

McIlheran, Adam S - DNR

From: McIlheran, Adam S - DNR
Sent: Friday, May 21, 2021 1:44 PM
To: James Drought (James.Drought@gza.com)
Cc: Heidi Woelfel
Subject: SIR Review Information Request, Clare Central, BRRTS #02-41-549867

Jim,

As part of SIR review we look at what was previously requested for SI review and if that information has been submitted. There were several items listed in the DNR response letter of August 1, 2018 that do not appear to have been completed for the site investigation. To continue our review and ultimate approval of the SIR they will have to be addressed. I have listed the items below as show in the letter, I also added in red further description of what is needed in each item.

1. In the Data Transmittal, Terracon's rationale for not completing additional investigation of soil contamination north/northeast of the site is satisfactory; however, the extent of soil contamination illustrated on the soil isoconcentration maps should be extrapolated further into the right-of-way. The contour lines on the soil isoconcentration maps where the extent is extrapolated should be dashed. **Lines by P-17 and P-35 were dashed but not moved further into the ROW of Atkinson. Revised line locations should be shown on applicable figures.**
2. Please include on the appropriate soil isoconcentration maps the depths of soil samples from borings that demonstrate "no detect", so it is evident that the extent of soil contamination is shown on the maps. **This still needs to be done, especially since the extent varies at different depths and intersection with migration pathways a concern.**
3. As requested in the DNR's December 14, 2016 letter, clarify whether the storm sewer in the east/west alley immediately south of 1033 W. Atkinson Avenue exists further east of the catch basin noted on the maps. Also determine if there is a storm sewer in the north/south alley between the residences and the 1003 W. Atkinson Avenue apartment building. **SIR did not specifically state if the alley combined sewer exists east of the catch basin. Did not discuss if there is a sewer or other utilities in the north/south alley adjacent to site.**
4. Water, telecommunication and electric utilities that provide service to the Clare Central Apartments are illustrated on the site maps. Please show where the gas and sewer lines enter the Clare Central Apartments' property. Also illustrate any utilities present in Atkinson Avenue. **Still need to show on figures where gas and sanitary sewer laterals enter the two buildings onsite. If the comm & elec. utilities west of 1003 terminate to above-ground poles, indicate that on figures. Still need to show utilities in West Atkinson Avenue, at least west of centerline.**
5. Discuss whether the utilities serve as migration pathways for contaminants. **Stated in SIR that clean soil sample from P-26 appears to show migration has not occurred along the utility. However, also stated that the communications utility in the alley may be a potential vapor migration pathway. Need to discuss/assess vapor migration risk within the combined sewer or laterals, to be able to determine if any planned remedial actions are necessary and appropriate to address this risk. State what you believe is the migration pathway of TCE to the 3618 property (such as sewer lateral, foundation drains, migration through the subsurface soils or groundwater, etc.).**
6. As part of the evaluation to determine if utilities serve or have served as migration pathways, check records to locate utilities that were present at the time the former manufacturing facility

existed. These utilities may have acted as migration pathways at the time the contaminants were released at the site. **This was not completed or discussed.**

In addition,

Several items in the SIR need to be addressed to continue the review:

- June 2020 soil sampling: It was stated in the SIR that 15 shallow soil borings, GZA GP-1 through 15) were performed and soil samples collected. Boring locations or soil analytical data were not included on any submitted figures or tables, no laboratory reports submitted, and no discussion of the data included in the SIR. It appears this information should be submitted as part of the SIR.
- Deed does not appear to have been submitted for the site or included in a PHI. Submit a copy of the current deed, or clarify if the city still owns the alley strip (tax key is not on current county GIS) and if both alleys are still city ROW or have been vacated.
- The approved SIWP of 2018 stated quarterly indoor air sampling was to be performed, however it appears only one round was collected, in August 2019. Explain why the work plan was not followed and only one round collected.
- Naphthalene was above the VAL in many 2019 indoor air samples including the sample from the outside porch. What is believed to be the source? An offsite source the day of sampling? Were naphthalene producing materials observed throughout the buildings or is this indicative of vapor/air migration throughout the building? No outdoor upwind sample appears to have been collected. Since this is a VPLE site and has indoor air issues, it must be clear which detected indoor air compounds are attributed to historical activities at the property and which are attributed to other sources, if practical.
- Was the residence to the south 3603 N 10th St ever assessed for vapor risk? It is 65' from P-11. If not, state rationale.
- B-B' Cross-Section should show the alley catch basin near P-24, per the map, and should somehow show the utility pipe from the catch basin to the street at the correct depth.
- Indoor Air sampling figures should show which samples had concentrations of compounds with VAL exceedances for the latest rounds.
- Figure 10: similar to the soil figures, the groundwater figure should show concentrations of the contaminants of concern for the latest round of data for each location sampled, so the accuracy of the iso-contours can be determined.
- Table 7: clarify on the table which samples were collected at which residence.

Regarding the recently submitted RAOR, to be able to determine if the proposed remedial actions reasonable address the known environmental risks in all media at the site, the above items would have to be adequately addressed.

Please let me know if you have any questions regarding the above listed items.

Regards,

Adam

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