

Training on DNR's Revised Case Closure Forms and Process

November 1, 2012

Presented by:
the DNR's Remediation and Redevelopment Program

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LIVE Event

Comments and questions during the event:

Send to:

DNRRRcomments@wisconsin.gov

Overview of DNR's Lean Pilots

- Secretary's office initiative
- 10 projects in 6 divisions
- Completed in August 2012
- New projects begin this fall/winter

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Lean Six Sigma

A little bit about the process...

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Lean Six Sigma in a Nutshell

What is "Lean"?

A systematic approach to identifying and eliminating waste.

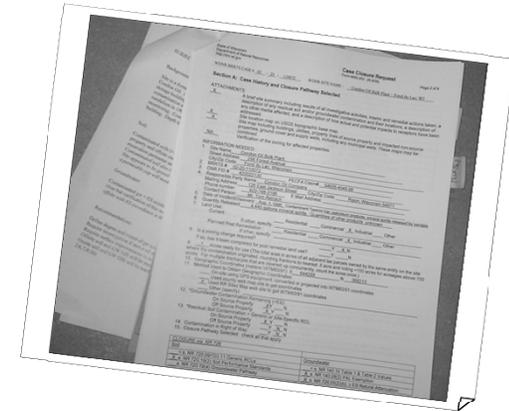
What is "Six Sigma"?

It is the analytical part of the system – emphasizes the use of data to make decisions.

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LEAN PROJECT:

DNR's
Closure
Submittal
Process



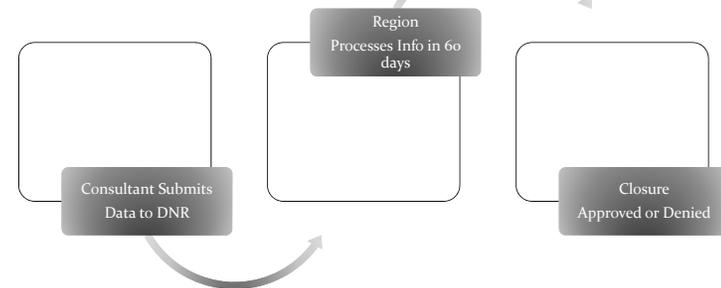
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Purpose of Lean Effort:

1. Reduce DNR staff time.
2. Identify reasons for waste in process (e.g. incomplete closure submittals).
3. Improve internal and external customer satisfaction.
4. Ensure notice to customer contains all deficiencies.
5. Reduce the amount of time it takes for the customer to receive notice of a "complete" submittal.

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DNR's Closure Process



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Voice of Customer

- Surveyed internal customer on perceived “waste” and suggestions for “improvements”
- Surveyed external customers – 12 consultants from different firms interviewed
- Data gathered and analyzed

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Voice Of Customer - External

- Perceived inconsistency of information requested.
- Suggested inconsistency between the regions.
- Recommended removal of redundancies between forms.
- Wanted FAQs, examples of good maps and tables, etc.
- Recommended e-payments and e-submittals.

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Voice Of Customer Findings –

Major Finding	Externals	Internals
Inconsistent Data Requests	X	
Duplicity in Forms	X	X
Electronic Submittal	X	X
Reduce Paperwork	X	X
Checklist	X	X
Absence of instructions	X	
Waste in Process		X

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Define: What is an “administratively” complete closure submittal?

- Closure forms + attachments + fees + signature = “administratively complete” submittal
- Closure forms will contain minimum in law, code and site-specific information that DNR believes is necessary to approve a closure request.
- Goal is that DNR staff receive a submittal that has all the information they need to conduct technical review.

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Day 1: Submittal to DNR

- Page 1 of form and fees sent to the DNR's Regional Environmental Program Associate (EPA).
- Entire closure package sent directly to the RR project manager, minus the fee.

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Day 1 through 10:

Administrative Completeness Check

- EPA enters data into BRRTS and notifies the PM that the check was received.
- PM begins 10-day admin completeness review.
- PM fills out e-checklist and routes it through DNR.

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Day 10: Admin Complete? **YES!**

- EPA sends responsible party and consultant email notice that package is complete.
- Next day, 60-day technical review begins.

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Day 10: Admin Complete? **No!**

- PM determines that package is administratively incomplete – missing information.
- E-checklist filled out.
- Itemizes all the components of the closure package that are missing.
- Email sent to RP *and* consultant with list of incomplete items.

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Incomplete Submittal: < 60 days

- Email sent by day 10 outlining all missing items.
- 30 days to deal with deficiencies.
- Email/call at day 30 if not complete.
- If DNR determines package is admin complete in 60 days or less, technical review begins.

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Incomplete Submittal: > 60 days

- If all information is not received within 60 days, DNR will “administratively withdraw” the package.
- Email sent to consultant and RP notifying them of reasons.
- Will need to reapply for closure.
- Fees will not be refunded.

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Interim Process: Improvements

- Created one statewide process.
- Initiated an administrative completeness review - by PMs – in first 10 days of receipt.
- Clearly defined what is a minimal submittal.
- Customer receives standardized notice of “admin completeness.”

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Recap: What is “Administratively Complete”?

Means all the information requested in the closure-GIS form has been submitted or addressed.

Does not mean that we agree with the quality, accuracy and thoroughness of the information submitted. That is part of the 60-day technical review.

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Final Submittal Procedures: By December 2013

- Electronic submittal and payment
- Automated “completeness” check
- Addresses customer wishes – internal and external
- Reduces transfer time between customer and DNR, and within DNR

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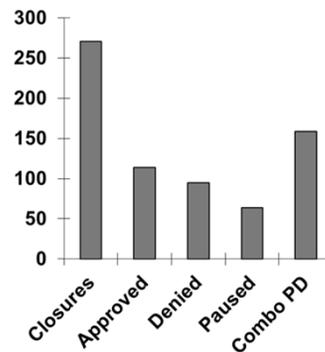
Quality of the Submittals

What was missing from the case closure submittals sent to DNR?

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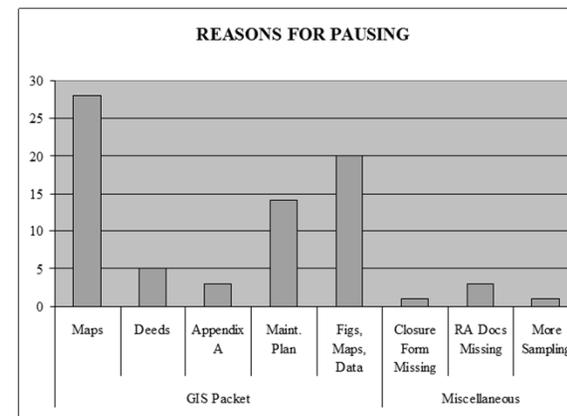
Measure: Closure Data

- 273 closures submitted
 - 114 were approved
 - 64 were paused
 - 95 were denied
- Over 50% of first-time submittals not approved



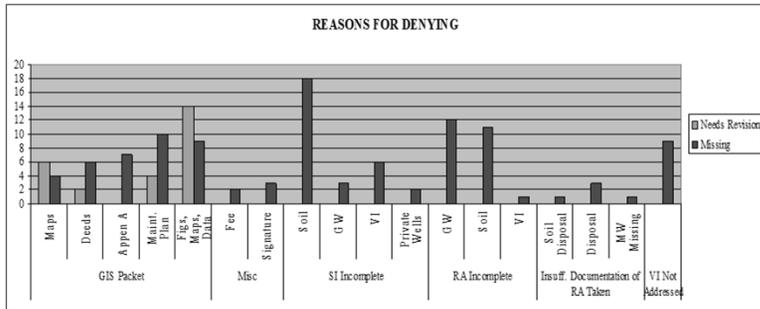
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Measure: Incomplete



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Denials: Missing Info vs. Needs Revision



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Improve

- VOC identified DNR forms as potentially contributing to “quality” issues for closure submittals.
- Team analyzed forms.
- Then, started from scratch with residual pieces.

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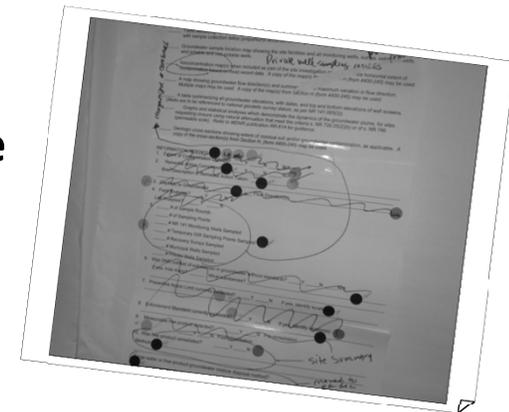
Based on that analysis

We then took a look at the 3 closure-related forms....

- Closure Form
- GIS Checklist
- Impacted Property Form

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Improve



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As a result of that evaluation:

- Merged closure and GIS forms into one form.
- Retooled impacted property owner form.
- Made both forms “fillable” and “savable”.
- Form is the “checklist” of what should be submitted to DNR.

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What this means for DNR closures:

- New closure-GIS form and attachments are now the DNR’s GIS registry package.
- New closure-GIS form and attachments replace the need for the traditional closure report.
- Process and forms apply to DNR closures.

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Schedule for Implementation

- October – outreach and additional training
- November 1st – training for externals
- January 1 – Go Live – form and process begins
- January to May – receive input; instructions, FAQs, etc.
- Comments to: DNRRRcomments@wisconsin.gov
- July – Finalize forms and support documents
- December – Finalize e-submittal system

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Starting January 2013

- Form is to be used for all *NEW* DNR closure submittals.
- Applies to new submittals postmarked on or after January 1, 2013.
- Process to be followed by all regions, consultants and RPs.

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Questions?

Send to:
DNRcomment@wisconsin.gov

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Overview: Changes to the Form

Pam Mylotta,
Southeast Region Team Supervisor

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How Did the Form Change?

- “One Form” – reduces duplication
- Page 1 = Environmental Program Associate info
- General instructions are embedded

The screenshot shows the top portion of a form titled 'Wisconsin DNR Registry' with a 'DRAFT' status. It includes a 'SUBMIT ALL UNDOING PACKAGE IN THE CHECK BOXES' instruction. The form has several sections with fields for 'Project Name', 'Project Number', 'Project Location', and 'Project Description'. There are also checkboxes for 'I am submitting this project for the first time' and 'I am submitting this project as a revision'. The bottom of the page contains a list of instructions for users.

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How Did the Form Change?

- E-copies of all documents to be submitted on data disk; multiple PDFs in e-folders.
- Form is the GIS Registry package

This screenshot is identical to the one on slide 39, showing the top portion of the 'Wisconsin DNR Registry' form with 'DRAFT' status and various input fields for project details.

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How Did the Form Change?

- Vapor Pathway – It's clearly in there
- More descriptive answers – almost no one-word answers or number entries
- Almost every part of form and attachments require a response, with minor exceptions

A thumbnail image of a draft form titled "Draft" with various fields and checkboxes. The form includes sections for "Vapor Pathway" and "Monitoring Wells".

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How Did the Form Change?

- More prompts for affected party notification and info
- Maintenance plans are to be submitted if required by site-specific circumstances
- Monitoring wells must be located prior to closure being requested
- Consultant certifications required

A thumbnail image of a draft form titled "Draft" with various fields and checkboxes. The form includes sections for "Affected Party Notification" and "Maintenance Plans".

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New Closure-GIS Form: General information

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General Highlights about the new form:

- Fillable pdf.
- Savable pdf.
- Printable pdf.
- Not able to send electronically - yet.
- Submit form and attachments; no need for separate closure report.

How to submit the Closure-GIS form

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wis.gov

Case Closure - GIS Registry
Form 4900-02 (6/10/12) Page 1 of 1
DRAFT

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided. Any section of the form not relevant to the case closure request must be fully filled out or explained on a separate page and attached to the relevant section of this form. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 746, Wis. Adm. Code, are included, and sent to the proper destination. 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.).

Site Information

BRRIS No. Parcel ID No.

BRRIS Activity (Site) Name X Y WTM Coordinates

Sheet Address City State ZIP Code

Responsible Party (RP) Name

Company Name

Sheet Address City State ZIP Code

Phone Number Email

Check here if the RP is the owner of the source property.

Environmental Consultant Name

Consulting Firm

Sheet Address City State ZIP Code

Phone Number Email

Access Ready For Use Voluntary Party Liability Exemption Site? Yes No

Fees and Method of Closure Request

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete and corrected.

1. Send a copy of page one of this form and the applicable ch. NR 746, Wis. Adm. Code, fee(s) to the DNR regional Environmental Program Associate at <http://dnr.wis.gov/epa/cbrownfields/contact.html>. Check all fees that apply:

\$750 Closure Fee \$200 GIS Registry Fee for Soil

\$250 GIS Registry Fee for Groundwater Lost Well(s) Total Amount of Payment \$ _____

2. Send one paper copy and one e-copy on compact disk of the entire closure package to the Regional Project Manager assigned to your site. Submit as unbound, separate documents in the order and with the titles prescribed by this form. For electronic document submittal requirements, see <http://dnr.wis.gov/epa/FPF/pubs/arr0609.pdf>.

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General instructions for submitting the form:

Submit to:

- Regional EPA where property is located:
 - Page 1, and
 - Fees.
- DNR Project Managers (PMs):
 - One paper copy of entire form, and
 - One CD or DVD with forms and attachments.

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General Instructions

Highlights:

- *Page 1* - needs to be fully filled out and appropriate fees included to be "complete."
- *Paper and electronic versions* should be organized in the same order as the closure-GIS form, and documents labeled/titled and numbered consistent with the form.
- *Each required form, document, map, table, figure, etc.*, should be submitted as a separate pdf on the CD or DVD.



Updated Guidance

How to prepare your closure package for submittal to DNR on a CD or DVD.

Wisconsin Department of Natural Resources Bureau for Remediation and Redevelopment PUB-RR-099 October 2012

Guidance for Electronic Submittals: Remediation and Redevelopment Program's GIS Registry

PURPOSE
The purpose of this guidance is to outline the appropriate format and procedures for electronic submittals for sites to be included in the Remediation and Redevelopment Program's GIS Registry. Consultants and representatives of responsible parties should submit one paper copy of the case closure documents and one electronically for inclusion in the GIS Registry.

SUBMITTALS
Normally, two copies of paper submittals are required. However, the DNR highly recommends that an electronic copy of the documents be submitted on a disk to help expedite the closure review process for your submittal. An electronic copy may substitute for one of the paper copies, provided it is in accordance with the guidelines listed below. (Note: The draft revisions to the NR 720, Wis. Admin. Code, series include a change that requires one paper copy and one electronic copy of each submittal.)

FILE FORMAT and DISKS:

1. The consultant or representative should prepare electronic files for submittal. The various elements need to be converted into a portable document format (.pdf), readable by Adobe Acrobat Reader.
2. Documents such as lab reports, chain of custody documents, boring logs, etc.

How to fill out the Closure-GIS Form

Covering:
-Page one
-Site Summary

Contents of Page One:

- Contact information.
- Fee information.
- Information on where to submit the package.

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wis.gov

Case Closure - GIS Registry
DRAFT in WIS Page 1 of 11

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 302, Wis. Stats., and the NR 720 and 740, Wis. Admin. Code, this form is required to be completed for case closure requests. The closure of case requests by the Department of Natural Resources (DNR) has determined that no further response is required at this time based on the information that was submitted to the DNR. All documents that are submitted to the DNR will be considered case closure documents by the Department. Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided. Any sections of the form not covered by the case closure request need to be filed and/or explained on a separate page and attached to the relevant section of this form. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fee required under ch. NR 740, Wis. Admin. Code, are included, and sent to the program operations. Payment information submitted will be used for administrative purposes and may be provided to requesters in the event required by Wisconsin's Open Records Law (ss. 19.31 - 19.38, Wis. Stats.)

Case Information	
Case No.	Parent ID No.
WRETS Activity (Agency Name)	WTRM Coordinates
Street Address	City
Responsible Party (RP) Name	State ZIP Code
Company Name	
Street Address	City
Phone Number	Email
<input type="checkbox"/> Check here if the RP is the owner of the source property.	
Environmental Consultant Name	
Consulting Firm	
Street Address	City
Phone Number	Email
Knows Neighb' For Use	Voluntary Party Liability Exemption Site? <input type="radio"/> Yes <input type="radio"/> No

Fee and Method of Closure Payment

If any fee is not reported for the case closure request, you must fully explain the reason why and attach that explanation to the relevant section of the form. All information submitted shall be kept confidential. Providing illegible information may result in a submittal being considered incomplete and corrected.

1. Send a copy of page one of this form and the applicable ch. NR 740, Wis. Admin. Code, to the DNR regional Environmental Program Administrator at regadmin@dnr.wisconsin.gov. Check all fees that apply.

<input type="checkbox"/> \$750 Closure Fee	<input type="checkbox"/> \$200 GIS Registry Fee for Soil
<input type="checkbox"/> \$200 GIS Registry Fee for Groundwater (not Weekly)	Total Amount of Payment \$
2. Send one paper copy and one e-copy on compact disk of the entire closure package to the Regional Project Manager assigned to your site. Submit an unbound, separate document in the order and with the files provided by this form. For electronic document submittal requirements, see <http://dnr.wis.gov/RR/PDF/RR-099099.pdf>.

New Closure-GIS Form: Site Summary Section

Dave Rozeboom,
West Central Region Hydrogeologist

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General Instructions

Highlights:

- *Site Summary Section of form:*
 - All questions need to be answered. If a question is “not applicable” to the site, explain reasons why.
 - No character limit on how much or little you want to include in response to each question.
- *Attachments to form:*
 - There must be a corresponding physical document associated with each required attachment.
 - If an attachment is “not applicable,” you are required to attach an explanation of why the requested information is not applicable to the circumstances at the site.

Site Summary

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

1. General Site Information and Site History

- A. **Site Location:** Describe the physical location of the site, both generally and specific to its immediate surroundings.

- B. **Prior and current site usage:** Specifically describe the current and historic occupancy and types of use.

- C. **Describe how and when site contamination was discovered.**

- D. **Describe the type(s) and source(s) or suspected source(s) of contamination.**

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- E. **Other relevant site description information (or enter Not Applicable).**

- F. **List BRRTS activity site name and number for all other BRRTS activities at this property, including closed cases.**

- G. **List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to this site, and those impacted by contamination from this site.**

- H. **Current zoning (e.g. Industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).**

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2. General Site Conditions

A. Soil/Geology

i. Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.

ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.

iii. Depth to bedrock, bedrock type, and whether or not it was encountered during the investigation.

iv. Describe the nature and locations of current surface cover(s) across the site (e.g. natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).

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B. Groundwater

i. Discuss depth to groundwater and piezometric elevations. Describe and explain depth variations, and whether free product affects measurement or water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.

ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.

iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.

iv. Identify and describe locations/distance of potable and/or municipal Wells within 1200 feet of the site.

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3. Site Investigation Summary

A. General

i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.

ii. Identify whether contamination extends beyond the source property boundary, describe the off-site media (e.g., soil, groundwater, etc.) impacted, and the vertical and horizontal extent of off-site impacts.

iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.

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B. Soil

i. Describe degree and extent of soil contamination at and from this site. Relate this to known or suspected sources and known or potential receptors/migration pathways.

ii. Describe the level and types of soil contaminants found in the upper four feet of the soil column.

iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site: for example, a Residual Contaminant Level (RCL), a Site-Specific Residual Contaminant Level (SSRCL), or a Performance Standard as determined under ss NR 720.09, 720.11 and 720.19, Wis. Adm. Code. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.

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C. Groundwater

i. Describe degree and extent of groundwater contamination at or from this site. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.

ii. Describe the presence of free product at the site, including the thickness, depth, and locations.

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D. Vapor

i. Describe how the vapor migration pathway was assessed, including locations where vapor or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.

ii. Identify the applicable DNR action levels and the land use classification used to establish them. Describe where the DNR action levels were reached or exceeded (e.g., sub slab, indoor air or both).

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E. Surface Water and Sediment

i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.

ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.

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4. Remedial Actions Implemented and Residual Levels at Closure

A. General: Provide a brief summary of the remedial action history. List previous remedial action report submittals by name and date. Identify remedial actions undertaken since the last submittal for this project and provide the appropriate documentation in Attachment C.

B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.

C. Describe the active remedial actions taken at the site, including: type of remedial system(s) used for each media impacted; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.

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D. Provide a discussion of the nature, degree and extent of residual contamination that will remain at the site or on off-site affected properties after case closure.

E. Describe the remaining soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds the ch. NR720, Wis. Adm. Code, standard(s) for direct contact.

F. Describe the remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway.

G. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.

H. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration, (e.g. stable or receding groundwater plume).

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I. Identify how all exposure pathways were removed and/or adequately addressed by immediate and/or remedial action(s) described above in paragraphs, B, C, D, E and F.

J. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.

K. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.

L. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.

M. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.

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5. Continuing Obligations: Situations where a maintenance plan(s) and inclusion on DNR's GIS Registry are required.

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: Maintenance Plans and GIS Registry	Maintenance Plan (s) Required in Attachment D	GIS Registry Listing
	A. On-Site	B. Off-Site			
i.	<input type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Direct Contact	✓	✓
ii.	<input type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Groundwater Infiltration	✓	✓
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure passive system	✓	✓
iv.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure active system	✓	✓
v.	<input type="checkbox"/>	<input type="checkbox"/>	None of the above scenarios apply to this case closure	NA	NA

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6. Continuing Obligations: Situations where inclusion on DNR's GIS Registry is required.

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: GIS Registry Only	GIS Registry Listing
	A. On-Site	B. Off-Site		
i.	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination exceeds ch. NR 720 generic or site-specific RCLs	✓
ii.	<input type="checkbox"/>	<input type="checkbox"/>	Sites with groundwater contamination equal to or greater than the ch. NR 140, enforcement standards (ES)	✓
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Monitoring wells: lost, transferred or remaining in use	✓
iv.	<input type="checkbox"/>	<input type="checkbox"/>	Structural Impediment (not as a performance standard)	✓
v.	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination remaining at ch. NR 720 Industrial Use levels	✓
vi.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor intrusion may be future, post-closure issue if building use or land use changes	✓
vii.	<input type="checkbox"/>	<input type="checkbox"/>	None of the above scenarios apply to this case closure	NA

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7. Underground Storage Tanks

- A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action? Yes No
- B. Do any upgraded tanks meeting the requirements of ch. SPS 310, Wis. Adm. Code, exist on the property? Yes No
- C. If the answer to question 7b is yes, is the leak detection system currently being monitored? Yes No

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Questions?

Send to:

DNRcomment@wisconsin.gov

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Maps, Figures & Other Documentation

Roxanne Chronert,
Northeast Region Team Supervisor

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Data Tables (Attachment A)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General directions for Data Tables:

- Use bold and italics font on information of importance on tables and figures. Use bold font for ch. NR 140, Wis. Adm. Code, groundwater enforcement standard (ES) attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, groundwater preventive action limit (PAL) standard attainments or exceedances.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e. do not just list as no detect (ND)).
- Include the units on data tables.
- Summaries of all data **must** include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15(2)(g)3, Wis. Adm. Code, in the format required in s. NR 716.15(2)(h)3, Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Pre-remedial Soil Analytical Table, etc).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate PDF.

A. Data Tables

- A.1. **Groundwater Analytical Table(s)**: Table(s) showing the analytical results and collection dates, for all groundwater sampling points e.g. monitoring wells, temporary wells, sumps, extraction wells, any potable wells and any other wells, extraction wells and any potable wells for which samples have been collected.
- A.2. **Pre-remedial Soil Analytical Table(s)**: Table(s) showing the soil analytical results and collection dates - prior to conducting the interim and/or remedial action. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.3. **Post-remedial Soil Analytical Table(s)**: Table(s) showing the post-remedial action soil analytical results and collection dates. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.4. **Pre and Post Remaining Soil Contamination Soil Analytical Table(s)**: Table(s) showing only the pre and post remedial action soil analytical results that exceed a Residual Contaminant Level (RCL) or a Site-Specific Residual Level (SSRCL).
- A.5. **Vapor Analytical Table**: Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.
- A.6. **Other Media of Concern (e.g., sediment or surface water)**: Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, time period for sample collection, method and results sampling.
- A.7. **Water Level Elevations**: Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.
- A.8. **Other**: This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

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Data Tables: General Directions

Data Tables (Attachment A)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General directions for Data Tables:

- Use bold and italics font on information of importance on tables and figures. Use bold font for ch. NR 140, Wis. Adm. Code, groundwater enforcement standard (ES) attainments or exceedances, and italicized font for ch. NR 140, Wis. Adm. Code, groundwater preventive action limit (PAL) standard attainments or exceedances.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e. do not just list as no detect (ND)).

- Compile in: Same Order, Numbering & Title
- Not relevant? Attachment an explanation
- Each Table Submitted as Separate PDF
- **Bold** Font for NR 720 RCL Exceedances
- *Italic* Font for SSRCLs
- No Highlighting, Shading, or Colored Font

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Data Tables: General Directions

Data Tables (Attachment A)

- Include the units on data tables.
- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15(2)(g)3, Wis. Adm. Code, in the format required in s. NR 716.15(2)(h)3, Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Pre-remedial Soil Analytical Table, etc.).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate PDF.

- Include Level(s) of Detection
 - Specify method detection limit as <value (not ND)
- Include Units
 - Uniform units between results and standards
- Historic Data (Previous Consultants)
- Include Contaminants without Standards

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Groundwater Data Tables

A. Data Tables

- A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates, for all groundwater sampling points e.g. monitoring wells, temporary wells, sumps, extraction wells, any potable wells and any other wells, extraction wells and any potable wells for which samples have been collected.

- All GW Sample Locations
 - MW, Temp Wells, Sumps, Potable Wells, Industrial Wells
- Water Level Indication with all Rounds
- Detection Limits
 - Specify method detection limit as <value (not ND)
- Include the ch. NR 140 ES and PAL values
 - ES Exceedances in **Bold**
 - Pal Exceedances in *Italic*
- Indicate Pre/Post Treatment with a line between sampling events

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Table # . Title:

Sample Date	Top of Well Screen (msl):				Length of Well Screen:			Water Level* (ft msl)
	Benzene	Ethylbenzene	Toluene	Xylenes (total)	TMBs (total)	MIBE		
4/3/95	970	180	1,400	750	297	<1.6	866.47	
8/18/95	4,600	530	3,000	1,900	<2.7	<0.80	865.47	
3/4/97	870	220	1,300	820	213	49	865.51	
7/16/97	4,400	570	5,400	2,300	600	<1.6	865.75	
6/12/98	1,700	280	2,300	1,200	316	<1.6	866.25	
12/10/98	4,200	800	5,400	3,600	620	<1.6	865.58	
7/9/99	3,400	560	5,000	2,220	520	<1.6	865.87	
10/8/99	3,600	720	5,000	3,300	640	9.1	865.48	
MW-3								
Sample Date	Top of Well Screen (msl):				Length of Well Screen:			Water Level* (ft msl)
	Benzene	Ethylbenzene	Toluene	Xylenes (total)	TMBs (total)	MIBE		
4/3/95	860	300	230	1,170	376	<0.21	866.30	
8/18/95	1,800	750	1,200	3,000	650	<0.21	865.39	
3/4/97	0.44	<0.12	<0.11	<1.8	<0.82	<0.21	865.46	
7/16/97	41	6.3	0.69	22	10	<0.21	865.61	
6/12/98	12	4.3	1.8	24	9.1	<0.21	866.13	
12/10/98	600	190	5	293	245	<0.21	865.50	
7/9/99	70	44	10	110	54	<0.21	865.75	
10/8/99	400	85	4.4	62	51	<0.21	865.38	
NR 140 ES	5.0	700	1,000	10,000	480	60	--	
NR 140 PAL	0.5	140	200	1,000	96	12	--	

* Asterisk indicates water table well screen submerged below water table

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Pre- and Post- Remedial Soil Data Tables

- A.2. **Pre-remedial Soil Analytical Table(s):** Table(s) showing the soil analytical results and collection dates - prior to conducting the interim and/or remedial action. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.3. **Post-remedial Soil Analytical Table(s):** Table(s) showing the post-remedial action soil analytical results and collection dates. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).

- Two Separate Tables
 - All soil data collected *prior* to interim/remedial action
 - All soil data collected *after* interim/remedial action
- Collection Date
- Include RCL (NR 720 Tables or EPA Calculator)
- Sample Collection Depth
- Depth to GW
 - Saturated Material vs. Soil (above all-time low water table)

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Soil Table

Example Presentation for Soil Analytical Results Summary
Add additional analyte columns as needed. Units are µg/kg unless otherwise indicated.

Boring & Sample	Sample Date	Depth* (ft bgs)	PID (ppm eq)	Table # , Title				
				GRO (mg/kg)	Benzene	Ethylbenzene	Toluene	Xylenes (total)
B1-S1	10/25/97	3.5-5.5	985	1400	<0.002	46,000	28,000	226,000
B1-S5	10/25/97	11-13	15	45	190	91	210	450
MW1-S3	12/15/98	6-8	5	<0.36	<20	<12	<11	<39
MW1-S5	12/15/98	11-13	4	<0.36	<20	<12	<11	<39
NR 720.09 RCLs				100	5.5	2,900	1,500	4,100
NR 746.06 Table 1 (free product indicator)				--	8,500	4,600	38,000	42,000
NR 746.06 Table 2 (direct contact standard)				--	1,100	--	--	--

Note: ft bgs = feet below ground surface
ppm eq = part per million equivalent
GRO = gasoline range organics
*Data with asterisk indicates sample was taken at or below the historic measured high water table, based on monitoring well data.

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Soil Data Tables

- A.4. **Pre and Post Remaining Soil Contamination Soil Analytical Table(s):** Table(s) showing only the pre and post remedial action soil analytical results that exceed a Residual Contaminate Level (RCL) or a Site-Specific Residual Level (SSRCL).

- Table with ONLY remaining soil contamination
- All remaining pre/post remedial soil data > RCL/SSRCL for Direct Contact and GW Protection
 - Indicate if exceeds a **RCL** or **SSRCL**
 - Indicate if exceeds GW Protection
- Unsaturated Contaminated Soil

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Vapor Data Tables

- A.5. **Vapor Analytical Table:** Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.

- PID Reading
- Types of Samples
- Collection Method
- Analytical Method
- Sample Results
- Date of Collection
- Time Period for Collection
- Method and Results of Leak Detection
- Method and Results of Communication Testing
- Some info will be in legend or in text of this form

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Other Media of Concern Data Tables

A.6. **Other Media of Concern (e.g., sediment or surface water):** Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, time period for sample collection, method and results sampling.

- Sediment, Surface Water, or Other
 - Collection Method
 - Analytical Method
 - Date of Collection
 - Time Period of Sample
 - Standard Utilizing

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GW Elevation Data Tables

A.7. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.

- Date of Measurements
- Measurements
 - Elevations from MSL
 - Depth to GW
- Free Product Measurements (if applicable)

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Other Data Tables

A.8. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

- Natural Attenuation
- Engineered Systems
- Other – anything unique about this site that would assist in explaining why it was ready for case closure?
- Not Applicable, Explain Why Not Applicable

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Maps and Figures

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Maps and Figures (Attachment B)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions for all Maps and Figures:

- If any map or figure is not relevant to the case closure request, you must fully explain the reason(s) why and attach that explanation (properly labeled with the map/figure title) in Attachment B.
- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11x17 inches, in a portable document format (pdf) readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(2)(h)1 and 726.05(3)(a)4.d, Wis. Adm. Code.
- Do not use shading or highlights on any of the analytical tables.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc.).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a., etc.) should be a separate PDF.

B.1. Location Maps

B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all impacted and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.

B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for on-site and applicable off-site properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

B.1.c. **RR Site Map:** From RR Sites Map (<http://dnrmaps.wi.gov/dnrim/jsp?alter=brts2>) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

B.2. Soil Figures

B.2.a. **Pre-remedial Soil Contamination:** Figure(s) showing the sample location of all pre-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeded a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

B.2.b. **Post-remedial Soil Contamination:** Figure(s) showing the sample location of all post-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

B.2.c. **Pre/Post Remaining Soil Contamination:** Figure(s) showing the only location of all pre and post remedial residual soil sample location(s) where unsaturated contaminated soil remains after remediation and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

B.3. Groundwater Figures

B.3.a. **Geologic Cross-Section Figure(s):** One or more cross-section diagrams showing soil types and correlations across the site, water table and piezometric elevations, and locations and elevations of geologic rock units, if encountered. Display on one or more figures all of the following:

- Source location(s) and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
- Source location(s) and lateral and vertical extent if groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES)
- Surface features, including buildings and basements, and show surface elevation changes.
- Any areas of active remediation within the cross section path, such as excavations or treatment zones.
- Include a map displaying the cross-section location(s), if they are not displayed on the Detailed Site Map (Map B.1b).

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Maps & Figures: General Directions

Maps and Figures (Attachment B)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions for all Maps and Figures:

- If any map or figure is not relevant to the case closure request, you must fully explain the reason(s) why and attach that explanation (properly labeled with the map/figure title) in Attachment B.
- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11x17 inches, in a portable document format (pdf) readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(2)(h)1 and 726.05(3)(a)4.d, Wis Adm. Code.

- Compile in: Same Order, Numbering, & Title
- Not relevant? Attachment an explanation
- Separate PDF Documents
- Max Paper Size 11 X 17", unless otherwise directed
 - Unless electronic portable document
- Prepare According to ss. NR716.15 (2)(h)1 and 726.(3)(a)4.d, Wis. Admin. Code

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Maps & Figures: General Directions

Maps and Figures (Attachment B)

General Directions for all Maps and Figures:

- Do not use shading or highlights on any of the analytical tables.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc.).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a., etc.) should be a separate PDF.

- **Bold or Italic Font for Exceedances**
- **No Highlighting, Shading, or Colored Font**
- **Include all Sample Locations**
- **Contour Lines Clearly Labeled & Defined**

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Location Map

B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all impacted and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.

- All Properties within Contaminated Site Boundaries
 - USGS Map or Plat Map
- If GW Standard Exceedances include:
 - Potable well locations
 - Residential
 - Municipal *
 - Within 1200 feet of contamination

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Detailed Site Map

- B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for on-site and applicable off-site properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

• Relevant Features in relation to boundaries of GW Contamination:

- Buildings
- Roads
- Surface Cover
- Property Lines
- Utilities
- Monitoring Wells
- Potable Wells

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RR Site Map

- B.1.c. **RR Site Map:** From RR Sites Map (<http://dnrm.wisconsin.gov/im/limf.jsp?site=brrts2>) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

- Include map from RR sites Map
- Feature the source property
- Display other open & closed BRRTS Sites
 - Within ½ mile or less

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Pre- and Post-Remedial Soil Maps

B.2. Soil Figures

- B.2.a. **Pre-remedial Soil Contamination:** Figure(s) showing the sample location of all pre-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeded a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.
- B.2.b. **Post-remedial Soil Contamination:** Figure(s) showing the sample location of all post-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.
- B.2.c. **Pre/Post Remaining Soil Contamination:** Figure(s) showing the only location of all pre and post remedial residual soil sample location(s) where unsaturated contaminated soil remains after remediation and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

- Three Separate Maps
 - All soil data collected *prior* to interim/remedial action
 - All soil data collected *after* interim/remedial action
 - All remaining pre/post remedial soil data > RCL/SSRCL for Direct Contact and GW Protection
- Unsaturated Contaminated Soil
- Single Contour, showing horizontal extent > RCL for DC and GW Protection

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Geologic Cross Section Figures

- B.3.a. **Geologic Cross-Section Figure(s):** One or more cross-section diagrams showing soil types and correlations across the site, water table and piezometric elevations, and locations and elevations of geologic rock units, if encountered. Display on one or more figures all of the following:
- Source location(s) and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
 - Source location(s) and lateral and vertical extent if groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES)
 - Surface features, including buildings and basements, and show surface elevation changes.
 - Any areas of active remediation within the cross section path, such as excavations or treatment zones.
 - Include a map displaying the cross-section location(s), if they are not displayed on the Detailed Site Map (Map B.1b)

- Correlation Across Site
- Soil & Bedrock Type
- Water Table & Piezometric Elevations
- Source Location
- Surface & Subsurface Features
- Areas of Remediation

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Groundwater Isoconcentration Figure

B.3.b. **Groundwater Isoconcentration:** Figure(s) showing the horizontal extent of the post-remedial groundwater contamination exceeding a ch. NR 140, Wis. Adm. Code, Preventive Action Limit (PAL) and/or an Enforcement Standard (ES). Indicate the date and direction of groundwater flow based on the most recent sampling data.

- Enforcement Standard (ES) Horizontal Extent
- Preventative Action Limit (PAL) Horizontal Extent
- GW Flow Direction (most recent sampling data)

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Groundwater Flow Direction

B.3.c. **Groundwater Flow Direction:** Figure(s) representing groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit two groundwater flow maps showing the maximum variation in flow direction.

- Flow Direction
- Variation over 20 degrees
 - Submit 2 or more maps
 - Showing variation over time

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Monitoring Wells Map

B.3.d. **Monitoring Wells:** Figure(s) showing all monitoring wells, with well identification number. Clearly designate any wells that: (1) are proposed to be abandoned; (2) cannot be located; (3) are being transferred; (4) will be retained for further sampling, or (5) have been previously abandoned.

- All Wells with Well Identification Number
 - Ever
 - All Sampling Wells on Tables Should be on Maps
- Designate:
 - Propose to Abandon
 - Cannot be located
 - Being Transferred
 - Retain for Additional Sampling

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Vapor Intrusion Map

B.4.a. **Vapor Intrusion Map:** Map(s) showing all locations and results for samples taken to investigate the vapor intrusion pathway, in relation to remaining soil and groundwater contamination, including sub-slab, indoor air, soil vapor, ambient air, and communication testing. Show locations and footprints of affected structures and utility corridors, and/or where residual contamination poses a future risk of vapor intrusion.

- All Sample Locations
 - Sub-slab
 - Indoor air
 - Soil Vapor
 - Ambient Air
 - Communication Test
- Affected Areas
- Future Potentially Acted Areas
 - High VOC contaminant levels in soil or gw, if building constructed in the future, could be a VI concern.

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Other Media of Concern

B.4.b. Other media of concern (e.g., sediment or surface water): Map(s) showing all sampling locations and results for other media investigation. Include the date of sample collection and identify where any standards are exceeded.

- Sediment or Surface Water
 - Sample Locations
 - Method for investigating
 - Date Sampled
 - Exceedances of standards noted

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Other

B.4.c. Other: Include any other relevant maps and figures not otherwise noted above. (This section may remain blank)

- Other Relevant Maps and Figures
- What else could help explain the site that was not already requested?
- This section may remain blank
 - No explanation needed

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Documentation of Remedial Action

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Documentation of Remedial Action (Attachment C)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc).
 - If the documentation requested below is "not applicable" to the site-specific circumstances, include a brief explanation to support that conclusion.
 - If the documentation requested below has already been submitted to the Department, please note the title and date of the report for that particular document requested.
- C.1 Site Investigation documentation, that has not otherwise been previously submitted.
- C.2 Investigative waste disposal documentation.
- C.3 NR 720.19 analysis, assumptions and calculations for site specific RCLs (SSRCLs), with justification, including EPA Soil Screening Level Model Calculations and results.
- C.4 Construction documentation or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
- C.5 Decommissioning of Remedial Systems. Include plans to properly abandon any systems or equipment upon receiving conditional closure.
- C.6 Photos. For sites or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system. Include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features should be visible and discernible. Photographs must be labeled with the site name, the features shown, location and the date on which the photograph was taken.
- C.7 Other. Include any other relevant documentation not otherwise noted above. (This section may remain blank)

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Remedial Action: General Directions

Documentation of Remedial Action (Attachment C)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc).
- If the documentation requested below is "not applicable" to the site-specific circumstances, include a brief explanation to support that conclusion.
- If the documentation requested below has already been submitted to the Department, please note the title and date of the report for that particular document requested.

- Provide: Same Order, Numbering, & Title
- Not relevant, attachment with explanation
- Separate PDF
- *If already submitted, note the date and title of report where the information can be found*

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Remedial Action

- C.1 Site investigation documentation, that has not otherwise been previously submitted.
- C.2 Investigative waste disposal documentation.
- C.3 NR 720.19 analysis, assumptions and calculations for site specific RCLs (SSRCLs), with justification, including EPA Soil Screening Level Model Calculations and results.

- SI Documentation
- Investigative Waste Documentation
- Soil Disposal Documentation
- SSRCL Assumptions and Calculations
 - DNR PM approval

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Remedial Action

- C.4. Construction documentation or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
- C.5. Decommissioning of Remedial Systems. Include plans to properly abandon any systems or equipment upon receiving conditional closure.
- C.6. Photos. For sites or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system. Include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features should be visible and discernible. Photographs must be labeled with the site name, the features shown, location and the date on which the photograph was taken.
- C.7. Other. Include any other relevant documentation not otherwise noted above. (This section may remain blank)

- Construction Documentation
 - Constructed Interim &/or Remedial Action
- Decommissioning of Remedial System
 - Abandonment Documentation
- Photos on Photo Log
 - Cover or Other Performance Standard
 - Structural Impediment
 - Active Vapor Mitigation System Monitoring Points

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Maintenance Plans

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Maintenance Plan(s) (Attachment D)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

When one or more "maintenance plans" are required for a site closure, include in each maintenance plan all required information in sections D.1. through D.5. below, and attach the plan(s) in Attachment D. The following "model" maintenance plans can be located at: (1) Maintenance plan for an engineering control or cover: <http://dnr.wi.gov/topic/Brownfields/documents/maintenance-plan.pdf>; and (2) Maintenance plan for vapor intrusion: http://dnr.wi.gov/topic/Brownfields/documents/appendix5_606.pdf.

- D.1. **Location map(s)** which show(s): (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) and all property boundaries.
- D.2. **Brief descriptions** of the type, depth and location of residual contamination.
- D.3. **Description of maintenance action(s)** required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter.
- D.5. **Contact information**, including the name, address and phone number of the individual or facility who will be conducting the maintenance.

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Maintenance Plans: General Directions

Maintenance Plan(s) (Attachment D)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

When one or more "maintenance plans" are required for a site closure, include in each maintenance plan all required information in sections D.1. through D.5. below, and attach the plan(s) in Attachment D. The following "model" maintenance plans can be located at: (1) Maintenance plan for an engineering control or cover: <http://dnr.wi.gov/topic/Brownfields/documents/maintenance-plan.pdf>; and (2) Maintenance plan for vapor intrusion: http://dnr.wi.gov/topic/Brownfields/documents/appendix5_606.pdf.

- Submit in: Same Order, Numbering, & Title
- Not relevant? Attach an explanation
- Separate PDFs

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Maintenance Plans

- D.1. **Location map(s)** which show(s): (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) and all property boundaries.
- D.2. **Brief descriptions** of the type, depth and location of residual contamination.
- D.3. **Description of maintenance action(s)** required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter.
- D.5. **Contact information**, including the name, address and phone number of the individual or facility who will be conducting the maintenance.

- Location Maps
- BRIEF Description Remedial Contamination – type, depth, & location
- Maintenance Actions
- Inspection log
 - Maintained on site or specified location
- Contact Information for individual or facility

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Monitoring Well Information

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Monitoring Well Information (Attachment E)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:
Attach monitoring well construction and development forms (DNR FORM 4400-113 A and B: http://dnr.wi.gov/org/water/dwg/gw/forms/4400_113_1_2.pdf) for all wells that will remain in-use, be transferred to another party or that could not be located. A figure of these wells should be included in Attachment B.3.d.

Select One:

No monitoring wells were required as part of this response action.

All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site

Select One or More:

Not all monitoring wells can be located, despite good faith efforts. Attachment E must include description of efforts made to locate the "lost" wells.

One or more wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s).

One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason(s) the well(s) will remain in use.

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Monitoring Well: General Directions

General Directions:
Attach monitoring well construction and development forms (DNR FORM 4400-113 A and B: http://dnr.wi.gov/org/water/dwg/gw/forms/4400_113_1_2.pdf) for all wells that will remain in-use, be transferred to another party or that could not be located. A figure of these wells should be included in Attachment B.3.d.

- Attach Monitoring Well Construction and Development Forms for wells that will:
 - Remain in Use
 - Be Transferred to another party
 - Could not be located
- Not relevant? Attach an explanation
- Map of all MWs Attachment B.3d.

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Monitoring Well

Select One:

No monitoring wells were required as part of this response action.

All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site

Select One or More:

Not all monitoring wells can be located, despite good faith efforts. Attachment E must include description of efforts made to locate the "lost" wells.

One or more wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s).

One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason(s) the well(s) will remain in use.

- Check all that apply
 - No MW were installed
 - All MW located and will be properly abandoned
 - MW Construction and Development Forms
 - Cannot be located
 - Transferred Wells
 - Wells that Will Remain in Use (retain for sampling)
- Map of all MW Locations (Attachment B.3d.)

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Recap of general directions:

Highlights:

- **Attachments to form:**
 - There must be a corresponding physical document associated with each required attachment – unless it explicitly says none is required.
 - If an attachment is "not applicable," you are required to attach an explanation of why the requested information is not applicable to the circumstances at the site.
- **Paper and electronic versions** should be organized in the same order as the closure-GIS form, and documents labeled/titled and numbered consistent with the form.
- **Each required form, document, map, table, figure, etc.,** should be submitted as a separate pdf on the CD or DVD.

Questions?

Send to:
DNRRRcomments@wisconsin.gov

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Notifications, Legal Documents and Signatures

Linda Hanefeld,
South Central Team Supervisor

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Notifications to Owners of Impacted Properties (Attachment F)
If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

- State law requires that the responsible party provide a 30-day, written advance notice (i.e., a letter) to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned.
- A model "template letter" for these mandatory notifications can be downloaded at: <http://dnr.wi.gov/files/PDF/pubs/m/RR919.pdf>.

Check all that apply to the site-specific circumstances of this case closure:

	A. Impacted Source Property and Owner is not Conducting Cleanup	B. Impacted Right of Way	C. Impacted Off-Site Property Owner	Impacted Property Notification Situations: Ch. NR 726 Appendix A Letter
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual groundwater contamination exceeds Ch. NR 140 Wis. Administrative Code enforcement standards.
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination that attains or exceeds standards is present after the remedial action is complete, and must be properly managed should it be excavated or removed.
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	An engineered cover or a soil barrier (e.g. pavement) must be maintained over contaminated soil for direct contact or groundwater infiltration concerns.
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Industrial land use soil standards were used for the clean-up standard.
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A vapor mitigation system (or other specific vapor protection) must be operated and maintained.
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vapor assessment needed if use changes.
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Structural impediment.
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lost, transferred or open monitoring wells.
9.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Not Applicable.

If any of the previous boxes in rows 1 thru 8 were checked, include the following as part of Attachment F:

- FORM 4400-246;
- Copy of each letter sent, 30 days or more prior to requesting closure; and
- Proof of receipt for each letter.

For this site closure, _____ (number) property (ies) has/have been impacted, the owners have been notified, and copies of the letters and receipts are included in Attachment F.

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Form 4400-246

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Impacted Property Notification Information
Form 4400-246 (R 10/12)

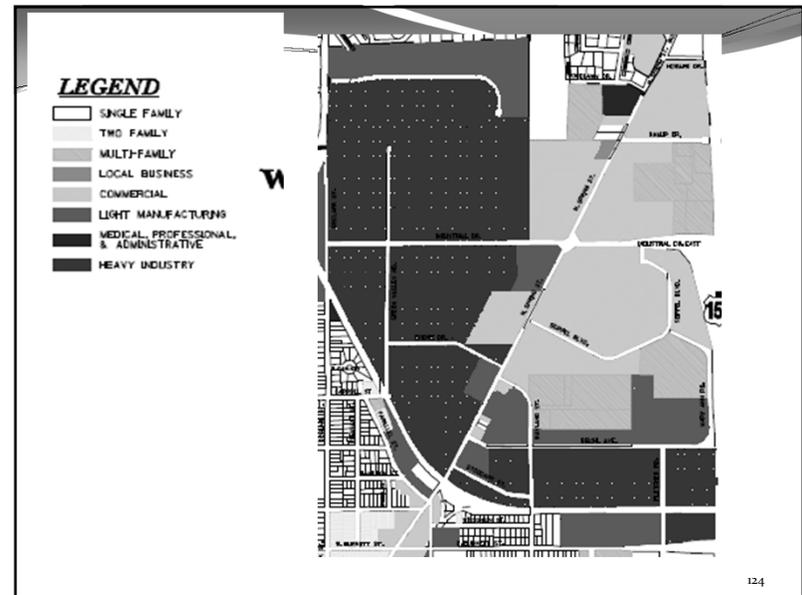
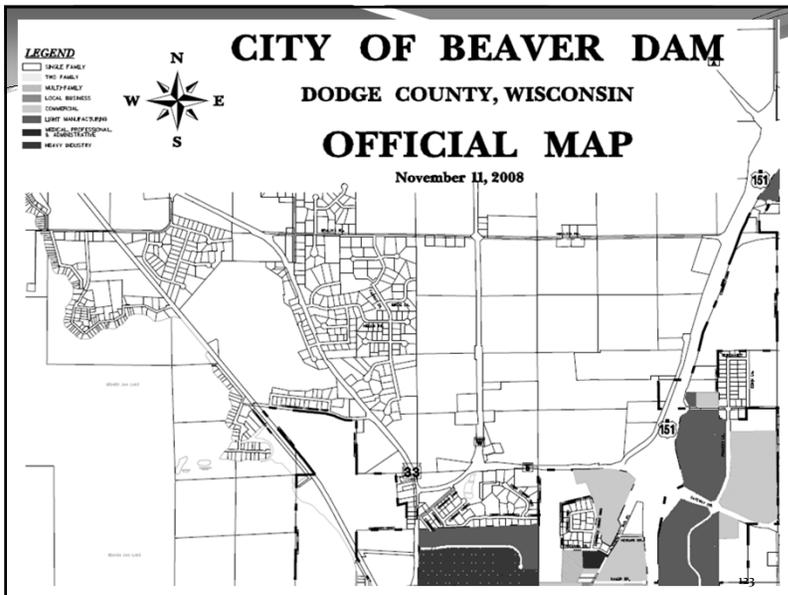
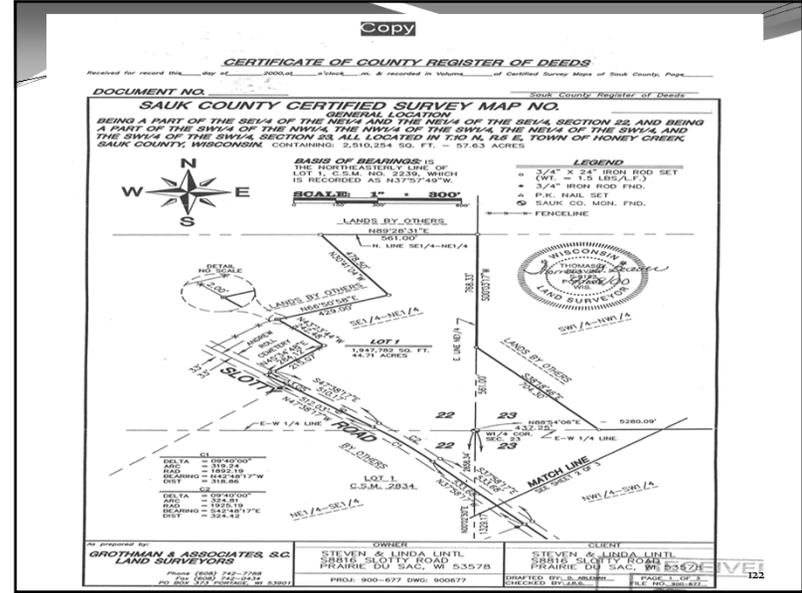
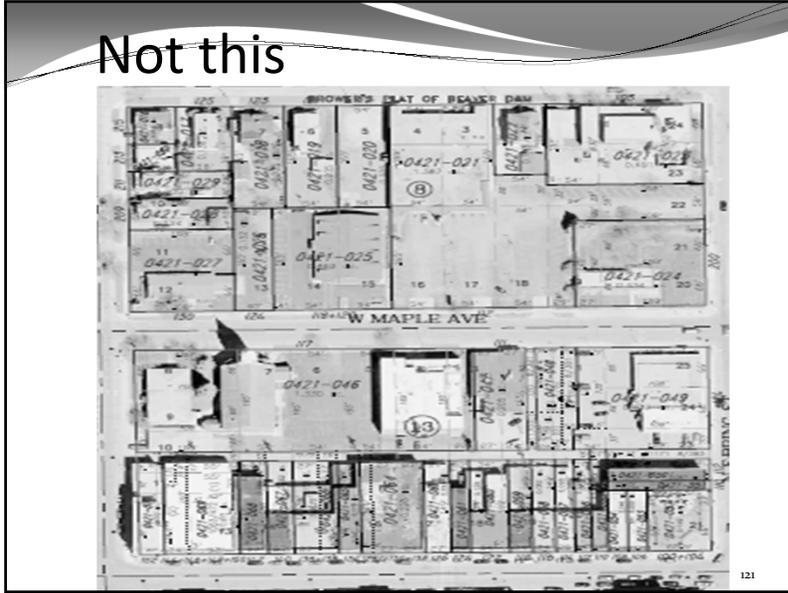
Notice: Completion of this form is mandatory for applications for case closure pursuant to ch. 292, Wis. Stats. and ch. NR 726, Wis. Adm. Code, where specific circumstances exist at the time of case closure. This form applies to situations where: (1) the party conducting the cleanup does not own the source property; (2) contamination has impacted a neighboring property to a certain degree; and (3) not all monitoring wells can/will be abandoned at the time of closure. A letter notifying these property owners is required of the responsible party if certain circumstances exist. The DNR's "Guidance on Case Closure and the Requirements for Managing Continuing Obligations" (PUB-RR-919) specifies those notification requirements. A model "Template for Notification of Residual Contamination and Continuing Obligations" (PUB-RR-919) can be downloaded at: <http://dnr.wi.gov/files/PDF/pubs/m/RR919.pdf>. The Department will not consider, or act upon your application, unless all applicable sections are completed on this form and the closure fee and any other applicable fees, required under ch. NR 749, Wis. Adm. Code, Table 1 are included. 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.).

BRRTS No. _____ Activity Name _____

ID	Impacted Property Address	Parcel No.	Date of Letter	WTMX	WTMY	Letter Sent To:		Reasons Letter Sent:						
						Source Property Owner is not RP Right of Way Government or Other Impacted Off-Site Property Owner	Groundwater Exceeds ES	Residual Soil Exceeds Standards	Cap/Impediment Control	Industrial Use Soil Standards	Vapor System in Place	Vapor Assmt Needed if use Changes	Structural Impediment	Lost, Transferred or Open Wells
A														
B														
C														
D														
E														
F														
G														
H														
I														

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Not this



Signatures and Findings for Closure Determination

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete and corrected.

Check the correct signature block below for this case closure request, and have the proper environmental professional(s) sign this document, in accordance with the ch. NR 700 Wis. Adm. Code rule series. Both boxes may be checked if applicable to this case closure.

A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies). In this situation, the closure request must be prepared by, or under the supervision of, a professional engineer and a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code. Include both signatures provided below with the submittal.

The response action(s) for this site addresses media other than groundwater. In this situation, the case closure request must be prepared by, or under the supervision of, a professional engineer, as defined in ch. NR 712, Wis. Adm. Code. The "engineering certification" language below, at a minimum, must be signed.

Engineering Certification

I, _____ hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code, that this case closure request has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. All phases of work necessary to obtain data, develop conclusions, recommendations and prepare submittals for this case closure request have been prepared by me, or their preparation has been supervised by me. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes.

Printed Name Title

Signature Date P.E. Stamp and Number

Hydrogeologist Certification

I, _____ hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. All phases of work necessary to address groundwater contamination including obtaining data, developing conclusions, recommendations and preparing submittals for this case closure request have been prepared by me, or their preparation has been supervised by me. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes.

Printed Name Title

Signature Date

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Signatures

- A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies). In this situation, the closure request must be prepared by, or under the supervision of, a professional engineer and a hydrogeologist, as defined in ch. NR 712, Wis. Admin. Code. Include both signatures provided below with the submittal.
- When a response action addresses groundwater contamination, the closure request must be prepared by or under the supervision of a professional engineer and a hydrogeologist as defined in ch. NR 712, WAC.
 - The closure request form must be signed by both these professionals.

Signatures:

- The response action(s) for this site addresses media other than groundwater. In this situation, the case closure request must be prepared by, or under the supervision of, a professional engineer, as defined in ch. NR 712, Wis. Admin. Code. The "engineering certification" language below, at a minimum, must be signed.
- When a response action addresses media - *other than groundwater contamination* - the closure request must be prepared by or under the supervision of a professional engineer as defined in ch. NR 712, WAC.
 - The closure request form must be signed by an engineer that has prepared or supervised the preparation of the case closure submittal.

Starting January 2013

- Form is to be used for all *NEW* DNR closure submittals.
- Applies to new submittals postmarked on or after January 1, 2013.
- Process to be followed by all regions, consultants and RPs.

Schedule for Implementation

- November 1st – training for externals
- January – Go Live – form and process begins
- January to May – receive input; instructions, FAQs, etc.
- Send comments by May 1 to DNRRRcomments@wisconsin.gov
- July – Finalize forms and support documents
- December – Finalize e-submittal system

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Questions?

Send to:

DNRRRcomments@wisconsin.gov

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