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Request for Coverage Under Wisconsin Pollutant Discharge Elimination System (WPDES) Wastewater Discharge Permit (WI-0046566-06) for Contaminated Groundwater from Remedial Action Operations

(Revised 8 / 2012)

Please type or print required information, except for the signature.

I. GENERAL INFORMATION

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A: FACILITY LOCATION INFORMATION

Name of Facility / Project	Official Representative Onsite Title	
Madison Kipp Corporation	Alina Satkoski	Environmental and Safety Coordinator
(Address or Highway / Road with Distance and Direction from nearest City)	Telephone No.:	Fax #
201 Waubesa Street	608-242-5200	608-770-9401
City, State, Zip Code	County	Email Address
Madison, Wisconsin 53704	Dane	asatkoski@madison-kipp.com

B: Individual, parent company, or organization with direct control over the facility. Enter full official legal name of the owner or parent company, if there is one, the mailing address, and the name and title of the official representative (responsible party) signing this application <u>if he/she is located at address of parent company</u>.

Parent Company/Owner	Company Contact	Title	
Madison Kipp Corporation	Alina Satkoski	Environmental and Safety Coordinator	
Mailing Address - PO Box, Street, or Route	Telephone No.:	Fax #	
P.O. Box 8043	608-242-5200	608-770-9401	
City, State, Zip Code	Email Address		
Madison, Wisconsin, 53704	asatkoski@madison-kipp.com		

C: Consulting Firm for Groundwater			
Company Name	Company Contact	Title	
ARCADIS	Jennine Trask, PE	Certified Project Manager	
Mailing Address - PO Box, Street, or Route	Telephone No.:	Fax #	
126 N. Jefferson Street, Suite 400	414-276-7742	414-276-7603	
City, State, Zip Code	Email Address		
Milwaukee, Wisconsin 53202	jennine.trask@arcadis-us.com		

D. Name of Person to Receive Discharge Monitoring Report Forms from Department:

E. Any Other Necessary Contact Person (name, phone, email)

Michael Schmoller, WDNR

F. DNR Environmental Response & Repair Project Number, and DNR Project Manager name:

BRRTS No. 02-13-001569, Facility ID 113125320, WDNR Project Manager Michael Schmoller

Infrastructure, environment, buildings Transmittal Letter	ARCADIS 126 North Jefferso Suite 400 Milwaukee Wisconsin 53202	on Street
Alan Hopfensperger Wisconsin Department of Natural Resources South Central Region 3911 Fish Hatchery Road Fitchburg, WI 53711	Copies:Tel 414.276.7742Mike Schmoller (electronic)Fax 414.276.7603Alina Satkoski (electronic)WDNR Water Permits CentralIntake – WT/3VT/3	
^{From:} Rebecca Robbennolt	_{Date:} November 25, 2014	
Subject: WPDES Permit Application Madison-Kipp Corporation	ARCADIS Project No.: WI001368.0023	
We are sending you: ⊠ Attached □ Under Se	eparate Cover Via the Following Items:	
□ Shop Drawings □ Plans □ Prints □ Samples ☑ Other: Application	Specifications Change Orde Copy of Letter Reports	Г
Conies Date Drawing No Rev	Description	Action*
1 11/25/14 Final Wi Co	PDES Permit Application for the Groundwater Extraction d Treatment System Treated Discharge, Madison-Kipp proration Site, 201 Waubesa Street, Madison, WI.	Review FA
Action* CR A Approved CR AN Approved As Noted F AS As Requested FA Other: Other:	Correct and Resubmit Resubmit Cope File Return Copie For Approval Review and Comme	oies s nt

Comments: Please find enclosed the WPDES Permit Application for the Groundwater Extraction and Treatment System Treated Discharge for the Madison-Kipp Corporation property located at 201 Waubesa Street in Madison, WI. If you have any questions, please contact me at your convenience (414) 276-7742. Thanks!

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II. SPECIFIC INFORMATION ON PROJECT

A. Pollutants

1. The suspected sources of the pollutants (estimate of material release quantity and contributing activities)

Historical chemical usage at the Site included PCE and oil potentially containing PCBs, and current chemical usage includes chlorine, hydraulic oils, caustic solutions and Stoddard solvent. Chlorinated solvents, including PCE; petroleum hydrocarbons, hydraulic oil, and gasoline; PAHs and PCBs have been found to be present in soil and groundwater.

2. Check all fuel and waste types suspected in the contamination at this site:

Unleaded Gasoline	🔲 Jet Fuel	Pesticides
Leaded Gasoline	🛛 Waste Oil	Fertilizers
🔀 Diesel Fuel	Solvents	
Heating Oil	Other: Polychlorina	ted Biphenyl

3. Check all pollutants identified at this site:

BETX (Benzene, Ethylbenzene, Toluene, Xylene)	Pesticides/Fertilizers
PAHs (Polynuclear aromatic hydrocarbons)	Total Recoverable Lead *
🔀 VOCs (Volatile Organic Chemicals)	Other Polychlorinated Biphenyls

* Include upstream receiving water hardness analysis if lead is detected.

B. Treatment

1. Describe the existing treatment system:

This system will be constructed in winter 2014. One extraction well will pump groundwater at 45 gpm into a 2,000 gal holding tank. Water will then be mixed at the dosage specified in section 2 below in a 550 gal mixing tank. The water will then be pumped through an air stripper for treatment, followed by discharge to a storm structure.

Treatment Techniques Used	
🔀 Pump & Treat	
Air stripping	
GAC (Granular Activated Carbon) Augmented Insitu Bioremediation (with chemicals or nutrient addition)	
Other (describe)	

2. If any cleaning, softening or descaling of the treatment system

a. <u>Identify any additives</u> that are proposed or being used for cleaning, softening, or descaling of the treatment system. Provide Material Safety Data Sheets, and describe dosage.

Hecla 1 anti-scalant at 30-60 ppm, approximately 2-4 gallons per day. MSDS attached.

b. <u>Describe what is done</u> to clean, soften or descale, and <u>how often</u> it is done.

Hecla 1 will be introduced upstream of the air stripper at a continuous rate.

c. <u>Where is the reject water</u> from cleaning and descaling <u>discharged</u>?

 \boxtimes same discharge point as treated effluent

sanitary sewer

other (please describe)

3. Anticipated operating schedule during the new permit term (2012 – 2017)

Continuous 24/7 operation beginning February, 2015.

4. Anticipated flowrate (in gpm), and total volume of treated water to be discharged per month: Narcadis-us.com/officedata/milwaukee-wn/aproject/madisonkipp/wi001368/2014/data/groundwater treatment system design data/wpdes permit attachments/wpdes permit application - gets.docx

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45 gpm flowrate. 1,944,000 gallons monthly treated discharge.

5. Effluent discharge point location:

Storm structure AS5940-0049. See attached Figure 1 - Site Layout.

6. Is an air permit from the DNR air management program required? If not, why not.

An air permit is not required. Contaminants in the vapor phase will be treated using vapor granular activated carbon and monitored in accordance with NR 445.

III. DISCHARGE MANAGEMENT PLAN UPDATE

Include the following information:

1. A summary of analytical results for contaminants detected at the site.

See attached Table 1 Summary of Groundwater Analytical Results 2012 to 2014.

2. Results from the most recent volatile organic compounds (VOC) scan, including methods used and detection levels.

A full round of water samples was collected from 36 Site monitoring wells and 4 multiport wells in April 2014. Groundwater samples were submitted for VOCs analyzed using United States Environmental Protection Agency (U.S. EPA) SW-846 Method 8260B. A summary of the April 2014 groundwater results is included in the attached Table 1 Summary of Groundwater Analytical Results 2012 to 2014. The groundwater results are compared to the ch.NR 140 preventive action limits (PALs) and enforcement standards (ESs).

3. Results from an analysis of the **poly-nuclear aromatic hydrocarbons (PAHs)** shown on the right, including methods used and detection levels (unless PAH data are already submitted)

The lab needs to reach the lowest detection level achievable for each parameter because of the low limit for total PAHs. EPA test method SW-846 8310 is recommended.

benzo(a)anthracene	dibenzo(a,h)anthracene
benzo(a)pyrene	fluoranthene
benzo(b)fluoranthene	indeno(1,2,3-cd)pyrene
benzo(g,h,i)perylene	naphthalene
benzo(k)fluoranthene	phenanthrene
chrysene	pyrene

See Table 1 Summary of Groundwater Analytical Results 2012 to 2014 (attached).

4. **Contaminants proposed for periodic monitoring** and demonstration of why any monitoring required in the permit should be exempted due to low level of contaminants in the wastewater discharge.

See Table 1 Summary of Groundwater Analytical Results 2012 to 2014 (attached).

5. **Information to support request for any alternate effluent limit** for discharges to groundwater (Part 5 of permit) or request for temporary exemption for in-situ discharges (Part 6 of permit).

Not Applicable

6. Plans and specifications for the proposed treatment system identifying sampling points. For supplier furnished package treatment units, only a flow diagram, design summary, and unit sizing calculations are

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required.

Please see attached Figure 1: Site Layout for proposed discharge location. For a flow diagram and design summary, see attached Groundwater Extraction and Treatment System Drawings. Air stripper modeling is summarized in Table 2 – Air Stripper Removal Efficiency. Additionally, a Basis of Design was submitted to the WDNR on April 1, 2014.

7. General description of operations, identifying operational tasks, who is responsible to do that task, and how frequently the task is done (particularly needed at pump & treat systems).

Madison-Kipp will complete the following Operational Monitoring and Maintenance tasks:

- Cleaning of air stripper trays per manufacturer's recommendations.
- Oil and grease equipment motors per manufacturer's recommendations.
- Replace anti-scalant drums as needed.
- Daily monitoring of system components.
- Collection of treated effluent for monitoring per WPDES requirements.
- 8. A **site plan** that identifies general land uses, underground storage tanks and pipelines, groundwater monitoring and recovery wells, contaminant plume definition and zone of influence, other known spills in the area, septic tanks and drain fields, separation distances to potable water supply wells and residences, and other pertinent information.

See attached Figures 2-11 for existing well locations and contaminant plumes.

- 9. A **detailed map** of the discharge location, showing if discharge is direct or via a storm sewer or other conveyance. Indicate distance from site to discharge location and other impacted water bodies or wetlands.
 - If a city storm sewer is used, approval from the municipality is required.
 - If a new outfall structure is proposed, the plans should identify the outfall and incorporate appropriate erosion control methods. A permit for riprap projects (available at most DNR offices) should be obtained.
 - Wetland discharges are not allowed unless they meet wetland protection requirements of Ch. NR 103, Wis. Admin. Code.
 - See attached Figure 1: Site Layout for proposed discharge location. The groundwater extraction and treatment system discharge will discharge to storm structure AS5940-0049. This discharges to the Stark Weather Creek, flowing to Lake Monona in the Rock River Basin. This discharge has been conditionally approved to this location by the Dane County Department of Health as non-stormwater discharge.

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Remediation WPDES WI-0046566-06 Discharge Permit - Request For Continued Coverage

III. SIGNATURES

A. Signature of person completing the form, attesting to the accuracy and completeness of the statements made.

secce it Rubbennoit Inediation Title Date Signed ARCADIS 126 N. Jefferson St Sulte400 milwarkle rehecca nobbenalto orcadis-us. (B.n Address Email Telephone Number 414-277-6208 Wisconsin

B. This application must be signed by the official representative of the permitted facility (responsible party) who is: the owner, the sole proprietor for a sole proprietorship, a general partner for a partnership, or by a ranking elected official or other duly authorized representative for a unit of government, or an executive officer of at least the level of vice president for a corporation, having overall responsibility for the operation of the facility. If the application is not signed, or is found to be incomplete, it will be returned.

WTHONY C. KOBUNSKI

Signature of Official Representative

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Submit this General Permit Request for Coverage:

Department of Natural Resources, Water Permits Central Intake - WT/3, P.O. Box 7185, Madison, WI 53707-7185.

The decision on whether to cover this discharge under the remediation general permit will be made by regional DNR wastewater staff. Upon receipt in Madison, this application will be forwarded to the appropriate regional staff person.

A copy of the submittal should also be sent to the Department Remediation & Redevelopment Project Manager. Watershed Central: General Permits/Reissue Docs/Grw Remediation/Request For Coverage 2012.doc

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WPDES Section II. Part B. Treatment 2. Descaling

Hecla 1 MSDS

MATERIAL SAFETY DATA SHEET

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HECLA 1

Latest Revision Date12/1 SECTION 1	L0/12 MANUFACTURER_INFC	Print Date	12/10/12
QUES INDUSTRIES, INC.		FOR CHEMICAI	J EMERGENCY
5420 W. 140TH STREET		CALL INFOTRAC @	1-800-535-5053
CLEVELAND, OHIO 44142		24 HRS/DAY, 7	DAYS/WEEK
PH (216) 267-8989 FAX (21 SECTION 2	6) 267-8998 PRODUCT_IDENTIFI	<u>CATION</u>	
PRODUCT NUMBER Q HECLA1			
TRADE NAME OR CHEMICAL NAME HECLA 1			·
SYNONYMS NA			
CHEMICAL FAMILY Polymer Blend			
NFPA - HEALTH HAZARD 2			
FIRE HAZARD 0			
REACTIVITY HAZARD, 0			
NFPA SCALE 4=Extreme 3:	=High 2=Moderate 1=Sligh	t 0=Insignificant	
KEYNA= Not Applic SECTION 3	cable ND= Not Determined HAZARDOUS INGRED	IENTS	
CHEMICAL NAME (S)	CAS NUMBER & WT TLV-TW	PEL	SEC.313 CARCINOGEN?
None SECTION 4	NA - NA NA SHIPPING DATA	NA A	NO NA
D.O.T. PROPER SHIPPING NAME NA			
D.O.T. HAZARD CLASS NA			
D.O.T. LABELS REQUIRED NA			
UN/NA 1.D. NUMBER NA			
PACKAGING GROUP NA	• 12		
NON-BULK SHIPPING NAME Compound, Indu	strial Process Water Treati	ng, Liquid	
BULK SHIPPING NAME Same			
SECTION 5	PHYSICAL DATA	\overline{f}	
BOILING/FREEZING POINT @760 mmHg ND / ND			
рН 5.1			
VAPOR PRESSURE mm Hg @20º C ND	· · ·		
VAPOR DENSITY (Air = 1) \dots >1			
PERCENT VOLATILE BY WEIGHT (%) 50			
SPECIFIC GRAVITY @20°C 1.25			
SOLUBILITY IN WATER Complete			
EVAPORATION RATE (BuAc=1)	<1		
APPEARANCE AND ODOR	low to amber liquid with mil AND EXPLOSION HA	d odor. ZARD_DATA	
FLASH POINT (Test Method) NA			
AUTOIGNITION TEMPERATURE NA			
FLAMMABILITY LIMITS IN AIR (% V) NA			

SECTION 6 FIRE AND EXPLOSION HAZARD DATA CONT'D
EVENUERUNG MEDIA Not combustible
SPECIAL FIRE FIGHTING PROCEDURES NA
UNUSUAL FIRE & EXPLOSION HAZARDS Cool drums exposed to neat of fire to prevent steam rupture.
SECTION 7 REACTIVITY DATA
PRODUCT STABILITY Stable
Conditions to Avoid None Known
CHEMICAL INCOMPATIBILITY Strong Oxidizers
HAZARDOUS DECOMPOSITION PRODUCTS None known
HAZARDOUS POLYMERIZATION Will Not Occur SECTION 8 HEALTH HAZARD DATA
SKIN CONTACT Prolonged or repeated contact may cause irritation.
EYE CONTACT May cause eye irritation upon contact.
INHALATION High concentration of mists or vapors may cause respiratory system irritation.
INGESTION Harmful if swallowed. SECTION 9 EMERGENCY AND FIRST AID PROCEDURES
SKIN
get medical attention. Launder contaminated clothing before reuse.
EYESImmediately flush eyes with large amounts of water for 15 minutes and get medical attention.
INGESTION If swallowed, get medical attention immediately. Never give anything by mouth to an unconscious person.
INHALATIONMove to fresh air. Aid in breathing, if necessary, and get medical attention.
SECTION 10 ENVIRONMENTAL DATA
SPILL OR LEAK PROCEDURES Avoid skin contact. Neutralize and absorb with sand or inert material. Place in suitable
container for disposal. Flush neutralized residues to sanitary sever.
WASTE DISPOSAL METHOD Dispose of in accordance with all federal, state and local regulations.
HARAKLOUD WASHE FUCERZOILL. WA
CONTAINER DISPOSAL Empty containers may contain residuars, including crean, then offer for recycling , rease, or
SECTION 11 SPECIAL PROTECTION INFORMATION
RESPIRATORY PROTECTIONNIOSH/MSHA approved filter type mask for dusts, fumes and mists as needed to maintain P.E.L.
VENTILATIONLocal and/or mechanical exhaust to maintain exposure below P.E.L.
PROTECTIVE CLOTHING Neoprene gloves, apron, boots - as necessary to prevent skin contact.
EYE PROTECTION
OTHER PRECAUTIONS Safety shower and eyewash fountains should be easily accessible. SECTION 12 SUPPLIER INFORMATION

This information is furnished without warranty, expressed or implied, except that it is accurate to the best knowledge of manufacturer. The data on this sheet relates only to the specific material designated herein. Manufacturer assumes no legal responsibility for use or reliance upon this data. ARCADIS

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WPDES Section II. Part B. Treatment 3. Discharge Location

Figure 1 – Site Layout



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