State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 3911 Fish Hatchery Road Fitchburg WI 53711-5397

Tony Evers, Governor Preston D. Cole, Secretary

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October 13, 2020

Paul Roth Northgate Partnership 7625 Bonetti Road Dane WI 53529

SENT BY ELECTRONIC MAIL 10/13/2020

SUBJECT: Next steps for the former Laundry Land project

1131 N. Sherman Avenue, Madison

BRRTS # 02-13-552183

Dear Mr. Roth:

The Department of Natural Resources (DNR) has reviewed the following reports prepared by SCS Engineers for the Laundry Land cleanup project:

- July 7, 2020 Soil and Groundwater Investigation Report
- August 10, 2020 Vapor Monitoring Report
- September 15, 2020 Construction Documentation Report for the vapor mitigation system in the 1131 N. Sherman Avenue unit of Northgate Shopping Center
- September 16, 2020 Groundwater Investigation Addendum/Update Report

SCS recommendations

In the September 16, 2020 report, SCS made a number of recommendations for additional groundwater investigation. Several of those recommendations should be helpful in determining how groundwater contamination from the nearby Klinke Cleaners case relates to Laundry Land. <u>DNR concurs with these recommendations and has several additional recommendations</u> for follow-up work, including vapor intrusion testing and mitigation.

Vapor intrusion sampling and mitigation

As required in Wis. Adm. Code § NR 716.11(5)(g), sample for sub-slab vapors at the following locations as soon as possible:

- Shopping center units at 1111, 1159, 1171, 1181, 1191, 1193, 1197, & 1201 N. Sherman Avenue
- 1738 Roth Street
- 1110 Ruskin Street
- 1709 Aberg Avenue
- 1289, 1291, and 1293 N. Sherman Avenue

A few of these have been sampled previously, but because vapor levels fluctuate so much over time and location, samples need to be taken more than once.

The units with vapor screening level exceedances need vapor mitigation. Mitigation of the vapor pathway is a requirement for closure (Wis. Adm. Code § NR 726.08). DNR has additional information in our January 2018



guidance document, <u>Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin (PDF i included with this email)</u>.

Understanding source areas, underground utilities, and groundwater flow

Groundwater and vapor contamination are sometimes associated with underground utility lines, either because gravel in a utility trench makes a preferential pathway for contaminants to follow or because liquid waste in the sanitary sewer leaked through a break in the line. For this reason, a detailed map of all subsurface public and private utilities is needed for the shopping center and nearby streets. By reviewing the utility locations and depths, along with the existing soil data, your consultant will be able to evaluate what the likely source areas are and how the contaminants moved from the sources into the surrounding area.

DNR also requests that updated cross-sections showing soil and groundwater data be prepared for the next groundwater monitoring report and that MW-14 be included in the next sampling round.

Possible remedial action

SCS conducted groundwater treatment approximately 5 years ago with two rounds of whey injection to stimulate breakdown of the chlorinated compounds. The injection wells are still in place in the parking lot islands. Since groundwater contamination levels declined after the treatment, DNR requests you consider additional injections to further reduce groundwater contamination, which is also a source of vapor contamination.

Next steps

<u>Proceed with vapor intrusion sampling and mitigation without delay</u>. If you wish to later file a DERF reimbursement claim for these expenses, send me a DERF budget request as soon as possible. Send a workplan and schedule for the other items within 60 days.

Thank you for your efforts to investigate and restore the environment at this site. If you have any questions or are interested in a Skype meeting to discuss this letter, please let me know at 608-219-2181 or cynthia.koepke@wisconsin.gov.

Sincerely,

Cynthia L. Koepke, P.G.

Choeplie

Remediation & Redevelopment Hydrogeologist

South Central Region

Copies by email to:

Nic Alexander, Rebecca Schultz, Alex Sterling, Alexander Company

Maggie Mackey, Northgate Partnership

Betty Socha and Robert Langdon, SCS Engineers

Attached PDF:

Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin, RR-800, January 2018