

From: Schultz, Josie M - DNR
Sent: Wednesday, June 23, 2021 11:22 AM
To: Andy Delforge
Subject: V&L Stripping, BRRTS # 02-05-216722, Next Steps

Hi Andy,

Thank you for discussing the V&L Stripping site with me this morning. As mentioned on the phone, DNR is recommending that you first evaluate risk to receptors: off-site vapor sampling, evaluation of sanitary utilities (lateral and main) and sampling, and on-site VMS commissioning and OM&M Plan. DNR also needs a determination on whether the CAP-18 injection was an effective source control in removing contaminant mass as required under Wis. Admin. Code §§ NR 722.07(3)(a) and NR726.05(8)(b)1., but focus on vapors first as the top priority.

Vapor

- On-Site Vapor - 864 Mather Street
 - A Vapor Mitigation System (VMS) was installed in May of 2020. An updated Interim Action Report containing items listed in Wis. Admin. Code NR 708.15(3) needs to be submitted, which includes the following:
 - **Separate** Operation, Maintenance and Monitoring (OM&M) plan referencing Wis Admin Code NR 724.13(2)(k):
 - *For vapor mitigation systems; a diagram and photographs showing piping, venting, fans and manometer locations, vent height and location, a description of how to verify that the vapor mitigation system is operating properly, identification of prohibited activities to ensure the continued effectiveness of the vapor mitigation system, and direction to notify the department before any action is taken which would disturb operation of the vapor mitigation system.*
 - Site-specific inspection log
 - Documentation of commissioning, to include pressure field extension testing
 - Off-site Vapor Sampling
 - Need information on homes, to include information on if basement or crawlspace is present, and the condition/construction of the foundation. If sump is present, it will need to be sealed with headspace vapor and groundwater sample obtained. Also need demographics for residents.
 - The following off-site residences screen in for a vapor assessment:
 - 856 Mather Street
 - Performed indoor air sampling within western edge of basement in 2010 and didn't detect CVOCs
 - Needs three rounds of concurrent sub-slab (30 minute) and indoor air (24-hour) sampling
 - Highly recommend a concurrent upwind outdoor air sample
 - Only analyze for dry cleaner CVOCs, not full suite (unless other contaminants are discovered in soil and/or groundwater)
 - 714 Lincoln Street
 - Needs three rounds of concurrent sub-slab (30 minute) and indoor air (24-hour) sampling
 - Highly recommend a concurrent upwind outdoor air sample

- Only analyze for dry cleaner CVOCs, not full suite (unless other contaminants are discovered in soil and/or groundwater)
- Preferential pathway vapor intrusion sampling
 - Sanitary sewer assessment is needed including obtaining historical source property lateral information and any changes to the sewer main in Lincoln Street resulting from road reconstruction. Sampling should include:
 - Grab sample from cleanout of sanitary lateral going to Lincoln Street
 - Grab sample from manhole at south end of Lincoln Street
 - Grab sample from manhole directly downgradient from lateral to Lincoln Street
 - Need information on if and how the sanitary main in Velp/Mather was replaced.

Groundwater

- Additional groundwater monitoring is needed from the entire well network to show concentrations have continued to decrease.
- Will need to expand analysis to full VOC list including compounds used in furniture stripping (e.g. MEK, acetone, etc.) to determine if there is contamination from the former property use.
- Need to continue to analyze for natural attenuation parameters as well.

Soil

- If further groundwater monitoring indicates additional VOCs (e.g. MEK, acetone), soil needs to be analyzed for these parameters as well.
- Mass removal/source control is required when VRSL exceedances are present. Need to perform mass-balance calculation based on historic soil data compared to today, as required per § NR 722.07(3)(a) & 726.05(8)(b)1.
- May also want to consider post-remediation sub-slab sampling to determine if the injection has adequately removed contaminant mass beneath the slab. VMS would have to be turned off for a period of time to allow sub-slab conditions to return to a natural state prior to sub-slab sampling.

Emerging Contaminants

- No emerging contaminants scoping has been provided.
 - Necessary prior to closure to determine if additional EC sampling needed based on type of dry-cleaning or water-proofing being done on site when was a Dry Cleaner (In DERF).
- Required prior to closure request.

Please submit a site investigation workplan for the next phase of work to be completed, and feel free to reach out if you or Ken have any questions.

Thank you,
Josie

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