

July 19, 2019

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

Re: NR 718 Application - Soil Waste Management Plan Rock River Sediment Removal Project Janesville, Wisconsin BRRTS Activity # 02-54-577951

Dear Mr. Grittner:

Thank you for your prompt response to our letter of July 17th. EAG is proposing that the dredged sediment be reused to grade a small area within the former JATCO for positive drainage and be revegetated, reducing the paved surface area in the northern portion of that parcel. Soils will be utilized as fill material (with continuing obligations, as applicable) at the final reuse location shown on the attached aerial map.

A 2-foot thick engineered barrier or "cap" consisting of uncontaminated "clean" soil material will be placed on top of the fill area to isolate the impacted soils. The native soils were sampled and analyzed to demonstrate no impacts for unrestricted use as a cover material. Vegetation (native grasses) will be established as a final surface feature. Please find herein supplemental information addressing your requests, including those in your letter of July 16, 2018. We have restructured this submittal to assist your review and approval, and attached all information for completeness.

 Laboratory reports were not included for all lab data referenced on the table. Data missing from the lab reports include: Solid Sample #1 – PAH and metal analysis Solid Sample #2 – PCBs, PAHs, PAH leach, and metals analysis

It is unclear whether soil samples #1-3, referenced in the lab reports, are the same as solid sample #1-3, referenced in different lab reports and on the table. It is also unclear why metals leach analysis was conducted on Soil #1 (collected 6/20) and Solid #1 (collected on 7/9). Providing a brief narrative describing how the soil/solid samples were collected and analyzed would be a useful for interpreting this data.

Solid samples #1-3 and Soil Samples #1-3 are the same samples. They were erroneously mislabeled, but still correspond to the same soil piles we sampled. The reason why Solid Sample #1 was sampled at two different dates is due to the lab not running leachate analysis for all of the parameters that we requested. A second sample was submitted on 7/9 to completely characterize the soil pile.

2. The volume of material currently proposed to be managed under the exemption needs to be stated. Is this request for the initially 500 yards of soils, or is it intended to apply to a greater volume? Is it expected that future requests will be made to reuse additional material at this location?

This request is for approximately 3,500 yds now with the remaining total managed as remediation waste until characterization analytical reports are received (to be forward in near future). The table has been updated to include the approximate volumes that each sample analysis characterizes. Future requests will be made for the remaining sediment that has not been processed and/or characterized in 2,500-cy portions. It should be noted that lab results for approximately 2,000 additional yards arrived on 7/18 and the table has been updated to show the results for all sample data received to-date (i.e., NE Geo Bag Sample #2, South Geo-Bag Sample #1, and South Geo-Bag Sample #2) teeing up future approvals. The lab report for these additional results has also been included as an attachment.

3. Explain how the sampling criteria in NR 718.12(1)(e) has been met by explaining what the sample results on the attached table represent. Were solid samples #1, #2, and #3 collected during the accumulation of the first 500 yards of stockpiled dewatered sediment as was originally proposed? Explain what a Geo-Bag sample is and if these results are being used to characterize stockpiled soil that will be reused at the former JATCO.

As stated in the previous answer, the tables have been updated to show the volumes that are represented for each sample. The "Solid Samples" consist of material that was coarse grained in nature and placed in open 500 yd stockpiles. "Geo-Bag samples" refer to the sediment that had more fine-grained material that needed further dewatering, so the material was subsequently placed in Geo-Textile Bags that can hold up to 500yds of dewatered sediment. The material in the Geo-Textile bags will be considered for reuse at the former JATCO site.

4. A map depicting the reuse area was provided. If the cap tapers off as shown on the figure it should extend beyond fill area to ensure the thickness will be protective.

A revised cross-section showing the cap soil overlapping the excavation to minimize potential for infiltration through the fill material is attached. Soil will be compacted and amended as necessary to support a vegetative cover.

5. Confirm whether the soil managed at the proposed reuse location will be placed more than 3 feet from the high-water level in that area.

The Final Case Closure letter for BRRTS # 03-54-000405, Section 2.B.(iv). indicates the depth to groundwater on the site ranged from 61.33 ft bgs to 69.53 bgs on the site in Section 2.B.(i). The depth of the reuse location will be more than 3 feet from the high-water level in the area

6. Provide a justification that reuse will meet requirements of NR 726.12(1)(b)1-5 (which generally means that the reuse of the contaminated soil in the proposed location will not result in harm to human health or the environment).

The analytical data provided so far indicates that the soil potentially exceeds industrial direct contact RCLs and that naphthalene has the potential to leach such that an enforcement standard could be exceeded by this compound. The flow chart included with the Application

suggests that soil with these characteristics be reused under a concrete cap or be disposed at a licensed facility. Explain how reusing the soil in the newly identified reuse area is as protective as these other strategies. The DNR does not typically consider a soil cap to be protective for preventing groundwater contamination.

See attached revised decision tree for soil characterization, existing and proposed continuing obligations that include a soil management plan, and a cap maintenance plan demonstrating the remaining level of contamination does NOT:

1. Pose a threat to public health, safety, or welfare or the environment.

2. Cause a violation of a ch. <u>NR 140</u> groundwater quality enforcement standard at any applicable point of standards application, except where the department has granted an exemption under s. <u>NR 140.28</u> for a specific hazardous substance or the criteria under s. <u>NR 726.05 (6)</u> are met. A groundwater use restriction is in place at the site associated with BRRTS No. 03-54-00405 and was granted on October 26, 1999 and filed in Rock County Register of Deeds, document number 1434932). No potable groundwater wells are present on the site, and groundwater use restrictions will continue to be upheld as referenced in the final closure of BRRTS # 03-54-00405, Section 2.B.(iv). Attached are extracted pages from the Final Case Closure letter.

3. Cause a violation of surface water quality standards in chs. <u>NR 102</u> to <u>106</u>. A Notice of Intent for Construction was filed online last week and a Stormwater Pollution Prevention Plan is available.

4. Cause a violation of air quality standards contained in chs. <u>NR 400</u> to <u>499</u>. Dust will be managed by watering as necessary.

5. Cause a vapor action level in indoor air to be attained or exceeded. No volatile organic compounds were identified in the sediments.

Leach test results should always be tabulated and compared to the enforcement standards to support the proposed management plan.

The summary table has been updated (page 2).

7. State specifically what continuing obligations will be required to address soil reused offsite and provide the applicable review and database fees.

As a condition for approving the 718 exemption the DNR will impose continuing obligations on the site where the contaminated soil will be managed. The applicant must propose these obligations as part of the exemption request.

It is unclear whether requiring industrial land use would be beneficial, as the sample results from Solid Sample #2 indicate that PAH concentrations exceed industrial direct contact RCLs. The only advantage to using industrial direct contact RCLs is when contaminant concentrations are between industrial and non-industrial standards, the soil is located at a property that is zoned for industrial uses, and a cap will not be maintained over the contaminated material. Recommending the continuous maintenance of the proposed cap would address the direct contact risk posed by residual contamination and would not require land use restrictions.

A two-foot capping layer (consisting of uncontaminated native soil), vegetative cover, and maintenance plan is proposed. The current zoning is M2 - General Industrial. Future zoning may include commercial uses; however, the proposal addresses continuing obligations for nonresidential land use, maintenance of the cover system, a soil management plan, restriction on groundwater use. Some of these deed restrictions were included in the Case Closure approval for BRRTS No. 02-54-560181 GM Former Haul-Away Yard per a letter from DNR to GM dated August 1, 2017. A groundwater use restriction is in place at the site associated with BRRTS No. 03-54-00405 and was granted on October 26, 1999 and filed in Rock County Register of Deeds, document number 1434932). No potable groundwater wells are present on the site, and groundwater use restrictions will continue to be upheld as referenced in the final closure of BRRTS # 03-54-000405, Section 2.B.(iv). A copy of the Final Case Closure letter and excerpted supporting documentation is attached. An Amended Soil Management Plan is included in this submittal.

The land use / zoning plan was not included with the application, so it is unclear if requiring industrial zoning to be maintained would be an issue for this property.

A copy of the current proposed planning is attached.

A \$1,000 check is being mailed along with two paper copies of this request.

We trust this supplemental information satisfies your current needs to grant approval of our request. If you have any questions, please contact me at 314-835-2814 or by email at <u>ddunn@enviroanalyticsgroup.com</u>.

Sincerely,

Samel M. Dunn

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

cc: Bill Fitzpatrick, PE

Enclosures:

- Aerial site plan with fill location and cross-section
- Revised Summary table of lab data dried sediment-soil
- Amended Soil Management Plan (w/cover maintenance plan)
- Current zoning
- Proposed land use / zoning plan
- Decision tree
- Excerpts of Case Closure file with continuing obligations and example soil boring log
- Test America Analytical reports

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Former GM Assembly plant

and the second second

Runoff 300 ft

age of

-Sediment-Soil Fill Area (vegetated)

vegetated cover

Sediment-Soil Fill

A

2-3 ft cover

GS

Fill Area Cross-Section

4-5 ft fill

NR 718 Beneficial Re-use exemption Request Rock River dredging Project Fill Location - JATCO Site 544 Kellogg Janesville, WI

> JATCO property former GM Haul-Away-Yard

9 2018 Google



Summary of Analytical Results - Dried Sediment-Soils

NR 718 Beneficial re-use exemption

Rock River Dredging project - former GM Assembley plant Janesville, WI

					Pilot Test Sample	Solid Sample #1	Solid Sample #2	Solid Sample #3	Geo-Bag Sample #1	Jatco Cover Soil	NE Geo-Bag Sample #2	South Geo-Bag Sample #1	South Geo-Bag Sample #2	Solid Sample #4	Solid Sample #5	Solid Sample #6	NE Geo-Bag Sample #3	Drying Bed Sample
Chemical	Background Concentrations	Vapor Intrusion Action Levels	Dermal Contact Action Levels	Soil-To- Groundwater Action Levels	100 yds volume	500 yds volume	500 yds volume	500 yds volume	500 yds volume		500 yds volume	500 yds volume	500 yds volume	500 yds volume	500 yds volume	500 yds volume	500 yds volume	500 yds volume
					500-150867-4	500-165506-1	500-165506-2	500-166406-2	500-165974-5	500-165506-3	500-166667-3	500-166667-4	500-166667-5	500-166745	500-166745			
					8/31/2018	6/20/2019	6/20/2019	7/9/2019	6/28/2019	6/20/2019	7/11/2019	7/11/2019	7/11/2019	7/15/2019	7/15/2019	7/15/2019	7/18/2019	7/18/2019
	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Acenaphthene			45200		0.017	<0.0074	0.5	0.12	0.14	<0.0061	0.055	0.018	0.29	Pending	Pending	Pending	Pending	Pending
Acenaphthylene					0.024	<0.0055	0.093	0.031	<0.05	<0.0045	0.043	0.025	<0.11	Results	Results	Results	Results	Results
Anthracene			100000	196	0.061	<0.0069	1.2	0.51	0.31	<0.0057	0.17	0.073	0.62					
Benzo[a]anthracene		900	20.8		0.21	0.026	3.5	0.78	0.65	<0.0046	0.45	0.21	1.5					
Benzo[a]pyrene		12000	2.11	0.47	0.23	0.028	3.3	0.75	0.67	<0.0066	0.46	0.22	1.1					
Benzo[b]fluoranthene		28000	21.1	0.478	0.32	0.033	5.6	0.81	0.77	<0.0074	0.57	0.28	1.7					
Benzo[g,h,i]perylene					0.087	0.015	0.86	0.31	0.14	<0.011	0.26	0.15	0.81					
Benzo[k]fluoranthene		2800000	211		0.13	0.022	1.9	0.69	0.63	<0.01	0.22	0.10	0.56					
Chrysene		28000000	2110	0.144	0.24	0.034	3.7	0.72	0.89	<0.0093	0.52	0.25	2.3					
Dibenz(a,h)anthracene		28000	2.11		0.02	<0.008	0.3	0.09	<0.073	<0.0066	0.077	0.048	<0.16					
Fluoranthene			30100	88.87	0.5	0.044	5.8	2.4	1.9	<0.0063	0.89	0.45	3.1					
Fluorene			30100	14.82	0.02	<0.0058	0.63	0.14	0.16	<0.0048	0.066	0.023	0.39					
Indeno[1,2,3-cd]pyrene		280000	21.1		0.085	0.016	0.91	0.3	0.29	<0.0088	0.22	0.12	0.73					
Naphthalene		17	24.1	0.658	0.02	<0.0064	0.74	0.1	0.19	<0.0053	0.051	0.018	0.42					
Phenanthrene					0.26	0.021	5	1.3	1.2	<0.0048	0.65	0.26	3.1					
Pyrene			22600	54.54	0.42	0.057	6.9	1.5	1.5	<0.0068	0.84	0.49	3.7					
1-Methylnaphthalene					0.017	<0.01	0.69	0.078	0.29	<0.0083	0.067	0.025	0.67					
2-Methylnaphthalene			3010		0.028	<0.0076	1.2	0.14	0.34	<0.0063	0.098	<0.018	0.85					
PCBs																		
PCB-1016		440000	28000		<0.041	<0.074	<0.078	<0.078	<0.074	<0.0059	<0.016	<0.018	<0.015					
PCB-1221		4400	883		<0.051	<0.092	<0.098	<0.098	<0.092	<0.0073	<0.020	<0.022	<0.018					
PCB-1232		2400	792		<0.051	<0.091	<0.097	<0.097	<0.091	<0.0072	<0.020	<0.022	<0.018					
PCB-1242		13000	972		<0.038	<0.069	<0.073	<0.073	<0.069	<0.0055	<0.015	<0.017	<0.013					
PCB-1248		13000	975		<0.046	<0.082	<0.087	<0.087	<0.082	<0.0065	<0.018	<0.020	<0.016					
PCB-1254		18000	988		<0.025	<0.045	<0.048	<0.048	<0.045	<0.0036	<0.010	<0.011	<0.0089					
PCB-1260		28000	1000		<0.057	<0.1	<0.11	<0.11	<0.1	<0.0082	<0.023	<0.025	<0.020					
Metals																		
Arsenic	8	3900	3	0.584	1.7	0.79	4.4	4.1	4.6	0.48	3.0	2.3	5.5					
Mercury	0.89	46	3.13	0.208	4.6	0.28	0.37	0.32	5.5	<0.005	1.2	1.5	2.1					
Barium	1070	3000000	10000	164.4	48	21	540	240	340	8.6	310	150	350					
Cadmium	1	9300	985	0.752	0.5	0.24	1.7	1.1	1.5	0.13	1.5	0.77	1.5					
Chromium				360000	9.9	7.8	74	23	46	3.0	40	28	53					
Lead	37.7		800	27	71	150	760	480	300	1.4	160	47	240					
Selenium	0.858		5840	0.52	<0.77	<0.65	0.72	0.87	2.5	<0.56	2.9	3.0	2.4					
Silver			5840	0.849	<0.17	0.78	1.3	1.1	2.2	0.49	2.6	2.7	3.2					

NS- Not Sampled

Indicates an exceedance of soil-to-grondwater standards Exceeds Dermal Contact Levels Exceeds Vapor Intrusion Levels

Note:

Final closure of BRRTS # 03-54-000405 was granted on October 26, 1999, subsequent to abandonment of the monitoring wells and implementation of a deed restriction filed with Rock County. The filing placed a groundwater use restriction on the deed for the Site (Rock County Register of Deeds, document number 1434932)."

ASTM Leach Analysis Results for Sediment

	ASTM Leach	Pilot Test Leach Sample	Solid Sample #1 Leach	Solid Sample #3 Leach	NE Geo-Bag Sample #2 Leach	South Geo-Bag Sample #1 Leach	South Geo-Bag Sample #2 Leach
Chemical	Enforcement	500-150867-5	500-166406-1	500-166406-2	500-166667-3	500-166667-4	500-166667-5
	Standards	8/31/2018	7/9/2019	7/9/2019	7/11/2019	7/11/2019	7/11/2019
	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Acenaphthene		<0.0072	<0.0036	<3.6	<0.0036	<0.0036	<0.0036
Acenaphthylene		<0.0064	<0.0032	0.017	<0.0032	<0.0032	<0.0032
Anthracene		<0.0064	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032
Benzo[a]anthracene		<0.0008	<0.00044	<0.00044	<0.00044	<0.00044	<0.00044
Benzo[a]pyrene	0.0002	<0.0011	<0.00056	<0.00056	<0.00056	<0.00056	<0.00056
Benzo[b]fluoranthene	0.0002	<0.0012	<0.00058	<0.00058	<0.00058	<0.00058	<0.00058
Benzo[g,h,i]perylene		<0.0084	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042
Benzo[k]fluoranthene		<0.0015	<0.00074	<0.00074	<0.00074	<0.00074	<0.00074
Chrysene	0.0002	<0.0028	<0.0014	<0.0014	<0.0014	<0.0014	<0.0014
Dibenz(a,h)anthracene		<0.0013	<0.00064	<0.00064	<0.00064	<0.00064	<0.00064
Fluoranthene		<0.0064	<0.0032	<0.0032	<0.0032	<0.0032	<0.0032
Fluorene		<0.0076	<0.0038	<0.0038	<0.0038	<0.0038	<0.0038
Indeno[1,2,3-cd]pyrene		<0.0017	<0.00084	<0.00084	<0.00084	<0.00084	<0.00084
Naphthalene	0.1	0.022	<0.003	0.11	<0.0030	<0.0030	<0.0030
Phenanthrene		<0.007	<0.0035	<0.0035	<0.0035	<0.0035	<0.0035
Pyrene	0.25	<0.0096	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048
1-Methylnaphthalene		<0.001	<0.005	<0.005	<0.0050	<0.0050	<0.0050
2-Methylnaphthalene		<0.0026	<0.0013	0.0019	<0.0013	<0.0013	<0.0013
PCBs							
PCB-1016		NS	NS	NS	NS	NS	NS
PCB-1221		NS	NS	NS	NS	NS	NS
PCB-1232		NS	NS	NS	NS	NS	NS
PCB-1242		NS	NS	NS	NS	NS	NS
PCB-1248		NS	NS	NS	NS	NS	NS
PCB-1254		NS	NS	NS	NS	NS	NS
PCB-1260		NS	NS	NS	NS	NS	NS
Metals							
Arsenic	0.01	0.0031	0.0036	0.005	0.0023	<0.0020	<0.0020
Mercury	0.002	<0.0002	<0.002	<0.002	<0.00020	<0.00020	<0.00020
Barium	2	<0.05	<0.05	<0.05	<0.050	<0.050	<0.050
Cadmium	0.005	<0.001	<0.001	<0.001	<0.0010	<0.0010	<0.0010
Chromium	0.1	<0.05	0.0085	<0.05	<0.0050	<0.0050	<0.0050
Lead	0.015	<0.002	0.022	0.0037	0.0025	<0.0020	<0.0020
Selenium	0.05	<0.001	<0.001	<0.001	<0.010	<0.010	<0.010
Silver		<0.05	<0.05	<0.05	<0.0050	<0.0050	<0.0050

NS- Not Sampled

Exceeds Criteria

AMENDED SOIL MANAGEMENT PLAN

ROCK RIVER SEDIMENT REMOVAL PROJECT

JANESVILLE, WISCONSIN

BRRTS Activity # 02-54-577951

Prepared For:

JAINES, LLC

1650 DesPeres Rd., Suite 303

St. Louis, MO 63131

Prepared By:



1515 Des Peres Rd, Suite 300

St. Louis, MO 63131

(314)835-1515

July 2019

BACKGROUND

The Former General Motors (GM) Assembly Plant (the Site) located in Janesville (Rock County), Wisconsin has been assigned WDNR Bureau for Remediation and Redevelopment Tracking System (BRRTS) Number (#) 02-54-577951. The property is currently zoned as M2 – General Industrial. The Site contains sediments impacted by contaminants of potential ecological concern (COPECs), including polycyclic aromatic hydrocarbons (PAHs), lead, mercury, and polychlorinated biphenyls (PCBs), that were identified near the Adjacent Outfall where storm water from the former GM plant discharged to the Rock River north of the substation along Delavan Drive in Janesville. Information regarding the sedimentation in this reach of the Rock River was initially reported in studies completed for the City as part of the Monterey Dam demolition planning (Inter-Fluve, Inc., 2015). Multiple site investigations and evaluations were subsequently conducted by GM as documented in the *Sediment Investigation Report* (GHD Report No. 21, May 2016), the *Rock River Site Investigation Report* (GHD Report No. 30, May 2017), and the *Remedial Action Options Report* (GHD Report No. 32, May 2017). Multiple lines of evidence from comprehensive studies of sediment quality impacts on local biological receptors were evaluated utilizing statistical methods and consensus-based guidance to assess potential ecological and human health exposure risks.

Sediments near the Adjacent Outfall are impacted by contaminants of potential ecological concern (COPECs), including PAHs, lead, mercury, and PCBs. Storm water from the former GM plant discharged to the Rock River via this outfall north of the substation along Delavan Drive. The RADR mitigates impacts near the outfall based upon the evaluation of potential risks to sediment-dwelling benthic invertebrates. It should be noted that GM reported no records of releases to stormwater and the contaminants identified near the outfall may have originated from other sources and not solely from historical GM operations. This document outlines the Soil Management Plan for the sediments that are to be removed during the dredging activities.

The RADR presented the project approach and objectives for removal of approximately 10,000 cubic yards of impacted sediment from a designated remedial action area (RAA) covering approximately two acres within the Rock River in the pool upstream from the Monterey Dam. Impacted sediment within the remedial action area shall be removed to refusal or one foot below the design surface, and a certified clean fill sand restorative layer placed over the RAA upon completion of the project.

The project includes hydraulically and/or mechanically dredging the impacted sediment and hydraulic conveyance of the sediment / river water slurry to the former GM plant for dewatering and treatment. The sediment slurry will be conveyed through a floating hose to temporary piping installed through the box culvert at the outfall and leading back to the diversion chamber located south of Delevan Drive at the former GM Site. The granular solids within the slurry will be removed by settling and discharged across a drying bed. The fluids containing fine-grained particles (concentrator supernatant) will be pumped into the large steel tank (#1) for additional solids removal by settling that may include polymerization. The water fraction will be pumped into the return water tank (#2). A fraction of the settled solids containing fine particles and organic matter will be filtered through geotextile tubes, with the ellutriant captured and recirculated to the settling tank.

Once removed from the drying bed, solids will be placed into segregated stockpiles located on concrete or asphalt and monitored using the paint-filter liquids test (PFLT) by ASTM 9095B, slump test, and/or field moisture content by the microwave method using paper cups. Once sufficiently dewatered for handling, dried sediments (i.e., soil) will be characterized for beneficial re-use onsite or final disposal offsite, in accordance with the Sampling and Analyses Plan and the Soil Management Plan described below. Five-point composite samples will be collected from each 500-cubic yard stockpile. Samples will be submitted to the laboratory and analyzed for the total concentrations of PAHs, PCBs, and metals. In addition, the water leach extraction procedure (ASTM Method 3987) will be followed and leachate analyzed for PAHs, PCBs, and metals. Initially, analytical results were requested on a rush turnaround time, typically 3-5 days (versus normal TAT of 10 days). The results are compared to the industrial RCLs and transmitted to DNR upon receipt along with EAG's management path for the material.

TCLP data that was provided in the General Motors Site Investigation that provides screening for the non-hazardous categorization of the sediment. Analytical results of the sediment samples obtained during the General Motors Site Investigation that were previously submitted to the WDNR are also attached.

The dredging activities are anticipated to be complete and dried sediments ready to move by the end of July, 2019 or sooner.

MANAGEMENT OF CONTAMINATED SOIL OR SOLID WASTES RECOVERED DURING REMEDIAL (RESPONSE) ACTIONS

It is requested that an exemption be granted in order to store and manage the dry sediment generated from this remedial action at the site which is not an operating licensed landfill (NR718.15). The Wisconsin DNR recommended format for exemption request is attached to this document. The information requested in Sections 3, 4, 5, 6, 8, 9, and 10 are included in this Soil Waste Management Plan.

STORAGE OF EXCAVATED CONTAMINATED SOIL

The dried sediment will be removed from the drying bed and stored within the sand stockpile dividers and characterized. Results of laboratory analyses will determine disposition for:

- 1. segregation, solidification and temporary storage before transportation and disposal offsite (complete with an impervious liner),
- 2. onsite transportation to the identified fill area to be capped with uncontaminated soil and revegetated, and
- 3. stockpiled in an area of remedial operations for future beneficial reuse onsite

The final reuse locations are detailed on the attached Figures. A decision diagram is included. Efforts are being made to continuously characterize and reuse or dispose of material as it is being generated per the decision diagram.

In accordance with NR 718.05 (2), none of the stockpile or final reuse locations are within a flood plain. These locations are more than 100-feet from a wetland, 300-feet from a navigable river, stream, lake, pond, or flowage, and more than 300-feet from any water supply well. All stockpile and final reuse

locations are more than 400-feet from the Rock River. Signs will be posted in the areas around the drying beds that will include the name, address, and phone number of the owner or operation, the types of hazardous substances on the property, the WDNR issued site ID number, and the anticipated removal date.

The dried sediment will be placed in the sand stockpile dividers on an impervious base (concrete pavement). The slope of the pavement beneath the sand stockpile dividers drains to an existing stormwater inlet manhole that will be plugged to serve as a sump and pumped back into treatment Tank #1 to control surface water runoff. These soil piles will be covered at the end of each day.

Samples of the dried sediment within the sand stockpile dividers (approximately 500 cubic yard piles) will be collected and analyzed per the Sampling and Analyses Plan. Samples are collected from the first 100, 300 and 500 cys, and then every 500 cys thereafter. Samples are analyzed for the COPEC identified during the Rock River sediment investigation and comparted to the industrial land use RCLs. The final reuse location for each stockpile will be determined based on the reported total concentrations and the concentrations in the water leach test procedure. A decision diagram is included with this Soil Management Plan.

Analytical results were compared to the appropriate industrial land use concentrations to ensure that the soils for beneficial reuse are protective of public health, safety, welfare and the environment. Soil sampling will demonstrate that the contaminated soil does not attain or exceed the applicable Wis. Admin. Code § NR 720 soil cleanup standards for industrial of land use classification for both direct contact and the groundwater migration pathways. Soil sampling and location of placement of contaminated soil will not result in an attainment or exceedance of groundwater quality standards in Wis. Stats. § 160 and Wis. Admin. Code § NR 140. Sampling will verify that no vapor intrusion would result from the placement of the contaminated soil and that all other pathways of concern at the site or facility (e.g, surface water and sediment) are protective of public health, safety, welfare and the environment.

Soil with concentrations of COPCs that are not protective of human health and the environment as described above will be placed on plastic sheeting in the waste piles, solidified, permitted as non-hazardous waste, and offsite transportation to an appropriate disposal facility arranged. Manifests for the transportation and disposal of this material will be maintained by EAG and copies submitted to the WDNR with each weekly report.

The only storage pile that is anticipated to remain for more than 30 days is the stockpile to the west of the dewatering operations (see Figure 3). This stockpile will be covered, and periodically inspected for erosion and storm water controls. WDNR will also be notified if a soil stockpile will remain on site for more than 90 days.

No transportation or treatment, other than transporting impacted soils to an appropriate offsite facility or to the designated final onsite reuse locations onsite is anticipated.

Native soils at the receiving location onsite are generally fill material on top of clayey-silt and silty sand. Groundwater occurs deeper than 10 feet bgs. Groundwater flow is generally to the north-northwest toward the Rock River, which follows the general Site topography. Any continuing obligations for maintenance beyond industrial land use and groundwater use restrictions will be identified in the remedial action completion report. A copy of the property deed with legal descriptions of the parcel(s) is attached to this document.

REPORTING

A report will be submitted to the WDNR on a weekly basis. This report will detail the volume of material recovered, the laboratory results for the samples, a comparison of results to the industrial soil residual concentration levels including vapor intrusion, dermal contact, soil-to-groundwater, and the groundwater standard (water leach test procedure) per Wisconsin Admin Code NR720. This report will also detail the final reuse location for each stockpile based on the analytical results, comparisons to industrial standards, and the decision diagram included in this Soil Management Plan.

The weekly report will contain the following items for review and concurrence:

- Laboratory Reports
- Summary of Results
- Comparisons of Results to Industrial RCLs
- Final placement of soil

CONTINUING OBLIGATIONS

The site zoning will be maintained as industrial land use and the concrete cap that will be installed above the material placed in the truck bay fill areas will be inspected regularly and repaired as needed to ensure the integrity of the concrete.

EXISTING ZONING

The project site is primarily zoned M2, General Industrial. The M2 industrial district is generally designed to accommodate manufacturing, production, storage, and general industrial activities in areas relatively remote from residential development or as otherwise allowed and designated in the Comprehensive Plan. The entire site falls within the South Jackson Overlay District, which was designed to ensure that industrial development of the Centennial Industrial Park is compatible with adjacent land uses and less intensive than would typically be permitted in the M2 District.

The zoning of the Centennial Industrial Park and adjacent properties is summarized in brief below. A full description of allowable uses can be founded in the City's Code of Ordinances in Chapter 18.36: Zoning Districts & Maps.

South Jackson Overlay District The South Jackson Street Overlay (SJO) district was created specifically to guide the redevelopment of the former GM Assembly Plant and maximize its positive impact on the surrounding community. The boundaries of the 300 acre SJO district encompass all of the parcels in the Centennial Industrial Park. Generally, the SJO requires that all future use, adaptive reuse, or redevelopment within the district be approved under the Planned Unit Development Process. A full description of the SJO can be found in the City of Janesville's Code of Ordinances 18.36.070 (4).

M1: Light Industrial

uses permitted.

M2: General Industrial

permitted.



O1: Office/Residence District

buildings, and open space.

C: Conservancy District

green spaces.

B2: Community Shopping District

primarily limited to second floor.

B3: General Commercial District Designed for heavier industrial activities and Preserves designated areas as open space Intended for motorist-oriented commercial All uses permitted in R1, as well as smaller lots manufacturing that may produce moderate in perpetuity. Land uses may include rivers activities with large service areas. Generally and a higher density of single and two family nuisances or hazards. No residential use and drainageways, wetlands, floodplains, located along major commercial arterials. residential dwellings. greenbelts, natural areas, or other beneficial Residential uses primarily limited to second floor.

R1: Single & Two-Family Residence

Designed for industrial activities that require Single and two family residences, apartment Designed to provide for a large consumer Low density, single family residences with All uses permitted in R1 and R2, as well as twoand contribute to a pleasant, hazard, and buildings, offices, civic uses like museums population; generally located along major limited two-family dwellings allowed by family and multiple family dwellings, mobile nuisance-free environment. No residential and libraries, health care, education, religious commercial arterials. Residential uses conditional use. Parks, open spaces, schools, homes, college residence halls, nursing and churches are also permitted. homes, museums, and cemeteries.

R2: Limited General Residence

R3: General Residence District





Light Industrial District (M1)

Community Shopping District (B2)





General Commercial District (B3)



Two-Family Residence District (R2)



High Quality Building Foundation



General Residence District (R3)

Project Site



Project Name

FORMER GM SITE PLANNING



Commercial Development Inc.

> Janesville, Wisconsin

Drawn By:	SK							
Checked By:	JB							
File:								
Issued For:								
Issue Date:	08/29/2018							
Project No.	52-xxxx.xx							
Sheet Title								
PROPOSED LAND								
USE/ ZON	USE/ ZONING							





Traffic signals



Scott Walker, Governor Cathy Stepp, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



VIA EMAIL

August 1, 2017

Kim D. Tucker-Billingslea General Motors, LLC – GEC & S Remediation Team 30400 Mount Rd., WTC Mfg. B MC:480-109-MB1, Off: 1 AP23 Warren, MI 48092

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

Subject: Final Case Closure with Continuing Obligations GM Haul Away Yard, Former, 544 Kellogg Avenue, Janesville, Wisconsin DNR BRRTS Activity # 02-54-56081

Dear Ms. Tucker-Billingslea:

The Department of Natural Resources (DNR) considers the GM Haul Away Yard case closed, with continuing obligations. No further investigation or remediation is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents or leases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wis. Adm. Code. The South Central Region Closure Committee (Closure Committee) reviewed the request for closure on June 1, 2017. The Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain consistency in the closure of these cases. A request for remaining actions needed was issued by the DNR on June 6, 2017, and documentation that the conditions in that letter were met was received on July 28, 2017.

The former haul away yard had several underground storage tanks (UST) containing petroleum but also other chemicals including volatile organic compounds (VOC) and semi-volatile organic compounds (SVOC). Responses included removal of the tanks in 2012 and subsequent soil and groundwater sampling. The conditions of closure and continuing obligations required were based on the property being used for industrial purposes. Residual contaminants that remain in soil and exceed applicable screening levels include VOCs (carbon tetrachloride, chloroform, cis-1,2-dichloroethene, methylene chloride, TCE, trichloroethene, trimethylbenzenes, and xylenes), SVOCs (naphthalene), polychlorinated biphenyls (PCBs) and manganese.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section <u>Closure Conditions.</u>

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Remaining contamination could result in vapor intrusion if future construction activities occur.
 Future construction includes expansion or partial removal of current buildings as well as construction of new buildings. Vapor control technologies will be required for occupied buildings,



unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that vapor control technologies are not needed.

The DNR fact sheet "Continuing Obligations for Environmental Protection," RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at <u>http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf</u>.

GIS Registry

This site will be included on the Wisconsin Remediation and Redevelopment Database (WRRD) at <u>http://dnr.wi.gov/topic/Brownfields/WRRD.html</u>, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), a map view, under the Geographic Information System (GIS) Registry layer, at the same web address.

DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry layer, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at http://dnr.wi.gov/topic/wells/documents/3300254.pdf.

All site information is also on file at the South Central Regional DNR office, at 3911 Fish Hatchery Road, Fitchburg, Wisconsin 53711. This letter and information that was submitted with your closure request application, including any maps, can be found as a Portable Document Format (PDF) in BRRTS on the Web.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wis. Stats. to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to: Department of Natural Resources Attn: Remediation and Redevelopment Program Environmental Program Associate

3911 Fish Hatchery Road Fitchburg, WI 53711

<u>Residual Soil Contamination</u> (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.) Soil contamination remains at various locations, primarily in the southern portion of the former West Shop, as indicated on the **attached maps** (Figure B.2.b, Residual Soil Contamination and Figure B.2.b.1, Residual Soil Contamination Tank L). We do <u>not</u> necessarily agree with GHD that the grayed data boxes in the attached figures or other figures attached to the closure request represent outdated data. Rather, the differences between the data collected in 2013 and 2016 could be due to the fact that the samples were collected at slightly different locations and depths.

If soil in the specific locations described above is excavated in the future, the property owner or right-ofway holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-ofway holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. In addition, all current and future owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

<u>Vapor Mitigation or Evaluation</u> (s. 292.12 (2), Wis. Stats., s. NR 726.15, s. NR 727.07, Wis. Adm. Code) Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building. VOCs, including chlorinated VOCs, remain in soil at several locations beneath and around the buildings, as shown on the **attached maps** (Figure B.2.b, Residual Soil Contamination, Figure B.2.b.1, Residual Soil Contamination Tank L, and Figure B.4.a, and Vapor Intrusion Map) at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. Isoconcentration lines on Figure B.4.a are based upon an industrial use scenario. We understand that the existing buildings will be demolished but that additional buildings could be constructed in the area in the future. Therefore, before a building is constructed and/or an existing building is utilized, the property owner must notify the DNR at least 45 days before the change and further assess the potential for vapor intrusion. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR agrees that vapor control technologies are not needed.

In Closing

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under s. 292.15, Wis. Stats., or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Jason Lowery at (608) 267-7570, or at jason.lowery@wisconsin.gov.

Sincerely,

Steven L. Martin South Central Region Team Supervisor Remediation & Redevelopment Program

Attachments: Figure B.2.b - Residual Soil Contamination Figure B.2.b.1 - Residual Sol Contamination Tank L Figure B.4.a - Vapor Intrusion Map

Copy: Mauricio Barrera and Glenn Turchan, GHD (email)



		Site-specific	c Risk-based So	creening Levels	s ⁽¹⁾		WDNR Criteria	
	A	В	С	D	E	F	G	F
Chemical	Industrial Soil Contact (mg/kg) ⁽³⁾	Industrial Soil Vapor Intrusion, Risk-Based (mg/kg) ⁽³⁾	Maintenance Worker Soil Contact (mg/kg) ⁽²⁾	Construction Worker Soil Contact (mg/kg) ⁽²⁾	NonIndustrial Soil Outdoor Air Inhalation (mg/kg) ⁽²⁾	Non-Industrial Soil residual contaminant levels - Protective of direct contact pathway (mg/kg)	Industrial Soil residual contaminant levels - Protective of direct contact pathway (mg/kg)	Soil re contar leve Protec Ground Qua (mg
voc								
1,2,4-Trichlorobenzene	30	0.087	75	28	3.6	22	99	0,
Carbon tetrachloride	11	0.2	54	8.9	3.4	0.85	4.3	0.0
Chloroform (Trichloromethane)	3.7	0.053	15	2.6	0.89	0.42	2.1	0.0
cis-1,2-Dichloroethene	200	NV	1700	1000	NV	160	2000	0.0
Ethylbenzene	2600	43	5700	1100	250	7.5	37	0.
Methylene chloride	460	26	1900	83	120	61	1100	0.0
Tetrachloroethene	100	1.7	200	3.5	7.9	31	150	0.0
Toluene	5400	220	20000	570	1100	820	820	0.5
Trichloroethene	5.7	0.087	10	0.2	0.41	1.3	8.8	0.0
Trimethylbenzene (mixed isomers)	NV	NV	NV	NV	NV	NV	NV	0.6
Xylenes (total)	340	4.3	590	43	24	260	260	2
SVOC Naphthalene	16	0.074	99	5.5	3.5	5.2	26	0.3
РСВ								
Total PCBs	0.72	1.3	8.9	1.7	6	0.21	0.71	0.0
INORG								
Cadmium	80	NV	350	45	NV	70	800	0.3
Lead	2700	NV	NV	NV	400	400	800	1.
Manganese	9700	NV	3500	410	NV	1800	23000	2



SB-20-13	07/10/2013	07/10/2013
	7-9(ft BGS)	10-12(ft BGS)
VOC		
1,2,4-Trichlorobenzene	0.24 U	0.0041 U
1,2,4-Trimethylbenzene	1.1	0.0041 U
Carbon tetrachloride	0.24 U	0.012 {H}
Chloroform (Trichloromethane)	0.24 U	0.0074 {H}
cis-1,2-Dichloroethene	0.029 J {H}	0.0041 U
Ethylbenzene	0.014 J	0.0041 U
Methylene chloride	0.24 U	0.0041 U
Toluene	0.24 U	0.0041 U
Trichloroethene	0.24 U	0.018 {H}
Trimethylbenzene	1.4 {H}	0.0041 U
Xylenes (total)	0.099 J	0.0082 U
SVOC		
Naphthalene	0.029	0.0077 U
РСВ		
Total PCBs	-	-
INORG		
Cadmium	-	-
Lead	-	-
Manganese	-	-



4-13	07/09/2013
	9-10(ft BGS)
-Trichlorobenzene	0.0046 U
-Trimethylbenzene	0.0046 U
on tetrachloride	0.019 {H}
roform (Trichloromethane)	0.02 {H}
,2-Dichloroethene	0.0046 U
benzene	0.0046 U
ylene chloride	0.0056 U
ene	0.0046 U
loroethene	0.035 {H}
ethylbenzene	0.0046 U
nes (total)	0.0092 U
С	
nthalene	0.0082 U
PCBs	-
RG	
nium	-
	-
ganese	-

■ SB-6-10

		Site-specific	c Risk-based So	creening Levels	S ⁽¹⁾		WDNR Criteria	
	A	В	С	D	E	F	G	Н
Chemical	Industrial Soil Contact (mg/kg) ⁽³⁾	Industrial Soil Vapor Intrusion, Risk-Based (mg/kg) ⁽³⁾	Maintenance Worker Soil Contact (mg/kg) ⁽²⁾	Construction Worker Soil Contact (mg/kg) ⁽²⁾	NonIndustrial Soil Outdoor Air Inhalation (mg/kg) ⁽²⁾	Non-Industrial Soil residual contaminant levels - Protective of direct contact pathway (mg/kg)	Industrial Soil residual contaminant levels - Protective of direct contact pathway (mg/kg)	Soil resid contamir levels Protectiv Groundw Qualit (mg/kg
VOC								
1,2,4-Trichlorobenzene	30	0.087	75	28	3.6	22	99	0.2
Carbon tetrachloride	11	0.2	54	8.9	3.4	0.85	4.3	0.001
Chloroform (Trichloromethane)	3.7	0.053	15	2.6	0.89	0.42	2.1	0.001
cis-1,2-Dichloroethene	200	NV	1700	1000	NV	160	2000	0.02
Ethylbenzene	2600	43	5700	1100	250	7.5	37	0.79
Methylene chloride	460	26	1900	83	120	61	1100	0.001
Toluene	5400	220	20000	570	1100	820	820	0.55
Trichloroethene	5.7	0.087	10	0.2	0.41	1.3	8.8	0.001
Trimethylbenzene (mixed isomers)	NV	NV	NV	NV	NV	NV	NV	0.69
Xylenes (total)	340	4.3	590	43	24	260	260	2
SVOC								
Naphthalene	16	0.074	99	5.5	3.5	5.2	26	0.33
PCB								
Total PCBs	0.72	1.3	8.9	1.7	6	0.21	0.71	0.004
NORG								
Cadmium	80	NV	350	45	NV	70	800	0.38
_ead	2700	NV	NV	NV	400	400	800	14
Manganese	9700	NV	3500	410	NV	1800	23000	20

SB-22-13	07/09/2013
	7-9(ft BGS)
VOC	
1,2,4-Trichlorobenzene	0.0047 U
1,2,4-Trimethylbenzene	0.0047 U
Carbon tetrachloride	0.00086 J
Chloroform (Trichloromethane)	0.0047 U
cis-1,2-Dichloroethene	0.0047 U
Ethylbenzene	0.0047 U
Methylene chloride	0.0047 U
Toluene	0.0047 U
Trichloroethene	0.002 J {H}
Trimethylbenzene	0.0047 U
Xylenes (total)	0.0094 U
SVOC	
Naphthalene	0.0069 U
PCB	
Total PCBs	-
INORG	
Cadmium	-
Lead	-
Manganese	-

TANK L - BOTTOM SHALLOW	06/13/2012
_	7-7(ft BGS)
VOC	
1,2,4-Trichlorobenzene	0.22 U/0.22 U
1,2,4-Trimethylbenzene	0.22 U/-
Carbon tetrachloride	0.87 J {BH}/3.1 J {BFH}
Chloroform (Trichloromethane)	0.14 J {BH}/0.22 U
cis-1,2-Dichloroethene	0.22 U/0.22 U
Ethylbenzene	0.22 U/0.22 U
Methylene chloride	0.22 U/0.22 U
Toluene	0.22 U/0.22 U
Trichloroethene	0.51 {BDEH}/0.3 {BDH}
Trimethylbenzene	0.22 U/-
Xylenes (total)	0.44 U/0.43 U
SVOC	
Naphthalene	0.22 UJ/-
РСВ	
Total PCBs	_/_
INORG	
Cadmium	0.095 U/0.097 U
Lead	2.5/1.6
Manganese	_/_

TANK L - BOTTOM DEEP	06/13/2012
	8.5-8.5(ft BGS)
VOC	
1,2,4-Trichlorobenzene	0.27 U
1,2,4-Trimethylbenzene	-
Carbon tetrachloride	10 {BDEFGH}
Chloroform (Trichloromethane)	0.54 {BFH}
cis-1,2-Dichloroethene	0.27 U
Ethylbenzene	0.27 U
Methylene chloride	0.27 U
Toluene	0.27 U
Trichloroethene	1.8 (BDEFH)
Trimethylbenzene	-
Xylenes (total)	0.54 U
SVOC	
Naphthalene	-
РСВ	
Total PCBs	-
INORG	
Cadmium	0.45 {H}
Lead	15
Manganese	-





Image: Constraint of the second se	LEGEND FORMER LOCATION OF UNDERGROUND FIBERGLASS PIPING FORMER UNDERGROUND STORAGE TANK REMOVED BY GM FORMER UNDERGROUND STORAGE TANK REMOVED BY OTHERS FORMER DISPENSER SOIL BORING LOCATION, CRA, 2010 SOIL BORING LOCATION, CRA, 2012 SOIL BORING LOCATION, CRA, 2013 SOIL BORING LOCATION, CRA, 2013 SOIL BORING LOCATION, GHD, 2016 MONITORING WELL LOCATION, GHD, 2016 SOIL SAMPLE LOCATION, GHD, 2016 AREA ASSOCIATED WITH BRTS # 03-54-000405 RESULT EXCEEDS' CRITERIA INDICATED IN BRACES NOT ANALYZED AND NON-DETECTS AN EXCEEDANCE IS INDICATED IF THE RATIO OF THE CONCENTRATION (IF SITE-RELATED) TO THE SCREENING LEVEL EXCEED 10. PARENT RESULT/DUPLICATE RESULT MILLIGRAMS PER KILOGRAM FEET BELOW GROUND SURFACE GENERAL MOTORS LLC INORGANICS (METALS) ESTIMATED CONCENTRATION NO VALUE PUBLISHED BUREAU FOR REMEDIATION AND REDEVELOPMENT POLYCHLORINATED BIPHENYLS SEMI-VOLATILE ORGANIC COMPOUNDS NOT PRESENT AT OR ABOVE THE ASSOCIATED VALUE NOT DETECTED; ASSOCIATED REPORTING LIMIT IS ESTIMATED VOLATILE ORGANIC COMPOUNDS NOT PRESENT AT OR ABOVE THE ASSOCIATED VALUE NOT DETECTED; ASSOCIATED REPORTING LIMIT IS ESTIMATED VOLATILE ORGANIC COMPOUNDS WISCONSIN DEPARTMENT OF NATURAL RESOURCES WISCONSIN DEPARTMENT FLEPHONE ** WATER MAIN **				
SB-11-12 SVOC bis(2-Ethylhexyl)phtr INORG Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver	SAI 06/07/2012 DA' 10-12(ft BGS) SAI alate (DEHP) 0.028 J 5.3 110 0.2 12 7.5 0.018 J 0.3 J 0.045 J CO PAI	MPLE IDENTIFIER TE SAMPLE COLLECTED MPLE DEPTH NCENTRATION (mg/kg) RAMETER			
# GHD 1 A 2 B 3 C 4 D 5 E 6 F 7 G 8 H 9 1 10 J 11 K 12 L 13 M 14 N 15 E 6 F 7 Q 13 M 14 N 15 V 20 T 21 U 22 V 23 W 24 X 25 Y 26 Z SB-13.13 SB-16-13 SB-24-13 SB-24-13 SB-24-13 SB-24-13 SB-24-13 SB-24 SB M M M M M	STORAGE TANKS TANK DESCRIPTION, REMOVAL I 3,000-GALLON NEW OIL, CRA 3,000-GALLON NEW OIL, CRA 3,000-GALLON NEW OIL, CRA S60-GALLON NEW OIL, CRA S60-GALLON NEW OIL, CRA S60-GALLON NEW OIL, CRA 300-GALLON NEW OIL, CRA S60-GALLON NEW OIL, CRA 300-GALLON DISEL WARZY 1,000-GALLON DISEL, WARZY	PETAILS JANESVILLE FIRE DEPARTMENT ID 2012 2 2012 4 2012 5 A 2012 7 2012 18 CRA 2012 13D 2012 14E 2019 231 1990 17 EMMOS 2010 533 1990 17 EMMOS 2010 533 14992 225k VOCs/SVOCs VOCs/SVOCs VOCs/SVOCs VOCs/SVOCs VOCs/SVOCs			
THIS BAR MEAS	SCALE VERIFICAT URES 1" ON ORIGINAL. ADJU MER HAUL-AV IESVILLE, WIS	ION JST SCALE ACCORDINGLY. VAY YARD SCONSIN			
Source Reference: CROWN SERVICE	ES GROUP, CSG JOB NUMBER	CIN IVIAP R: 1020101, DATE: 03/09/2011.			
Scale: AS SHOWN	M. BARRERA Project Nº: 77493-01	Date: JANUARY 2017 Report N ^o : Drawing N ^o : 005 figure B.4.a 77493-01(005)GN-WA044 JUN 21, 2017			

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0 10 20ft

State of Wisconsin						
Department of Natural Resources Route To:	Watershed/Wastewater	Waste Manageme	ent 🗆	MONITORING WEL	L CONSTRI	JCTION
	Remediation/Redevelopment	Other		Form 4400-113A	Rev. 7-9	8
Facility/Project Name	Local Grid Location of Well	ΠF		Well Name		
Allied Systems / Former Haul-Away Yard	ft. [] S.	<u>f. dw.</u>		MW	-3-12	
Facility License, Permit or Monitoring No.	Local Grid Origin [] (estimated:) or Well Lo	cation 🔯	Wis. Unique Well No.	DNR Well N	umber
N/A	Lat Lor	ng	" or	VM585	585	5
Facility ID	St. Plane ft. N,		S/C/N	Date Well Installed		
154062810	Section Location of Waste/Source		E 7 M	06/07	/2012	1.22
Type of Well	NE 1/4 of NW 1/4 of Sec 1	2.T. 2 N.R.	12 DW	Well Installed By: (Per	son's Name a	nd Firm)
Well Code 11/mw	Location of Well Relative to Waste/	Source Gov. I	ot Number	Don Tor	nancour	
Source Apply	u 🗆 Upgradient 🦷 s 🖾 Si	degradient			5 MI	
60 ft. 14444	d 🖾 Downgradient n 🗆 N	ot Known		Major J	Jrilling	<u></u>
A. Protective pipe, top elevation 83	6.00 fl. MSL	1. Cap a	and lock?	1	🛛 Yes	\square No
B. Well casing, top elevation 83	15.73 fl. MSL	Po 2. Prote	ctive cover p	ipe:		80
	26.0	a, Ins	ide diameter:		0 <u></u>	<u> </u>
C. Land surface elevation	.30.0 ft. MSL	D. Lei	ngin:		Cteal	<u> </u>
D. Surface seal, bottom836.0 ft. MSL	or <u>1.0</u> fl.	C. Ma	terial:		Other	
12 LISCS alognification of soil near several			ditional prote	uction?	M Ver	
		X IF	unional prote	flushmount 8" r	ad box	
			yes, describe.		Destasite	_
Bedrock		🖇 🔪 👌 3. Surfa	ce seal:		Bentomte	
13. Sieve analysis attached?	is 🖾 No 🛛 🗱 🖗				Other	
14 Drilling method woods Botor			rial hatwaan t	stall onging and protectio		
14. Draming method used: Kolar	y [] 30		I I AI DELWEEN	wen casing and protectiv	Bentonite	M 30
ROTOSONIC Othe		Š.			Other	
15. Drilling fluid used: Water 1202 Ai	ir [] 0 1 🛛 🕅	5. Annu	lar space seal	a Granular/Chippe	ed Bentonite	Ц 33 П 26
Drilling Mud 03 Non	е Г199	b	Lbs/gal m	id weight Bentomite	-sand slurry	
		c	Losygai mi	id weight Ben	tonite sturry	
16. Drilling additives used?	s 🖾 No 🛛 👹 🎇	a <u>u</u>	$_{70}$ Denion	w Dentomic-c	the above	10 DU
		f H	ow installed	Volume addee for any or	Tremie	CT 01
Describe	📓 🕅		ow instance,	Trei	nie numned	
17. Source of water (attach analysis, if required): 🛛 🗱 🕅	X		110	Gravity	CT 0.8
Potable		6 Bento	nite scale	a Bentor	ite manules	п 31
10000	📓 🖗		$1/4$ in \mathbb{N}^3	/8 in □1/2 in Ben	tonite chins	
E Bentonite seal ton 836.0 ft MSL	лг 57.9 0 . 🗱 🕷				Other	
	* ·· \ 📓 🕷	7. Fine s	and material:	Manufacturer, product	name & mes	h size
F. Fine sand, top 836.0 ft. MSL (yr 63.0 ft 🗙 👹	// 2				
		b. Vo	lume added	fl ³		
G. Filter pack, top 836.0 ft, MSL of	or 65.2 ft	8. Filter	pack materia	l: Manufacturer, produc	t name & me	sh size
			1	#2 Sand		
H. Screen joint, top 836.0 ft, MSL of	n 67.5 ft	h Vol	lume added	1.6 n ³		
IN 1002 -		9 Well	casino.	Flush threaded PVC	schedule 40	⊠ 23
1. Well bottom 836.0 ft. MSL c	vr 80.0 ft.		orining.	Flush threaded PVC	schedule 80	$\square 24$
				I tash mituave I to	Other	
J. Filter pack, bottom 836.0 ft MSL of	r 78.0 ft	10 Scme	n material	PVC		
		a Ser	reen Type:		Factory cut	n 11
K. Borehole, bottom 836.0 ft. MSL c	or 80.0 ft.		ioun i jpoi	Con	tinuous slot	
					Other	
L. Borehole, diameter6.0 in		b. Ma	anufacturer			
		c. Slo	ot size:		().010 in.
M. O.D. well casing in.		d. Sło	otted length:			10.5 ft.
<u> </u>		11. Backf	ill material (b	elow filter pack):	None	⊠ 14
N. I.D. well casing <u>2.00</u> in.			Ben	tonite Chips	Other	

..........

Tel:

Fax:

I hereby certify that the information on this form is true and correct to the best of my knowledge. Signature A to the information on this form is true and correct to the best of my knowledge. Firm Conestoga-Rovers & Associates

UYMOD.

Please complete both Forms 4400-113A and 4400-113B and return them to the appropriate DNR office and burcau. Completion of these reports is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file these forms may result in a forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on these forms is not intended to be used for any other purpose. NOTE: See the instructions for more information, including where the completed forms should be sent.

State of Wisconsin Department of Natural Resources

MONITORING WELL DEVELOPMENT Form 4400-113B Rev. 7-98

Route To: Watershed/Wastewater		Waste Management [
Ren	nediation/Redeve	lopment	Other 🗌				
Facility/Project Name		County		Well Name			
Allied Systems / Former Haul-Away Yard			Rock MW-1-12				
Facility License, Permit or Monitoring Number		County Code	Wis. Unique Well Number DNR Well Number				
N/A	Y TO DO DESIGNATION	54	VM5	86	1	586	
1. Can this well be purged dry?	🗆 Ye	s 🛛 No	11. Depth to Water	Before Deve	elopment	After Develop	oment
2. Well development method: surged with bailer and bailed	□ 4	1	(from top of well casing)	a. (54.70 ft.		ft.
surged with bailer and pumped surged with block and bailed		1 2 2	Date	b. 6/9/	2012		
surged with block, and pumped surged with block, bailed, and pum compressed air	ped □ 7 □ 2	0	Time	e	⊠ a.ı 12:00 □ p.ı	m. m.	⊠ am. □ p.m.
bailed only pumped only pumped slowly other		0 1 0	 Sediment in well bottom Water clarity 	Clear 🗆 1	inches	Clear 🛛 20	inches
3. Time spent developing well		min.		(Describe)	Drown	(Describe)	207
4. Depth of well (from top of well easing)		ft.		<u> </u>	, DIUWII	9.5 NTU, CI	
5. Inside diameter of well	1	71.4 in.					
6. Volume of water in filter pack and well casing		1.1 gal.	Eill in if drilling fluid		well is at soli	d uncte facility	
7. Volume of water removed from well	1	25.0 gal.	14. Total suspended	B witt used and	mg/l	a waste facility.	mg/l
8. Volume of water added (if any)		gal.	solids				
9. Source of water added			15. COD		mg/l		mg/l
10. Analysis performed on water added? (If yes, attach results)	□ Y¢	s 🗆 No	16. Well developed b Rob Ro Conest	y: Person's Name edman oga-Rovers &	e and Firm 2 Associat	es	

17. Additional comments on development:

Facility Address or Owner/Responsible Party Address		I hereby certify that the above information is true and correct to the best of		
Name:	Former Haul Away Yard/ Allied Systems Ltd	my knowledge.		
Firm:	GMLLC	Signature: / Watthe Shompoon		
Street:	300 Renaissance Center M/C: 482-30C-96C	Print Name: MARTHA F. THOMPSON		
City/State/Zip: Detroit, Michigan 48265		Firm Conestoga-Rovers & Associates		
2 V - 2	N M M R R R R R R R R R	a s wided a consta		

NOTE: See instructions for more information including a list of county codes and well type codes.