

September 11, 2015

Mr. James Friedl
Block System Cleaners
2017 Winnebago Street
Madison, WI 53704

Subject: Case Closure Denial, Additional Site Investigation Needed for
Block System Cleaners, 2017 Winnebago Street, Madison, Wisconsin
DNR BRRTS Activity # 02-13-552132

Dear Mr. Friedl:

On August 6, 2015, the South Central Regional Closure Committee reviewed your request for closure of the case described above. The Department of Natural Resources (Department) reviews environmental remediation cases for compliance with state and federal laws to maintain consistency in the closure of these cases. As discussed with you on August 6, 2015, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with your written response regarding the necessary work and a schedule for completion of this work.

As noted above, additional site work is necessary in order to meet the requirements for site closure. An investigation for an on-site source for the groundwater contamination is needed, the degree and extent of the contaminant groundwater plume needs to be defined, and active remediation of the groundwater contamination should be proposed. Department guidance, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin* (PUB – RR-800 December 2010), indicates that in most cases, remediation of the source is required in order to reduce or eliminate the vapor intrusion pathway.

Need to Define the Degree and Extent of Contamination

Additional soil and groundwater investigation is needed in order to define the degree and extent of contamination. Soil samples in the unsaturated zone should be conducted. Additional site investigation for groundwater contamination should be conducted, specifically, the degree and extent of the deeper level contamination as noted in the piezometer (PZ-1) needs to be defined. This entails, at a minimum, investigating deeper than PZ-1 and down-gradient of PZ-1. The source for the contaminated groundwater was not identified. An investigation for an on-site source area should be conducted.

Need to Conduct Additional Remedial Action

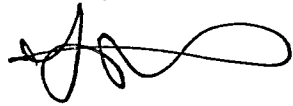
A remedial action is needed in order to comply with the closure criteria of ch. NR 726, Wis. Adm. Code. An active remedial measure should be proposed to reduce the contaminant mass in the groundwater. Section NR 726.05(8)(b)1., Wis. Adm. Code, requires as a criterion for closure for sites with vapor contamination that a remedial action be conducted to reduce the mass and concentration of volatile compounds to the extent practicable.

A complete closure request should be re-submitted once all the above requirements have been satisfied, together with any required documentation, to let the Department know that applicable requirements have been met. Case closure can be considered once all the above requirements have been satisfied.

Within 60 days of the date of this letter, please respond in writing with a schedule of your plans to meet these requirements. Until requirements have been met, your site will remain "open" and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 700.11, Wis. Adm. Code. You will also be responsible for any operation and maintenance activities required under s. NR 724.13, Wis. Adm. Code.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (608) 275-3310.

Sincerely,



Linda Hanefeld
Team Supervisor, South Central Region
Remediation & Redevelopment Program

cc: Jason Bartley, Ready Earth Consulting, Inc., P.O. Box 365, Pewaukee, WI 53072

From: Jason Bartley <jbartley@readyearth.net>
Sent: Tuesday, August 04, 2015 5:33 PM
To: DiMaggio, Janet H - DNR
Cc: Kevin Burditt
Subject: Re: WDNR Case Closure - GIS Registry Form 4400-202 for 02-13-552132 Acknowledgement
Attachments: A.4 Vapor Analytical Table.pdf; B.1.a Location Map.pdf; B.1.b.1 Detailed Site Map with Affected Property Boundaries.pdf; B.1.b.2 Detailed Site Map with Utilities.pdf; B.4.a Vapor Intrusion Map.pdf

Janet,

As we discussed, here are the revisions in electronic form. Hopefully the changes meet what you are expecting. Thanks for trying to get this to committee this week. I know that the schedule is tight and it may not make it but your efforts are appreciated.

Thanks,
Jason

On Wed, Jul 29, 2015 at 11:02 AM, <janet.dimaggio@wi.gov> wrote:
This email confirms on 07/21/2015 the Wisconsin Department of Natural Resources (DNR) Remediation and Redevelopment (RR) Program received Case Closure - GIS Registry Form 4400-202 (R 03/15) with fee(s) for:

02-13-552132 BLOCK SYSTEM CLEANER
2017 WINNEBAGO ST, MADISON

The Project Manager conducted an initial Administrative Review of your submittal on 07/29/2015 and determined the following items and/or attachment(s) are missing, incorrect or incomplete:

(Attachment A)(4): Vapor Analytical Table(s)

(Attachment B)(1A): Location Map

PM Comment: The map needs to "outline all properties within the contaminated site boundaries..."

(Attachment B)(1B): Detailed Site Map

PM Comment: Property boundaries are not clearly indicated.

(Attachment B)(4A): Vapor Intrusion Map

PM Comment: Results of sampling should be noted on this map.

The Department does not consider your closure request complete, nor will the PM begin the technical review of your request, until the deficiencies listed above are corrected. Our regional Closure Committees typically meet on the first Thursday of each month. Please keep this date in mind for your future planning.

You may contact DNR Project Manager JANET DIMAGGIO at janet.dimaggio@wi.gov or (608) 275-3295 with any questions.

For more information on the RR Program, please visit <http://dnr.wi.gov/topic/Brownfields/>

This email sent to:

janet.dimaggio@wi.gov
wendy.weihemuller@wisconsin.gov
blockcleaners@att.net
jbartley@readyearth.net

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Jason E. Bartley, P.G.
President
ReadyEarth Consulting, Inc.
P.O. Box 365
Pewaukee, WI 53072
ph 262-522-3520
cell 414-731-9874
jbartley@readyearth.net

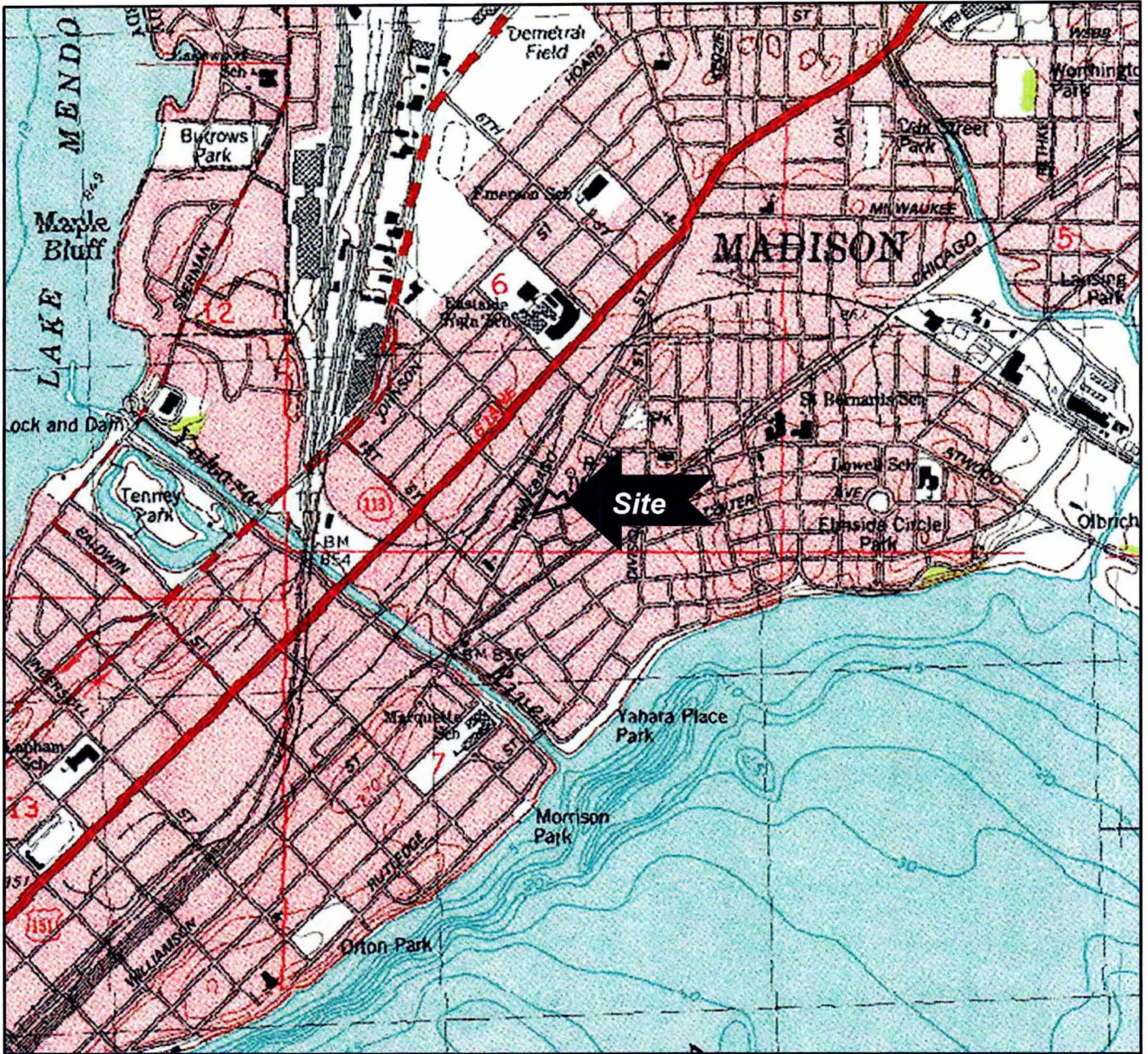
A.4 Vapor Analytical Table

Block System Cleaners
2017 Winnebago Street
Madison, Wisconsin

	VP-1		VP-2		VP-3		VP-4		VP-5		non-residential VRSL
	sub-slab vapor Block Cleaners east basement		sub-slab vapor Block Cleaners west main level		sub-slab vapor 2009 Winnebago basement		sub-slab vapor 2044 Atwood basement		sub-slab vapor 2021 Winnebago west main level		
Sample Date	11/15/11	2/26/13	11/15/11	2/26/13	3/22/12	2/26/13	3/22/12	2/26/13	3/22/12	2/26/13	
start time	1030	1000	1310	0930	1340	1045	1400	1150	1445	1115	
end time	1245	1050	1350	1030	1425	1135	1450	1240	1530	1205	
Shut-In Test	pass	pass	pass	pass	pass	pass	pass	pass	pass	pass	
Helium Shroud Test	pass	pass	pass	pass	pass	pass	pass	pass	pass	pass	
Volatile Organic Compounds (ppbv)											
cis-1,2-dichloroethene	<2.0	<3.4	<2.0	<3.4	<4.5	<3.4	<0.84	<0.67	<4.2	<0.67	NS
trans-1,2-dichloroethene	<2.0	<3.4	<2.0	<3.4	<4.5	<3.4	<0.84	<0.67	<4.2	<0.67	NS
tetrachloroethene	105	1,710	83.5	628	99.8	366	6.2	18.7	79.0	7.4	900
trichloroethene	<2.0	3.8	<2.0	<3.4	<4.5	<3.4	<0.84	<0.67	<4.2	<0.67	53.33
vinyl chloride	<2.0	<3.4	<2.0	<3.4	<4.5	<3.4	<0.84	<0.67	<4.2	<0.67	366.67

Notes:

- Concentrations in **red bold** exceed their respective non-residential vapor risk screening levels (VRSLs).
- All samples were collected from sub-slab vapors with 6-liter summa canisters and sampling apparatus to allow for shut-in and helium shroud tests. Dedicated flow controllers maintained maximum sample rates of 200ml/min and all samples were allowed to run for at least 40 minutes.
- Shut-in tests included applying a vacuum of ~100 in-water (~7 in-Hg) to the closed-system sample chain to check valve connections. The shut-in tests passed if no dissipation was noted over approximately 1 minute.
- Helium shroud tests introduced ~40% by volume of He to a shroud placed over the sample apparatus valve penetrating the floor to check seal. The He shroud tests passed if no helium was detected within sample chain.
- VRSLs obtained from the DNR Quick Look-Up Table based on the EPA regional screening tables for indoor vapor action levels (VALs): http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm.
- The VRSLs were determined from the VALs using an attenuation factor of 0.03.
- All samples were analyzed by Pace Analytical using the TO-15 method.
- ReadyEarth did not conduct communication testing for the sub-slab testing. Communication testing for the SSDS is included as A.7.b.



Scale



1" ~ 1,500



SW ¼ of the SE ¼ of Section 6, Township 7N, Range 10E

Madison East Quadrangle (1983)

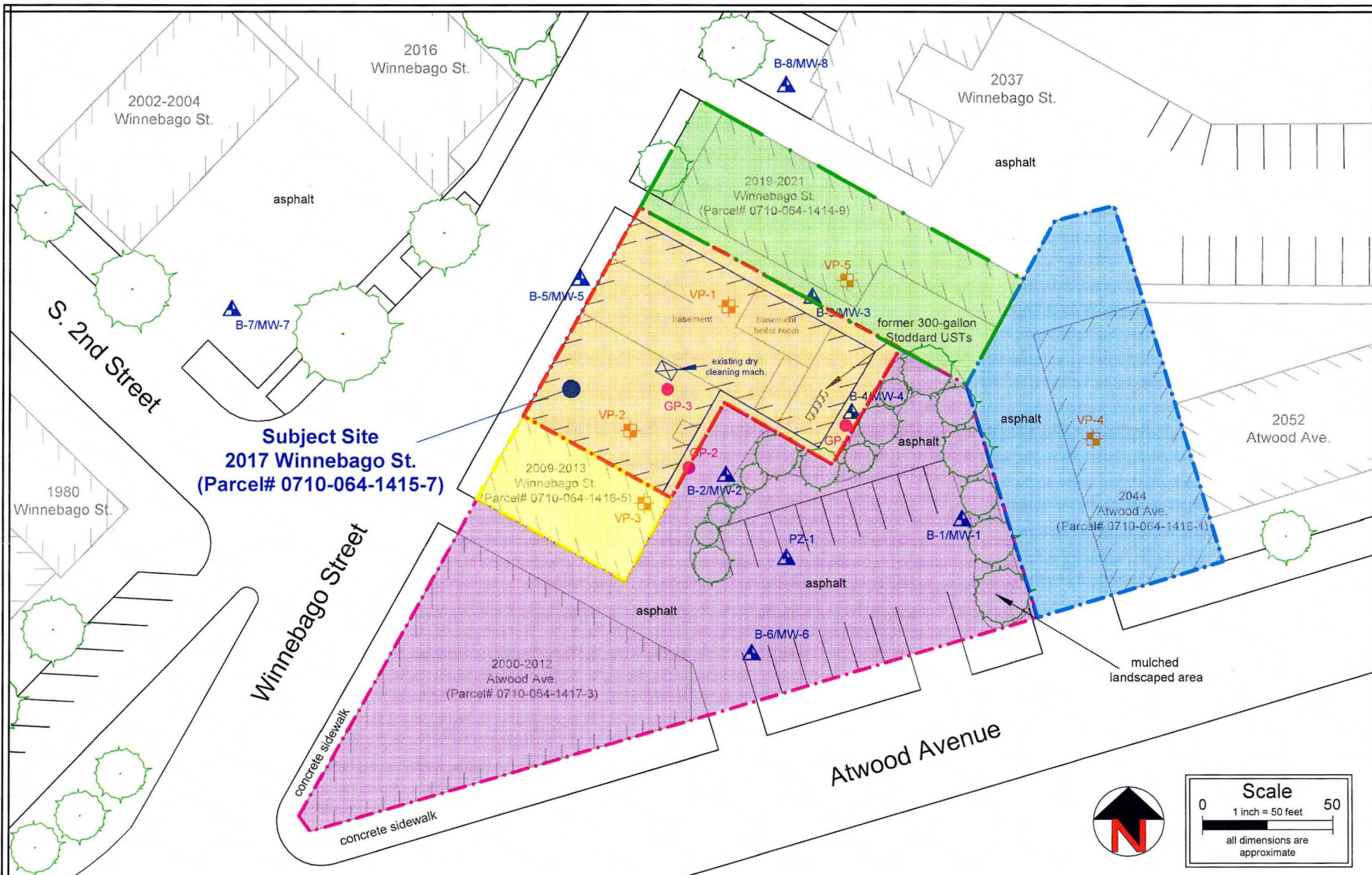
Wisconsin – Dane Co.

7.5 Minute Series (Topographic)

United States Department of the Interior Geological Survey



B.1.a Location Map
 Block System Cleaners Property
 2017 Winnebago Street
 Madison, Wisconsin



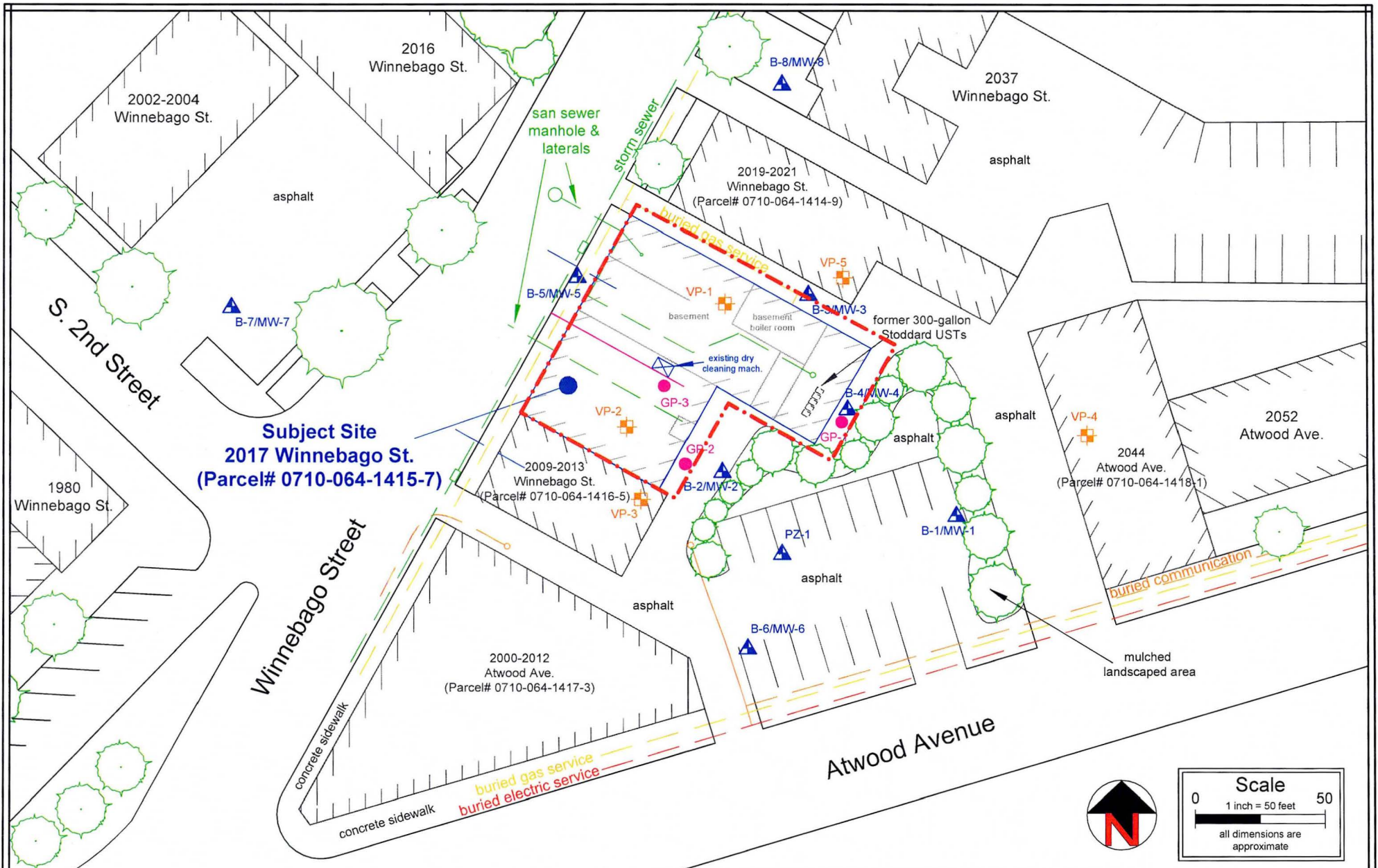
Drawing No.: 11-0604a

DWG Date: 09-15-11

Rev Date: 08-04-15

Drafted by: JEB

B.1.b.1 Detailed Site Map with Affected Property Boundaries
Block System Cleaners
2017 Winnebago Street
Madison, Wisconsin



Drawing No.: 11-0604x

DWG Date: 08-4-15

Rev Date:

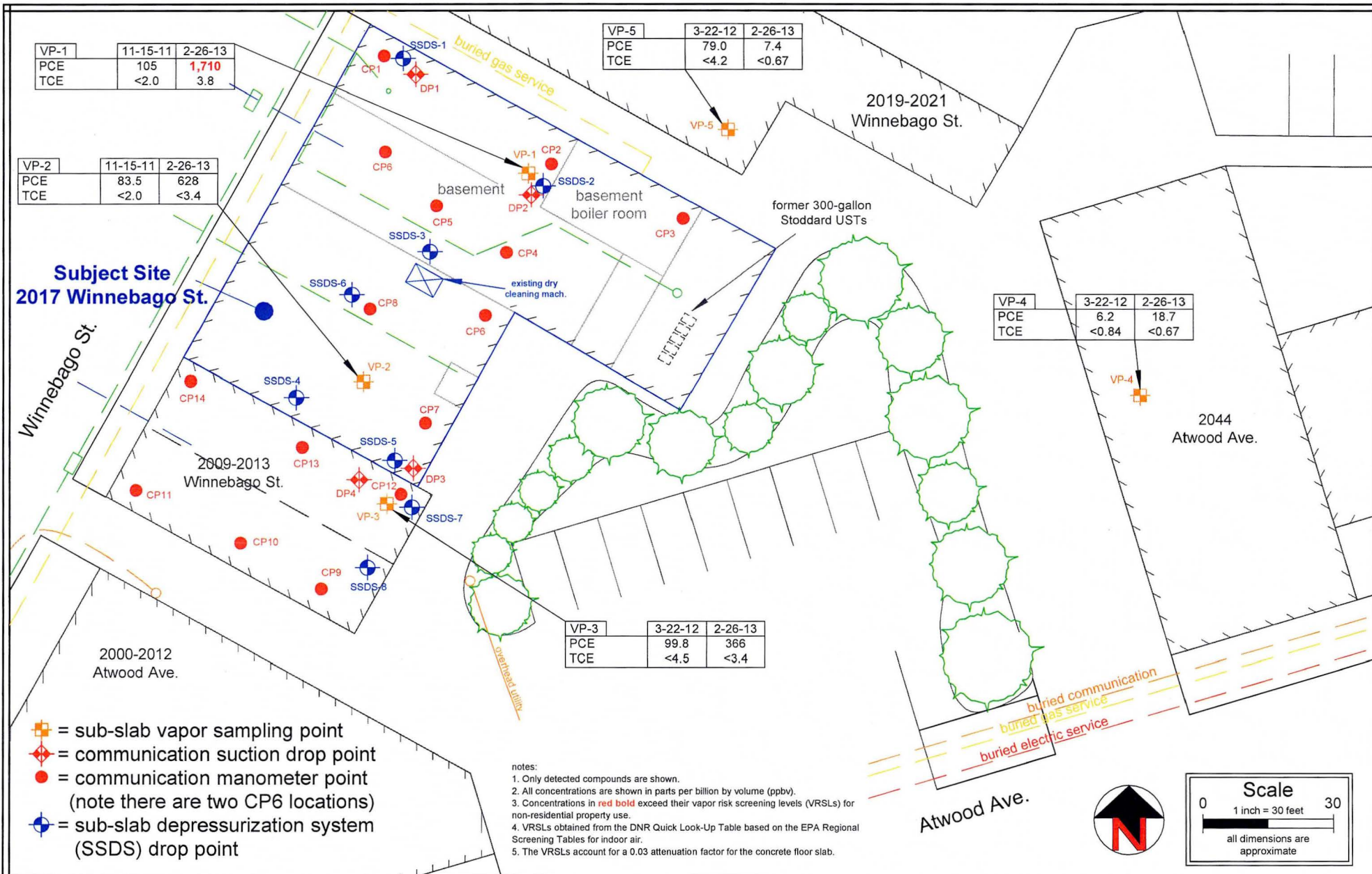
Drafted by: JEB

B.1.b.2 Detailed Site Map with Utilities

Block System Cleaners

2017 Winnebago Street

Madison, Wisconsin



VP-1	11-15-11	2-26-13
PCE	105	1,710
TCE	<2.0	3.8

VP-5	3-22-12	2-26-13
PCE	79.0	7.4
TCE	<4.2	<0.67

VP-2	11-15-11	2-26-13
PCE	83.5	628
TCE	<2.0	<3.4

VP-4	3-22-12	2-26-13
PCE	6.2	18.7
TCE	<0.84	<0.67

VP-3	3-22-12	2-26-13
PCE	99.8	366
TCE	<4.5	<3.4

- = sub-slab vapor sampling point
- = communication suction drop point
- = communication manometer point (note there are two CP6 locations)
- = sub-slab depressurization system (SSDS) drop point

- notes:
1. Only detected compounds are shown.
 2. All concentrations are shown in parts per billion by volume (ppbv).
 3. Concentrations in **red bold** exceed their vapor risk screening levels (VRSLs) for non-residential property use.
 4. VRSLs obtained from the DNR Quick Look-Up Table based on the EPA Regional Screening Tables for indoor air.
 5. The VRSLs account for a 0.03 attenuation factor for the concrete floor slab.



Drawing No.: 11-0604w

DWG Date: 06-29-15

Rev Date: 08-04-15

Drafted by: JEB

B.4.a Vapor Intrusion Map
 Block System Cleaners
 2017 Winnebago Street
 Madison, Wisconsin