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WISCONSIN DEPT. OF NATURAL RESOURCES

November 21, 2024

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 S. Adams St, Green Bay, WI
BRRTS Activity # 02-05-237064, FID # 405044090

Dear Mr. Butz:

On November 1, 2024, the Wisconsin Department of Natural Resources (DNR) received the "Supplemental Site Investigation Work Plan" (Report) prepared for Bay Towel, Inc. by Fehr Graham Engineering and Environmental. The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report 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 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/Injection 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.

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.

SIWP Summary

To delineate the environmental impacts of the reported discharge, the Report recommended completion of the following activities:

- additional soil investigation to further delineate contamination;
- additional CVOC groundwater monitoring;
- additional preferential pathway evaluation;
- additional vapor investigation; and
- installation of a sub-slab vapor mitigation system (VMS) at 445 South Adams

DNR Review of the SIWP

Following the DNR's review of the Report, the DNR requests that you proceed with the proposed work, while incorporating the following comments:

Soil

DNR concurs with the proposed soil contamination delineation locations and consultant's proposal to hold soil sample locations for further delineation until the first round of samples are analyzed and results received. Care should be taken to ensure that the additional samples are analyzed before VOC holding times expire.

Soil sample location B-133, which is located off-site, across Chicago Street, had detections of CVOCs above groundwater pathway residual contaminant levels (RCLs) for perchloroethylene (PCE) and trichloroethylene (TCE) at 2' bgs, and had no detections at 5' bgs. DNR recommends obtaining a soil sample directly adjacent to location B-133 to confirm concentrations of PCE and TCE at 2' and 5' bgs at this location.

DNR does not recommend obtaining soil samples from the historic sanitary sewer backfill, as the soil will be saturated. Instead, DNR recommends installing temporary monitoring wells within the historic sanitary sewer backfill to obtain a groundwater sample, and collect shallow soil sample(s) in areas that would help delineate soil contamination in the right-of-way (ROW), e.g. in the area of B-144 and B-162.

Groundwater

DNR concurs with two semi-annual rounds of groundwater sampling in the fall of 2024 and spring of 2025, sampling the entire monitoring well network and analyzing for CVOCs only. Dependent on groundwater monitoring results, additional monitoring and/or delineation may be required.

Vapor

445 South Adams Street (Clinic)

DNR concurs with the installation of a VMS and telemetry system, and the proposed commissioning plan. The VMS will require long-term operation, maintenance, and monitoring (OM&M) and annual inspection. Long-term OM&M and annual inspection will be required as a continuing obligation at time of submittal of the interim action report.

317 Chicago Street (Residence)

DNR concurs with the proposal to obtain an additional round of concurrent sub-slab vapor and indoor air from this residence via passive sampler over a duration of 14 to 28 days. DNR recommends ensuring with the laboratory that the 14 to 28 day sample duration would yield method detection limits (MDLs) below vapor risk screening levels (VRSLs) and vapor action levels (VALs) for CVOCs.

501 South Washington (Fire station, considered residential))

DNR concurs with the proposal to obtain an additional round of concurrent sub-slab vapor and indoor air from the fire station via passive sampler over a duration of 14 to 28 days. DNR recommends ensuring with the laboratory that the 14 to 28 day sample duration would yield MDLs below VRSLs and for CVOCs.

Preferential Pathways

DNR concurs with grabbing a water sample from one down gradient and two upgradient storm sewer manholes and ensuring that the samples are not obtained until at least two days after a rain event.

DNR recommends installation of temporary monitoring wells within the backfill of the historic sanitary sewer and grabbing a groundwater sample rather than grabbing a soil sample. DNR is concerned with the potential of groundwater traveling along this backfill as a preferential pathway for contaminant migration.

Other DNR Comments

- In addition, please keep in mind that depending upon the results of the sampling, it may be necessary to expand the sampling to define the degree and extent of the contamination.
- Sampling results must be sent to the DNR and property owner(s), including owners of off-site properties from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14).

Schedule

DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 days of submittal of the work plan, by January 30, 2025.
- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (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 suggests that the SIR be submitted with a fee for review and response.
- Per Wis. Admin. Code § NR 722.09 (2m), a remedial action options report (RAOR) should be submitted within 60 days after completion of the site investigation.
- Per Wis. Admin Code § NR 724.15, a construction documentation report must be submitted to the DNR for the VMS installed at 445 South Adams. The construction documentation report shall be submitted within 60 days after construction and performance verification is complete.
- 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)
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