacted material placed under the Upland Cap is 270,000 cy.

- When is the Arsenic excavation on City property planned to be completed?

The arsenic excavation was completed in late July/early August 2022, and removed a total of approximately 1,660 cy which was mainly managed on-site under the cap per the SW1A/SW1B NR 718 exemption approvals. 160 tons of higher arsenic concentrations was landfilled (>38 mg/kg). Additional samples were collected as needed for verification that the top 4 feet of soil containing arsenic greater than the BTV was removed. It was backfilled with coarse (up to 3", very few fines) recycled concrete fill (exempt under 500.08(2)(a)) and tested to have non-detectable PCBs). The location and use was verified with Jerry DeMers.

If you have any questions, let me know.

Regards,

Adam

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Classification: Confidential

Table 7 - Post-Remedial Well Monitoring Network
Comprehensive Remedial Action Options Report and Remedial Design Report
CNH Industrial Lakeside Property
Village of Mount Pleasant, Racine County, Wisconsin

Sample Group	Well ID	Well Status	Planned Analyses	Approximate Depth to Water (ft)	Well Depth (ft)	Justification / BRRTS Case
Sitewide GW Quality	CFMW-1	Active	PAHs, PCBs, RCRA-Metals	10	16.2	Monitor downgradient of Champion Fill, Foundry Sand.
	CFMW-2	Active	PAHs, PCBs, RCRA-Metals	5	14.6	
	CFMW-3	Active	Water Level Only	4	14.8	Provide control for groundwater flow contours
	CFMW-4	Active	Water Level Only	7	14.8	Provide control for groundwater flow contours
	CFMW-5	Active	VOCs, RCRA-Metals	10	14.2	Monitor downgradient of Champion Fill and PCE exceedance at CFMW-6, on-site management material
	CFMW-6	Active	VOCs, RCRA-Metals	7	14.6	
	CFMW-7	Active	VOCs, RCRA-Metals	6	14.5	
	CFMW-8	Abandoned 2021 [1]	-	-	-	
	CFMW-9	Abandoned 2021, replaced with LBMW-1 [1]	Lead (dissolved) and pH	15	18.9	
	CFMW-10	Active	PAHs, PCBs, RCRA-Metals	6	14.4	Monitor downgradient of Champion Fill and Oils Application, on-site management material
	CRA-7	If located, to be abandoned[2]	-	-	-	
	GMMW-2	Abandoned 2021 [1]	Lead (dissolved) and pH	15	21.3	Monitor upgradient and downgradient, Foundry Sand, chemical storage area, oils application
	GMMW-3	Active	PAHs, PCBs, RCRA-Metals	~20	24.5	
	GMMW-4	Active	PAHs, PCBs, RCRA-Metals, VOCs	12	22.0	
	GMMW-5	Active	Water Level Only	5	15.0	
	PZ-3	If located, to be abandoned[2]		-	-	
	RMT-3	To be abandoned	PAHs, PCBs, RCRA-Metals, VOCs	-	13.0	
	RMT-5	Active	PAHs, PCBs, RCRA-Metals, VOCs	3	13.0	Oils Application monitoring, Arsenic exceedance at RMT-5, on-site management material
	RMT-11R	Active	PAHs, PCBs, RCRA-Metals, VOCs	9	14.7	Upgradient well
	RMT-12	If located, to be abandoned[2]	-	-	-	
	RMT-13	To be abandoned and replaced as RMT-13R	PAHs, PCBs, RCRA-Metals	38	47.0	Foundry Sand monitoring
	RMT-14	Active	Water Level Only	9	15.0	Provide control for groundwater flow contours
	RMT-15	Active	Water Level Only	6	15.0	
	RMT-16	Unlocatable, likely currently under stockpile	Water Level Only	5	15.0	
	RMT-17	Active	PAHs, VOCs, RCRA-Metals	9	14.7	Monitor downgradient of Champion Fill, sitewide GW quality monitoring
	RMT-18	Active	PAHs, VOCs, RCRA-Metals	4	12.8	
	RMT-19	Abandoned	-	-	-	
	TW01	Active	Water Level Only	2	12.2	Provide control for groundwater flow contours, upgradient well
	TW02	Active	PAHs, PCBs, RCRA-Metals, VOCs	1	12.0	Oils Application monitoring, on-site management material
	TW03	Active	Water Level Only	2	12.2	Provide control for groundwater flow contours
	TW04	Active	Water Level Only	2	12.2	Provide control for groundwater flow contours
	TW06	Active	Water Level Only	2	12.2	Provide control for groundwater flow contours
	LBMW-1	Active	Lead (dissolved) and pH	11	18.0	Provide monitoring of post remedial conditions within the Lower Bluff and down gradient monitoring of Sludge Drying Area
AST Vault	ASTTW-1	Active	CVOCs, 1,4 Dioxane [3], MNA parameters	6	12.0	Monitoring natural attenuation of the former above ground storage tank vault area
	ASTTW-2R	Active		2	13.9	
	ASTTW-3	Requires repair as of April 2022		7	-	
	ASTTW-4	Active		7	15.0	
	RMT-9	Active		6	13.0	
	RMT-10	If located, to be abandoned [2]		9	15.0	
	RMT-20	Active		-	-	
	RMT-21	Active		3	13.0	
ETA	ETA-MW1	Active	PVOCs, PAHs, MNA parameters	9	16.0	Monitoring of the Lakeside Building Eastern UST area
	ETA-MW2	Active		16	20.0	
	ETA-MW3	Active		14	20.0	
	TW05	To be abandoned for UST removal, likely replaced	Water Level, NAPL thickness	9	13.0	
	TW07	Active, dry	Water Level	15	19.4	Provide control for groundwater flow contours, monitoring of Lakeside Building UST area and potential free product
Industrial Chemical Storage Area	ICS-MW4	Active	CVOCs, 1,4-Dioxane [3], MNA parameters	8	15.0	Monitoring natural attenuation of the former chemical storage area
	ICS-MW5	To be Abandoned, replaced as of April 2022		8	15.0	
	ICS-MW5R	Active		8	15.0	
	ICS-MW6	To be Abandoned, replaced as of April 2022		9	15.0	
	ICS-MW6R	Active		9	15.0	
	ICS-MW7	Active		9	15.0	
	ICS-MW8	Active		9	15.0	
Sludge Drying Area	SDAMW-1	Active	Lead (dissolved) and pH	36	44.0	Monitoring for lead and other COCs following sludge/soil removal and effectiveness of infiltration barrier
	LBMW-1	Active Installed 2022	Arsenic, Lead (diss.), PCBs, PAHs	11	17.0	Monitoring groundwater in Lower Bluff following the PCB/petroleum excavation, Foundry Sand
Fuel Oil / Power House	FOMW-3	Abandoned 2021 [1]	-	-	-	
	FOMW-4	Abandoned 2021 [1]	-	-	-	
	FOMW-5	Abandoned 2021 [1]	-	-	-	
	FOMW-6	Abandoned 2021 [1]	-	-	-	
	FOMW-7	Abandoned 2021 [1]	-	-	-	
	FOMW-8	Abandoned 2021 [1]	-	-	-	
	LBMW-2	To be Installed	Arsenic, Lead (diss.), PCBs, PAHs	-	-	Monitoring groundwater in Lower Bluff following the PCB/petroleum excavation, Foundry Sand, Former Power House AST

[O:SJM 5/22; C: KRN 5/31/22; U: SJM 6/6/22, JAZ 6/22, 10/22]

Notes:
1. Well construction forms and abandonment documentation are included in Appendix N
2. Monitoring well location and status undetermined as of 2021 due to movement of materials on site. If well is found during 2022 construction activities or in future land development, will require abandonment.
3. Planned monitoring for 1,4 dioxane at all wells in the ICS and Former AST vault area in Fall 2022. Narrow down sampling for 1,4 dioxane in 2023 to only wells that have PAL exceedances.