

McIlheran, Adam S - DNR

From: McIlheran, Adam S - DNR
Sent: Monday, June 28, 2021 3:26 PM
To: James Drought (James.Drought@gza.com)
Cc: Heidi Woelfel
Subject: SIR review status, Clare Central, BRRTS 02-41-549867

Jim & Heidi,

We have reviewed the Clare Central SIR, there are a few items which need to be addressed before the SIR would be considered complete. The RAOR was not able to be reviewed yet but is scheduled for early July. However the revisions to the figures and tables indicated below are needed before that time so that the RAOR can be adequately evaluated. A couple of the items are RAOR-related, but it would be helpful if we had that information prior to our review meeting.

Soil:

1. The soil data table should highlight the Direct Contact RCL exceedances (and all other RCLs) no matter what depth the samples were collected. As long as the depth of the samples are also indicated on the table it can be ascertained if the DCRCL applies for that given sample.
2. The Cross-sections should be revised to show TCE sample depths and concentrations, with direct contact and groundwater RCL lines for all impacts shown, taking into account all available soil data. The vertical elevations should be in MSL. Accurate cross-sections are important not only for completion of SIR but also for review of appropriate proposed remedial actions.
3. Soil contamination figures for CVOCs at 0-4', 4-8', and 8-12' need to show more refinement of contours between ND or RCL and the next highest contour (10,000 ppb on Figures 6 & 7). If RCL is a contour, identify if it is for a particular CVOC or all listed in the boxes. If a sample was collected sample concentration is ND for a particular location and depth, indicate that next to the sample location on the appropriate figure instead of listing on side of figure.

Groundwater:

1. The groundwater elevation summary table should have an explanation for the question marks and have all elevations in MSL so comparisons can be made, or an explanation why this is not done.
2. The groundwater impact figure (or figures) should show all locations with ES exceedances, including vinyl chloride at MW-2.

Vapor:

1. A vapor sample should be collected from the sewer manhole in N 11th St. that is west of the alley catch basin which the catch basin is connected and the sample analyzed for contaminants of concern. This is to provide data regarding any CVOC vapor migration from the catch basin area through the sewer line to any nearby residences. Refer to DNR guidance [RR-649](#) regarding manhole vapor sampling method.
2. Current vapor guidance states pressure field extension testing of SSDSs should have at least two rounds of data collection, it appears the systems operating have had only one. This work, along with indoor air sampling should be planned to be included in the RAP with a description of the work.

The above soil and groundwater table/figure updates will need to be submitted prior to RAOR review. The below information could also be submitted prior to RAOR review, to the extent of details which are possible at this time:

1. Since the planned excavation area is known, state which monitoring wells will be abandoned and the estimated locations of the replacement wells. It is noted that temporary monitoring well data indicated groundwater impacts south of the 1033 building. A replacement well should be considered in this area. Likely this could be accomplished best in conjunction with soil remediation.
2. It appears indoor air sampling post-excavation should be planned, but it wasn't clear if this was the case. A plan could be included in the RAP with a description of the work.

I think this is all that is needed now prior to RAOR review. If you have any questions on the requested information let me know.

Regards,

Adam

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