From: Grittner, Paul V - DNR

Sent: Friday, June 24, 2022 3:03 PM

To: rons@st-ma.com
Cc: wjnicklas@gmail.com

Subject: Comments on updated Case Closure Form - Superior Linens

Attachments: MW-4 documents.pdf

Ron,

The Department of Natural Resources (DNR) reviewed the modified Case Closure form submitted for the Superior Linens site (BRRTS # 02-41-532649). The following modifications/corrections are still needed to complete the packet:

Case Closure 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 given on the form are located south of this location.
- The BRRTs Activity Site Name on the cover page of the Case Closure form should be changed to 'Superior Linens – SW Building Corner Spill' to better identify what this case was opened to address. Unfortunately, the name we recommended previously is too long to fit into BRRTS and the case closure form. The DNR will update our BRRTS database with this name change.

Case Closure Form Page 12, item H. – The response to this question should note that natural attenuation will address groundwater contamination and that and vapor is being addressed by the operating mitigation system.

Case Closure Form Page 14, the Continuing Obligation Table will need to be modified. Rows iv, vi, and xiii will need to be selected for the 'source property' column. MW-4 must be properly abandoned if found in the future, the barrier/cover will need to be maintained over soil contamination that poses a risk to groundwater, and the need to mitigate vapor intrusion will need to be considered in the future if a building on the property is constructed or modified.

Table A.1 – This table must note that SB-11 and SB-12 are located in the same locations as MW-11 and 12 since they are not labeled on the figures.

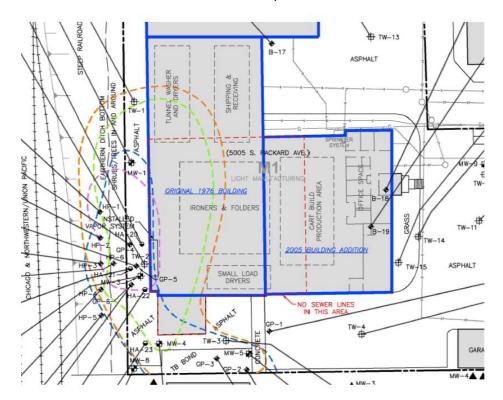
Tables A.2, A.3 The 'Notes' section needs to be corrected/finished.

Figures B.2.a and B.2.b - Soil samples collected from boring locations TW-6, 9 through 13, and 17 had lead concentrations greater than an RCL. The location of lead contaminated soil must be identified on soil contamination figures.

Attachment D - Cover or Barrier Maintenance Plan

- 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. The requirement to maintain a barrier must be applied to the entire extent of these additions

(the 'Engineered Barrier Protection of Groundwater RCLs' depicted on Figure 1 of the Plan must be extended north and eastward).



- Representative photos of all surfaces that make up the cap must be provided as part of attachment D.3. Photos are provided to document the condition of the barrier at the time of closure and are used to judge whether the cap changed or deteriorated during annual inspections conducted by the facility and during occasional inspections conducted by the DNR. The photos provided are not current, do not provide a good representation of the cap (no pictures south of building, etc.), and are too small to make out details. New photos must be provided.

Attachment E – include the construction form and development form for MW-4 (see attached).

Attachment G.

Notification of the closure request and the intent to impose continuing obligations needs to be provided to the current owner of the Superior Linens site. The initial notification did not list all continuing obligations that will be placed on the property. The need to take 'Future Actions to Address Vapor Intrusion' and the missing monitoring well MW-4 was not identified on the form. Form 4400-286 must be updated and resubmitted to the property owner. The updated form can be emailed to the current property owner for review. The DNR will not close this site until at least 30 days after this updated form is received by the owner (as documented by an email read-receipt if necessary) or until the property owner provides written or emailed notification that they have been informed of these continuing obligations and that have no technical issues with them.

Only submit a corrected Case Closure Form and any attachments that were modified. We will incorporate them into the existing packet. Please let me know if you have any questions regarding these requests.

We are committed to service excellence.

Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Paul Grittner

Hydrogeologist - Remediation and Redevelopment Program Wisconsin Department of Natural Resources Phone: (414) 405-0764 paul.grittner@wisconsin.gov



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