

From: Feeney, John M - DNR
Sent: Thursday, November 17, 2016 4:17 PM
To: Smith, Jason
Cc: Stolzenburg, Thomas (TStolzenburg@trcsolutions.com); Norman, Michele R - DNR; Prager, Michael A - DNR
Subject: Preliminary Closure/GIS form comments

Jason here are our preliminary comments on the closure/GIS form. The SER Closure Committee may add some additional requirements when they review the case:

CO Table

Xiii – There would be no more VI risk in the building as it is; however check this box in case construction occurs outside the building in areas of residual soil contamination, or the present slab is removed or changed prior to new construction.

A.1 Groundwater Analytical Table

The closure package should include pre-2008 groundwater monitoring data – in a separate table or combined, per the 4400-202 instructions for A.1 “...showing analytical results and collection dates for all groundwater sampling points... for which samples have been collected.”

A.2 Soil Analytical Results Table

The soil tables from the other consultant are semi-legible with faded parts on the copy. Please fix, particularly in Attachment A.2, the tables labeled 5, 7, 9, and 9 continued.

An upgraded text explanation under 3.B.i should explain how the extent of contamination in soil has been determined at this time, based on the original site investigations, and the remedial actions that took place.

A.3 Residual Soil Tables

Add the tables for the Recycling Dock/SE Degreaser Area. There is no table for that area.

A.4 Vapor Tables

For the TCA filling Area, include pre and post chem-ox treatment sub-slab vapor tables. Make it more clear that the West Dock soils were re-sampled several times as the lactate injection program proceeded, with a text box.

B.1.b Detail Site Map

The wells from Construction Forms (BRRTS # 02-46-171750) should be included on the groundwater maps – as the map is now, it looks like the shallow southern extent of groundwater contamination has not been determined. We request the data be included in the tables. Clearly indicate on the maps and tables (color coding?) that these wells are for a separate and co-mingled plume (in part), from an offsite, separate, and separately responsible party source. There should also be text in the 4400-202 form to reflect the newly added data.

B.2.a Soil Contamination

Revise general map to explain the basis of the single iso-concentration (source areas) lines. Add a direct contact RCL single iso-concentration line. Label the transect F to F' for the cross section on the map. There is no indication of the contamination at the MW-9, 9D area on the large-scale general map (at Excavation Area 1). Put that on the map. Label transects for the cross sections.

B.2.b Residual Soil Contamination

(comments a-d for the large-scale, general map). – See B.2.a comment for adding two single RCL lines.

- (a) The original soil iso-concentration contours for the West Dock, and Recycling Docks areas should be the starting point for residuals in those areas. For the east parking lot - indicate where the excavations were. Include all information on the figures to help explain how soil contamination was delineated. Adjust contours if needed based on data.
- (b) Dash and question mark the residual soil contamination on the west part of the TCA filling area where it goes under the building (where there is not much soil data). Dash lines based on data.
- (c) Similarly, dash and question mark the West Dock area soil residual contamination where it goes under the building. Dash lines based on data.
- (d) Put the soil borings on the map. Only wells are indicated to show delineation of soil contamination at present. All sampling locations need to be displayed on figures in Attachments B.2.a and B.2.b, as appropriate.

B.3.a Geologic Cross Section

Include source areas, and active remediation areas on the cross section, per the instructions for B.3.a. on 4400-202.

B.4.a Vapor Intrusion Map

Please include the color-coded map from the public meeting that included the Construction Forms and DHFS sub-slab sampling pass fail color data on it.

B.4.c Other

These tables, figures and maps should go under C.4.

B.5.a Structural Impediment Photos

Include photo(s) showing the structural impediment.

D.1 Cap and Maintenance Plan

Cap map - fix the part that seems to indicate the soil contamination going onto the railroad property, to the east of the parking lot, slightly, unless the contamination does go slightly onto the railroad ROW, but the residual contamination map does not seem to indicate that.

Add a reference to the offsite mitigation system DNR approved maintenance plans. D.1 needs to include the off-site maintenance plans. "Attach a maintenance plan for each affected property." Include descriptions of maintenance plans, location map, photographs, and inspection logs.

D.2 Location Map

Include a map of the offsite mitigation system locations.

Attachment G

As agreed, submit to DNR the remainder of this material, when it is deemed most complete, please on CD only.

Cover Letter

The groundwater iso-concentration maps for groundwater TCE and TCA in the cover letter – those iso-concentration lines should be dashed and question-marked and drawn to the plant in the 2016 box since the on-site wells were abandoned in 2012, and there is no 2016 data there.

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