

June 24, 2019

OHM Holdings, Inc.
Attn: Mr. Brian Cass
W229 N2494 Highway F
Waukesha, WI 53186

Subject: Case Closure Review Under Wis. Admin. Code ch. NR 726 One Hour Martinizing, 2262 South 108th Street, West Allis, WI FID: 241287530 BRRTS: 02-41-246246

Dear Mr. Cass:

On May 2, 2019, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. As you are aware, the DNR reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b). As discussed with your consultant, Enviroforensics, case closure has been administratively paused because additional legal requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with the information requested or a written response regarding the necessary work and schedule for completion of this work:

- Full inspection of both sub-slab depressurization systems (SSDSs)(2262 and 2248 S. 108th St.), completion of any necessary maintenance on the systems, and documentation of inspection and maintenance activities. If the systems are not operating or are not operating effectively, repairs must be completed and the systems recommissioned (tested) for operating efficiency.
- Update the SSDS operations, maintenance and monitoring plans for each system to include a description of how to verify that the SSDS is working properly and the step by step procedures required to perform required inspections, (i.e. include photographs of manometers and indicate the acceptable range of readings, add location of manometers to the system figures, incorporate information from the installers' installation report, Attachment 4 Vapor Mitigation System Operation and Maintenance, into the beginning sections of the O&M plan. Include language regarding maintaining the integrity of the building floor by inspecting and sealing any cracks, and requiring maintenance on the sump seal. Use the attached Appendix G, Example OM&M Inspection Log, in the revision of the OM&M plan as your guidance.
- Conduct a training session with the owner of 2248 South 108th Street on the system providing details on inspection procedures, and have the current owner sign a completion statement,
- Include property owner information to O&M plans and have current owners sign a copy of the plan for both properties.
- Required revisions to the Cap Maintenance Plan for 2262 S. 108th St., figures, and tables have been sent to Enviroforensics by email and a copy is included in this letter.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements.

Costs

If the additional commissioning and revisions require additional cost approval under the DNR's Dry Cleaner Environmental Response Fund (DERF), submit a change order for the proposed additional work to be completed along with the costs and linking spreadsheet (Form 4400-214D) to the DNR for approval.

OHM
2262 S. 108th St.
West Allis, WI
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Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

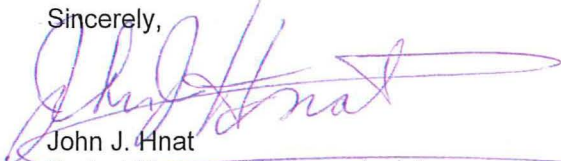
Case closure can be reconsidered by the DNR once documentation has been received.

Conclusion

If you have any questions regarding the information in this letter, or you would like to schedule a meeting to discuss this case, please contact me at 414-263-8644, or john.hnat@wisconsin.gov. For more information on the closure reconsideration process, please see DNR publication, RR-102, “Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process” by visiting dnr.wi.gov, search: RR-102, for more information.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,



John J. Hnat
Project Manager/Hydrogeologist
Remediation & Redevelopment Program
Southeast Region Headquarters

Attachments:

- Appendix G, Example OM&M inspection Log, DNR R&R Publication RR-800, January 2018
- Email to Enviroforensics: Subject – Revisions to Cap Maintenance Plan; Figures, and Table Revisions

cc: Wayne Fassbender – Enviroforensics, LLC. N16 W23390 Stone Ridge Dr., Suite G, Waukesha, WI 53188
WDNR SER Files

From: Hnat, John J - DNR
Sent: Monday, June 24, 2019 10:21 AM
To: Wayne Fassbender (WFassbender@enviroforensics.com)
Subject: OHM 2262 S 108th St

Wayne,

Here's the changes to maps, tables, and the cap plan. The cap maintenance plan for the site includes the parking lot **and** building foundation:

- On Page 1, 1st paragraph: change the last sentence to, "The maintenance activities relate to the existing asphalt/concrete parking lot and building foundation which occupies the area over the residual soil and groundwater contamination."
- On Page 2, in the Annual Inspection paragraph, change the first sentence to, "The asphalt/concrete parking lot cap will be.....rain water."
- After the first paragraph, another paragraph should explain how the building foundation will be inspected for foundation cracks, proper sealing of the sump, etc., and how/when they will be repaired.
- On Page 3, under maintenance activities, change the last sentence to, "The property owner, in order to maintain the integrity of the asphalt/concrete parking lot and building foundation cap, will.....for viewing."
- On Page 3, under prohibition of activities and notification, change the first paragraph to, "The following activities are prohibited on any portion of the property where the asphalt/concrete parking lot and building foundation cap is required.... structure."
- The second paragraph, "If removal, replacement, or other changes to the asphalt/concrete and building foundation cap are.... Code.
- Add a paragraph that states that maintenance of the building floor and sealed sumps are required for the SSDS to operate as designed.
- In the Description of Cap paragraph in the Cap Maintenance Plan on Page 2, the highlighted **Figure D.1** should be changed to **Figure D.2**.
- Remove the green and yellow colored extent of soil/GW contamination on the revised map Figure D.2. Keep the boundaries of the engineered barrier in brown.

Other Revisions

- Rename Figure B.2.c to B.2.b. and change the name to Residual Soil Contamination.
- Figure B.3.b, groundwater isoconcentration map, should be revised to expand the enforcement standard line to include 2262 South 108th Street, the site building.
- Figure B.4.a, vapor intrusion map, should indicate where the extent of the future vapor risk exists on the source property (2262 S. 108th St.) and north adjacent property (2248 S. 108th St.).
- Table A.1 does not include data for PZ-1 and OW-3.
- Make all changes to the case closure packet and resubmit.

This will be attached to the DNR reply letter pertaining to the case closure. Call if you have any questions. Thanks.

 *J. Hnat, C.P.G., P.G..*

Project Manager/Hydrogeologist
Remediation and Redevelopment Program
Southeast Region Headquarters
Wisconsin Department of Natural Resources

(☎) phone: (414) 263-8644

(☎) fax: (414) 263-8550

(✉) e-mail: John.Hnat@wisconsin.gov

SYSTEM COMPONENT		WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?	ANNUAL INSEPECTION					
NAME	PHOTO					DATE	NOTES	DATE	NOTES	DATE	NOTES
Fan		<p>Fan creates a vacuum and lowers pressure below foundation.</p> <p>The fan also removes soil gases from below foundation for discharge to atmosphere.</p>	<p>Fan Operation</p> <p>Fan Location</p> <p>Motor Noise</p>	<p>Fan is on</p> <p>Fan mounted outside & secure</p> <p>Fan motor is quiet (loud motor may indicate problem)</p>	<p>Fan may need to be replaced every 15 to 20 years.</p> <p>Replacement fan to have similar specifications as original with respect to flow and vacuum.</p> <p>ORIGINAL = Insert Fan Spec and Name</p>						
Sealed Sump w/Vent Pipe		<p>Sump Cover: Soil gases are collected in sump and the cover prevents soil gas from getting inside home.</p> <p>Vent Pipe: Pipe conveys the vacuum from the fan, and collects soil gases for discharge to the atmosphere.</p>	<p>Sump Cover Seal</p> <p>Vent Pipe Condition</p>	<p>Sump seal is air tight around edge and at pipe penetrations.</p> <p>Vent pipe is connected to fan, and is free of cracks or leaks.</p>	<p>Sump cover or vent pipe may need to be sealed or replaced if cracks or leaks appear.</p> <p>See NOTE below regarding pipe alternations. Have professional test pressures if pipes are modified</p>						
Suction Drop Point w/Vent Pipe		<p>Suction Pit: Soil gases are collected in a pit below the foundation, and tight seal prevents soil gas from getting inside home.</p> <p>Vent Pipe: Pipe conveys the vacuum from the fan, and collects soil gases for discharge to the atmosphere.</p>	<p>Suction Pit Seal</p> <p>Vent Pipe Condition</p>	<p>Seal is air tight around pipe penetration.</p> <p>Vent pipe is connected to fan, has not cracked</p>	<p>Suction pit seal or vent pipe may need to be sealed or replaced if cracks or leaks appear.</p> <p>See NOTE below regarding pipe alternations. Have professional test pressures if pipes are modified</p>						
Manometer or Differential Pressure Gauge		<p>Measures differential pressure between vacuum side of vent pipe and indoor space.</p> <p>This measurement confirms there is a vacuum being pulled by the fan.</p>	<p>Liquid Level on Manometer</p>	<p>Liquid level in manometer is between ___ and ___ on the ___-hand side.</p>	<p>A change in liquid level indicates a change in the vacuum below foundation. This could be caused by failure of fan, blockage of vent pipe, change in water level below building, or other conditions.</p> <p>Troubleshoot or hire professional to identify cause and repair if needed.</p>						
Outdoor Vent Pipe		<p>Pipe carries soil gas outside and vents them to the atmosphere.</p>	<p>Vent Pipe Condition</p> <p>Vent Pipe Location</p>	<p>Vent pipe remains connected to fan.</p> <p>End of pipe free from obstructions.</p> <p>The exhaust is more than 15 feet from windows or air intakes.</p>	<p>Vent pipe may require replacement, or cleaning to remove ice or debris.</p> <p>See NOTE below regarding pipe alternations. Have professional test pressures if pipes are modified.</p>						
Foundation Floor		<p>Foundation is a barrier that minimizes soil gas entry into building, and helps fan to work efficiently.</p>	<p>Foundation Condition</p> <p>Foundation Footprint</p>	<p>No penetrating cracks or holes in foundation below grade.</p> <p>Check if there have been alterations or additions to building.</p>	<p>Seal cracks or other penetrations as you would to prevent water from entering.</p> <p>If building floor plan has changed, contact a professional contractor and/or the DNR to evaluate if modifications to the vapor mitigation system are necessary.</p>						
Vapor Pin		<p>This is a sample port to measure vacuum or take sample of soil gas if needed. It needs to remain sealed when not in use to prevent soil gas entry into the home.</p>	<p>Pin Seal/Cap</p> <p>Pin Condition</p>	<p>Vacuum measured with a micromanometer is less than ___ in H2O or ___ Pa.</p> <p>Pin is sealed and capped when not in use.</p>	<p>Repair or replace the seal and cover as needed.</p> <p>Permanently seal hole if sample port is ever removed.</p>						