

McIlheran, Adam S - DNR

From: McIlheran, Adam S - DNR
Sent: Tuesday, November 16, 2021 10:11 AM
To: Heidi Woelfel
Cc: James Drought (James.Drought@gza.com)
Subject: Clarifications needed for RAP Review, Clare Central, BRRTS# 02-41-549867

Heidi,

In reviewing the RAP for the Clare Central site, we need clarifications on a few items that were mentioned in the RAOR or were requested to be addressed in the RAP:

1. It is stated that the existing SSDSs in each building will be inspected semi-annually and maintained. Does this include the SSDS in the 3618 N 11th St. residence? Clarify what actions are planned for the SSDS on the 3618 N 11th St. property.
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 was to be completed following soil remedial activities, along with determining if the SSDSs system need to be modified due to a change in site conditions or regulatory guidance since the time they were installed. This does not appear to be included in the RAP.
3. It is stated in the RAP that the excavation venting system is designed to make the SSDSs more effective, and therefore part of the site vapor mitigation. Clarify that maintaining and inspecting the vent system is planned to be a continuing obligation with the SSDSs.
4. The RAOR included a description of sealing the elevator shafts in the buildings to prevent vapor migration from the sub-surface area of the shafts into the buildings. This was not included in the RAP. Clarify and describe this planned action. This should include all of the subsurface area of the shaft (floor and walls) and include a maintenance/inspection plan that the mitigation method will stay in place. It was not clear if one or both of the shafts will be sealed. If one will not be sealed, it would likely still need to be inspected for any cracks that may develop and mitigated thereafter.
5. It appears indoor air sampling post-excavation should be planned to confirm elevator shafts will not be a migration conduit following sealing and due to naphthalene detections in the 2019 indoor air sampling round, but a plan was not included in the RAP. Clarify the post-excavation indoor air sampling plans.
6. Clarify that confirmation soil samples will be collected from the 4' parking lot excavation bottom and the 8' excavation bottom (only the number of samples was stated). Clarify at what depth sidewall samples will be collected.
7. Clarify if confirmation samples will be collected from the catch basin excavation and if not, how residual impacts in that area of the alley will be documented.
8. Confirm that City of Milwaukee has been consulted and has no objection to catch basin, sewer pipe, backfill, alley pavement, removal and replacement specifications.
9. Clarify that the area of the proposed cap to be maintained is the excavated area (for infiltration reduction) and residual soil at 0-4' bgs with impacts above direct contact RCLs, such as next to and under the onsite buildings.

I would like to present the RAP to our review group on the 23rd, so if you can respond on these points by the end of the week I would be able to include them in our review.

Thanks,

Adam

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