MONTGOMERY WATSON

October 27, 1994

RECEIVED
OCT 28 1994
DEPT. OF NATURAL RESOURCES
SD HEADQUARTERS

Ms. Stacy Dehne
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711

Re: Remedial Action Implementation
Tank No. 16 Dispenser Island Area
Commercial Carriers, Inc.
544 Kellogg Avenue
Janesville, Wisconsin

Dear Ms. Dehne:

This letter provides a brief summary of the chronology of events related to the site referenced above. On behalf of Commercial Carriers, Inc., Montgomery Watson requests that this site be considered for closure by the WDNR Close-Out Committee.

- June 1993. Tank 16 and the associated dispenser island were closed by removal by RMT, Inc. Soil collected from under the dispenser resulted in a photoionization detector (PID) response of 223 instrument units (I.U.). The WDNR was notified of the conditions encountered.

- June 24 and 25, 1994. Soil borings were installed under Warzyn supervision to determine the extent of soil contamination at the former dispenser area. Based on analytical results, the horizontal extent of soil contamination was within an area within approximately 5 ft of the former dispenser island for Tank No. 16 and extended vertically to a depth not greater than 13 ft.

- September 3, 1993. UST Investigation Report - Dispenser Area submitted to the WDNR for review.

- November 23, 1994 Remedial Action Plan (RAP) submitted to the WDNR for review. The recommended remedial alternative was excavation and surface spreading on a paved area of the site.

- December 21, 1993. WDNR approves the RAP. They would prefer that the remediation occur before July 1994. WDNR requires a bermed area be installed around the soil to limit runoff while it is being treated.

One Science Court
P.O. Box 5385
Madison, Wisconsin
53705-0385

Tel: 608 231 4747
Fax: 608 231 4777

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- February 21, 1994, Warzyn responds to WDNR concerns regarding the timing of the soil remediation. The proposed time frame of July 1994 was important for two reasons. The primary reason was that the effectiveness of the selected remedial method is driven by temperature and ultraviolet radiation from the sun, both of which would be optimized in July. The second reason July 1994 was chosen was that the activity at the CCI facility will be very heavy during the spring and the area where the thin spreading is proposed will be utilized for vehicle parking. July will be a time of decreased activity and it is anticipated that the soil can be spread without interfering with site operations.

- March 24, 1994. WDNR approves Warzyn's February 21 addendum to the RAP.

- June 21, 1994. The WDNR Application to Treat or Dispose of Petroleum Contaminated Soil is sent to Ms. Mary Lynn Douglas for her signature as the soil generator. It is subsequently sent to the WDNR for their review.

- July 12, 1994. Soil is excavated and thinly spread within a bermed area at the north end of the site. Soil samples were collected from the base of the excavation at four locations and analyzed for gasoline range organics (GRO) and petroleum volatile organic compounds (PVOCs). None of the soil samples contained GRO compounds. Three of the samples did not contain PVOCs. One sample contained xylenes at a concentration of 3 ug/kg, well below the Interim Soil Cleanup Guideline of 4,100 ug/kg for xylenes. Table 1 is a summary of these results. The excavation was backfilled with clean crushed limestone which was compacted in 10 to 12 in. lifts.

- July 27, 1994. Soil samples were collected from four locations within the thinly spread soil (samples NW, NE, SE, and SW). Each sample was analyzed for GRO and Wisconsin LUST VOCs. None of these compounds were detected. Table 2 is a summary of the analytical results.

- August 1994. The WDNR indicated that a different form was required for thin spreading.

- August 17, 1994. The analytical results for samples collected on July 27, 1994 were faxed to the WDNR for review. A letter of the same date indicates that the WDNR agrees that the soil has been successfully remediated and that it can now be disposed of at the site.

- September 20, 1994. The thinly spread soil was removed from the paved area at the site and spread in a non-paved area of the site.

Enclosed is the Application to Treat or Dispose of Petroleum Contaminated Soil Form required for thin spreading of soil and the supporting calculations.

Based on the information presented in this letter, no further action is required at this site. On behalf of Commercial Carriers, Inc., Montgomery Watson requests that this site be considered for closure by the WDNR Closeout Committee. We request a written response to our request for closure.

Please contact us with questions or comments.

Sincerely,

WARZYN INC.

Margaret C. Blanchard
Hydrogeologist

Michael G. Collentine
Project Manager

Enclosures: Table 1 Summary of Soil Analytical Results - July 12, 1994
Table 2 Summary of Soil Analytical Results - July 27, 1994
Application to Treat or Dispose of Petroleum Contaminated Soil

cc: Mr. David Ax
Ms. Mary Lynn Douglas

MCB/prh/MGC
J:\10014804\WP\LTR\997_DEHN.WPD
10014804/155-MD
2892.0021-MD

# TABLE 1

## Summary of Soil Analytical Results - July 12, 1994
## Tank 16 Dispenser Area
## CCI Facility
## Janesville, Wisconsin

| | #1 | #2 | #3 | #4 | Interim Soil Cleanup Guidelines |
|---|---|---|---|---|---|
| GRO (mg/kg) | X | X | X | X | 100 |
| PVOCs (ug/kg) | | | | | |
| Benzene | X | X | X | X | 5.5 |
| Toluene | X | X | X | X | 1,500 |
| Ethylbenzene | X | X | X | X | 2,900 |
| Xylenes | 3 | X | X | X | 4,100 |
| 1,3,5-Trimethylbenzene | X | X | X | X | NS |
| 1,2,4-Trimethylbenzene | 3 | X | X | X | NS |

General Notes:

1. X = Analyzed, but not detected.
2. Soil samples collected from the base of the excavation.

MCB/prh/WFB
J:\10014804\WP\TBL\98_TBL1.WPD
10014804/155-MD

# TABLE 2

## Summary of Soil Analytical Results - July 27, 1994
## Tank 16 Dispenser Area
## CCI Facility
## Janesville, Wisconsin

| | NW | NE | SW | SE | Interim Soil Cleanup Guidelines |
|---|---|---|---|---|---|
| GRO (mg/kg) | 8.3 | 35 | 45 | 7.8 | 100 |
| PVOCs (ug/kg) | | | | | |
| Benzene | X | X | X | X | 5.5 |
| Toluene | X | X | X | X | 1,500 |
| Ethylbenzene | X | X | X | X | 2,900 |
| Xylenes | X | X | X | X | 4,100 |
| 1,2-Dichloroethane | X | X | X | X | 4.9 |

General Notes:

1. X = Analyzed, but not detected.

MCB/prh/WFB
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10014804/155-MD

# APPLICATION TO TREAT OR DISPOSE OF PETROLEUM CONTAMINATED SOIL

Form 4400-120

This form is required by the Department of Natural Resources for leaking underground storage tank sites to ensure that petroleum contaminated soil is treated or disposed of in compliance with NR 500-540, NR 158, and NR 419, Wis. Adm. Code. Failure to comply with applicable statutes and administrative rules may lead to violations of subchapters III and IV of ch. 144 Wis. Stats. and may result in forfeitures of not less than $10 or more than $25,000 for each violation, pursuant to ss. 144.426(1), 144.74(1), and 144.99, Wis. Stats. or fines of not less than $100 or more than $150,000 or imprisonment for not more than 10 years, or both, pursuant to s. 144.74 (2), Wis. Stats. Each day of a continuing violation constitutes a separate violation. Department approval of this form is required prior to site remediation, except for soils to be buried in landfills.

DIRECTIONS: 1) Complete parts I. 2) Select the treatment option in part II. Pretreatment approval is required for any treatment other than landfill burial. Submit this form to the DNR project manager for approval. 3) If your treatment option is landfill burial, complete part III before submitting the ORIGINAL form to the project manager. 4) If soil will be used as cover at a landfill, first submit this form for approval and then, after part III has been completed, resubmit the ORIGINAL to the project manager. 4.91:2.2P

**ALL SITES MUST COMPLETE PART I.**

Part I. Source of Soil

Site/Facility Name
CCI - Former Tank Dispenser Island Area

Site I.D. # (for DNR use only)

Site Address
544 Kellogg Avenue

Contact Name
Ms. Mary Lynn Douglas

City, State, Zip Code
Janesville, Wisconsin

1/4, 1/4, Section, Township, and Range
NE 1/4, NW 1/4, Sec. 12, T2N, R12E

The information on this form is accurate to the best of my knowledge.
NOTE: Soil generators responsible for waste disposed of in landfills may incur future liability.

*Signature of Soil Generator*

*Telephone Number (inlcude area code)*
615 221 6213

Consulting Firm
Warzyn Inc.

Contact
Margaret C. Blanchard

Telephone Number
(608) 231-4747

**Estimated Volume Contaminated Soil**

125 Tons/cubic yards (circle one)

**Type of Petroleum Contamination (Circle):**

(Gasoline) Diesel Fuel/#2 Fuel Oil

Other _____

Soil Type (USCS)

X sand (SP, SW)
___ silty/clayey sands (SM, SC)
___ silt (ML, MH, OL)
___ clay (Cl, CH, OH)
___ gravel (GC, GM, GP, GW)
___ peat (PT)

Distance to Nearest Residence/Business _____

**Contaminant concentration:**

One screened sample for each 15 yds $^3$ and one laboratory analysis for each 300 yds $^3$ of contaminated soil when the field instrument *registers contamination* OR one laboratory analysis for each 100 yds$^3$ when the field instrument *does not register contamination on* soil shown to be contaminated during the site investigation/excavation or stockpiling. PLEASE ATTACH A TABLE LISTING RESULTS OF BOTH FIELD SCREENING AND LAB ANALYSES, AND INCLUDE SUPPORTING LAB REPORTS, IN ADDITION TO THE TPH AND BENZENE INFORMATION REQUESTED BELOW. NOTE: DILHR requires a minimum of 3 laboratory samples on excavated soil for PECFA claims.

Total Benzene in soil to be remediated (attach calculations) 0.102 lbs

Total Petroleum Hydrocarbons (TPH) in soil to be remediated (attach calculations) 33.6 lbs

Total TPH as GRO

## ATTACH EMISSIONS CALCULATIONS

(a/1,000,000) x (2,800 lbs/yd $^3$ ) x b = benzene emission in lbs., where a = benzene concentration of soil sample in ppm or mg/kg dry weight basis, and b = amount of contaminated soil in yds $^3$ . NOTE: This calculation can also be used to estimate TPH emissions by substituting TPH concentration (ppm or mg/kg) for "a". It may also be used to calculate VOCs.

## COMPLETE ONLY THOSE SECTIONS OF PART II THAT PERTAIN TO YOUR SITE

**Part II: Proposed Treatment Facility**

### 1. SOIL VENTING/VACUUM EXTRACTION

NOTE: This option may require an air pollution control permit. An activated carbon unit or similar treatment system to strip VOCs from the blower discharge will be required if emissions exceed limits established by Air Management. System design and monitoring information must be included.

Contact responsible for system maintenance _____

Telephone Number (include area code) _____ Anticipated start date _____

Total VOC discharge rate from Pilot testing or calculations _____ lbs/hr at _____ scfm

Benzene Discharge Rate from Pilot testing or calculations _____ lbs/hr at _____ scfm _____ Estimated Project Total

### 2. ANY METHOD OF REMEDIATION NOT LISTED IN PART II (NOTE: For thermal treatment, use Form 4400-149.)

Attach narrative and drawing(s) to describe the remediation method to be used. A final report is required. At a minimum, the information submitted should include the following applicable items:

a. proposed treatment method
b. location/size of remediation site
c. distance to nearest residence/business
d. field sampling methods
e. protective covering and curbing techniques
f. volume estimate and soil thickness needing remediation
g. method of turning/mixing soil
h. highest estimated hourly/daily VOC emissions
i. highest estimated daily/total benzene emissions
k. anticipated startup and completion dates
l. proposed vertification method of contaminant content
m. project contact person
n. final destination of soil

**LEAVE BLANK - DEPARTMENT OF NATURAL RESOURCES USE ONLY**

Application Concurrence:

Air Management _____ Date _____

Project Manager _____ Date _____

Comments:

### 3. DISPOSAL OF CONTAMINATED SOILS AT A SANITARY LANDFILL-NR 500

NOTE: Contaminant concentrations must meet Solid Waste guidelines and analytical results must be submitted within 30 days of disposal.

PLEASE COMPLETE PART III BELOW AFTER LANDFILL BURIAL IS COMPLETED.

THIS SECTION IS TO BE COMPLETED BY THE DISPOSAL FACILITY ACCEPTING THE CONTAMINATED SOIL

**Part III**

Transporter Name _____ Transported License Number _____

Name of landfill _____ License No. _____

Actual Volume of soil landfilled _____ Indicate yds $^3$ or tons _____cover soil _____ buried

Date received at landfill Accumulated Benzene emissions to date _____

*Signature* of landfill facility representative _____

[DISPOS-P]

PART II. Proposed Treatment Method.

WARZYN

BY M Blanchard DATE 6/17/94 SUBJECT CCI - Former Tank 16 Dispenser Island Area Soil Remediation Calculations SHEET NO. ____ OF ____

CHKD. BY M. Gilmer DATE 6/17/94 JOB NO. 100148

- Volume of soil 125 cy

- Mass of benzene
  Benzene detected in B12 (1-3 ft) at 0.29 mg/kg

$$0.29 \frac{mg}{kg}\left(\frac{kg}{1\times10^{6} mg}\right)\left(\frac{2800\ lb}{1\ cy}\right) 125\ cy = 0.102\ lb\ benzene$$

- Mass of GRO - GRO detected in B12 (1-3ft) at 96 mg/kg

$$96 \frac{mg}{kg}\left(\frac{kg}{1\times10^{6} mg}\right)\left(\frac{2800\ lb}{1\ cy}\right) 125\ cy = 33.6\ lb\ GRO$$

MICHIGAN LAB
459 HUGHES DRIVE
TRAVERSE CITY, MI 49684
PHONE: (616) 947-5777

Certificate of Analysis No. 9306301-06

RYDER AUTOMOTIVE CARRIER DIV.
1450 West Long Lake Road
Troy, MI 48098-6330
ATTN: Dave Axe

DATE: 07/06/93

PROJECT: JATCO
SITE: JANESVILLE, WI
SAMPLED BY: WARZYN
SAMPLE ID: B-12 1-3'

PROJECT NO: 10014801
MATRIX: SOIL
DATE SAMPLED: 06/25/93 10:10:00
DATE RECEIVED: 06/28/93

ANALYTICAL DATA

| PARAMETER | RESULTS | DETECTION LIMIT | UNITS |
|---|---|---|---|
| GC/FID Gasoline-Purgeables<br>WI LUFT GRO<br>Analyzed by: DC<br>Date: 07/01/93 | 96 | 10 | mg/Kg |
| BENZENE<br>METHOD 8020<br>Analyzed by: KW<br>Date: 06/30/93 | 290 | 10 P | µg/Kg |
| Moisture<br>ASTM D2216<br>Analyzed by: VS<br>Date: 07/01/93 11:00:00 | 11.0 | | wt.% |

(P) - Practical Quantitation Limit

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 17th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: Wisconsin Laboratory Certification Number: 998020320

SPL, Inc., - S. L. Grenda