



June 3, 2020

Mr. James Friedl
4946 County Road A
Oregon WI 53575

Transmitted Electronically

Subject: Response to the Reconsideration Letter and Additional Comments Regarding Site Investigation Addendum for the Block System Cleaners Facility Located at 2017 Winnebago Street in Madison, Wisconsin
BRRTS No. 02-13-552132

Dear Mr. Friedl:

The Department of Natural Resources (Department) has reviewed the Site Investigation Addendum dated September 17, 2019, received September 23, 2019 and the Reconsideration Letter dated February 11, 2020, revised March 24, 2020 and received March 30, 2020. The additional work performed has added to the understanding of the contaminant discharge. However, better definition of the source of groundwater contamination and confirmation of the configuration of the groundwater plume is needed in order to obtain a site closed determination. The information ideally should define the source of the contamination, the extent of the contamination, the mass of contamination still present, and an understanding of the type of subsurface environment and how that influences contaminant transport and any future attenuation.

The Department spoke with your consultant on June 2, 2020 and specified an additional downgradient well nest be installed to confirm groundwater flow direction and the extent of the plume. We strongly suggest you also consider source area remediation as an interim action in the saturated zone and/or the unsaturated zone as a means to reduce the time-frame for natural attenuation to effectively reduce contaminant concentrations in groundwater and perhaps alleviate the need for ongoing soil vapor mitigation.

The Department also has the following recommendations:

1. When installing any borings, perform grain size analysis of select samples to more precisely classify soils.
2. Perform slug tests in a representative subset of the site monitoring wells to estimate aquifer hydraulic conductivity.
3. Perform vertical chemical profiling in the deepest boring for the new well nest to aid in plume delineation and well screen locations.
4. Construct a potentiometric surface map for the deeper sand using data from the deepest piezometers.

The Department is also asking for clarification on the following:

- Was the floor drain in the vicinity of the Stoddard tanks investigated for a break?
- The discussion in the Reconsideration Letter centers on PCE. A discussion on trichloroethene (TCE) is important and should be included as it may pose a health risk.

If you have any questions or concerns regarding this letter, please contact Janet Dimaggio at (608) 275-3295 or by email at janet.dimaggio@wisconsin.gov or at the address listed in the letterhead.

Sincerely,

A handwritten signature in blue ink, appearing to read "St L Martin".

Steven L. Martin, P.G.
South Central Region Team supervisor
Remediation and Redevelopment Program

c.: Janet DiMaggio (electronic)
Jason Bartley, Ready Earth, jbartley@readyearth.net (electronic)
Todd Jindra, JET Venture LLC, tkjindra@aol.com (electronic)