From: O"Connell, Theodore
To: Romfoe, Elizabeth A - DNR
Cc: Voit, Angela; DOT Hazmat Unit; Malsom, Andrew - DOT
Subject: RE: [EXTERNAL] WI DOT STH 38 and West St - UST [03-52-577432] - WisDOT ID 0656-50-30
Date: Thursday, March 27, 2025 10:49:32 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.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.

Hi Ellie,
Responses to your questions/comments are below in blue. After your review, please let me know if you would like to discuss via a call before we make any revisions to the SIR and upload to the portal.

Thanks,

Ted O'Connell
Senior Project Manager

TRC

999 Fourier Drive, Suite 101, Madison, WI 53717
C 608.630.6710 | toconnell@trccompanies.com
LinkedIn | Instagram | TRCcompanies.com

From: Romfoe, Elizabeth A - DNR <elizabeth.romfoe@wisconsin.gov>
Sent: Thursday, March 6, 2025 8:21 AM
To: O'Connell, Theodore <TOConnell@trccompanies.com>
Subject: [EXTERNAL] WI DOT STH 38 and West St - UST [03-52-577432]

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

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Good morning Ted,

On January 18, 2025, the DNR received the document titled *Site Investigation Report* (SIR) and reviewed it for compliance with Wis. Admin. Code ch. NR 716. The DNR is requesting the following additional information to support the SIR review:

I. Given the concentrations found in sidewall sample, SW-6, justify that additional sampling is not needed in the northeast direction and describe why you believe that the impacted soil does not extend further than 6-10 feet onto the adjacent property. Additional lines of evidence could include the direction of groundwater flow and the concentrations found at SW-5.

The sidewall sample SW-6 was collected from the area where the former UST piping was found to be present, as such it does not represent contamination associated with the former UST, but rather the piping itself. The location and extent of the piping still present on the adjacent property (1730 State Street) is unknown. However further investigation of the piping, or any soil/groundwater contamination associated with the piping still present or other impacts associated with the former filling station at 1730 State St is not the responsibility of WisDOT. As discussed in the background section of the SIR and as documented by Giles (https://apps.dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=274536&docName=20231218_112_DERP_Change_Order.pdf&docDsn=549890), the original use of the 1730 State St property was a filling station. The location of the former filling station structures was identified by Giles and this information is included in Appendix E of TRC's SIR. The information regarding the former filling station structures will be added to Figure 3 to aid in this discussion. There is evidence of additional PVOC impacts on the 1730 State St property that is located "upgradient" from the ROW, however these impacts have not been fully investigated by the property owner at this time.

II. The May 8, 2024, groundwater sample collected from MW-6 shows an increasing concentration of benzene which was followed

by a J-flagged detection in August of the same year. If WisDOT is willing to accept a residual groundwater continuing obligation (CO), the DNR will not require an additional sample. However, if WisDOT would like to pursue closure without this CO, an additional sample will be needed to confirm that benzene is below the enforcement standard.

Currently, closure with continuing obligation for residual groundwater at the site is appropriate. As there are documented upgradient PVOC impacts in soil and groundwater at 1730 State St and the remaining piping adjacent to MW-6, it would be expected to have intermittent detections of VOCs in groundwater at MW-6. DNR has requested the RP of 1730 State St to conduct additional investigations at 1730 State St to further define the degree and extent of contamination. Should additional groundwater monitoring results show that GW at MW-6 is no longer impacted the CO related to groundwater could be removed for this Site.

III. The concentration of naphthalene at SW-6 (8.8 ppm), remains undefined and appears to be within 30 feet of the adjacent building. Provide an updated vapor screening evaluation to assess if vapor sampling in the adjacent building is warranted.

As discussed above, the delineation of PVOC contamination to the northeast is the responsibility of the RP for 1730 State St, not WisDOT. Additionally, the 30 feet of horizontal separation from a building only applies when NAPL is present. The guidance uses 5.5 ppm as an INDCATOR that NAPL may be present. However, this area was fully exposed during the UST removal and over-excavation as well as during construction for the storm sewer replacement and no NAPL was encountered, therefore the 30-foot set back is not applicable. Additionally, the building at 1730 State St has already been assessed for VI (both sub-slab and indoor air). The initial sub-slab sampling detected high concentrations of CVOCs but did not detect PVOCs. Due to the sub-slab CVOC concentrations a SSDS was installed by the RP in July 2023 (https://apps.dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=274536&docName=20231218_112_DERP_Change_Order.pdf&docDsn=549890). With the VI mitigation system in place no further VI evaluation is necessary for this property.

IV. Add the location and depth of the utilities on the cross-section(s) to assess the utilities as potential migration pathways in your interpretation of the extent of soil and groundwater contamination.

Utilities will be added to the cross-section.

The DNR will pause its review of the SIR until the above information is provided. Please submit the requested information to the DNR via the submittal portal.

Additionally, the DNR made the following administrative changes to this contamination site:

- The activity name has been revised to "WI DOT STH 38 and West St - UST" to reflect the source of the reported contamination.
- The Facility Identification (FID) number has changed to separate it from the adjacent BRRTS site. The new FID is 252307330.

In all future submittals and communications for this site, use the revised activity name and FID number, in addition to the BRRTS number.

Please let me know if you have any questions.

Thank you,
Ellie Romfoe

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

Elizabeth Romfoe
She/Her/Hers
Hydrogeologist – Remediation and Redevelopment
Wisconsin Department of Natural Resources
Phone: (414) 335-4473
elizabeth.romfoe@wisconsin.gov

dnr.wi.gov