

From: Borski, Jennifer - DNR
Sent: Monday, December 16, 2019 1:14 PM
To: Beggs, Tauren R - DNR; Schultz, Josie M - DNR
Subject: RE: Please Review: Vapor Data for Allyn Property, BRRTS # 02-31-564071

Tauren and Josie,

Thanks for taking the time to discuss this site with me today. This email is intended to capture our conversation and next steps for this site. Please reply if I missed anything.

My primary recommendation is to sort out some of the long-term considerations for this site:

- While there is still access to the former operator of the dry cleaner (Registered Agent for the LLC property owner), talk with them about insurance archeology and the success we've seen with pursuit of historical insurance policies by those with an expertise in this field;
- Discuss intentions for occupancy of the on-site residential units after the current Registered Agent passes away; and
- Identify *who* is performing OMM of the current vapor mitigation system (see s. NR 724.13, Wis. Admin. Code);

Significant additional investigation is needed at this Site to be in compliance with ch. NR 716, Wis. Admin. Code. Understanding that funds are currently limited, it is advisable to focus funding on data gaps in the conceptual site model and assessment of the air pathway (for CVOCs) to focus on any potential acute risk:

- Identify if there are any floor drain(s) in the dry cleaning room;
- Identify the sanitary sewer lateral(s) pathway from the property and where they connect to a sewer main;
- Identify the use of the former dry cleaning room and sample indoor air (8-hr for non-residential and 24-hr for residential);
- Sample indoor air within the second floor residential units at the source property (24-hr);
- Identify layouts of crawl spaces, basements and individual apartment units at the source property, apartment complex to the east and mixed commercial/residential building to the west;
- Repeat sub-slab sampling (30-min grab) at the residential building to the east, along with indoor air within the basement, first floor and second floor residences (24-hr); and
- Based on layout of the sub-structures in the building to the west, install additional sub-slab vapor port(s) and sample sub-slab (30-min grab) and indoor air within the basement/crawlspace (8-hr or 24-hr depending on use), first floor (8-hr) and second floor (24-hr).

There is need to evaluate the potential risk to occupants down-gradient from the undefined groundwater contamination plume as well. Of primary concern is the winery and condos beyond MW-5 where PCE was found above the enforcement standard. If the groundwater plume extends beneath these buildings at the water table (or is *projected* to extend beneath these buildings), a vapor investigation is needed at these locations as well.

Additional investigation into soil, groundwater and air is needed on and off-site, including along utilities. We did discuss that the concern for migration of vapor or groundwater contamination along the exterior of a utility is low based on the soil type (sand) and water table well below utilities. However, the

potential for a secondary release from within a utility lateral or migration of vapor contamination within utilities has not been ruled out.

Please keep me posted on the progress toward pursuing the historical insurance policy. I can also review a future vapor workplan if you and Josie request additional assistance. Let me know if you have further questions.

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Jennifer Borski

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From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Thursday, November 14, 2019 2:00 PM
To: Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>
Cc: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Subject: Please Review: Vapor Data for Allyn Property, BRRTS # 02-31-564071

Hi Josie,

This site is a dry cleaner in Algoma. I have worked with Jennifer and the Department of Health Services in the past on this site, but thought it would be good to run through this site again now that additional work has been completed and requirements for vapor investigations have changed.

Background for site

The site investigation for soil, groundwater, and vapor is not complete. A release occurred from historic dry cleaning activities on the site in the dry cleaning room inside the building and from the exterior drum storage area immediately adjacent to the west side of the building. PCE and breakdown products have been detected in soil, groundwater, and vapor. Groundwater contamination is migrating northeast with groundwater flow towards the Ahnapee River. The site is well sorted sand with bedrock at approximately 25' below ground surface. The groundwater table is around 17-19' below ground surface.

I have included all the SI data for soil, groundwater, and vapor to date at the following link:
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Vapor

The dry cleaning building at the source site is two stories, with two apartments on the second floor and living space on the south end of the first floor. The former dry cleaning operations were in the northern section of the building. Sub-slab samples collected in the source area had VRSL exceedances for PCE and TCE and the indoor air samples exceeded the VAL for TCE. Both TCE and PCE were elevated in the sub-slab sample, but PCE was very high. A vapor mitigation system was installed on June 22, 2017 in the dry cleaning building. Indoor air was required to be sampled after the mitigation system started operating until there were no longer VAL exceedances before occupancy of the first floor would be allowed by DHS. The DNR was able to collect some indoor air samples from the adjacent apartment building to the east in December 2016 to make sure there were no immediate threats to those residents. There were no VAL exceedances detected in those samples. The RP and consultant collected two sub-slab samples from under the basement of the apartment complex to the east and one sub-slab sample in the basement of the commercial/residential building to the west in January 2019. Only one round has been sampled from the three sub-slab samples so far, but they were below VRSLs. The surrounding buildings are in very close proximity to the source site building. Based on the known contamination at the site, primary migration pathways for vapor would be vapor off-gassing from contaminated soil or from the deep water table. Due to the well sorted sands in the sub-surface, there would likely not be migration around utility corridors. Additional properties to the northeast will likely need vapor assessment where groundwater contamination could be found after additional investigation.

Review

- In-pipe/conduit vapor sampling: is this now needed at this site? I have asked the consultant to put the utilities on the figures, but have not received the updated figures yet.
- Due to the surrounding buildings being in such close proximity to the soil source, what is a good approach to additional vapor assessment?

Sometime the week after Thanksgiving would be fine for a response to this.

If you have any questions, please let me know.

Regards,

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Tauren R. Beggs

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