MEMORANDUM

To: File
From: Michele Norman
Date: 8/15/2013
RE: Review of past site communications with Andy Boettcher

Subject: Superior Health Linens
5005 S. Packard Ave, Cudahy
FID #241780880 BRRTS #02-41-532649

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On August 15, 2013, I talked to Andy Boettcher, the former project manager for this site. As a follow-up to a meeting between Pam Mylotta, Kristin Kurzka, and Randy Boness (Sigma), I asked Andy if he remembered a verbal agreement with Sigma regarding what was necessary to close the site and that the site investigation had been completed. I also asked him if he had any notes or e-mails that may not have been included in the case file.

Andy said that he remembers the site investigation was on-going with the installation of additional groundwater monitoring wells and vapor sampling. The last meeting Andy had with Sigma, on July 24, 2012, focused on the vapor sampling. Sigma did not request DNR review of the most recent document, a RAP submitted on Oct. 19, 2012, so Andy did not provide a written response or make any notes regarding the summary presented within of the July 24, 2012 meeting. Andy searched his e-mail and WORD files, but did not find anything related to Superior Health Linens that was not already included within the file.

Following my phone call with Andy, I again reviewed the file, looking for documentation that Andy may have written that would lead Sigma to believe that the site investigation had been completed.

On Oct. 1, 2004, Andy wrote a letter that summarized a Sept. 9, 2004 meeting with Triad Engineering, regarding the conceptual approval of the investigative/remedial approach for the site. In the letter, Andy requested:

1. Re-sampling of TW-16 – not done.
   To assess downgradient impacts, Sigma installed PZ-3 and MW-6 in 2010.
2. Location of subsurface utilities – not done.
   Sigma's July 10, 2008 report stated that a utility survey had been performed, but the results are not in the case file.
3. Approximately 8 permanent wells will be installed to define the degree of contamination after temporary wells are installed to define the extent.
   Sigma installed 5 wells and 1 piezometer in 2007. In 2010, Sigma installed 1 well and 1 piezometer in 2010.
4. 8 quarters of VOC groundwater sampling in the permanent wells to determine the viability of monitored natural attenuation (MNA) as a remedy for groundwater contamination.
   4 rounds of data have been collected in the 2007 wells and piezometers.
   3 rounds of data have been collected in the 2010 well and piezometer.
5. Due to the presence of shallow soil contamination, a barrier may be used to eliminate direct contact exposure.
6. Source removal or treatment will be conducted in the loading dock area, due to high levels of CVOCs in the soil and groundwater – not done.

Andy's notes, taken during the Sept. 4, 2008 meeting, included the following:

7. (Sigma/RP) may excavate 2 source soil areas. (This will need disposal approval from the DNR.)
8. Sigma will a) evaluate vapors and b) send a utility map. (The utility map is not in the file.)

Andy's notes, taken during the July 24, 2012 meeting included the following:

9. (Sigma) feels that SI is complete.
10. Want to allow natural attenuation to remedy the groundwater contamination.
11. (Sigma) plans to:
    a. Take 2-3 rounds of groundwater samples – to date, only 1 additional round has been collected in Jan. 2013.
    b. Install 4(?) vapor sample probes.
    c. Evaluate vapor system vs. performance standard.
    d. Install pavement over contaminated soil.

The Oct. 19, 2012 RAP from Sigma proposed the following remedial approach:

12. Capping areas of MW-3 and MW-5.
13. Installation of a sub-slab venting system.
14. Confirmation of venting system installation and performance.
15. Groundwater sampling for a minimum of 3 rounds -- only 1 additional round has been collected in Jan. 2013.

In Sigma's May 6, 2013, Vapor Testing Report, it was requested that installation of a sub-slab system not be required since the vapor results demonstrated that CVOCs do not pose a risk via vapor intrusion.

The file contents indicate that the site investigation was on-going. Closure topics were addressed throughout the investigation with 1) groundwater sampling to determine the viability of MNA, 2) capping areas of shallow soil impacts, and 3) installation of a sub-slab vapor system.