

Pfeiffer, Jane K - DNR

From: Pfeiffer, Jane K - DNR
Sent: Monday, October 18, 2021 10:05 AM
To: Brian Kappen
Subject: Martinos (02-30-552186) - Closure Packet Revisions Required

Greetings Brian,

As I mentioned in my voicemail from this morning, the case closure packet for the above-referenced site must be updated to include the following revisions:

Form 4400-202:

- Update the applicable sections (e.g., 3.A.i, 3.A.ii., 3.D., 4, etc.) of Form 4400-202 to discuss the recent vapor assessment and associated results.
- Update Section 4.h. to provide a separate discussions concerning the cap as it pertains to direct contact and to soil to groundwater pathway RCL exceedances. This section must provide a justification for limiting the required cap to the subject property and not the off-site affected properties to the south where soil to groundwater pathway RCL exceedances exist. This justification should discuss the following:
 - The levels of contamination at the source property versus the off-site affected properties;
 - the fact that major portions of the off-site affected properties are currently unpaved, which has already allowed for infiltration to occur at the off-site properties;
 - the fact that the remediation that has occurred thus far has reduced the mass and concentration of contamination within the soil where groundwater infiltration occurs;
 - whether infiltration has had a major impact on the plume, etc.
- Revise Table 5 to include future vapor risk at source property and at off-site affected properties.
- Update Table G to include the properties where a future vapor risk continuing obligation applies. You may reference the vapor screening criteria presented in RR-800 to determine which properties have a future vapor risk. See Attachment G section below for notification requirements.

Attachments (general):

- Clearly label each attachment (e.g., D.1., D.2., D.3., D.4., etc.).

Attachment A:

- Update all applicable data tables to include new (vapor) data that was not previously presented in the closure packet.

Attachment B:

- Update any applicable figures to show contamination lines as dashed lines where contamination is inferred. Extent of contamination should be inferred between sample locations that are contaminated and locations that have no detection of contaminants.
- Revise Figures B.4.a.1. and B.4.a.2. to remove the presented delineation of the future vapor risk. Alternatively, these figures can include a note on the legend indicating which properties have a future vapor risk.

Attachment D:

- Discuss the soil to groundwater pathway RCL exceedances in the "Description of Contamination" section of Attachment D.1.
- Revise cap extent on Figure D.2. to cover all areas where direct contact risks exist. Additionally, extend the cap to include the following areas:
 - The entire source building (3917 52nd St);

- the entire 3909 52nd St. building;
- the entire 3907 52nd St building;
- and the entire southern alleyway from the eastern-most edge of the 3907 52nd St building to the eastern property boundary.
- Considering the extended cap area, provide an updated and more detailed discussion on the dimensions of the cap and how to delineate the cap in the "Description of Cap" section of Attachment D.1. Consider adding GPS coordinates to better define the cap limits.
- Considering the cap is intended to protect against the soil to groundwater pathway migration, include the residual soil to groundwater RCL exceedance line on Figure D.1. Alternatively, add another figure to Attachment D showing this type residual soil contamination.
- Update the photo log to include photos of the extended area of the cap.
- Update the inspection log to indicate the items to be inspected, the frequency of inspection, and the DNR PM's email address.

Attachment G:

- Provide an updated notification to the Gulick residence to show soil and groundwater impacts that exist at their property. This should include the updated figures that apply.
- Provide notifications to the property owners where a future vapor risk CO exists, as applicable. If any part of the property is within screening criteria then a notification should be sent to the affected property owner.

An updated closure packet can be uploaded to the DNR's RR electronic submittal portal. As I mentioned on the phone, once the updated case closure packet is submitted, the DNR will perform a QA/QC review of the new packet to determine whether there are any remaining revisions that are required prior to case closure. Please do not hesitate to reach out with any questions you might have.

Thank you,

Jane

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Jane Pfeiffer

Phone: (414) 435-8021

jane.pfeiffer@wisconsin.gov