TRC Environmental Corporation
708 Heartland Trail, Suite 3000
Madison, WI 53717

Main 608.826.3600
Fax 608.826.3941

Via e-mail

Memorandum

To:	Peter Ramanauskas – U.S. EPA
From:	Andrew Stehn & Katherine Vater
Subject:	Review of the U.S. EPA TSCA PCB Coordinated Approval – April 3, 2019
Date:	April 8, 2019
CC:	Tony Koblinski, Mark Sheppard, & Matt Sill – Madison-Kipp Corporation Michael Schmoller – WDNR John Steketee, Michael Beedle – U.S. EPA
Project No.:	323372.0000.0000, Phase 8

TRC, on behalf of Madison-Kipp Corporation (MKC) has reviewed the U.S. EPA TSCA PCB Coordinated Approval received on April 3, 2019 from U.S. EPA for the MKC facility at 201 Waubesa Street, Madison, WI (the Site). The Coordinated Approval was a letter with one attachment, which will serve as the requirements for the Coordinated Approval between U.S. EPA and WDNR for management of PCBs at the Site. WDNR agreed to terms for the requirements for management of PCBs at the site in the Stipulation and Order for Judgement (November 22, 2017).

In the letter, U.S. EPA requests notification 60 days prior to any "removal, replacement, or other change to a cover system or building which is acting as a cover." This notification will be made except if emergency repairs are required, in which case the notification will be made as soon as possible.

Within Attachment 1, TRC reviewed of the Approval Conditions. In general, MKC understands the Approval Conditions and will comply. The following are some comments/notes regarding specific Approval Conditions.

- **Approval Condition B.1.a** – Already being conducted as part of the semi-annual sampling program.
- **Approval Condition B.1.b** – Completed in October 2018.

- **Approval Condition B.2.a** – Already being conducted as part of the semi-annual sampling program.
- **Approval Condition B.3** – Evaluation of a groundwater hydraulic control option will be included in the remedial action options report if required as listed in the Stipulation and Approval Condition.
- **Approval Condition D.1** – Work required under the November 2017 Work Plan was completed in June 2018 as documented in the *Remedial Action Documentation Report – Rain Garden Excavation and Restoration* (TRC, July 23, 2018). All future excavation in the Rain Garden will be completed under an agency approved work plan.
- **Approval Condition D.2** – Sediment sampling in 2018 was completed consistent with the referenced June 18, 2018 letter and the July 2018 report. The 2018 monitoring results were documented in the *Rain Garden – 2018 Sediment Monitoring* letter report (TRC, December 4, 2018).

  Sediment sampling in 2019 will be completed consistent with the recommendations in the December 4, 2018 letter report. Semi-annual sampling will be completed following heavy rain events in spring/early summer and in late summer/fall. One water sample will be collected from the outfall during each sediment sampling event.
- **Approval Condition F.2** – If there are detections of PCBs in groundwater above the method limits of detection, an evaluation and discussion will be included.
- **Approval Condition F.3** – MKC will include the following in its annual report:
  - Documentation of PCB disturbance/disposal (rain garden or onsite)
  - Status of Financial Assurance
  - Status of Continuing Obligations
  - Documentation of cap inspections and repairs
- **Approval Condition F.4** – A Risk Mitigation Plan will be prepared and implemented.