From: Grittner, Paul V - DNR

Sent: Tuesday, November 03, 2020 6:08 AM

To: Swenson, Steve R

**Subject:** Superior Linens, 02-41-532649

Subject: Superior Linens, 5005 S Packard Avenue, Cudahy

DNR BRRTS Activity #: 02-41-532649; FID #: 241780880

Steve,

The Department of Natural Resources (DNR) has reviewed the October 2, 2020, "Response to WDNR's Correspondence dated September 9, 2020" and offers the following comments:

- The updated Figure 23, Estimated Extent of Groundwater Impacts in 30-Foot Sand, provides a reasonable interpretation of site conditions.
- The DNR has no further recommendations for modifying the Sub-Slab Depressurization System (SSDS) Operations & Maintenance Plan, other than to ensure that it is kept up-to-date.
- Capping the area outlined on Figure 25 will address the apparent direct contact risk posed by residual soil contamination.
- The DNR agrees with the interpretation that soil contamination is present under the main building but does not likely extend beyond the east side of the building. No soil samples were collected under the building and the extent of contamination depicted on Figure 20 is only considered an estimate. The plume limits on the figure do not need to be modified further. The DNR typically requires impervious surfaces currently in place over residual soil contamination that poses a risk to groundwater be maintained in the future to ensure that conditions affecting the groundwater plume remain unchanged. Because of the uncertainty of the extent of soil contamination under the building this requirement will likely apply to the entire area covered by the portion of the building constructed in 1976 and 2005.
- Based on the information currently known about the extent of contamination under the building, and the use of different areas within the building, the DNR will concur with your recommendation to not collect an air sample from within the sanitary line.
- The DNR previously stated that remeasuring contaminant concentrations in sub-slab vapor would be acceptable for determining if the sub-slab ventilation system must continue to operate or if a remedial action is needed. Collecting samples using high-volume purge methods is allowed for this purpose. The DNR recommends the proposed sampling location be moved closer to the location where elevated TCE concentrations were previously detected (SV2-2). While it is important to avoid outside influences to the sample, the sample location must be positioned to collect vapor from the area most likely to be impacted. The area of influence at the original sample locations did not extend far beyond the building, only a small change to sample location should be needed to correct this. We can revisit this topic after the proposed work plan is submitted.

- The DNR would not necessarily require, but would not be opposed to, the collection of indoor air samples as part of the site investigation if analysis of the sub-slab sample(s) did not identify a vapor intrusion risk or if the risk posed by sub-slab vapor could be addressed through continued operation of the depressurization system.
- The August 17, 2020, letter sent to the property owners by the DNR stated that the requirement to evaluate emerging contaminants, including PFAS, applies to all sites that have not received a final case closure letter, regardless of the review stage. You must provide an evaluation of emerging contaminants consistent with Wis. Admin. Code § NR 716.07 for this site, which DNR must review in order to provide a closure determination or final closure letter.

You now have access to the DNR document portal. Please contact me at the number or email below if you have any questions regarding this project or if you continue to have issues uploading files.

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## **Paul Grittner**

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