

The Former General Motors Property, 1000 General Motors Drive, Janesville, WI

The General Motors Property consisted of six parcels. This document provides guidance on steps a future owner of the larger parcel, 1000 General Motors Drive (Parcel ID #0401300001), should follow, hereafter referred to as the “Main Parcel”. Questions on all parcels should be addressed to the Wisconsin Department of Natural Resources (WDNR) prior to redevelopment to ensure compliance with WDNR regulations are met. A summary of the continuing obligations (COs) by Parcel Identification Number can be found on pages 2-3 of the June 2, 2022 case closure letter issued by the WDNR. This legally binding document can be found in the online data base under BRRTS #: 02-54-560205 or follow this link: [WDNR EM/RR BOTW \(wi.gov\)](https://www.wdnr.gov/EM/RR/BOTW)

The Main Parcel of the GM Property was closed with the following COs:

- Residual Soil Contamination (Impacted soils encountered during redevelopment must be properly managed.)
- Cover for soil, see pages 9-56, cap maintenance plan dated March 18, 2022 in the CO packet (Redevelopment of the property must include a cap that is as or more protective than the one currently present.)
- Industrial Soil Standards (Property must remain industrial unless cleaned up to commercial or residential standards.)
- Material Management Plan (MMP) for Redevelopment (A MMP must be submitted for approval prior to redevelopment outlining how impacted materials will be managed.)
- Residual Groundwater Contamination (Groundwater encountered during redevelopment must be properly managed. Installation of wells may be restricted.)
- Monitoring Wells Could not be Property Filled or Sealed (If found, monitoring wells must be properly abandoned.)
- Future Vapor Intrusion Concern (Vapor intrusion potential must be properly investigated and/or mitigated for future redevelopments.)

The Main Parcel had an approximate 100 year industrial use history. Redevelopment can consider the COs in categories: soil, groundwater, and vapor. To ensure redevelopment in compliance with applicable codes and statutes, a comprehensive MMP is required and should encompass the above categories. An environmental professional knowledgeable with Wisconsin regulations is recommended to help with the redevelopment. Submittal of a MMP and approval by the WDNR can facilitate redevelopment and restore properties to productive use.

Future Vapor Risk

A continuing obligation indicating there is a possibility for vapor intrusion was put on the Main Parcel at the time of case closure. Certain chemicals that get spilled or discharged into the ground emit gases, or vapors, that can move through the soil. These vapors may enter a building through cracks, holes, drains and other small openings in a basement floor, wall, or foundation slab. It is similar to how radon, a naturally occurring gas, enters a house or building. Sampling and testing determines whether or not these soil gases are present in the indoor air.

Specific areas were tested on the Main Parcel indicating the risk may be limited (Figure B.4.a.). Options are available to prevent these contaminant vapors from getting indoors, called vapor mitigation. The selection and design of a vapor mitigation system (VMS) will depend on the land use setting, building specifications, and whether the system is being added to an existing building or incorporated into new construction. For simplicity, vapor mitigation can be grouped into three categories: Active Depressurization, Active Indoor Air Controls, or Passive Controls.

Vapor mitigation technologies can be incorporated into new buildings without use of the existing slabs, retrofitted into redevelopment if the existing slabs will be repurposed, or a combination of the two. If the existing slabs are utilized in the redevelopment, testing of the sub-slab and indoor air once construction is complete will determine if a VMS is required. It is more cost effective to build the infrastructure for a VMS

and sub-slab ports (for post-construction sampling prior to activating the VMS) during redevelopment than to do an after-the-fact retrofit.

Vapor mitigation is often incorporated into the construction of new buildings when vapor intrusion is possible because of residual contamination, but sub-slab vapor conditions cannot be verified until the new building is constructed. If the vapor intrusion pathway cannot be eliminated, then including features to mitigate vapor intrusion in the building design is encouraged because mitigation is often cheaper and more effective when installed at the time of new construction.

Several helpful documents for environmental professionals can be found here:

[Resources for environmental professionals || Wisconsin DNR](#)

The following links are of relevance to the Main Parcel:

- Continuing Obligations for Environmental Protection, Responsibilities of Wisconsin Property Owners (Pub. RR-819)
<https://dnr.wi.gov/DocLink/RR/RR819.pdf>
- <https://dnr.wi.gov/DocLink/RR/RR819.pdf> Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request (Form 4400-237)
<https://dnr.wi.gov/files/PDF/forms/4400/4400-237.pdf>
- Recommended Format for Exemption Request Chs. NR 718.12 or 718.15, Wis. Admin. Code (Form 4400-315)
<https://dnr.wi.gov/files/pdf/forms/4400/4400-315.pdf>
- DNR Case Closure Continuing Obligations: Vapor Intrusion (RR-042)
[DNR Case Closure Continuing Obligations: Vapor Intrusion \(wi.gov\)](#)
- Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin Wis. Stat. ch. 292; Wis. Admin. Code ch. NR 700 (Pub. RR-800)
[Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin](#)

Contact the WDNR project manager with any questions.

