

From: Martinez, Joseph J - DNR
Sent: Tuesday, March 10, 2020 4:16 PM
To: 'Kate Juno'
Subject: Meeting Summary Notes - MPL Corp. (BRRTS 02-41-184461)

On March 9, 2020, DNR representatives Joseph Martinez and Paul Grittner met with Katherine Juno of LF Green Development, LLC (LF). This meeting was held in response to a request for technical assistance, dated January 30, 2020, regarding the MPL Corp. Wire & Metal Specialties DIV (BRRTS# 02-41-184461) property located at 4021 S. Kinnickinnic Ave., Milwaukee, WI (Site). As agreed, a summary of the meeting is provided below:

Purpose

- The purpose of the meeting was to discuss the actions needed to complete the site investigation and move the case towards closure.

General

- All sample data for the site investigation may not be contained in the ReadyEarth Consulting Inc. summary report dated September 21, 2018. DNR recommends reviewing the case file and compiling all available data.
- The DNR will upload all relevant documentation contained in the case file to BRRTS on the web.
- LF agreed to confirm the responsible party's mailing address.

Soil

- The extent of chlorinated volatile organic compound (CVOC) contamination in soil appears to be undefined south of GP-109 and GP-19. LF should consider conducting additional site investigation activities near the southern property boundary to define the southern extent of CVOC contamination in soil.
- The DNR agrees with LF's proposal to collect shallow soil samples near the northern property boundary in an attempt to determine the source of PVOC contamination and provide further delineate of the degree and extent of CVOC contamination.
- The DNR also agrees with LF's plan to collect soil samples within the northern portion of the on-site building to further define the northern extent of CVOC contamination in soil. This sampling would also aid in evaluating the potential of a secondary source area near a former vapor degreaser which was noted near GP-10 and would help define the degree and extent of PVOC contamination identified near the northern property boundary.

Groundwater

- The extent of CVOC contamination in groundwater is undefined south of MW-102. LF should consider whether additional site investigation activities near the southern property boundary to define the southern extent of contamination are necessary.
- LF plans to sample the groundwater monitoring wells which were installed by previous consultants. The DNR concurs with your plan to assess current groundwater conditions at the site. Groundwater sampling must include the down-gradient well MW-12 and, due to the presence of 1,1,1 TCA contamination on-site, the DNR recommends including 1,4 dioxane in the analysis of groundwater samples.
- Additional data/information must be provided to demonstrate that groundwater contamination located at PZ-1 is defined. Minimally, the down-gradient, horizontal extent of contamination

within this portion of the aquifer will need to be determined. This may require the installation of a piezometer near MW-12 which is screened at a comparable depth to PZ-1.

Vapor

- Due to the proximity between the structure on the northern adjacent property (4005 S. Kinnickinnic Ave.) and groundwater contamination identified along the northern property boundary, sub-slab vapor samples should be collected at the northern adjacent property. These samples should be analyzed for VOCs. Due to the potential acute (short-term) health effects associated with TCE, this vapor sampling should be prioritized.
- A vapor intrusion assessment should be completed to determine if vapor sampling is needed at the southern adjacent property located at 4045 S. Kinnickinnic Ave. Due to the potential acute (short-term) health effects associated with TCE, this vapor determination and, if necessary, sampling should be prioritized.
- LF will evaluate whether the small commercial or industrial VRSL is appropriate for the on-site building.
- LF has proposed conducting radon sampling to determine a site-specific attenuation factor (AF) for the on-site building. The DNR recommends submitting a Site Investigation Work Plan for DNR review prior to conducting the assessment. The Work Plan should include specific details on how, where, and when radon measurements will occur, and the methodology that will be used to calculate the AF.
- Adequate indoor air sampling, along with details regarding the floor slab, indoor air flow, HVAC operation, and other factors influencing vapor intrusion will be needed to support the vapor assessment.
- The DNR is currently reviewing a request to approve a site-specific AF based on radon sampling for Ventura Foods Inc. (BRRTS 02-68-582266). LF may review this request and forthcoming DNR review for reference.
- Sub-slab vapor samples collected from beneath the on-site building identified TCE at concentrations in exceedance of the default industrial VRSL. Due to this exceedance, the vapor pathway must be interrupted or mitigated and remedial action to reduce the mass and concentration of volatile compounds to the extent practicable is needed to comply with the closure criteria specified in Wis. Admin. Code § NR 726.05(8).
- Details regarding current site occupancy, previous vapor sample results, and potentially additional indoor-air sample results should be evaluated to determine whether immediate or interim actions are needed to address vapor intrusion in the on-site building.
- The depth and location of subsurface utilities must be identified and included as part of vapor intrusion assessment activities.

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