



May 12, 2017

Jerry and Irene Rand
P.O. Box 97
Webster, WI 54893

Subject: Case Closure Denial because the site investigation is incomplete
Webster VOC Contamination, Webster, Wisconsin
DNR BRRTS Activity # 02-07-000337

Dear Mr. and Mrs. Rand:

On April 6, 2017, the Northern Region Case Closure Committee reviewed your request for closure of the case described above. The Department of Natural Resources reviews environmental remediation cases for compliance with state and federal laws to maintain consistency in the closure of these cases. As discussed with your consultant on April 10, 2017, the closure committee has denied closure because additional 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 your written response regarding the necessary work and a schedule for completion of this work.

Need to Complete a Vapor Investigation

Additional site investigation is needed to determine whether or not vapor intrusion is a completed pathway at this site, or if there is a risk of future exposure due to residual contamination.

- The vapor exposure pathway has not been fully investigated in accordance with Wis. Admin. §. NR 716.11(5)(g);
- To complete a vapor investigation for CVOC contamination, sub-slab samples must be collected from all buildings within 100 feet of the source area, and all buildings overlying groundwater with CVOC concentrations over the NR 140 ES at the water table.
 - The current extent of groundwater contamination over the NR 140 ES is estimated, and groundwater over the NR 140 ES may be present under additional buildings.
 - Further investigation is needed to define the extent of groundwater over the NR 140 ES to determine if additional buildings require vapor sampling because of groundwater conditions.

Need to Conduct Additional Groundwater Monitoring

Additional groundwater monitoring is needed in order to establish compliance with the closure criteria of ch. NR 726. If monitored natural attenuation is to be used as a remedial action, you need to determine whether there is a stable or receding plume. The extent of the estimated plume is not defined vertically –on the source property or the downgradient extent of the estimated groundwater contaminant plume.

Need to Define the Degree and Extent of Contamination

Because additional soil, groundwater and vapor sampling is needed in order to define the degree and

extent of contamination you may want to consider a soil gas vapor survey to assess potential vapor intrusion issues.

Need to Conduct Remedial Action and Vapor Mitigation

Remedial action and vapor mitigation are needed in order to comply with the closure criteria of ch. NR 726.

- Sub-slab vapors exceeded vapor risk screening levels for PCE at in the Murray Street Apartments; therefore, remedial action to reduce the mass and concentration of the source of the vapors, and mitigation to interrupt the vapor exposure pathway are required per Wis. Admin. § NR 726.05(8)(b).
- The absence of vapors over Vapor Action Levels in indoor air is not enough to rule out the vapor exposure pathway in a residential building.
- Additional buildings may also require mitigation depending on the results of additional work to complete the vapor investigation.
- Any vapor mitigation system needed to satisfy Wis. Admin. § NR 726.05(8)(b) will require performance verification and a long-term operation, monitoring, and maintenance plan.

A complete closure request should be re-submitted once all the above requirements have been satisfied, together with any required documentation, to let the Department know that applicable requirements have been met. Case closure can be considered once all the above requirements have been satisfied.

Within 60 days of the date of this letter, please respond in writing with a schedule of your plans to meet these requirements. Until requirements have been met, your site will remain “open” and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 700.11, Wis. Adm. Code. You will also be responsible for any operation and maintenance activities required under s. NR 724.13, Wis. Adm. Code.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact DNR Project Manager Ralph Smith at (608) 261-6543.

Sincerely,



Stephen M. Ales, P.G.
Field Operations Director
Remediation & Redevelopment Program

cc: Kevin & Kimberly Flodin, 8810 Perida Road, Webster, WI 54893 (Owners via Land Contract)
Brian Hegge & Erica Klingfus, MSA Professional Services, Inc.
1835 North Stevens Street, Rhinelander, WI 54501
Case File