



August 16, 2018

Mr. Paul Grittner, Contaminated Material Management Specialist  
Wisconsin Department of Natural Resources  
Remediation and Development  
PO Box 7921  
Madison, WI 53707-7921

RE: Amended Soil Waste Management Plan  
Rock River Sediment Removal Project  
Janesville, Wisconsin  
BRRTS Activity # 02-54-577951

Dear Mr. Grittner:

EnviroAnalytics Group, LLC (EAG) received a copy of your August 6, 2018 Response to Amended Soil Management Plan letter to Jaines LLC. EAG is pleased to submit the following responses to your comments. These responses have been numbered 1 through 7 to correspond with the comments presented in your letter.

1. EAG will continuously characterized the dewatered sediment piles as the material is generated so that stockpiled contaminated soil does not exceed 2,500 cubic yards. Analytical results of samples obtained from the dewatered sediment will be immediately reported to WDNR upon receipt with a recommendation for reuse or offsite disposal based on the decision flow chart. A copy of this flow chart is attached. Alternative storage practices will be considered (i.e., covered piles within containment) if these actions are not sufficient to comply with the 2,500 cubic yard requirement.
2. EAG will provide WDNR with laboratory data, material volume, and final reuse location for each designated stockpile as the information is available, and summarized in the weekly report.
3. The decision diagram for the Soil Management Plan is attached. This diagram details the requirements for soils to be reused within the vegetative area to the west of the operations, the truck bay areas, and offsite disposal. The parking lot area north of the tire building is no longer considered a beneficial reuse location. All references to “non-residential” criteria have been removed from the sections detailing the Storage of Excavated Contaminated Soil and Reporting and the decision diagram and replaced with industrial residual contaminant levels (RCLs). It is the intent of the site owner to maintain the zoning of this property as industrial.
4. A sample for laboratory analyses will be collected from the first 100 cubic yards, the first 300 cubic yards, and the first 500 cubic yards of material recovered. Samples will then

be collected for every 500 cubic yards of material thereafter. The most recent estimate is approximately 10,000 cubic yards of sediment material will be recovered during the dredging project. This sample frequency would result in 22 samples collected to characterize the 10,000 cubic yards. Additional samples for QA/QC measures such as duplicates will be collected per the Sampling and Analysis Plan. If additional material is recovered during dredging operations, samples will be obtained at a rate of 1 sample for every 500 cubic yards. The proposed sampling is expected to adequately characterize the material since once sediment is recovered it will be conveyed hydraulically to the dewatering area and be homogenized in the process. Composite samples of discrete aliquot from several locations with each stockpile provide a representative sample for analytical testing. Initial testing will provide a clear picture of data range and consistency.

5. The results of the analyses of the samples obtained from the first 100 cubic yards, the first 300 cubic yards, and the first 500 cubic yards will be compared to verify consistency. Samples will be obtained at a rate of 1 sample for every 500 cubic yards thereafter if the results of analyses of the initial sampling indicate that results are consistent. Additional sampling may be proposed and completed if the results of analyses of the initial sampling indicate results are inconsistent.
6. The locations of the two reuse areas are presented in several figures in the SMP. These figures are attached to this letter for ease of review. The vegetative area is located immediately west of the dewatering operations. The area is approximately  $\frac{3}{4}$ -acre and is mostly exposed soil with some vegetation.

The truck bay areas were used to load and unload trucks as part of the former General Motors Assembly Plant operations. The bays are approximately 36-feet wide, 4-feet high and lengths of 1500-feet and 300-feet. The above ground structures that make up the assembly plant are currently being demolished and it is the intent of the owner to leave all existing slabs in place. The dewatered sediment material designated for this area will be used to fill the truck bays and the material will be capped with concrete to match the existing slabs and prevent risks associated with direct contact.

7. Attached is a draft maintenance plan for the concrete cap that will be installed on top of the material used to fill the truck bay areas, including the inspection and maintenance log. This document will be finalized with photographs and exact location maps as soon as the cap is installed.

We trust that the above responses address your comments and we shall notify you 5 days in advance of the date we begin the dredging operations and sampling of the dewatered sediment. If you have any questions, please contact me at 314-835-2814 or by email at [ddunn@enviroanalyticsgroup.com](mailto:ddunn@enviroanalyticsgroup.com).

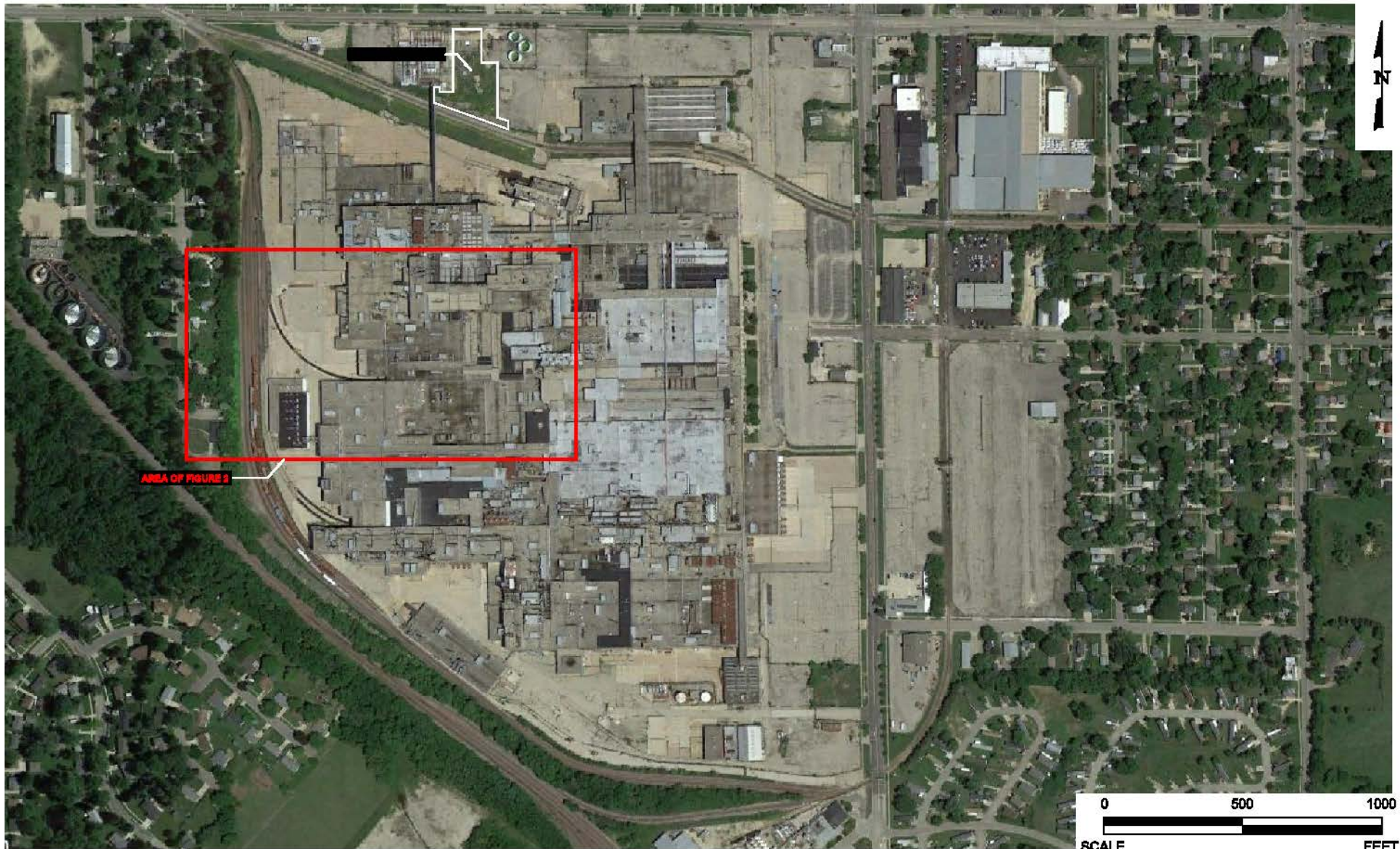


Sincerely,

*Daniel M. Dunn*

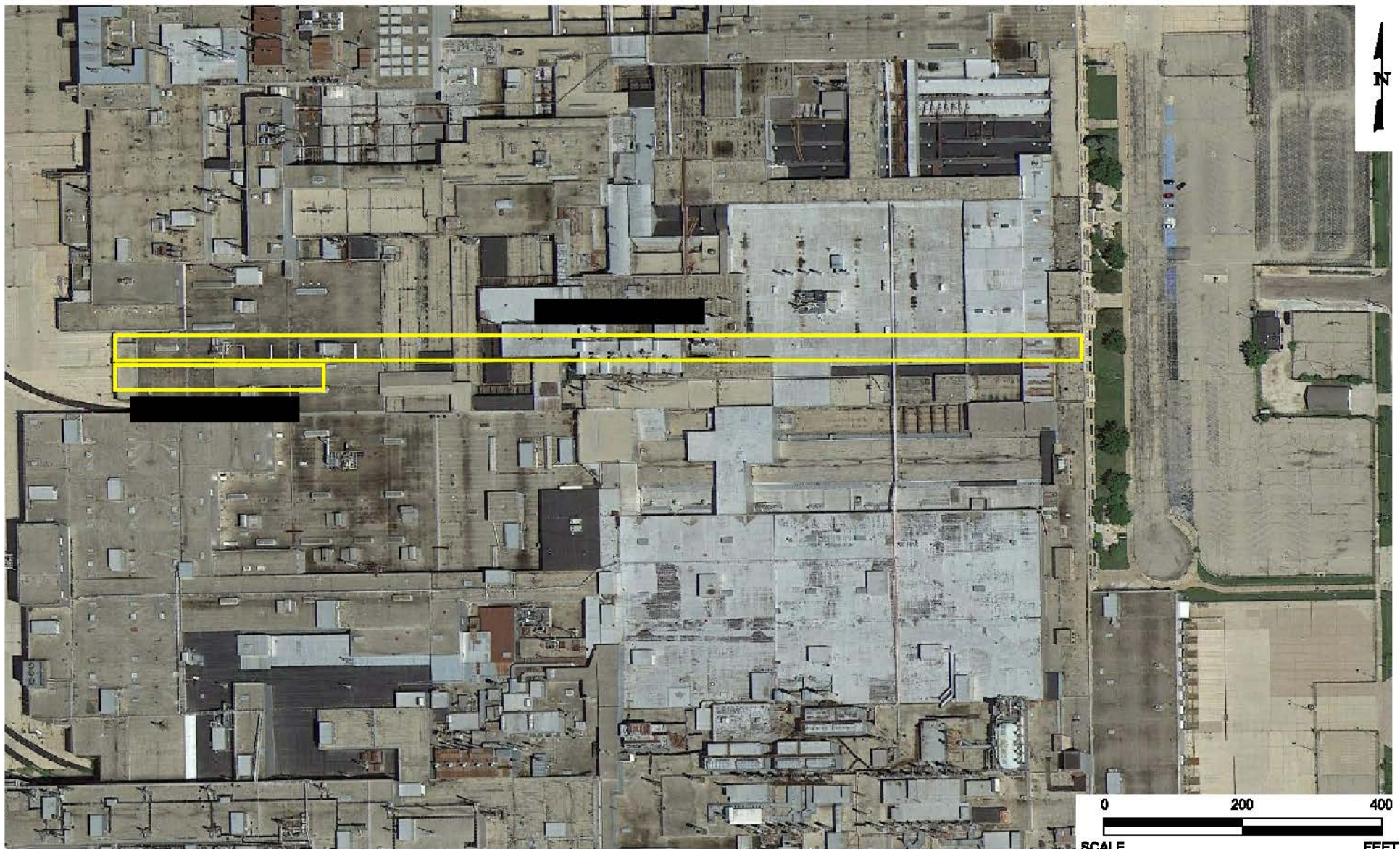
Daniel M. Dunn  
Director of Remediation  
EnviroAnalytics Group, LLC  
1515 Des Peres Rd, Suite 300  
St. Louis, MO 63131

Enclosures



DESIGN: PK	DRAWN: lmc	CHKD.: PK
DATE: 07/26/18	SCALE: As Shown	REV.:
DRAWING NAME: EAG 2018JANESVILLE PLANTFIGURE 4 AREA MAP		

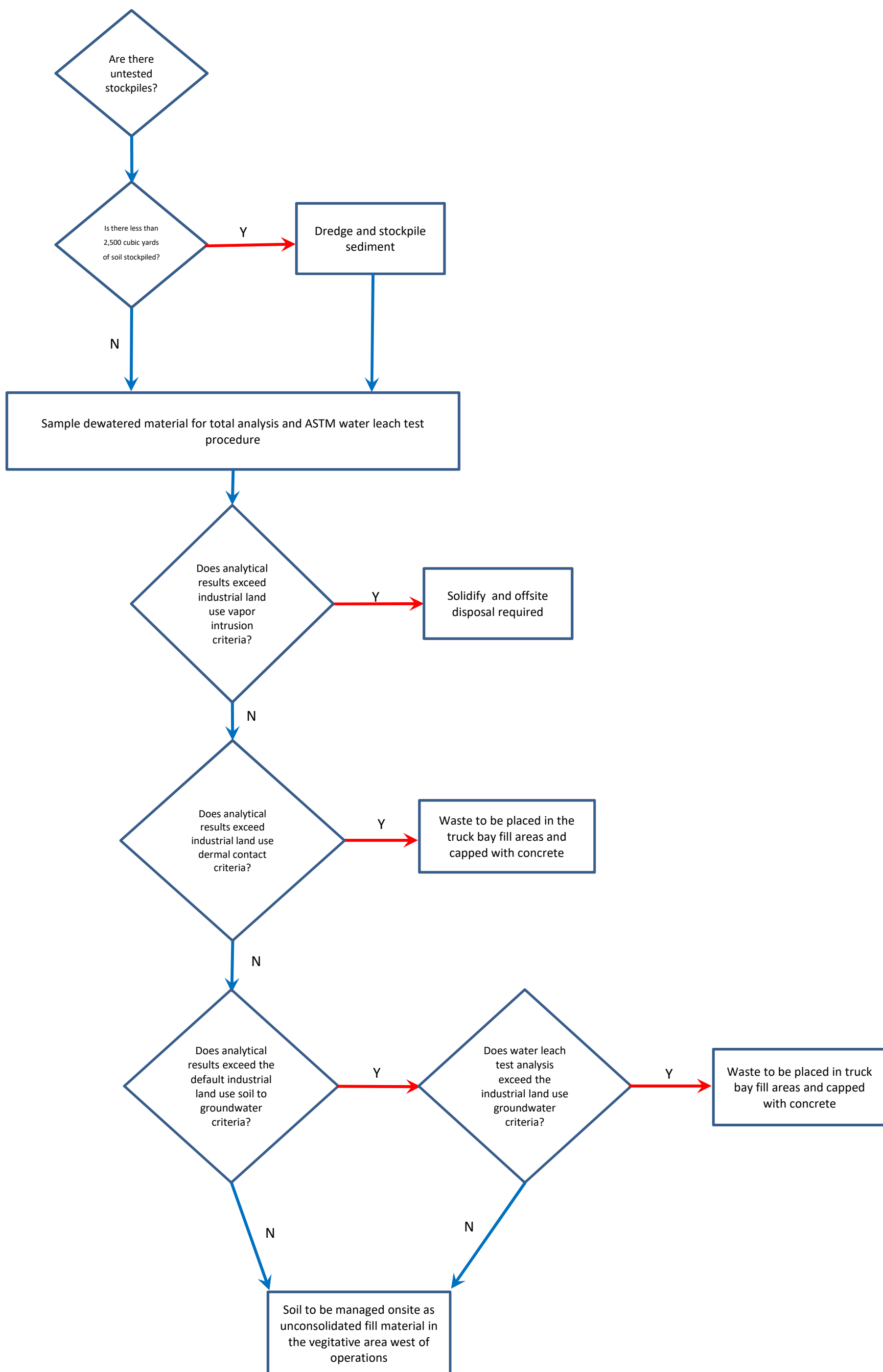
**FIGURE 4  
AREA MAP  
GM Janesville Assembly Plant  
1000 General Motors Drive  
Janesville, Wisconsin**



**FIGURE 5**  
**BENEFICIAL REUSE LOCATIONS - TRUCK BAY FILL AREAS**  
**GM Janesville Assembly Plant**  
**1000 General Motors Drive**  
**Janesville, Wisconsin**

DESIGN: PK	DRAWN: lmc	CHKD.: PK
DATE: 07/19/18	SCALE: As Shown	REV.:
DRAWING NAME: EAG 2018JANESVILLEFIG 5 BENEFICIAL REUSE LOC.		

FIGURE 6  
SOIL WASTEMANAGEMENT PLAN - DECISION DIAGRAM  
1000 GENERAL MOTORS DRIVE  
JANESVILLE, WISCONSIN



## COVER MAINTENANCE PLAN

(to be included in Form 4400-202, as Attachment D)

August 8, 2018

Property Located at:

1000 General Motors Drive  
Janesville, Wisconsin 53546

BRRTS Activity #02-54-577951

Tax Key: 0401300001

### Introduction

This document is the Maintenance Plan for a concrete cover at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the concrete cover which addresses or occupies the area over the contaminated soil.

More site-specific information about this property/site may be found in:

- The case file in the DNR office
- At <http://dnr.wi.gov/topic/Brownfields/wrrd.html>, which includes:
  - BRRTS on the Web (DNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
  - RR Sites Map for a map view of the site, and
- The DNR project manager for Rock County.

### D.1. Descriptions:

*(Form 4400-202, Attachment D, Part D1. – brief description of the type, depth and location of residual contamination, description of the system/cover/barrier to be maintained, and its location on the site, maintenance activities, and contact information.)*

#### Description of Contamination

This material is sediment/soil that was removed from the Rock River, dewatered, and approved for beneficial reuse on the former General Motors Assembly Plant property. The locations where this material was reused as soil on the site is shown on the attached map. The material contains polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals. The material was placed and compacted at a depth from just below the surface to approximately 4-feet below grade at two former truck bays at the former General Motors plant.

#### Description of the Cover to be Maintained

The cover consists of approximately 4-inches to 6-inches of concrete. The material that was removed via dredging operations and was approved for beneficial reuse on the site. This material was used to fill former truck bays and the concrete cover was poured on top of the contaminated soil to match the grade of existing assembly plant concrete slabs. The former truck bay areas are located in the central portion of the former assembly plant site and are shown on the map.

### Cover/Building/Slab/Barrier Purpose

The concrete cover over the contaminated soil serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The cover also acts as an infiltration barrier to minimize potential for future soil-to-groundwater contamination. The plant is undergoing site-wide investigations of soil and groundwater conditions that exceed the groundwater standards in ch. NR 140, Wisconsin Administrative Code under a separate BRRTS #. The current and anticipated future land use of the property is industrial. The barrier will function as intended unless disturbed.

### Annual Inspection

The cover overlying the contaminated soil will be inspected periodically and a minimum of once a year. The inspection will normally occur in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and/or where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. A copy of this log is attached. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources (DNR) representatives upon their request.

### Maintenance Activities

*(Form 4400-202, Attachment D, Part D1. – Description of Maintenance Actions required for maximizing effectiveness of the cover/barrier/engineered control, feature or other action for which maintenance is required.)*

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and make sure they use appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the cover overlying the contaminated soil is removed or replaced, the replacement barrier must be of equal functionality. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the concrete cover will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.



## Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

The following activities are prohibited on any portion of the property where concrete cover is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure; 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

## Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of DNR.

## Contact Information

*(Form 4400-202, Attachment D, Part 1.) Contact Information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.)*

August 2018

Site Owner and Operator:       Jaines, LLC  
  Michael Roberts, Member  
  Thomas Roberts, Member  
  1515 Des Peres Road, Suite 300  
  St. Louis, Missouri 63131  
  314-835-1515

Signature: \_\_\_\_\_

Consultant:                    EnviroAnalytics Group, LLC  
  Attn: Daniel M. Dunn  
  1515 Des Peres Road, Suite 300  
  St. Louis, Missouri 63131  
  314-835-2814

DNR:                            Paul Grittner, Contaminated Material Management Specialist  
  Wisconsin Department of Natural Resources  
  101 South Webster Street  
  Box 7921  
  Madison, Wisconsin 53737-7921  
  608-266-0941

**D.2 Location Map(s)**

*Include a location map which shows:*

- (1) the feature that requires maintenance;*
- (2) the location of the feature(s) that require(s) maintenance: on and off the source property;*
- (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site;*
- (4) the extent and type of residual contamination; and*
- (5) all property boundaries.*

**D.3 Photographs of Cover/Barrier**

*Include one or more photographs documenting the condition and extent of the cover/barrier/building/slab at the time of the closure request. Pertinent features must be visible and discernible. Include a title on each photograph, which identifies the site name and location of the feature, and the date on which the photograph was taken.*

**D.4 Continuing Obligations Inspection and Maintenance Log**

Use DNR Fillable Form [Form 4400-305](#)

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name	BRRTS No.
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Inspections are required to be conducted (see closure approval letter): <input type="radio"/> annually <input type="radio"/> semi-annually <input type="radio"/> other – specify _____	When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):
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Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

**Continuing Obligations Inspection and Maintenance Log**

Form 4400-305 (2/14)

BRRTS No.

Activity (Site) Name

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title: