



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

March 19, 2012

Marina Cliff Condominium Association Board
3333 5th Avenue
South Milwaukee, Wisconsin 53172

Re: Marina Cliff Condominium Property
Marina Cliffs/Northwestern Barrel Site
South Milwaukee, Wisconsin

Dear Condominium Association Board Members,

On March 14, 2012, the United States Environmental Protection Agency (U.S. EPA) received a list of questions from Mr. Tony Ditello regarding the cleanup and close-out of the Marina Cliffs Condominium portion of the Marina Cliffs/Northwestern Barrel Site in South Milwaukee, Wisconsin. Enclosed are U.S. EPA responses to these questions.

We look forward to our meeting with the Board. If you have any questions, please contact me at 312-886-6151 or via e-mail at kolak.shari@epa.gov.

Sincerely,

Shari Kolak

Shari Kolak
Remedial Project Manager
Superfund Division

Enclosure

cc: Andy Boetcher, WDNR
Ed Roberts, CRA

**U.S. EPA Answers to the Marina Cliffs Condominium Board Questions
Related to the Cleanup and Close-out of the
Marina Cliffs/Northwestern Barrel Superfund Site**

U.S. EPA answers to the Boards' questions are italicized below.

1) **Will we ever get a complete release?** *Yes, provided the Potentially Responsible Parties (PRPs) complete the following activities. For the:*

Marina Cliffs Condominium Property (Property)

- *PRPs abandon any remaining monitoring wells and soil gas probes - includes MW8-MW10 and gas probes GP1 - GP4*
- *PRPs collect one additional round of indoor air samples in four buildings to confirm indoor air quality is below WDNR action levels*
- *PRPs submit Maintenance and Inspection Plan for EPA and WDNR approval. The Plan includes a maintenance and inspection schedule for the drain tile depressurization system, inspection of soil/pavement over two areas with residual subsurface contaminated soil, procedures for handling contaminated soils if excavated in future, and an agreement to provide EPA and WDNR future access to the property*
- *PRPs obtain a Post Closure Site Control Agreement with Marina Cliffs Condominium Corporation defines continuing obligations retained by PRPs and/or the Marina Cliffs Condominium Corporation to implement the Maintenance and Inspection Plan*
- *PRPs, State, and EPA conduct pre-certification inspection to ensure that all work is done and the Property is restored to its pre-excavation condition*
- *PRPs revise and re-submit Final Report which addresses EPA/WDNR comments on the draft Final Report and includes the Post-Removal Site Control Agreement and Maintenance and Inspection Plan*
- *PRPs register two areas with contaminated subsurface soils on WDNR's Geographic Information System (GIS) Registry – will ensure protection of construction/utility workers from future exposure to contaminated soils at a depth of 4-10 feet, if excavation occurs in the future. The PRPs need to prepare and submit the following to WDNR:*
 - *Completed GIS packet*
 - *An approved Maintenance and Inspection Plan*
 - *Completed Case Closure Request form*
 - *Payment to process request*

- ***EPA issues Notice of Completion*** which certifies that all work at the Properties has been conducted in accordance with the various EPA issued Administrative Orders. The Notice of Completion is issued after EPA/WDNR comments on the Final Reports are addressed, post-removal site control agreement in place with the Marina Cliffs Condominium Corporation, and the areas at the Property are listed on WDNR GIS registry
- ***WDNR issues Case Closure Letter*** – the letter will state that no further cleanup is required at the Properties. The Case Closure Letter will have:
 - *figures showing two areas of residual contamination (4-10 ft bgs) on Properties*
 - *Cap Maintenance Plan to ensure cover soils remain in place*
 - *Soils Management Plan to address potential excavation and handling of contaminated soils*

With the completion of the above activities, the Property is considered officially closed.

Northwestern Barrel Site (Site)

- ***PRPs abandon monitoring well MW-4***
- ***PRPs remove remaining portions of perimeter fence***
- ***PRPs register area around MW-4 on WDNR GIS Registry*** - The PRPs need to prepare and submit the following to the WNDNR:
 - *Completed GIS packet*
 - *Completed Case Closure Request form*
 - *Payment to process request*
- ***PRPs revise and re-submit Final Report*** which addresses EPA/WDNR comments on the draft Final Report
- ***EPA issues Notice of Completion*** - after EPA/WDNR comments are addressed, post-removal site control agreement in place, and the area of contaminated groundwater around MW-4 is listed on WDNR GIS registry
- ***WDNR issues Case Closure Letter*** stating that no further cleanup is required at the Site. The Case Closure Letter will have:
 - *figure showing area around MW-4 with groundwater contamination*
 - *Groundwater Management Requirements* - to address potential extraction and handling of contaminated groundwater at Site. One of the requirements will be to contact WDNR before pumping groundwater or installing a water well

With the completion of the above activities, the Site is considered officially closed.

2) **How long do the PRPs have to monitor the wells until they remove them?** *All monitoring wells (MW-8 – MW-10) will be abandoned at the Property and Site (MW-4). EPA is not requiring the PRPs to monitor any of the wells.*

3) **Is it safe for us to dig up and repave the parking lot?** *Yes, providing the workers wear protective clothing in the two areas of contaminated soil. There are two areas (under the asphalt parking lot) on the Properties that have residual soil contamination from 4 to 10 feet below the ground. See figure 2. Because these areas will be listed on WDNR's GIS Registry, any future construction/utility worker performing excavation in these areas should be alerted to the presence of contamination and therefore, will be required to wear appropriate protective clothing when handling contaminated soils. Also, see EPA answer to Question 6 below.*

4) **How long will fans on the 4 units have to run and will we receive money to uninstall them now or at that time? Also we need to know the home owners with the fans will be paid for the power used till the fans are removed.** *Past indoor air sampling in one of the units has shown when the fans are not running, Trichloroethence (TCE) and Vinyl Chloride (VC) are present in indoor air above WDNR's indoor air action levels. When the fans are running, TCE and VC in indoor air are below WDNR's indoor air action levels. This suggests the fans will need to be operated indefinitely or until it can be demonstrated there is no longer a reason to continue to run the fans (i.e, when indoor air is below WDNR action levels when the fans are turned off).*

The PRPs are responsible for paying all costs associated with the operation (including electric costs), maintenance, and removal of the tile depressurization systems if U.S. EPA and WDNR determined there is no longer a need for the systems. All agreements negotiated by the PRPs with the Marina Cliffs Condominium Corporation should be documented in the Post-Removal Site Control Plan.

5) **If there is a problem at any time and they have to dig will they repave as new?** *If additional work is required due to newly discovered contamination, the PRPs are responsible for restoring the Property to the condition it was in prior to initiating the work. Depending on the severity of the damage to the parking lot, the PRPs will be responsible for patching the affected area or repaving the entire lot if needed.*

6) **What is the latest report on what is still in the ground and is there any danger to the community?** *At the Marina Cliffs Property, subsurface soils in three discrete areas were treated in October/November 2004 and June 2007 by injecting BIOX into the ground. See figure 1. After treatment, only two areas of contaminated soil (4-10 feet below the ground) remain above WDNR action levels for a construction/utility worker. See figure 2. There is no danger to the community because the contamination is under the asphalt parking lot so residents will not physically come in contact with the contaminated soils. However, if construction/utility workers excavate to these depths in these areas, they will need to wear protective clothing during handing of the soils.*

At the Northwestern Barrel Site, a total of 11,600 tons of hazardous soil waste and a total of 172, 160 tons of non-hazardous waste were excavated and disposed of at a licensed disposal facility. Seven monitoring wells (MW1- MW7) were installed in 2000 and groundwater monitoring was performed. No contamination was detected in any of these wells except MW-4 so all wells except MW-4 was abandoned and no longer exists.

The only area that has contamination at the Site is the groundwater in the vicinity of MW-4. See figure 3. In 2006 and 2008, the groundwater was treated with Fenton's Reagent which significantly reduced the Benzene concentrations from 460- ug/L in 2005 to 21 ug/L in 2009. Groundwater is above the EPA Maximum Contaminant Level (MCL) (5 ug/L) for Benzene but concentrations are expected to decline over time. There is no danger to the community from the area of contaminated groundwater around MW-4. All residents are hooked up (and drinking) clean municipal water so there is no threat of exposure to contaminated groundwater. There is also a deed restriction filed in 2010 with the Registry of Deeds for Milwaukee County which prohibits drilling any drinking water wells on the Site property thereby preventing the potential for future exposure to contaminated groundwater.

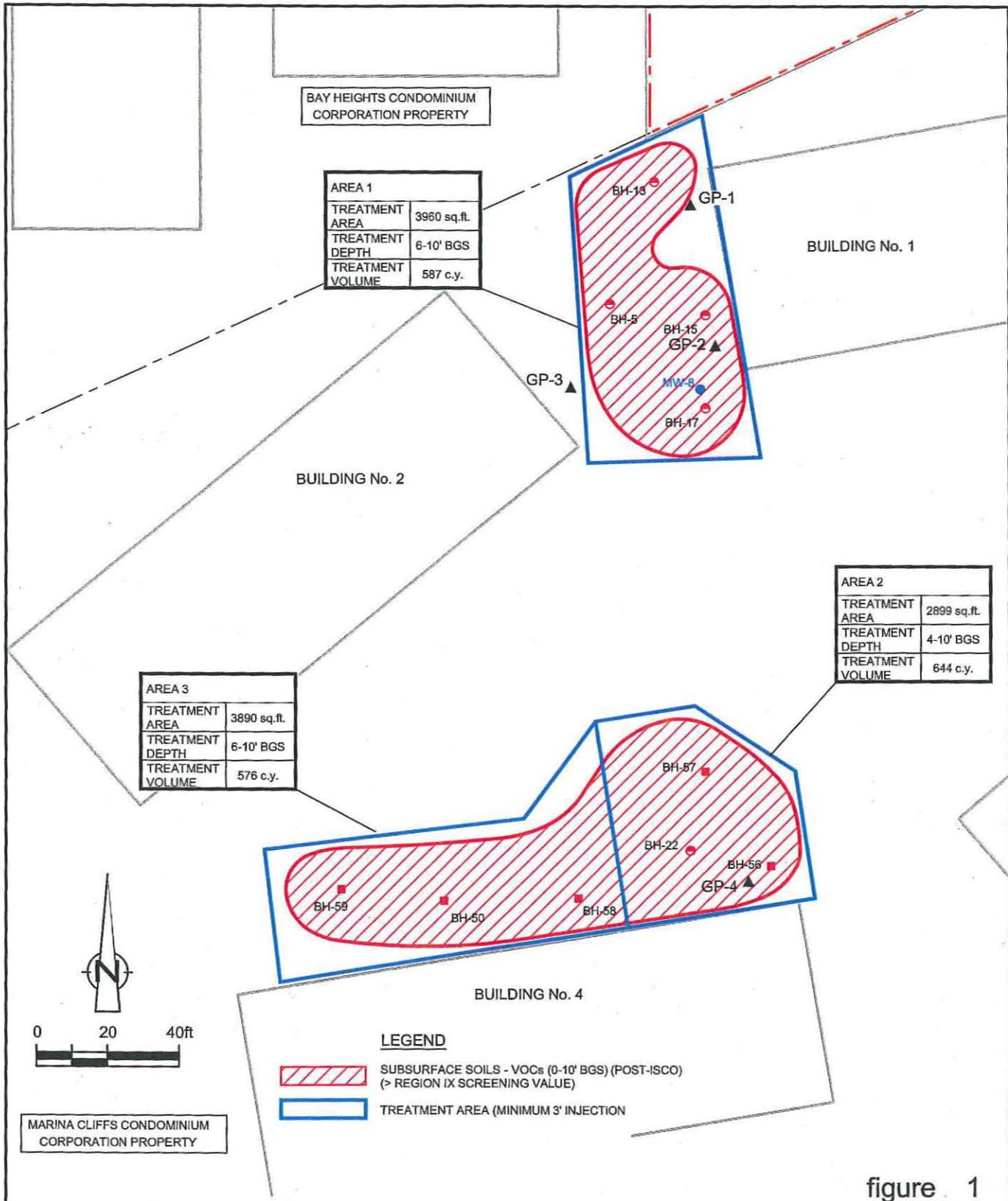


figure 1

**PRE-ISCO TREATMENT
SUBSURFACE SOILS (0 - 10' BGS) - VOCs > REGION IX PRGs
PROPERTIES IMMEDIATELY ADJACENT TO
MARINA CLIFFS/ NORTHWESTERN BARREL SITE
South Milwaukee, Wisconsin**



