



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Cathy Stepp, Secretary
Mark Aquino, Regional Director

South Central Region Headquarters
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January 12, 2015

Alina Satkoski
Environmental and Safety Coordinator
Madison Kipp Corporation
P.O. Box 8043
Madison, WI 53704

SUBJECT: Coverage under General Permit WI-0046566-06, Discharge of Contaminated Groundwater from Remedial Action Operations

Dear Ms. Satkoski:

The Department has reviewed your application for authorization to discharge treated contaminated groundwater from a remediation project at 201 Waubesa Street, Madison, WI. The contamination is the result of a release of contaminants due to historical and ongoing operations at Madison Kipp Corporation (WDNR BRRTS #02-13-001569).

Your proposed discharge is eligible for coverage under the general Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0046566-06 for Discharge of Contaminated Groundwater from Remedial Action Operations. You are responsible for compliance with the conditions contained in this permit. The permit and fact sheet should be downloaded from the DNR website at:
<http://dnr.wi.gov/topic/wastewater/generalpermits.html>.

Discharges under this permit are required to be consistent with a discharge management plan that has been approved by the Department. Your application submitted will be considered as the required discharge management plan. The analysis results would indicate that monitoring is required for all parameters listed in the permit on page 9. All of your contaminated wastewater discharges must be done according to the terms and conditions of the permit, specifically sections 1, 2, 4 and 8.

Treatment of contaminated groundwater will be provided by Madison Kipp Corporation. One extraction well will pump groundwater at 45 gpm into a 2,000 gallon holding tank. Water will then be mixed in a 550 gal mixing tank with Hecla 1 anti-scalant at 30-60 ppm, approximately 2-4 gal/day. The water will then be pumped through an air stripper for treatment, followed by discharge into storm sewer inlet AS5940-049 at 201 Waubesa Street. Treated water will discharge into Stark Weather Creek which flows into Lake Monona. Any significant system changes will require Department approval. **Note: It is the responsibility of the permittee to obtain any and all necessary permissions, permits, and approvals from other state and local agencies prior to initiating operations.**

Permit Coverage begins on January 12, 2015. Records of effluent volume and chemical monitoring data shall be submitted on discharge monitoring report (DMR) forms on a monthly basis until completion of project. All sample results must be reported on the DMR. Reports are due the 15th day of the month following the completion of the reporting period or within one month following the completion of the project. The DMR forms

will be sent to Nicholas Bertolas, as specified in the application. The owner must sign the DMRs. DMRs should be sent to the address indicated on the DMR.

Post treatment samples must meet the limits (reproduced below) listed in Part 4, page 9 of WPDES permit WI-0045655-06. Sampling for all parameters except flow is required prior to treatment and after treatment prior to discharge to Stark Weather Creek.

DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS				
(1,2,4,8)				
PARAMETER	DISCHARGE LIMIT	SAMPLE FREQUENCY	SAMPLE TYPE	NOTES
Flow	gallons per day	Daily	Total daily	
Bromoform	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Carbon Tetrachloride	150 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Chloroform	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Dichlorobromomethane	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,2-Dichloroethane	180 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1-Dichloroethylene	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Methyl Bromide	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Methyl Chloride	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1,2,2-Tetrachloroethane	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Tetrachloroethylene	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1,2-Trichloroethane	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1,1-Trichloroethane	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Trichloroethylene	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Vinyl Chloride	10 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	

Suspended Solids, Total	40 mg/L Daily Maximum	Daily for 6 weeks/Monthly	Grab	
Cis-1,2-Dichloroethene		Daily for 6 weeks/Monthly	Grab	
Trans-1,2-Dichloroethene		Daily for 6 weeks/Monthly	Grab	

- 1) Nicholas Bertolas, Wastewater Specialist (608) 275-3281, shall be notified:
 - Two (2) weeks prior to the startup of any discharge;
 - Within 24 hours if post-treatment concentrations of these parameters meet or exceed the discharge limits;
 - If the flow is anticipated to increase above 70 gpm;
 - If free product is discovered;
 - One (1) week prior to usage of any cleaning solutions or additives.
- 2) The discharge shall be sampled one time per discharge event for the remainder of the project. The first set of samples must be taken within 24 hours of system start up.
- 3) All sample results must be reported on the DMR; this includes samples that exceed the frequency required by the permit and this letter.

Note: The monitoring parameters shall be tested at a weekly frequency during the initial six weeks of discharge and thereafter at a monthly frequency.

- 4) Sampling and analysis for all parameters shall be **unfiltered**.
- 5) Sampling for suspended solids must be conducted any time a cleaning procedure is conducted. Sampling and analysis is not required during normal operating time.
- 6) A grab sample shall be analyzed for pH whenever treatment unit cleaning solutions are discharged, or when other activities could significantly change the pH of the water.
- 8) The discharge limits are set to protect both surface water and groundwater quality since the discharge is to surface water that may have seepage to groundwater. The most restrictive limits will apply.

***Special Note: The site of this remediation project and discharge is located within 1,000 feet of 3 open and ongoing R&R contamination sites as well as within 1,500 feet of 7 closed sites. Special precaution should be taken in the undertaking of this project.**

****Special Note: The proposed discharge is to a 303d-listed impaired water. Be familiar with monitoring associated with impaired waters – see permit section 2.14 or: <http://dnr.wi.gov/topic/impairedwaters/>**

Limits based on groundwater quality protection are set at the preventive action limits in ch. NR 140, Wis. Adm. Code. These limits are based on substances reported to be in the discharge, but may not necessarily include all substances of public health or welfare concern, which are in the discharge. However, nothing in this permit allows the permittee to discharge any substance in a concentration that would cause groundwater standards in Ch. NR 140 to be exceeded.

If you have any questions about permit requirements or the contents of this letter, please feel free to contact me.

Sincerely,

Nicholas Bertolas

Wastewater Specialist – Bureau of Water Quality
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road, Fitchburg, WI 53711
Phone: (608) 275-3281
Nicholas.Bertolas@wisconsin.gov

cc: Permit File – Region and Central Office
Alan Hopfensperger, WDNR Hydrogeologist (via email)
Jeff Brauer, WDNR Wastewater Engineer (via email)
Michael Schmoller, WDNR R&R Project Manager (via email)
Mike Sorge, WDNR Water Resources Management Specialist (via email)
Jennine Trask, Certified Project Manager – Arcadis (via email)
George Parrino, Madison and Dane County Public Health (via email)

LEGAL AUTHORITIES AND APPEAL RIGHTS

Section 283.35, Wisconsin Statutes, authorizes the Department to issue general permits for discharges from categories or classes of point sources. If a permittee believes coverage of a facility under a general WPDES permit is not appropriate, the permittee may apply for issuance of an individual WPDES permit pursuant to section 283.35(2) and may petition the Department for withdrawal of coverage under the general permit. The individual permit application should indicate which site specific factors would justify alternate WPDES limits for the operation. Issuance of such a site specific WPDES permit will provide for a 30 day public comment period, and potentially a public informational hearing and/or an adjudicatory hearing. The Department may withdraw a facility from coverage under a general permit if it is determined that a discharge is a significant contributor of pollutants to waters of Wisconsin, or in certain other cases set out in s. 283.35, Stats. In lieu of general permit withdrawal, the Department may refer any violation of this permit to the Department of Justice for enforcement under s. 283.89, Stats. In order to avoid any enforcement action, **please read the WPDES permit carefully and comply with the permit requirements.**

If you believe you have a right to challenge the Department decision to cover this facility with a WPDES general permit, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. To request a contested case hearing pursuant to section 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. Such a petition should identify pollutant(s) that are believed to be not appropriately regulated by the general permit for the specific site. All requests for contested case hearings must be made in accordance with section NR 2.05(5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the time period for filing a petition for judicial review.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. A petition for judicial review must name the Department of Natural Resources as the respondent.