

From: Grittner, Paul V - DNR
Sent: Monday, April 04, 2022 11:03 AM
To: rons@st-ma.com
Subject: Comments on Case Closure Form - Superior Linens

Ron,

The DNR has completed an initial review of the Case Closure form submitted for the Superior Linens site (BRRTS # 02-41-532649) and identified a number of modifications that will need to be made to the document, as well as additional steps that must be made to meet closure requirements. These are summarized below. A full technical review of the closure request will be conducted by the DNR later this month. Additional information to support the closure request and additional modifications to the closure documentation will likely be requested after that time. We did want to provide you with this initial review to give you the opportunity to get started working on this list and to provide you with an opportunity to provide additional information that we will consider when we conduct our technical review.

The DNR requests that Case Closure Forms and all attachments be submitted as separate PDF documents (a separate pdf file for A1, A2, A3, etc.). One benefit of this is that when portions of the packet are corrected only those parts would need to be resubmitted – not an entire new packet.

Needed changes for closure packet:

Form Cover Page: The WTM coordinates should roughly identify where the source area is - near the southwest corner of the building as noted on page 1 of the form. The coordinates need to be give in WTM, not lat/long.

Page 3, H. - 02-41-586879 SMITHFIELD FOODS - EMPLOYEE WELFARE BUILDING needs to be included on the list of adjacent sites.

Page 7, B.i – 1,2,4-TMB was identified at 505 mg/kg in soil (not 505 mg/L)

Page 10, A. – The sub-slab vapor mitigation system is not a remedial action. Such a system could be considered an interim action and should instead be discussed under item 'B' on the same page.

Page 11, H. – The methods being used to address groundwater (capping, natural attenuation) and vapor (mitigation system) also need to be listed as part of the response.

Page 12, J. – The response should note how the excavation is expected to have positive impact on groundwater or vapor impacts. The mitigation system should be noted as an interim action conducted to interrupt the vapor intrusion exposure pathway.

Page 12 L. – The response to this question is no – a PAL or ES exemption is not needed at this site.

Page 13, Continuing Obligation Table on Page 13 of the Case Closure form will need to be modified. Residual soil and groundwater contamination is present in the railroad ROW, row ii and iii of the ROW column must be checked. Row i of the off-site property column must also be checked.

Soil samples collected from boring locations TW-6, 9 through 13, and 17 had lead concentrations greater than an RCL. Identify the presence of the contamination on a figure and note this within the closure packet.

Table A.1 – Include groundwater results from samples collected from TW-1 through TW-16, HP-1, HP-3, HP-5, and the grab samples collected from SB-11 through SB-15.

Tables A.2, A.3, and A.4 – Residential standards need to be listed in addition to the industrial. We use this information to determine what restrictions need to be placed on the property at closure.

Table A.2 & A.3 – Include lead, TOC, and DRO analytical results and the sample results for KSP-1 on these tables. 'HPU' locations are labeled elsewhere as 'HP' – the labels should be made the same on figures and table.

Cover Page for A.4 incorrectly references A.5

Figure B.1.c – The figure needs to depict the area within at least a half-mile radius from the site.

Figure B.3.a(3) – The extent of the recent remedial excavation should be depicted on this figure.

Figure B.4.a – Identify the indoor air sampling locations.

Attachment D - Cover or Barrier Maintenance Plan

- The plan must have contact information for the current owner and preferably contact information for the organization who will be conducting the inspections (property manager, occupying company, etc.) if needed.
- The 'Location of Engineered Barrier' Figure must depict the extent of all soil contamination located within, west, and south of the building (the area currently depicted on figure B.1.a(1)).
- Paved surfaces that currently exist over soil with VOC contaminants at concentrations over the protection of groundwater RCLs will be required to be maintained as part of the cap. This will include all asphalt on the west side of building and the asphalt and concrete west of GP-1. As was noted in an earlier email from the DNR, the floors within the portions of the main building that were constructed in 1976 and 2005 will be required to be maintained as part of the cap due to the uncertainty of limits of soil contamination under the building.
- Representative photos of all surfaces that make up the cap must be provided as part of attachment D.3.
- Do not refer to the vapor system plan as attachment D.1, and cover plan as attachment D.2. D.1 refers to the plan text, and D.2. is specifically meant to refer to figures. ■

Confirm that monitoring well MW-4 was properly abandoned and provide the abandonment form. If documentation of the abandonment is not available this well may need to be identified in the closure letter as being lost. The letter will require the well to be abandoned if it is discovered in the future. The information requested under the instructions for Attachment E of the Case Closure form (description of efforts made to locate the well) will also need to be provided.

Attachment F.1 – confirm that this is the most recent copy of the deed for the property (was a new one created after the recent property transfer?). Provide an updated deed if this is not the most current.

Attachment G.

Notification of the closure request and the intent to impose continuing obligations needs to be provided to owners of impacted properties the responsible party does not own. At this time that would include the railroad right of way holder and the current owner of the Superior Linens site. Follow the directions provided in the Case Closure form for providing notification and complete the table summarizing notified parties. The DNR requires that notification be provided at least 30 days before closure is requested. The DNR may proceed with closing the site before 30 days has elapsed if the parties being notified provide written notification that they have been notified that a closure request has been made and that continuing obligations will apply to them, and they have no technical issues with this.

Please let me know if you would like to discuss the closure process or have any other questions regarding this project.

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