



May 16, 2022

Bay Towel, Inc.
Attn: Mr. John Butz
2580 S Broadway Ave
Green Bay, WI 54307
Via Electronic Mail Only to jbutz@baytowel.com

Subject: Review of Site Investigation Work Plan
Bay Towel – Solvent Investigation, 501 South Adams Street, Green Bay, Wisconsin
BRRTS Activity # 02-05-237064, FID # 405044090

Dear Mr. Butz,

On April 4, 2022, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Work Plan* (SIWP) prepared for Bay Towel, Inc. by Fehr Graham. The SIWP was submitted with a fee for DNR review and response. The submittal of an SIWP is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. Ch.292. The DNR reviewed the SIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Background

The Bay Towel – Solvent Investigation site (the “Site”) is an approximately 1.33 acre property that was formerly occupied by a large dry cleaning building and parking lot. DNR was notified of chlorinated volatile organic compound (CVOC) contamination on the Site on December 16, 1999. Since this date, extensive investigation and remedial actions have taken place.

Two historic CVOC releases were discovered at the property during the site investigation. The main release occurred beneath the former building and this area was excavated multiple times (“Main Excavation”) to remove contaminated material. The most recent excavation in this area occurred in 2020 to 2021 and went to a depth of 30 feet below ground surface (bgs). Bioavailable Absorbent Media (BAM) was approved to be applied to the base of this excavation, as documented in DNR’s May 8, 2020, Infiltration Approval letter. A smaller secondary release area is located along the eastern portion of the parking lot on the property (“Eastern Excavation”), and soil has been excavated down to five feet bgs in this area. The locations of both excavations are shown on the attached map (Figure 5, Soil Excavation Limits, 10/5/21).

Altogether, approximately 10,000 tons of contaminated soil has been removed from the site over multiple excavation events. The site is currently vacant, and excavations have been backfilled with coarse-grained materials, including clear stone followed by gravel with sand and ¾” stone at the surface in most of the main excavation.

On October 18, 2021, Fehr Graham, on behalf of Bay Towel, Inc., submitted a technical assistance request with appropriate fee for DNR to review the site for path to closure. DNR held a virtual meeting on November 18, 2021, and a letter response to the request was sent on December 2, 2021. The SIWP was submitted in response to the *Response to Technical Assistance Request* letter.

SIWP Summary

The SIWP proposes the following additional work to further define the degree and extent of chlorinated volatile organic compounds (CVOCs) and per and polyfluoroalkyl substances (PFAS) both on-site and off-site:

- Obtain unsaturated soil samples from 2 and 5 feet bgs to further delineate around the Eastern Excavation and Main Excavation areas, including off-site soil sampling.
- Install three piezometers screened at 20-30 feet bgs to further delineate CVOc contamination present in groundwater at recently installed piezometer MW-15.
- Perform additional rounds of post-remediation groundwater monitoring.
- Assess and/or investigate preferential pathways, including utility backfill and in-pipe sanitary sewer vapor sampling.
- Perform off-site vapor sampling within buildings located at 501 S. Washington Street, 317 Chicago Street, and 445 Chicago Street, Green Bay, Wisconsin.
- Perform an additional round of PFAS groundwater sampling within previously sampled SMW-3R, MW-5R, MW-15, and PZ-1, along with additional monitoring wells MW-6 and MW-12.

DNR Review of the SIWP

Following the DNR's review of the SIWP, the DNR concurs that you can proceed with the proposed work, with the following comments:

- Soil
 - Collect a soil sample from a depth of 5 feet bgs as well at soil borings B-141 and B-140; the SIWP proposed only grabbing a sample from the depth of 2 feet bgs.
 - Collect a soil sample to the south of excavation confirmation sample EX59 unless a soil sample was obtained from MW-8, which was installed circa 2000.
 - Collect soil sample(s) to further delineate to the northeast of the Main Excavation.
- Groundwater
 - If the newly installed piezometers are impacted, additional delineation may be warranted.
- Vapor
 - Recommend performing vapor sampling with summa canisters the first round, then longer duration passive sampling (i.e., over 5 or more days) for subsequent rounds.
 - Only analyze samples for contaminants of concern (i.e. CVOCs).
 - Recommend an upwind outdoor air sample to assess background.
 - Need to assess demographics within off-site buildings at time of vapor sampling.
 - Additional vapor investigation and/or mitigation may be needed if vapor intrusion is found to be an issue, or if elevated vapor concentrations are found within the sanitary sewer.
 - DNR agrees with gathering information on utility backfill and locating utilities, including storm and sanitary laterals, with ground penetrating radar (GPR) prior to sampling backfill for contaminant migration.
 - Utility locations and depths should be included on future figures.
- DNR agrees that sanitary sewer manhole access should be assessed during the first round of vapor sampling, and then perform sampling during a subsequent visit. DNR recommends sampling three manholes rather than the two suggested in the SIWP. A brief SIWP needs to be submitted with manhole locations and only analyze for contaminants of concern (i.e. CVOCs)

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- PFAS
 - A PFAS and emerging contaminants scoping statement needs to be submitted; we recommend submitting this with the future SIR.

The site investigation can be an iterative process. Site investigation activities may indicate that further assessment is needed to define the degree and extent of contamination.

Schedule

The submitted SIWP indicates the proposed investigation work will be completed between June to October, 2022, so the field investigation will be initiated within 60 days after DNR approval, as required per Wis. Admin. Code § NR 716.11(2r).

The DNR is requesting implementation of the following schedule:

- Sampling results, specifically off-site vapor analytical results, must be reported to the DNR and off-site property owners within 10 days of receiving the data, per Wis. Admin. Code § NR 716.14(2).
- Results of the site investigation activities must be submitted to the DNR in a comprehensive SIR that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR recommends that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 920-366-5685 or josie.schultz@wisconsin.gov.

Sincerely,



Josie Schultz
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Matt Dahlem, Fehr Graham (mdahlem@fehr-graham.com)
Dillon Plamann, Fehr Graham (dplamann@fehr-graham.com)
Don Gallo, Axley Brynelson, LLP (dgallo@axley.com)