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February 7, 2020

Mr. Michael Schmoller
Wisconsin Department of Natural Resources
South Central Region
3911 Fish Hatchery Road
Fitchburg, WI 53711

Subject: Notification of Utility Work Beneath Madison Kipp Corporation Cap
Madison-Kipp Corporation, 201 Waubesa Street, Madison, Wisconsin
Facility ID #113125320, WDNR BRRTS #02-13-576860, #02-18-578014

Dear Mr. Schmoller:

Madison Kipp Corporation (MKC) was recently notified by Madison Gas and Electric (MG&E) that utility improvements are warranted at MKC's 201 Waubesa Street, Madison, WI property (Site). Attachment 1 includes a photo and figure identifying the location where improvements are required. Based on the Cap Maintenance Plans associated with the Bureau for Remediation and Redevelopment Tracking System (BRRTS) case numbers #02-13-576860 and #02-18-578014, TRC on behalf of the MKC is providing this notification that a portion of the current Site's Cap will need to be temporarily removed to complete the work.

MKC plans to assist with the work to ensure that materials below the cap are managed appropriately, and the cap is repaired to an equal or better condition following the utility work. This letter provides the proposed management of the current cap materials, soil requiring excavation, proposed cap repair, and follow up documentation.

Proposed Work

MG&E will be replacing components for their sub-station located along the northeast side of MKC's building. As part of the work a six-foot by two-foot area of the current asphalt cap will be removed and underlying soil will be disturbed to an estimated depth of four feet below ground surface to expose an electrical line for new connections to be made. The location of the work is shown on the photo and figure within Attachment 1. Once work is completed the area will be restored in-kind including the installation of new asphalt of equal or better condition.

Per MG&E's current schedule, work is proposed to be completed on February 23, or March 1, 2020. A brief letter documenting the work will be submitted to the WDNR within 60 days of completion of the work.

Material Management Plan

MKC will saw cut the current asphalt surface and remove the approximate six-foot by two-foot area. The asphalt will be segregated from the underlying soil and disposed of appropriately. Soil will be excavated to a maximum depth of four feet below ground surface. The proposed work is near historical soil boring B-20 which indicates that soil in this vicinity contains: chlorinated volatile organic compounds (CVOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals. The photo and figure included in Attachment 1 show the approximate location of the proposed work and a soil analytical summery table with laboratory analytical data from boring B-20 is included in Attachment 2.

Based on the extent of the excavation, minimal soil disturbance, non-source area concentrations reported in boring B-20, and replacement of the cap, MKC proposes to re-use any soil removed for the utility work as excavation backfill. If soil remains following the work, the soil will be containerized and disposed of appropriately. The asphalt cap will be reinstalled of equal or better quality following the completion of all sub-grade work.

MKC and TRC request concurrence of this plan to complete the minor utility work for MG&E. If you have any comments, questions, or concerns, please contact Andrew Stehn (608-826-3665) or Katherine Vater (608-826-3663) of TRC.

Sincerely,

TRC

Andrew M. Stehn

Andrew Stehn, P.E.
Senior Project Engineer

cc: Mark Sheppard – MKC (electronic)
Peter Ramanauskas – USEPA (electronic)
Michael Beedle – USEPA (electronic)

Attachments:
1. Proposed Work Area and Historical Soil Boring Locations
2. Soil Analytical Summary Table - Historical Soil Borings

Attachment 1

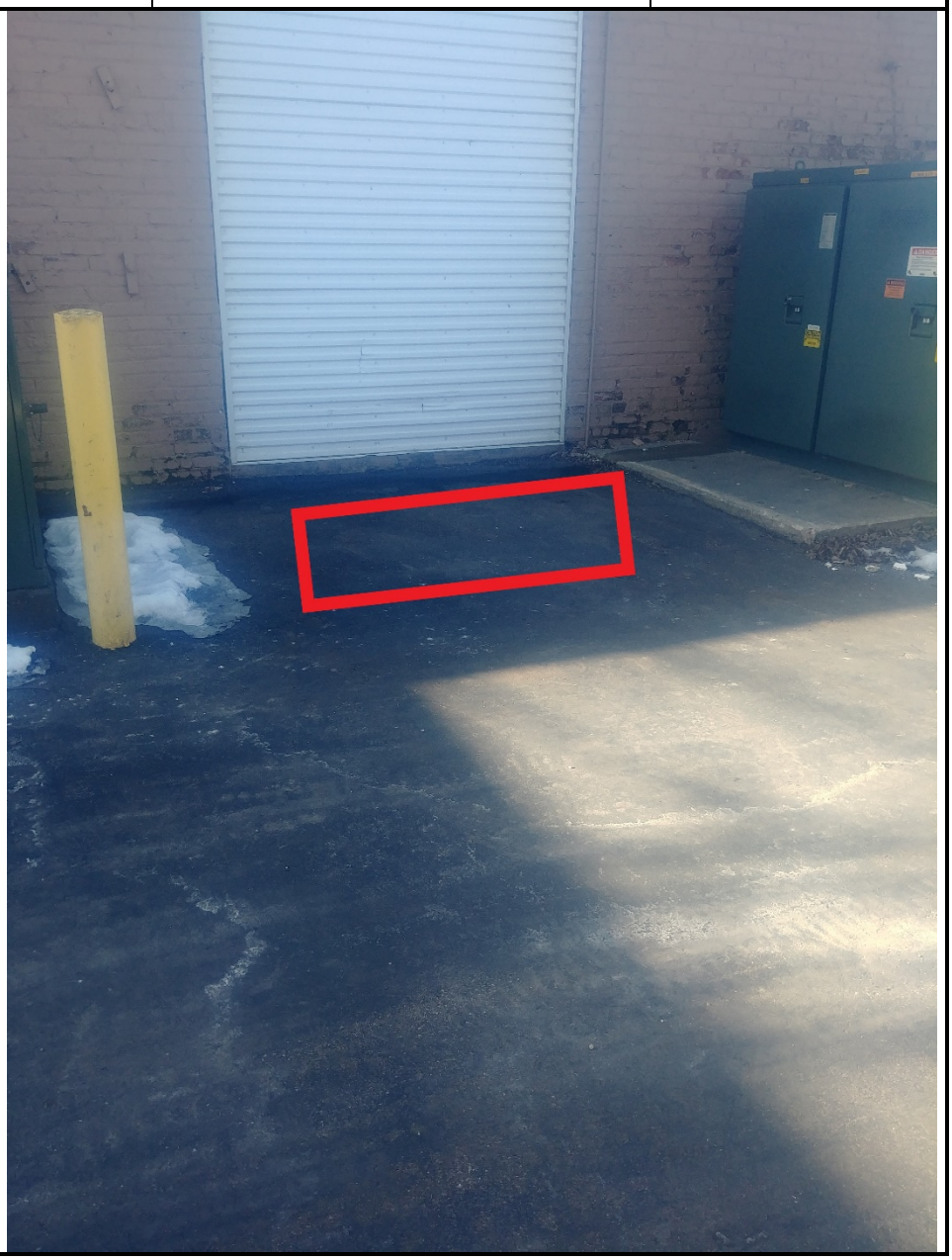
Proposed Work Area and Historical Soil Boring Locations

Photographic Log

Client Name:	Site Location:	Project No.:
Madison Kipp Corporation	201 Waubesa Street Madison, Wisconsin	372148.0000.0000

Photo No.	Date
1	

Description
Photo taken facing west toward the proposed location requiring utility work. This area is located just outside the northeast corner of Madison Kipp Corporation's 201 Waubesa Street Facility in Madison, WI.



Approximate location of MG&E proposed utility reconstruction work.

Area - 6' x 2' to a depth of 4' below ground surface.

LEGEND

CONCENTRATION OF PCBs (0-2 FEET BELOW GROUND SURFACE)

- NON-DETECT
- LESS THAN OR EQUAL TO 1 mg/kg
- GREATER THAN 1 mg/kg
- GREATER THAN 50 mg/kg
- PROPOSED EXCAVATION AREA
- PARCELS
- BUILDING FOOTPRINTS

mg/kg MILLIGRAM PER KILOGRAM
PCBs POLYCHLORINATED BIPHENYL

0 100 200
Feet

NOTES:
1. LOCATION OF RESIDENTIAL SAMPLES ARE APPROXIMATE
2. AERIAL IMAGERY OBTAINED FROM BING IMAGERY SERVICE THROUGH ESRI ONLINE MAPPING, ACCESSED 8/27/12

MADISON-KIPP
201 WAUBESA STREET
MADISON, WI

PROPOSED EXCAVATION AREA (0-2 FEET BELOW GROUND SURFACE)

ARCADIS

FIGURE 2

CITY: MKE DIV/GROUP: IM DB: EH LD: CK
MADISON-KIPP
I:\Madison_Kipp\Madison_Kipp\20121019\PCB_Results_0to2_excavation_areas_20121019.mxd

Figure modified by TRC for Notification of Utility Work Beneath Madison Kipp Corporation Cap Letter Submittal.

Attachment 2

Soil Analytical Summary Table - Historical Soil Borings

Table A.2.a. On-Site Soil Analytical Results, Madison-Kipp Corporation, 201 Waubesa Street, Madison, Wisconsin.

Boring ID	B-20	B-21	B-22	B-24		B-25		B-26		B-27
Sample Interval (feet bls)	0-2	0-2	0-2	2-4	10-12	0-2	4-6	2-4	8-9	0-2
Sample Date	6/4/2012	6/4/2012	6/4/2012	6/18/2012	6/18/2012	6/12/2012	6/12/2012	6/8/2012	6/8/2012	6/8/2012
VOCs (mg/kg)										
1,1-Dichloroethene	<0.02	<0.018	<0.019	<0.019	0.16	<0.019	<0.02	<0.017	<0.018	<0.017
1,2,3-Trichlorobenzene	<0.02	<0.018	<0.019	<0.021	<0.02	<0.021	<0.022	<0.019	<0.021	<0.02
1,2,4-Trichlorobenzene	<0.015	<0.013	<0.014	<0.023	<0.021	<0.023	<0.024	<0.021	<0.022	<0.021
1,2,4-Trimethylbenzene	<0.014	<0.012	<0.013	<0.013	<0.012	0.74	<0.014	<0.012	<0.013	<0.012
1,2-Dichlorobenzene	<0.013	<0.012	<0.013	<0.012	<0.012	<0.012	<0.013	<0.011	<0.012	<0.012
1,3,5-Trimethylbenzene	<0.013	<0.012	<0.013	<0.012	<0.012	0.21	<0.013	<0.011	<0.012	<0.012
Benzene	<0.0048	<0.0043	<0.0047	<0.0045	0.012 J	<0.0045	<0.0048	<0.0041	<0.0044	<0.0042
Carbon tetrachloride	<0.017	0.1	0.3	<0.016	<0.014	<0.016	<0.016	<0.014	<0.015	<0.015
cis-1,2-Dichloroethene	0.84	0.93	0.089	0.28	36	<0.0075	<0.0079	15	0.61	1.6
Ethylbenzene	0.017	<0.0073	<0.008	<0.0076	<0.0071	0.42	<0.0081	<0.007	<0.0075	<0.0071
Isopropylbenzene	<0.016	<0.014	<0.016	<0.015	<0.014	0.098 J	<0.016	<0.014	<0.015	<0.014
Naphthalene	0.18	0.17	0.48	<0.03	<0.028	0.73	<0.032	<0.027	<0.029	<0.028
n-Butylbenzene	<0.0084	<0.0074	<0.0082	<0.0078	<0.0073	0.093	<0.0083	<0.0072	<0.0077	<0.0073
N-Propylbenzene	<0.011	<0.01	<0.011	<0.011	<0.0098	0.18	<0.011	<0.0097	<0.01	<0.0099
p-Isopropyltoluene	<0.012	<0.011	<0.012	<0.011	<0.01	0.063 J	<0.012	<0.01	<0.011	<0.01
sec-Butylbenzene	<0.01	<0.0089	<0.0098	<0.0093	<0.0087	0.046 J	<0.0099	<0.0085	<0.0091	<0.0087
tert-Butylbenzene	<0.0089	<0.0078	<0.0086	<0.0082	<0.0077	<0.0082	<0.0087	<0.0075	<0.0081	<0.0077
Tetrachloroethene	20	3	19	1	1.4	1.2	0.1	1.3	0.44	**42**
Toluene	<0.0075	<0.0066	0.0092 J	<0.0069	0.015	0.3	<0.0074	0.02	<0.0068	<0.0065
trans-1,2-Dichloroethene	<0.016	<0.014	<0.016	0.065	10	<0.015	<0.016	0.87	<0.015	0.044 J
Trichloroethene	**1.3**	0.11	0.34	0.22	**10**	0.016 J	<0.012	0.46	0.11	**7.1**
Vinyl chloride	<0.0068	<0.006	<0.0066	0.034	**10**	<0.0063	<0.0067	**1.3**	0.018	<0.0059
Xylenes, Total	0.11	<0.0039	<0.0043	<0.0041	<0.0038	1.3	<0.0044	<0.0038	<0.0041	<0.0039
PAHs (mg/kg)										
1-Methylnaphthalene	1.3	3.8	2.8	<0.02	0.032 J	0.2	<0.02	<0.018	<0.019	0.028 J
2-Methylnaphthalene	1.3	3.9	2.4	<0.052	<0.047	0.27	<0.052	<0.046	<0.05	<0.047
Acenaphthene	1.5	5	3.8	<0.012	0.29	0.014 J *	<0.012 *	0.029 J	<0.012	<0.011
Acenaphthylene	1.1	1.3	0.65	<0.0092	<0.0084	0.015 J	<0.0092	<0.0082	<0.0089	<0.0084
Anthracene	6.3	14	9	<0.0095	0.84	0.057	<0.0094	0.059	<0.0091	<0.0086
Benzo(a)anthracene	**12**	**29**	**20**	<0.0084	**6.8**	**0.2**	<0.0084	0.12	<0.0081	0.039
Benzo(a)pyrene	**9.5**	**14**	**15**	**0.017 J**	**8**	**0.19**	<0.0073	**0.11**	<0.0071	**0.039**

Footnotes on Page 15.

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Sample Date	6/4/2012	6/4/2012	6/4/2012	6/18/2012	6/18/2012	6/12/2012	6/12/2012	6/8/2012	6/8/2012	6/8/2012
PAHs (mg/kg) (continued)										
Benzo(b)fluoranthene	12	13	16	0.021 J	12	**0.21**	<0.0078	0.12	<0.0076	0.064
Benzo(g,h,i)perylene	<0.014	8.6	8	<0.014	6.2	0.15	<0.014	0.078	<0.013	0.029 J
Benzo(k)fluoranthene	**4.4**	**6.4**	**8.5**	<0.0096	**14**	0.14	<0.0096	0.061	<0.0093	0.02 J
Chrysene	12	**26**	**18**	<0.0091	6.5	0.22	<0.009	0.12	<0.0088	0.062
Dibenz(a,h)anthracene	**0.13**	<0.052	**3.3**	<0.011	**1.9**	<0.011	<0.011	**0.018 J**	<0.011	**0.015 J**
Fluoranthene	25	53	45	<0.016	7.8	0.36	<0.016	0.27	<0.016	0.088
Fluorene	2.5	6.8	5.8	<0.0091	0.25	0.016 J	<0.0091	0.027 J	<0.0088	<0.0083
Indeno(1,2,3-cd)pyrene	<0.014	**7.6**	**6.8**	<0.014	**5.5**	0.13	<0.014	0.064	<0.013	0.024 J
Naphthalene	4	4.8	3.4	<0.0078	0.022 J	0.14	<0.0077	0.012 J	<0.0075	0.027 J
Phenanthrene	35	57	47	<0.017	3.4	0.34	<0.017	0.24	<0.016	0.078
Pyrene	28	52	41	<0.015	7.4	0.3	<0.014	0.24	<0.014	0.081
PCBs (mg/kg)										
Aroclor-1242	<0.14	<1.3	**3.3**	<0.0066	<0.0062	<0.0064	<0.0069	<0.0058	<0.0063	<0.03
Aroclor-1248	**3**	**23**	<0.16	<0.008	<0.0075	**0.38**	<0.0082	<0.007	<0.0076	<0.036
Aroclor-1254	<0.093	<0.83	<0.086	0.11	0.0066 J	<0.0042	<0.0045	0.024	0.022	**0.62**
Aroclor-1260	<0.21	<1.9	<0.2	<0.0099	<0.0093	<0.0096	<0.01	<0.0087	<0.0094	<0.045
Total Detected PCBs	3	23	3.3	0.11	0.0066	0.38	ND	0.024	0.022	0.62
PCB Homolog (mg/kg)										
Dichlorobiphenyl	NA	<0.0041	NA	NA	NA	NA	NA	NA	NA	NA
Heptachlorobiphenyl	NA	<0.0058	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorobiphenyl	NA	0.024 J	NA	NA	NA	NA	NA	NA	NA	NA
Monochlorobiphenyl	NA	<0.0022	NA	NA	NA	NA	NA	NA	NA	NA
Pentachlorobiphenyl	NA	0.046 J	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachlorobiphenyl	NA	0.29	NA	NA	NA	NA	NA	NA	NA	NA
Trichlorobiphenyl	NA	0.16	NA	NA	NA	NA	NA	NA	NA	NA
RCRA Metals (mg/kg)										
Arsenic	**8.2**	**6.2**	**9.2**	**2.6**	**1.8**	**4.5**	**3.8**	**2.9**	**5.4**	**4.4**
Barium	95	160	110	70	28	52	120	51	71	120
Cadmium	1.4	2.1	1.4	0.14 J ^	0.078 J ^	1.1	<0.055	0.066 J	<0.051	0.72

Footnotes on Page 15.

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Sample Date	6/4/2012	6/4/2012	6/4/2012	6/18/2012	6/18/2012	6/12/2012	6/12/2012	6/8/2012	6/8/2012	6/8/2012
RCRA Metals (mg/kg) (continued)										
Chromium	25	30	18	8.7	6.9	8.9	11	7.2	13	9.9
Lead	62	190	140	13	2.5	51	12	13	7.5	53
Mercury	0.054	0.15	0.038	0.03	0.017 J	0.17	<0.0065	0.011 J	0.051	0.058
Selenium	<0.37	0.83 J	0.30 J	0.33 J	<0.32	0.55 J	<0.32	<0.31	0.43 J	0.65 J
Silver	2.3	0.17 J	0.18 J	<0.062	<0.067	0.19 J	<0.067	<0.064	<0.061	<0.065
Cyanide, Total (mg/kg)	0.24 J	1	0.31 J	<0.18	<0.17	<0.16	<0.17	<0.14	<0.14	<0.17

Only detected constituents are noted. Please refer to laboratory reports for a complete list of constituents and results.

100	Exceeds the WDNR's non-industrial direct contact residual contaminant level.
100	Exceeds the WDNR's industrial direct contact residual contaminant level.
100	Exceeds the WDNR's soil to groundwater pathway residual contaminant level.
100	Exceeds the Toxic Substance Control Act disposal limit.
100	Exceeds the EPA's self-implementing high-occupancy cleanup level with no site restrictions.
*	Laboratory control spike or laboratory control spike duplicate exceeds the control limits.
<	Constituent not detected above noted laboratory detection limit.
^	Laboratory instrument related quality control limits exceeded.
J	Constituent concentration is an approximate value.
B	Compound was found in the blank and sample.
bls	Below land surface.
H	Sample was prepped or analyzed beyond the specified holding time.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
NE	Criteria not established.
ND	Detected total PCBs were reported less than the laboratory detection limit.
PAHs	Polycyclic Aromatic Hydrocarbons.
PCBs	Polychlorinated Biphenyls
RCL	Residual contaminant level.
RCRA	Resource Conservation Recovery Act.
TSCA	Toxic Substance Control Act.
EPA	United States Environmental Protection Agency.
VOCs	Volatile Organic Compounds.