



January 21, 2015

VIA US MAIL AND EMAIL

William Nicklas
James Baumgartner
D & C Partners, LLP
W223 N7658 Cherry Hill Road
Sussex, WI 53089

Subject: Technical Assistance Superior Linens - BRRT 02-41-532649 - FID 241780880

Dear Sirs,

Thank you for the opportunity to meet with you and your consultant on December 2, 2014 to review your progress on the above named site. During our meeting you identified as your goal as to achieve case closure as soon as possible to finalize your transfer of the property to new operators of the medical linen business. I have reviewed your file and your November 5, 2014 status report and prepared the following comments to assist you in achieving your goal.

Additional site work is necessary in order to meet the requirements for site closure. You need to complete an investigation to determine the degree and extent of chlorinated volatile organic compounds (CVOC) contamination in soil and groundwater and to initiate and complete a vapor intrusion assessment of all occupied dwellings that are potentially impacted by the CVOC contamination.

Need to Define the Degree and Extent of CVOC Contamination

Additional soil and groundwater sampling is needed in order to define the degree and extent of CVOC contamination in soil and groundwater. More should be done to determine the vertical and horizontal extent of CVOC contamination in the source areas you have identified. This work will enable you to make decisions regarding what, if any, remediation is necessary.

Need to Complete a Vapor Investigation

It is my understanding your vapor intrusion mitigation systems are operational for all affected occupied buildings on your site. Please submit as-built documentation that demonstrates the effectiveness of the systems and an operation and maintenance (O&M) plan for your vapor intrusion mitigation systems. Your systems should be inspected in accordance with that O&M plan and the results of that inspection included with the plan. Additional vapor intrusion assessment is needed to determine whether or not vapor intrusion is a completed pathway that represents an off-site exposure risk due to residual contamination. If vapor intrusion is an issue off-site document all source control actions taken.

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 the extent of groundwater contamination, monitor for natural attenuation parameters, and determine whether there is a stable or receding plume. I encourage you to use the Department's guidance, *Understanding Chlorinated Hydrocarbon Behavior in Groundwater*, RR-699, found on our website.

Closure Documents

Included with future submittals and your closure documents, please provide the following:

- **Detailed site map** illustrating all the following; polygon of all previous spills and BRRTs activities, all waste disposal sites, fill sites, subsurface facilities and utilities, topography, locations of historic contaminant sources, historic shipping and receiving ingress/egress, and monitoring well and sampling locations.
- **Surface Water and Sediment** Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.
- **Remedial Actions** Identify how all exposure pathways were removed and/or adequately addressed by immediate and/or remedial action(s).

Please submit a workplan that addresses items above within 60 days of receipt of this letter, March 25, 2015. Addressing the potential for vapor intrusion exposures should one of your priorities.

It was a pleasure meeting you both and I appreciate your efforts to restore the environment at this site. Please feel free contact me directly at 262-884-2344 if you have any questions regarding this letter especially if you would like advice on your vapor intrusion monitoring and response actions.

Sincerely,



Doug Cieslak
Hydrogeologist
Sturtevant Service Center
Remediation & Redevelopment Program

c: Michele Norman – Key Engineering Group (email)
Darcy Gravelle - Key Engineering Group (email)