

COVER MAINTENANCE PLAN

August 5, 2019

Property Located at: 1000 General Motors Drive (source) and 544 Kellogg Ave (adjacent fill repository).
Janesville, Wisconsin 53546

Township, Range, Section:
NW 1/4 of NE 1/4 of Section 1, T.2N., R.12E

Decimal Degrees:
Lat: 42.659071°
Lon: -89.023715°

Degrees, Minutes, Seconds:
Lat: 42° 39' 32.83" N
Lon: 89° 01' 25.60" W

BRRTS Activity (source) #02-54-577951 and (fill) #02-54-56081 (FID# 154062810)

Property Tax ID Number: 241 0412100149

Introduction

This document is the Maintenance Plan for a soil 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 soil 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 South Central office
- At <http://dnr.wi.gov/topic/Brownfields/wrrd.html>, Site: <https://dnr.wi.gov/botw/HAY> 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 (Bill Fitzpatrick) for this site located in Rock County.

Descriptions:

Description of Contamination

This material is dried sediment/soil that was removed from the Rock River, dewatered, and approved for beneficial reuse on the former General Motors Assembly Plant property. The material contains residual concentrations of polyaromatic hydrocarbons (PAHs) and trace metals. The material was placed and compacted at a depth from 2-feet below the ground surface (ft bgs) to approximately 6-feet below grade.

Description of the Cover to be Maintained

The soil cover consists of a minimum of 2-feet of native clayey-silt soil with topsoil to support a vegetative cover. The cover will extend beyond the excavated area that is approximately 200-wide and 300-feet long with concave bottom up to 6 feet deep. The soil cap/cover will be placed, compacted, and graded to a minimum slope of 4:1 or flatter to minimize erosion. The locations where this material was placed as soil on the site is shown on the attached map (see Figures 1, 2, and 3).

Cover Purpose

The soil cover (uncontaminated native on-site soil) over the dried sediments-soil material conservatively serves as an engineered barrier to prevent direct human contact with residual contamination. Note that analytical results indicate that fill soil could pose a threat to human health through direct contact. The current and anticipated future land use of the property is industrial-commercial. The cover will function as intended unless disturbed.

The soil cap will minimize infiltration and be sufficiently protective of groundwater. Only three of the 26 soil leachate results slightly exceed the Enforcement Standard for lead. A statistical evaluation of the data using the USEPA ProUCL demonstrates that the 95 Upper Confidence Limit on the mean concentration (0.0125 mg/L) is **below** the ES of 0.015 mg/L for lead. One soil sample leachate result for Naphthalene slightly exceeded the ES (0.11 mg/L versus ES of 0.10 mg/L) and was qualified data (B-flag) also detected in the laboratory blank. The repository is shallow (< 6 ft bgs) and well above the uppermost saturated lithology. The fill material will be separated from contact with groundwater by over 50 feet (fill depth of 2-6 ft bgs versus GW depth @ > 60 ft bgs). Furthermore, a groundwater use restriction is already 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). See other documents on BRRTS on the web link below: https://dnr.wi.gov/botw/HAY_GWUR_10261999.

A native stabilization mix for vegetation will be mixed. The table below specifies the species and rates of seeding by mass are required (9 PLS lb/acre):

Scientific Name	Common Name	Rate (Oz./Acre)
Grasses, sedges		
Lolium multiflorum	Annual rye	15 LB/Acre
Elymus virginicus	Virginia Wild Rye	20.00
Carex comosa	Bristly Sedge	10.00
Sorghastrum nutans	Indian Grass	10.00
Spartina pectinata	Prairie Cordgrass	10.00

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, erosion, settlement, and other potential problems that can cause 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 will be documented.

A log of the inspections and any repairs will be maintained by the property owner. Form 4400-305, Continuing Obligations Inspection and Maintenance Log is attached. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. 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

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 of erosional rills or bare spots, or larger re-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) in accordance with a site-specific Safety Plan. The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains in accordance with the Soil Management Plan. 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 soil 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 soil 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 soil 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

August 2019

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

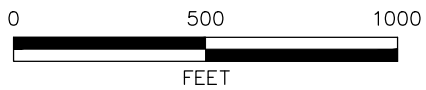
Location Map

See attached Figures showing site location, limits of disturbance and the area of the soil cover to be maintained, and a cross-section of design plan.



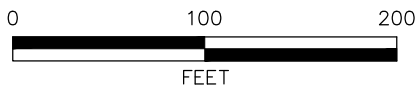
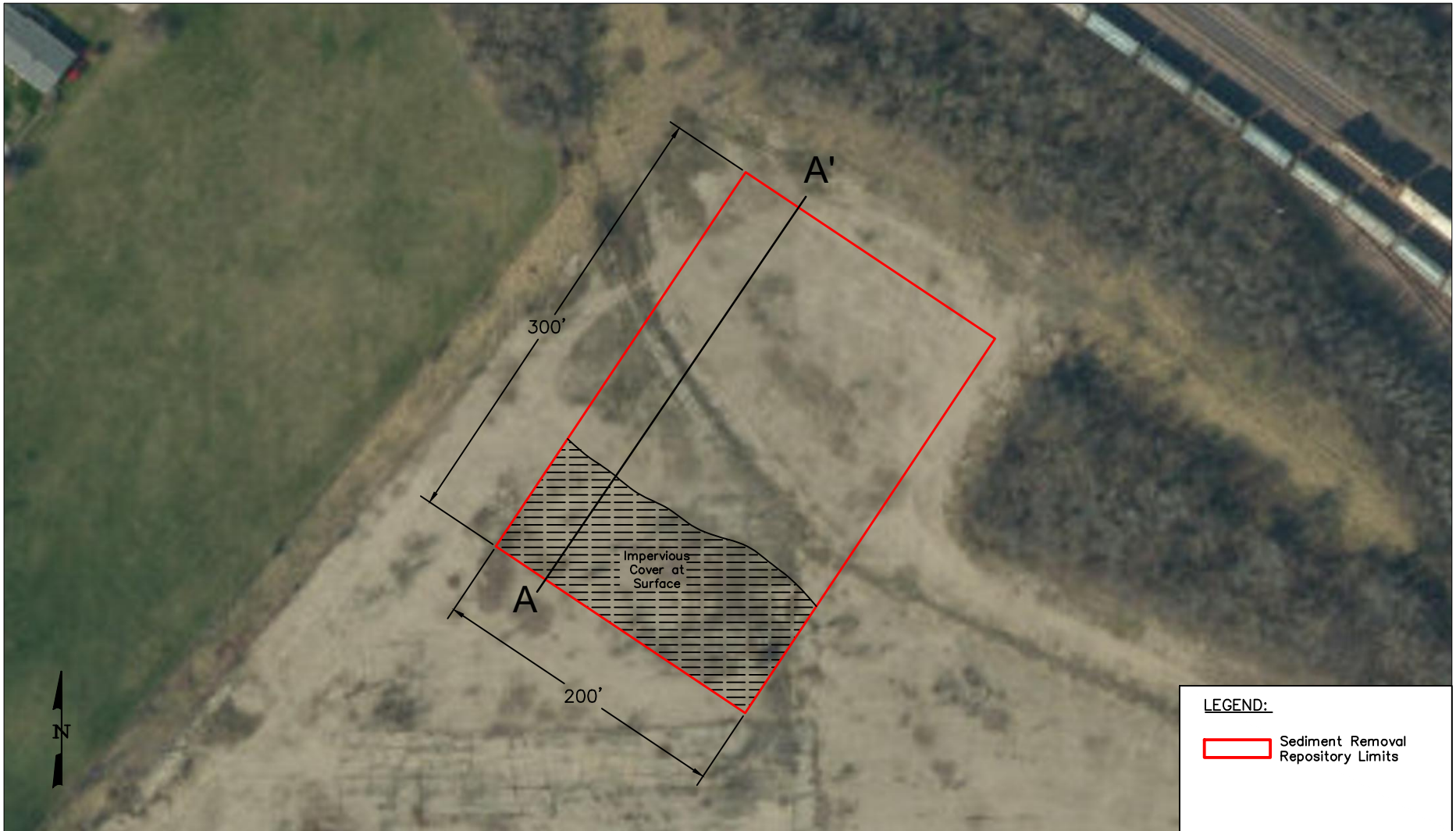
LEGEND:

- Sediment Removal Repository Limits
- Property Boundary



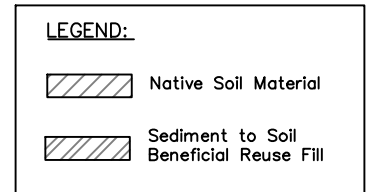
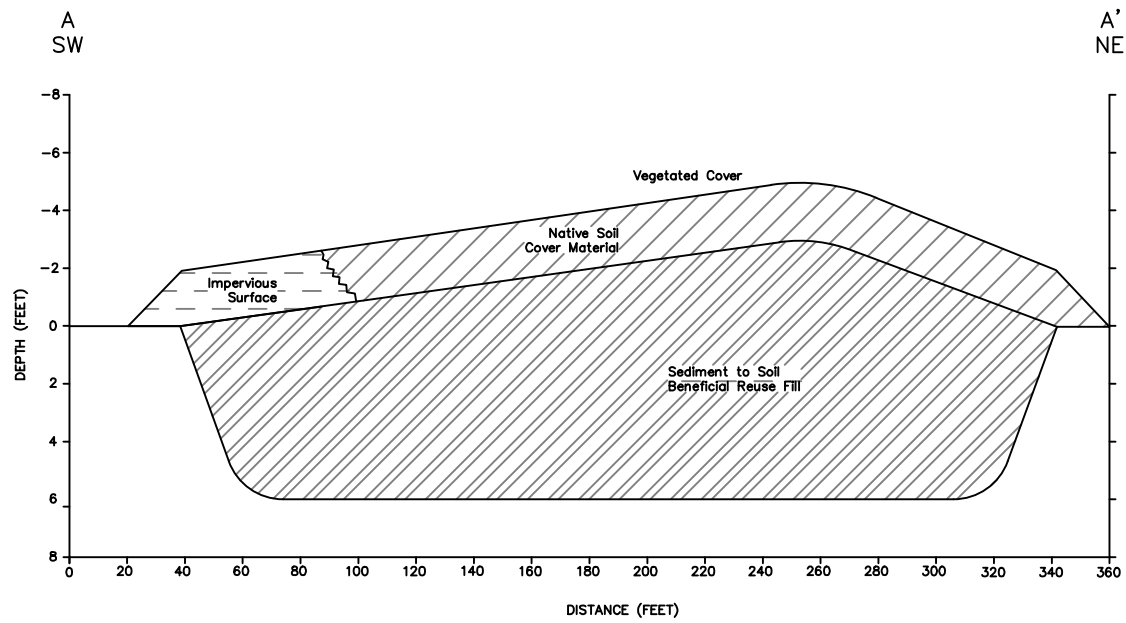
DESIGN: KA	DRAWN: KA	CHKD.: DD
DATE: 8/7/19	SCALE: AS SHOWN	REV.: 01
DRAWING NAME: FIGURE 1 - GENERAL LOCATION MAP		

FIGURE 1
GENERAL LOCATION MAP
JAINES, LLC
ROCK RIVER SEDIMENT REMOVAL REPOSITORY
JANESVILLE, WI



DESIGN: KA	DRAWN: KA	CHKD.: DD
DATE: 8/5/19	SCALE: AS SHOWN	REV.:
DRAWING NAME: FIGURE 2 - PLAN VIEW MAP		

FIGURE 2
 PLAN VIEW MAP
 JAINES, LLC
 ROCK RIVER SEDIMENT REMOVAL REPOSITORY
 JANESVILLE, WI



DESIGN: KA	DRAWN: KA	CHKD.: DD
DATE: 8/5/19	SCALE: AS SHOWN	REV.:
DRAWING NAME: FIGURE 3 - CROSS SECTION A-A'		

FIGURE 3
CROSS SECTION A-A'
JAINES, LLC
ROCK RIVER SEDIMENT REMOVAL REPOSITORY
JANESVILLE, WI

Photographs of Cover

Photographs will be added to this maintenance plan once the dried sediment has been placed in the area and the soil cover established.



Former GM Haul Away Yard (JATCO) site receiving fill



Source; Post-Dredged Dried Sediment in concrete bins

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. _____

Former Haul-Away-Yard / JATCO

02-54-560181

Inspections are required to be conducted (see closure approval letter):

- annually
 semi-annually
 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):

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

{Click to Add/Edit Image} Date added: Title:

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