From:	Pomes, Michael
To:	McIlheran, Adam S - DNR
Cc:	Carey, Angela J - DNR; Ramanauskas, Peter; Graczyk, Lisa (she/her/hers); Lane, Emily
Subject:	RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)
Date:	Monday, November 25, 2024 1:02:49 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png

---

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Adam—

The EPA will have no additional comments on the Remedial Action Documentation Report received on 3/4/2024. I read the Executive Summary and scanned parts of the NR 724 Remedial Action Documentation Report (Part 1 of the sequence of report files) and found the report to be satisfactory and thorough.

Go ahead and finalize the WDNR approval letter – It is good to go.

Thanks,

Michael L Pomes, Ph.D. PG
Physical Scientist
Corrective Action Section 1
Remediation Branch
Land, Chemicals & Redevelopment Division

U.S. Environmental Protection Agency Region 5
LCRD-RB-CAS1
Mail Code LR-16J
77 West Jackson Boulevard
Chicago, Illinois 60604
Pomes.michael@epa.gov

Phone: 312-886-2406

Kansas Professional Geologist PG 168
AMPP/NACE Cathodic Protection Technician CP2 Cert. 9100

AMPP/NACE Cathodic Protection Tester CP1 Cert. 9100

From: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Sent: Thursday, November 21, 2024 9:37 AM
To: Pomes, Michael <pomes.michael@epa.gov>
Cc: angela.carey@wisconsin.gov; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Graczyk, Lisa (she/her/hers) <graczyk.lisa@epa.gov>; Lane, Emily <Lane.Emily@epa.gov>
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Sounds good, thanks for the update.

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

Our core values include professionalism, integrity, and customer service.
Please visit our survey to provide feedback on your experience interacting with any DNR employee.

From: Pomes, Michael <pomes.michael@epa.gov>
Sent: Thursday, November 21, 2024 9:20 AM
To: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Cc: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Graczyk, Lisa (she/her/hers) <graczyk.lisa@epa.gov>; Lane, Emily <Lane.Emily@epa.gov>
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Adam—

We at EPA definitely did receive the link to the Remedial Action Documentation Report on 3/4/2024. We apologize for missing that email. Downloading of the files to my EPA computer has started – 20240215_99_Info_Rcvd_Part_1_of_6.pdf came in with 102,092 KB and 3478 pages. Downloading for the remaining five files has completed.

EPA has no additional concerns about a soil management plan. As described below, one is in place for future activities requiring approval by WDNR.

I will get back with you by early next week on any additional review work that EPA may do on the RADR.

Thanks,

Michael L Pomes, Ph.D. PG
Physical Scientist
Corrective Action Section 1
Remediation Branch
Land, Chemicals & Redevelopment Division

U.S. Environmental Protection Agency Region 5
LCRD-RB-CAS1
Mail Code LR-16J
77 West Jackson Boulevard
Chicago, Illinois 60604
Pomes.michael@epa.gov

Phone: 312-886-2406

Kansas Professional Geologist PG 168
AMPP/NACE Cathodic Protection Technician CP2 Cert. 9100
AMPP/NACE Cathodic Protection Tester CP1 Cert. 9100

From: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Sent: Wednesday, November 20, 2024 3:56 PM
To: Pomes, Michael <pomes.michael@epa.gov>
Cc: angela.carey@wisconsin.gov; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Graczyk, Lisa (she/her/hers) <graczyk.lisa@epa.gov>; Lane, Emily <Lane.Emily@epa.gov>
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Michael,

Thank you for reviewing the letter. Regarding your two questions:

1. The RADR was submitted to DNR initially on 1/19/24 and resent on 2/15/24 with formatting errors corrected. Ramboll (CNH's consultant) was instructed to copy EPA on the report also. The DNR link to it can be found on DNR BOTW for the site here, it is the multi document pdf dated 2/15/24 (referenced in the first attached email). Since it was a very large document, it could not be sent by email but accessed by a link which Ramboll sent to EPA. An email with the link was included in the second attached email. DNR & EPA had a meeting regarding the status of the site and RADR in late February.

2. Regarding submittal of a soil management plan for any future construction or restoration activities: Yes they have to notify the DNR of any planned soil disturbance activities onsite and in complying with either a NR Ch. 718 exemption or NR Ch. 726 Post-Closure Modification they would have to submit and describe a plan for soil management for the planned activities prior to DNR approving the work.

Just to clarify, will you be conducting any further review of the RADR and EPA providing any additional comments regarding the adequacy and completeness of the report? I just wanted to confirm this before the letter is finalized and sent to CNH.

Thanks,

Adam

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

Our core values include professionalism, integrity, and customer service.
Please visit our survey to provide feedback on your experience interacting with any DNR employee.

From: Pomes, Michael <pomes.michael@epa.gov>
Sent: Tuesday, November 19, 2024 10:46 AM
To: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Cc: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Graczyk, Lisa (she/her/hers) <graczyk.lisa@epa.gov>; Lane, Emily <Lane.Emily@epa.gov>
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Adam—

I competed my review of the attached letter and made no comments on it. Overall, the letter looks satisfactory.

However, I did note two things while reviewing the letter:

- Page 1, Paragraph 1 -- Did the EPA receive the Remedial Action Documentation Report (RADR)?

- Page 2 -- Contaminated Material Management & Site Restoration -- Will a soil management plan be instituted and followed for any future construction or restoration activities?

Please be sure to send us a copy of the RADR report or resend the email containing the RADR report in case I missed that email.

Here is the answer to the question you posed about the timing of recording the deed notice. EPA concurs with having the recording of the deed notice done at the time of the Continuing Obligations if that proves to be more efficient.

Let us know if you have any additional questions.

Thanks,

Michael L Pomes, Ph.D. PG
Physical Scientist
Corrective Action Section 1
Remediation Branch
Land, Chemicals & Redevelopment Division

U.S. Environmental Protection Agency Region 5
LCRD-RB-CAS1
Mail Code LR-16J
77 West Jackson Boulevard
Chicago, Illinois 60604
Pomes.michael@epa.gov

Phone: 312-886-2406

Kansas Professional Geologist PG 168
AMPP/NACE Cathodic Protection Technician CP2 Cert. 9100
AMPP/NACE Cathodic Protection Tester CP1 Cert. 9100

From: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Sent: Friday, November 15, 2024 12:02 PM
To: Pomes, Michael <pomes.michael@epa.gov>
Cc: angela.carey@wisconsin.gov; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Graczyk, Lisa (she/her/hers) <graczyk.lisa@epa.gov>
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Sounds good, thanks for the update.

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

Our core values include professionalism, integrity, and customer service.
Please visit our survey to provide feedback on your experience interacting with any DNR employee.

From: Pomes, Michael <pomes.michael@epa.gov>
Sent: Friday, November 15, 2024 12:00 PM
To: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Cc: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Graczyk, Lisa (she/her/hers) <graczyk.lisa@epa.gov>
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Adam—

Thank you for checking up on your email of 8/16/2024. I completed the review of the letter today and am waiting on input about my comments from Peter Ramanauskas, R05-LCRD-RB-CAS1 Chief, and our PCB specialist, Lisa Graczyk, R05-LCRD-LCB-WMS, at the EPA. We

will be in touch once I hear back from them.

Thanks,

Michael L Pomes, Ph.D. PG
Physical Scientist
Corrective Action Section 1
Remediation Branch
Land, Chemicals & Redevelopment Division

U.S. Environmental Protection Agency Region 5
LCRD-RB-CAS1
Mail Code LR-16J
77 West Jackson Boulevard
Chicago, Illinois 60604
Pomes.michael@epa.gov

Phone: 312-886-2406

Kansas Professional Geologist PG 168
AMPP/NACE Cathodic Protection Technician CP2 Cert. 9100
AMPP/NACE Cathodic Protection Tester CP1 Cert. 9100

From: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Sent: Thursday, November 14, 2024 3:11 PM
To: Pomes, Michael <pomes.michael@epa.gov>
Cc: angela.carey@wisconsin.gov
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael,

I was just checking in on this letter review from August. Let me know if any questions come up in your review.

Regards,

Adam

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

Our core values include professionalism, integrity, and customer service.
Please visit our survey to provide feedback on your experience interacting with any DNR employee.

From: Pomes, Michael <pomes.michael@epa.gov>
Sent: Friday, August 16, 2024 9:19 AM
To: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Cc: Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Lane, Emily <Lane.Emily@epa.gov>; Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
Subject: RE: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Adam—

The U.S. Environmental Protection Agency Region 5 acknowledges receipt of the Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251). We will get back with you with our comments and concerns.

Thanks,

Michael L Pomes, Ph.D. PG
Geologist
Corrective Action Section 1
Remediation Branch
Land, Chemicals & Redevelopment Division

U.S. Environmental Protection Agency Region 5
LCRD-RB-CAS1
Mail Code LR-16J
77 West Jackson Boulevard
Chicago, Illinois 60604
Pomes.michael@epa.gov

Phone: 312-886-2406

Kansas Professional Geologist PG 168
AMPP/Nace Cathodic Protection Technician CP2 Cert. 9100
AMPP/Nace Cathodic Protection Tester CP1 Cert. 9100

From: McIlheran, Adam S - DNR <Adam.McIlheran@wisconsin.gov>
Sent: Friday, August 16, 2024 9:11 AM
To: Pomes, Michael <pomes.michael@epa.gov>
Cc: Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Lane, Emily <Lane.Emily@epa.gov>; angela.carey@wisconsin.gov; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
Subject: Draft RADR Approval Letter for Review, CNH Lakeside Property, Mount Pleasant, WI - WID 000 808 287 (BRRTS 02-52-554251)

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Michael,

Attached for your review and comment is a draft Remedial Action Documentation Report review letter for the CNH Lakeside property in Mount Pleasant, WI. The report was submitted to DNR & USEPA earlier this year. DNR concurs the report is generally adequate for documenting the remedial actions.

One clarification we would like to check with EPA on is the timing of the required deed notice recording (for the barrier cap), whether it can be finalized when we place COs at closure or if EPA requires it to be recorded when the RADR is approved. We can then let CNH know accordingly.

If you have any questions at all on the letter feel free to contact me.

Thank you,

Adam

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Adam McIlheran
Hydrogeologist – Remediation & Redevelopment Program
Wisconsin Department of Natural Resources
Southeast Region, Milwaukee Service Center
1027 West St. Paul Avenue
Milwaukee, WI 53233
Phone: (414) 207-2179

Adam.McIlheran@wisconsin.gov

dnr.wi.gov