

McIlheran, Adam S - DNR

From: Heidi Woelfel <Heidi.Woelfel@gza.com>
Sent: Wednesday, November 17, 2021 3:27 PM
To: McIlheran, Adam S - DNR
Cc: James Drought
Subject: FW: Clarifications needed for RAP Review, Clare Central, BRRTS# 02-41-549867

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Hi Adam,
GZA's responses to your questions are below. Please let me know if you have any further questions for your November 23rd meeting to discuss Clare Central.

Thank you,
Heidi

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.

GZA is not aware of the operational status of this SSDS because letters and door flyers were left by GZA at the residence prior to the sampling events conducted in August 2019 and July 2021 with no response from the owner or tenant. GZA will again attempt to make contact with the property owner through correspondence and door flyers at the residence prior to any planned semi-annual SSDS inspections and maintenance activities at the Clare Central property. If the owner or tenant responds and access is granted, GZA will perform an inspection and maintenance of this SSDS.

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.

Sub slab pressure field testing was conducted by Terracon and Radon Reduction on March 28, 2012 to assess the SSDS system initially installed in 2012. Updates to the SSDS were conducted to improve the pressure field in October 2012 but no additional testing was conducted. GZA will install up to five sampling ports within the first floor common areas of each building to assess the sub slab pressure field following the soil remedial activities scheduled for Spring/ Summer 2022. The results for the pressure field testing will be provided to the WDNR along with any recommendations for SSDS modification or maintenance. If the results of the pressure field testing indicate sufficient distribution, no further pressure field testing will be proposed.

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.

The vent system will have a continuing obligation for inspection of the vents for each building to ensure that vapors have an uninterrupted vent pipe to migrate through. Each vent pipe will also be installed with protective bollards and

will have a screened cap to prevent any dirt or debris from entering the vent. The vent pipes will be inspected semi-annually to ensure they are in good condition.

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.

GZA conducted an inspection of each elevator shaft area for each apartment building in August 2020, and identified cracks in the floors of the shafts for both buildings. The floor, and any wall, cracks will be filled and sealed prior to the elevator shaft for each building being sealed with Liquid Boot™ or similar. The Liquid Boot™ will be placed on the interior building floor and walls of each elevator shaft. The elevator shafts for each building will be inspected semi-annually following the sealing to ensure the seal of the floor and walls remains in good condition.

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.

Indoor air samples from the apartments and common areas from each apartment building will be collected prior to the excavation activities in spring 2022 and following the excavation and installation of the exterior venting system in fall or winter 2022. The samples will be also be collected from an outside porch area for the buildings to compare the exterior ambient air conditions. An upwind air sample will be considered, but given the transient nature of the area, the sample may be omitted. The air samples will be collected into 6-liter summa canisters from the breathing zones over a 24-hour sampling event for analysis of VOCs by TO-15. The results of the air sampling will be submitted to the WDNR.

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.

Following excavation of the soils in the 0- to 8-foot depth interval in the excavation, sidewall and floor samples will be collected to verify the concentration of the residual contamination left in place after the excavation. The sidewall samples will be collected every 50 feet along the sidewall, or approximately eight to ten samples from the midpoint of the excavation above the groundwater level (2 feet for the 4-foot excavation and approximately 4-feet or less for the 8-foot excavation), and the floor samples will be collected at a rate of one sample per 2,000 square feet, or a minimum of three floor samples. GZA will collect a minimum of two floor samples from each the 4-foot and 8-foot excavation floors. The soil samples will be collected from above the groundwater level for the sidewalls, and if possible, the floor of the excavation. The floor sample may be below the groundwater level, therefore the sample will not be considered as a soil sample due to the saturated nature of the sample. The floor and sidewall samples will be submitted for laboratory analysis of VOCs by USEPA Method 8260.

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.

One side wall sample will be collected from the catch basin excavation at the depth of 4 to 5 feet deep from each of the four walls on the excavation. One floor sample will be collected following the removal of the catch basin. The soil samples will be collected from above the groundwater level for the sidewalls, and if possible, the floor of the excavation. The floor sample may be below the groundwater level, therefore the sample will not be considered as a soil sample due to the saturated nature of the sample.

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.

The Remedial Options Actions Report and the Remedial Design Report were both provided to Mr. Mat Reimer and Mr. Dave Misky of the City of Milwaukee. Mr. Reimer has not indicated any concerns regarding the proposed remedial activities, however he and Mr. Dave Misky have stated in an email to GZA in May 2021 that the ROAR and RAP comments and approval by the WDNR is needed prior to the City's comments so that the WDNR's review is not held up by the City. GZA will be providing the WDNR review letters to the City for the ROAR and the RAP and will have a discussion with the City to discuss the planned remedial work.

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.

The alley way excavation and the catch basin excavation areas will have new asphaltic pavement placed following the soil excavation and backfilling activities. Clare Central and Telos Inc. have also elected to repave the area between to the two excavations and the parking area for the eastern apartment building (Building 1003). The new paving will be used as a soil barrier to prevent direct contact with the residual soils and to limit stormwater infiltration to the subsurface. The cap will be inspected annually. There will be no areas around the alley and buildings which are currently unpaved that will be paved following the remedial activities; new paving will be placed only on areas that are currently paved.

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*** Please note: Our office is currently working remotely. I can be reached at 414.687.3313.**

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