

Pfeiffer, Jane K - DNR

From: Pfeiffer, Jane K - DNR
Sent: Thursday, February 25, 2021 12:01 PM
To: Brian Kappen
Subject: Martinos (02-30-552186) - Follow-Up
Attachments: 20201218_80_CLOSURE_NOT_RECOMMENDED.pdf

Hi Brian,

Thank you for speaking with me to yesterday regarding the above-referenced site. As we discussed, considering the recent indoor air (IA) and sub-slab (SS) vapor samples taken at the Gulick residence (5231 40th Ave.) were not analyzed for the contaminants that were identified above their VALs in previous sampling events (i.e., 1,2-dichloroethane and chloroform), the DNR is requesting that the following information be submitted in an email response or standalone document at your next earliest convenience:

1. Provide a discussion of the potential sources for these contaminants within the IA at the Gulick residence, as requested in the DNR Closure Not Recommended (CNR) letter, dated 12/16/20 (attached). Furthermore, provide justification for why these contaminants identified in the IA at the Gulick residence are not from the soil and/or groundwater contamination originating at the Martinos site.

Additionally, during our phone call you asked whether a comprehensive SIR was necessary, or whether a standalone submittal would be adequate in response to the CNR letter. I spoke with my supervisor and she verified that the DNR will require the submittal of a comprehensive SIR. Since the SIR was submitted to the DNR on 09/06/15, additional site data has been submitted to the DNR in seven update reports. The seven update reports are listed below:

GW Monitoring Report, dated 02/16/16
GW Sampling Results, dated 03/15/16
Vapor Sampling Results, dated 04/28/16
Vapor Sampling Results, dated 09/14/16
GW Sampling Results, dated 10/02/16
GW Sampling Results, dated 10/13/16
GW Sampling Results, dated 02/01/17
Vapor Sampling Results, dated 02/19/21

These reports do not include any data interpretation that ties the site data together to support a conceptual site model regarding the degree and extent for the reported contamination. Moreover, the above reports do not include the post-excavation sample data, presented in the Remedial Action Documentation Report (RADR), dated 01/16/18, that is used to further delineate the contamination.

It is inappropriate for the DNR to review nine submittals containing SI data to determine compliance with Wis. Admin. Code ch. NR 716. Therefore, a comprehensive SIR is needed that incorporates the data from the original 2015 SIR, the seven update reports, and the RADR's post-excavation sampling data to comply with Wis. Admin. Code ch. NR 716. The data interpretation must incorporate all site data collected for all affected environmental media to define the degree and extent of contamination for the reported discharge.

Please do not hesitate to contact me with any questions, comments or concerns you may have with the information presented in this email.

Thank you,

Jane

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Jane Pfeiffer

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