



May 20, 2020

Don Tieman
N8649 County Rd G
Willard, WI 54493

Subject: Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended
Arlene's Inn, N8631 County Road G, Willard, Wisconsin 54493
DNR BRRTS Activity # 03-10-196577

Dear Mr. Tieman:

On May 19, 2020, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. As you are aware, the DNR reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b). As discussed with Ron Anderson on May 19, 2020, case closure is not recommended because additional legal requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with the information requested or your written response regarding the necessary work and a schedule for completion of this work.

Additional Requirements Needed for Case Closure Under Wis. Admin. Code ch. NR 726

As noted above, additional work is necessary to meet the requirements for case closure because of the elevated compounds detected in the sub-slab vapor samples. Additional indoor air vapor samples will need to be conducted to define the vapor intrusion risk and a vapor mitigation system will need to be installed to mitigate vapor intrusion.

Need to Define the Degree and Extent of Contamination

Additional vapor sampling is needed to define the degree and extent of contamination per Wis. Admin. Code § NR 716.11.

Need to Complete a Vapor Investigation

Additional site investigation, per Wis. Admin. Code § NR 716.11 (5), is needed to determine whether vapor intrusion is a completed pathway at this site, or if there is a risk of future vapor exposure due to residual contamination. If vapor intrusion is an issue at this site, document all source control actions taken under Wis. Admin. Code § NR 726.05 (8). Additional indoor air samples from the entrance of the crawl space and directly above the crawl space on the ground floor is needed to complete the investigation. The top floor of the building is believed to be unoccupied and therefore no indoor air sample is required at this time. Should this change, additional vapor sampling will be required to

complete the investigation.

Need to Conduct Additional Remedial Action

Additional remedial action is needed to comply with the closure criteria of Wis. Admin. Code ch. NR 726. Installation of a vapor mitigation system will be needed to prevent risk of vapor intrusion.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements. Submit a supplemental SIR within 60 days of completion of work (NR 716.15 (1)).

Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

Case closure can be reconsidered by the DNR once documentation has been received.

Conclusion

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the DNR project manager, Duabchi Vang at (715)-839-3779 or at duabchi.vang@wisconsin.gov. For more information on the closure reconsideration process, please see DNR publication, RR-102, “Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process” by visiting dnr.wi.gov, search: RR-102, for more information.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,



Dave Rozeboom
Team Supervisor, West Central Region
Remediation & Redevelopment Program
715-839-3710
David.Rozeboom@wisconsin.gov

cc: Ron Anderson, METCO—email only

Vang, Duabchi L - DNR

From: Vang, Duabchi L - DNR
Sent: Wednesday, May 20, 2020 9:44 AM
To: Ron Anderson
Cc: 'Jason Powell'
Subject: Arlene's Inn 03-10-196577-Closure Not Recommended
Attachments: Arlenes Inn 03-10-196577 Closure Not Recommended.pdf

Hi Ron,

Thanks for chatting yesterday. This site was not recommended for closure due to an incomplete vapor intrusion investigation related to the crawl space and the elevated compounds at SS-3. Attached is the Closure Not Recommended letter that will be mailed to the RP.

Additional work that must be done to complete the VI investigation are as follows:

- Two indoor air samples—one in the basement immediately adjacent to the open crawl space access point and another directly above the crawl space on the first floor. The samples should be done concurrently and over an 8-hr period when the building is commonly occupied. Analysis should be for full VOCs. Since the second floor is currently an unoccupied residence, indoor air sampling is not needed at this time. If the second floor occupancy changes, please let me know, and additional sampling may be needed.
- For any detects, including historical SSV detects of pentanes and hexanes not on the [WI Vapor Quick Look-Up Table](#) for common contaminants, the vapor analytical table(s) will need to include vapor action levels (VALs) and vapor risk screening levels (VRSLs) calculated on the [USEPA Vapor Intrusion Screening Levels \(VISL\) calculator](#) using a hazard quotient of 1 and a target risk of 10E-5 as required in Wisconsin.
- Installation of a VMS at the building.
- Submit a Site Investigation Report for the work above.

You stated that you would be unable to complete this work before the end of PECFA. The sunseting of PECFA does not remove liability from the RP for investigation and cleanup of the site. Let me know if you have any additional questions.

Thank you

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Duabchi (Dee) Vang

Pronouns: she/her/hers

Hydrogeologist - Remediation and Redevelopment

Wisconsin Department of Natural Resources

Phone: (715)-839-3779 (voicemail only during pandemic)

Temporary Phone: 715-492-0300

duabchi.vang@wisconsin.gov

