State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Milwaukee WI 53212-3128

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September 18, 2012

Mr. Salvatore Purpora S&P Equipment 5025 S. Packard Avenue Cudahy, WI 53110

Subject:

Case File Review

MSF Corp (S&P Equipment) site at 5025 S. Packard Avenue, Cudahy, WI

WDNR FID #241197880 BRRTS #02-41-242945

Dear Mr. Purpora:

Thank you for submitting updated groundwater sampling information from 2009 for your site to the Wisconsin Department of Natural Resources (DNR). I have reviewed this information and other documents in the case file with the Project Manager, Andrew Boettcher. Based on our review, we cannot close the case, because the degree and extent of contamination have not been adequately investigated and the contamination has not been mitigated. We understand that project costs are a concern, and we would be willing to meet with you to review options to proceed with the site investigation and remediation in a phased approach. We would like to provide comments in the following categories:

Vapor Intrusion

- 1. Volatile Organic Compounds (VOCs) have been detected in the groundwater on-site. Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater into buildings where people may breathe air contaminated by the vapors. To date, soil vapor samples have not been collected and analyzed.
- 2. Collection of soil vapor data in the northwest corner of the building is a high priority. Results will be used to evaluate the necessity of a vapor mitigation system.

Groundwater

- 1. Sampling results from 2009 are provided for MW4, MW5, MW6, PZ4, and PZ5, however the locations of these points have not been identified on any maps in the file. Well construction forms have not been provided for these sampling points to specify well depths and screened intervals.
- 2. Groundwater sampling is on-going at the adjacent site to the north, Superior Health Linens. There may be an opportunity to coordinate sampling and share/obtain results from S/MW4 and S/MW5 on this adjacent site. If sample results cannot be shared, an additional monitoring well may be required in the northwest corner of the site.



- 3. The typical minimum requirement is to perform quarterly sampling for one year to define the extent of the groundwater contamination. Depending on the results from the first two rounds of sampling, the wells showing no exceedances of contaminant levels may not be required to be sampled during the last two rounds.
- 4. The results will determine if the site must be listed on the DNR's GIS Registry for residual groundwater contamination as part of the closure process.

Soil

- 1. Additional soil sampling may not be necessary if the soil contamination remedy is sufficient to address potential site-wide residual soil contamination.
- 2. A Cap Maintenance Plan will be required if the remedy for the residual on-site contamination is the use of an impervious barrier consisting of pavement, building foundations, and adequate soil cover. See the following link for a maintenance plan template: http://dnr.wi.gov/files/PDF/pubs/rr/RR606.pdf.
- 3. The property will be listed on the DNR's GIS Registry for residual soil contamination as part of the closure process.
- 4. If residual soil contamination is left at the site, a Soil Management Plan should be prepared to ensure that any future construction contractors are aware of any special requirements necessary based on the soil contamination present on-site.

General

- 1. The closure request will be reviewed with the anticipated land use being commercial.
- 2. Following the submittal of the formal Case Closeout package, this case will be presented to the Regional DNR Case Closure Committee for final comment and approval.

The Department appreciates the actions you are taking to restore the environment at your site. Please contact me so we can review how to proceed. I can be reached at 414-263-8546 or <u>michele.norman@wisconsin.gov</u>. I look forward to hearing from you.

Sincerely,

Michele R. Norman Hydrogeologist, Remediation & Redevelopment

cc: DNR case file