

From: Michalets, Linda M - DNR
Sent: Thursday, February 02, 2023 11:12 AM
To: James Bannantine; Grant Zwiefelhofer
Cc: Delcore, Lee R - DNR; Travis W. Peterson; Andrew Stith
Subject: Cristo Rey site, BRRTS #02-41-583465 SI/RAP

Hi Jim and Grant,

Thank you for your time discussing the site investigation report for this site with Lee and me. We understand that you will be submitting a SI/RAP that addresses the issues we discussed and that are briefly outlined below. Some of the items were included in the 1st report and not the 2nd, but we are expecting a comprehensive report, which provides adequate justification for a closure request as the next step. At this time, I will keep our review paused for receipt of the final, revised report in a week or two.

Overall, consider the conceptual site model for historic fill material as the source of contamination:

- If contaminated fill material is the source of contamination, then contamination must be inferred wherever fill material is encountered, or across the entire property. Because this is a very large property, it is likely not economically feasible to place enough borings to define the extent of fill material; instead, the potential that contaminated fill could be encountered across the entire property should be inferred, and the entire site should be maintained with a barrier cap to be protective.
- There is not enough sampling to conclude that no contamination is present in areas with anthropogenic material encountered or other areas not sampled. Therefore, the site needs to be capped to be protective.
- Cap Maintenance Plan should include extent of contamination RCL lines.
 - Capping, with justification, to preclude the need for gw sampling.
- SIR must include an evaluation of soil >gw pathway RCLs.
- All contaminants >RCLs could potentially be encountered across this property. Figures should indicate that.
- Cross sections should be included in the complete SIR.
- SIR needs an assessment of potential for contaminated fill to impact groundwater.
- EC evaluation needed for historic fill material source.
- Vapor intrusion assessment needed.
- CMP is missing the manufacturer's guidelines that was indicated as Attachment D.4.i.

Please let me know if you have any questions when preparing the final report.

Thank you,
Linda

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Linda Michalets

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