



May 20, 2021

Mr. Bill Nicklas  
Mr. Jim Baumgartner  
D&C Partners, LLP  
W223 N7658 Cherry Hill Road  
Sussex, WI 53089

Subject: Review of Site Investigation Report / Remedial Actions Options and Design Report Addendum dated March 31, 2021  
Superior Linens, 5005 S Packard Avenue, Cudahy  
DNR BRRTS Activity #: 02-41-532649; FID #: 241780880

Dear Mr. Nicklas and Mr. Baumgartner:

On April 2, 2021 the Department of Natural Resources (DNR) received the "Site Investigation Report / Remedial Action Options and Design Report Addendum" prepared for the Superior Linens site. The Report proposed addressing the direct contact risk posed by residual contamination through a combination of maintaining existing pavement over the contamination (on-site) and excavation and off-site disposal of contaminated soil from within the railroad right of way. The excavation of and removal of soil is also intended to meet a requirement of case closure to remove the source of contamination posing a vapor intrusion risk (to the extent practicable). As requested, the Report discusses the potential for emerging contaminants to be associated with the discharge being investigated was assessed.

After reviewing the information provided, the DNR has concluded that the proposed actions will address the direct contact risk and provide adequate source removal based on the site conditions. No further assessment or investigation is required to determine if emerging contaminants have impacted the site. Additional details and requirements are summarized below.

### **Vapor assessment and proposed remedial action**

Chemical analysis of the sub-slab vapor sample collected from under the building in December, 2020, confirmed that contamination has the potential to pose a vapor intrusion risk. Various remedial options were evaluated to reduce the contaminant mass, address the vapor intrusion risk, and satisfy the requirement of Wis. Admin. Code § NR 726.05(8). The DNR agrees with your assessment that the location of soil contamination relative to the building and rail lines, the depth of the contamination, and geologic conditions at the site limits the amount of source removal that can be conducted in a cost-effective manner. The proposed remedial action (excavation of shallow, uncapped soil with significant trichloroethene contamination) will satisfy the requirement to remove source material to the extent practicable. The proposed excavation and removal of contaminated soil to a depth of four feet and subsequent backfilling is also an acceptable means to address the direct contact risk.

A remedial action documentation report (that meets the requirements of Wis. Admin. Code § NR 724.15) must be provided to the DNR to demonstrate the contamination has been addressed. The sub-slab mitigation system must continue to operate for as long there is a risk posed by vapor intrusion.

### **Proposed capping plan**

The DNR previously concurred with your identification of the area where soil contamination poses a direct contact risk. Maintaining the existing impervious barrier within this area and completing the proposed excavation will address this risk.

As the DNR has also communicated to you, impervious surfaces currently in place over residual soil contamination will be required to be maintained to ensure that groundwater quality will continue to improve. 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.

### **Emerging Contaminant Assessment**

Based on the information you provided in the Report, the DNR is not requesting further assessment or investigation to determine if emerging contaminants are associated with the discharge identified at this site.

### **Closure assessment**

The DNR recommends preparing a closure request to be submitted concurrently with, or after, the remedial action documentation report. The closure request must identify and discuss the presence of chlorinated and non-chlorinated volatile organic contaminants in soil and groundwater, lead in soil, and any other contaminant discovered on this property not specifically addressed by the two closed LUST cases.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this request, please contact me by calling (414) 405-0764, or by email at [paul.grittner@wisconsin.gov](mailto:paul.grittner@wisconsin.gov).

Sincerely,



Paul Grittner  
Hydrogeologist  
Remediation & Redevelopment Program

cc: Steve Swenson – SM&A/Terracon ([steves@st-ma.com](mailto:steves@st-ma.com))  
Nick Swartz – Superior Health Linens ([nswartz@superiorhealthlinens.com](mailto:nswartz@superiorhealthlinens.com))  
M. Andrew Skwierawski, Davis & Kuelthau, s.c. ([askwierawski@dkattorneys.com](mailto:askwierawski@dkattorneys.com))  
Kevin Peterburs - Union Pacific Railroad ([kjpeterb@up.com](mailto:kjpeterb@up.com))