

Martinez, Joseph J - DNR

From: Martinez, Joseph J - DNR
Sent: Monday, September 20, 2021 8:20 AM
To: Robert Cigale
Cc: mdjscherf@msn.com
Subject: Krystal Kleeners - Request for Closure Documentation Revisions

Bob,
As you are aware, a case closure request for the Krystal Kleeners (02-68-576741) site was submitted to the DNR on July 20, 2021. The DNR has reviewed the case closure submittal and requests that you complete the documentation revisions described below prior to case closure. The DNR is not requesting additional sampling at this time. After the revisions are complete, please resubmit the entire packet to the e-submittal portal.

- Figure “B.3.b PCE in Groundwater 8/26/20” appears to show the incorrect PCE concentration at MW6. The figure shows 1.76 micrograms/L whereas the groundwater table indicates the result was 176 micrograms/L. Revise figure B.3.b to show the correct concentration at MW6.
- Figure “B.3.b PCE in Groundwater 8/26/20” does not illustrate the horizontal extent of groundwater contamination exceeding the PAL and/or ES. Revise this figure to include lines that depict the extent of PAL and ES exceedances.
- Table “A.4.c Differential Pressure Measurements” only contains the most recent differential pressure measurement results. Revise the table to include all the differential pressure measurement results collected at the site.
- Indoor air sampling was conducted during the site investigation, but the results are not provided in the closure packet. Include a table that contains the indoor air results within the A.4 vapor table section.
- Figure “B.4.a.1 sub-slab vapor sample results 8/26/20” depicts the results of sub-slab sampling conducted on 8/26/2020. Limited locations were sampled during this event and the mitigation system was active during sampling. Further, based on this figure it would appear that no VRSL exceedances were identified at the site, which is not the case. The DNR requests that you either revise this figure or provide an additional sub-slab vapor figure that depicts the maximum concentrations identified at each sampling location and/or the maximum VRSL exceeded within each tenant space. For example, indicate that the 143 and 145 tenant spaces historically had large commercial/industrial VRSL exceedances and the 141 tenant space historically had a residential VRSL exceedance (disregard the small commercial VRSL exceedance for naphthalene in the 5/3/2016 sample from VP141S as this exceedance was not reproduceable and was not for the contaminants of concern).
- The maintenance plan states that the building slab will “provide a surface seal for the vapor mitigation system installed at the site, to capture and release to the atmosphere any harmful vapors before they can migrate to indoor air spaces and pose a potential health risk.” The DNR agrees that the condition of the building slab will influence the effectiveness of the vapor mitigation system and therefore requests that you expand the cap to include the building slab of the entire area requiring vapor mitigation (the entire 143 and 145 tenant spaces).
- Wis. Admin. Code § NR 727.05(1)(b)3 states that inspection logs shall be submitted on a form provided by the department. The DNR recently updated the vapor mitigation system inspection log form/template (form 4400-321). Revise attachment D to include the updated inspection log. The updated inspection log can be found at the following link: <https://dnr.wi.gov/files/PDF/forms/4400/4400-321.pdf>.
- The maintenance plan states that “a copy of the inspection log will be kept at the address of the Site owner and available for submittal or inspection by the WDNR representatives upon their request.” The DNR will be requiring annual submittal of the inspection log as part of case closure of this site. Revise the maintenance plan to state that annual submittal of the inspection log to the DNR is required.
- Due to the residual groundwater contamination, revise the continuing obligations table to indicate that, for the source property, “Vapor: Residual volatile contamination poses future risk of vapor intrusion.”

- It is the DNR’s understanding that all wells have been located and will be properly abandoned upon the DNR granting conditional closure of the site. If this is the case, revise the continuing obligations table to remove/uncheck the “Monitoring wells remain: not abandoned” box in the source property column.
- In your response to 4B you state that no immediate or interim actions were taken at the site. Revise this response to include discussion of the vapor mitigation system installation and operation.
- Provide additional justification that the groundwater plume is stable in your response to 4I. The DNR recommends discussing the relatively low concentrations of contaminants and that the plume does not appear to have migrated, even though the release likely occurred a number of years ago.

Please contact me at 414-218-6042 if you have any questions about the revisions requested above. Once the DNR has determined the revisions requested above are complete, the entire closure packet will go through our QA/QC process. I will contact you if any further revisions are needed. After the QA/QC review and submittal of any further revisions, the DNR typically authorizes abandonment of the wells.

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