CORRESPONDENCE/MEMORANDUM -

DATE:	June 16, 2016
TO:	RR Case Files Former One Hour Martinizing (BRRTS # 06-05-576806)
	One Hour Martinizing (BRRTS # 02-05-217276)
FROM:	Sarah Frederick & Kristin DuFresne – NER RR Program
SUBJECT:	Summary of June 2, 2016 NER VPLE Committee Meeting
PARTICPANTS:	NER VPLE Committee Roxanne Chronert – NER RR Team Supervisor Tauren Beggs – NER Land Recycling Team Representative Keld Lauridsen – NER Closure Committee Member Kevin McKnight – NER Closure Committee Member
	Presenter Sarah Frederick – NER RR Hydrogeologist
	Project Manager Kristin DuFresne – NER RR Hydrogeologist

On June 2, 2016, the NER VPLE Committee met to discuss the One Hour Martinizing property located at 1923 Main Street, Green Bay, Wisconsin.

The following background information was provided:

- The One Hour Martinizing (BRRTS # 02-05-217276) ERP/DERF case is associated with a former dry cleaner that was located in a former strip mall. The dry cleaner and strip mall no longer exist on the property. At the time of submission of the VPLE Site Investigation Report, dated May 6, 2016, the slab-on-grade concrete pad from the former building and asphalt parking areas remained in place. However, it is the department's understanding that the concrete and asphalt were in very poor condition and was in the process of being removed for redevelopment at the time of this review.
 - ERP/DERF related site investigation activities are believed to be complete.
- The VPLE (BRRTS # 06-05-576806) pertains to Lot 3.
 - The developer is pursuing the VPLE.
 - The responsible party is anticipated to continue with the ERP/DERF related activities.
 - \circ $\;$ There are two different consultants working on the site.
 - VPLE General Engineering Company
 - ERP/DERF Fehr Graham
- ERP/DERF hot spot soil excavation activities were completed in August 2015.



- At the April 8, 2016 VPLE Committee Meeting, the Committee made the following recommendations:
 - The Phase I and Phase II is considered complete.
 - Create separate "no action required" BRRTS cases for Lots 1 and 2 when the property is officially split into Lots 1, 2, and 3.
 - The groundwater monitoring wells installed as part of the VPLE site investigation should not be abandoned. Depending on the groundwater analytical results additional sampling may be needed from these wells in the future.
 - At the time of development, utility plugs and/or sub-slab vapor sample ports should be considered/installed for any new building(s) constructed on the property. Any installed vapor barriers should not be penetrated.
 - Additional soil investigation should include the collection of discrete, rather than composite, soil samples for laboratory analysis.

Discussion of Additional Investigation since April 8, 2016 VPLE Committee Meeting:

- Soil:
 - o Additional soil borings advanced on April 20-21, 2016 (VP-1 through VP-15).
 - The only detections exceeding WDNR groundwater pathway RCLs (and BTVs) were in soil collected at VP-13 and VP-14.
 - VP-13: cis 1,2-Dichloroethene (75ppb at 6-8 ft bgs), Nickel (32.5ppm at 6-8 ft bgs)
 - VP-14: Tetrachloroethene (660ppb at 2-4 ft bgs; 7700ppb at 6-8 ft bgs), 1,2,4-Trimethylbenzene (850ppb at 6-8 ft bgs)
 - No PAHs detected in soil.

• Groundwater:

- Spring 2016 post excavation GW results consistent with Nov. 2015 results.
- o PAHs exceeding the ES were confirmed at MW-4
 - Benzo(a)pyrene, Benzo(b)fluoranthene, Chrysene (April & May 2016)
- PAHs were detected in exceedance of the PAL at all sampled well locations. Though it was noted that the samples were turbid.
- No PAH source has been identified
 - GEC has recommended a NFA for PAHs considering the generally low levels and widespread nature of PAHs. GEC suggests that PAHS could be related to asphalt application.
 - A NFA is not a viable option because no action has been taken.
- Vapor:
 - An active vapor mitigation system is planned to be installed beneath the floor slab of the proposed building. GEC was encouraged to provide the DNR with a copy of the proposal (5/2/16).

• Fehr Graham is currently assessing the utility corridors (storm water line located directly down gradient from MW-3).

The NER VPLE Committee made the following recommendations:

- Soil degree and extent are defined for CVOCs and PAHs
 - Nickel at VP-13 considered background
 - No PAHs in soil
- Groundwater degree and extent are not defined.
 - All wells should be maintained.
 - Confirmation sampling at all well locations with PAL or ES PAH exceedances.
 - The SI for CVOCs is complete; however, MW-1, MW-2, MW-3, MW-4, MW-6, MW-7, MW-9, and TW-5 should be resampled and analyzed for CVOCs.
 - GW insurance will be required.
- Vapor the VPLE Committee recommends that the developers plan to install a passive system that can be converted to an active system if needed. Frederick/DuFresne to check with Borski to determine the need for vapor sampling prior to the passive/active system being installed.
 - DuFresne spoke with Borski on June 15, 2016. The following comments were provided:
 - The department encourages developers to incorporate passive, with the ability to become active, vapor mitigation systems into the building construction.
 - If possible, vapor sampling ports should be installed as part of the building construction.
 - No vapor sampling is required prior to the installation of a passive/active vapor mitigation system (i.e. an active system can be installed and begin operating without any prior vapor sampling).
 - The department strongly recommends the collection of vapor samples prior to turning on an active vapor mitigation system. This sampling will aid in determining the requirement for an active vapor mitigation system and the need for a continuing obligation.
 - A continuing obligation for an active vapor system will require:
 - Routine maintenance
 - Submittal of annual reports to DNR
 - A certificate of completion can be issued at sites with an active vapor mitigation system as a continuing obligation.