

## Lesko, Robin A - DNR

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**From:** Stanek, Linda K - DNR  
**Sent:** Wednesday, July 12, 2023 2:47 PM  
**To:** Brian Schneider  
**Cc:** Alessi, Timothy G - DNR  
**Subject:** Spic and Span (FMR) BRRTS # 02-41-585636

Brian,

After an initial review of the site investigation report (SIR) and remedial action options report (ROAR) and per our discussion on July 12, 2023, the DNR is requesting additional information to complete the SIR and ROAR review, described below:

### Remedial Action Options Report

- According to your remedial option (Option B), the excavation will extend to approximately 8.5-9 feet below ground surface (bgs). Based on soil sample results, higher levels of contamination appear to extend in deeper soils, greater than 9 feet bgs. Provide a detailed description why deeper, impacted soil will not be excavated and how deeper impacts will be remediated
- The highest concentrations of Tetrachloroethene (PCE) and Trichloroethene (TCE) identified in soil to date were detected in soil samples collected near the base of the sanitary sewer. Consider extending the proposed remedial excavation to include additional soils along the sanitary sewer including the SB#5 and SB#17 locations and extending the depth of excavation below the sanitary sewer.
- Since post-excavation sub-slab vapor conditions cannot be verified until the remedial excavation is complete, inclusion of vapor mitigation in the proposed remedial design is encouraged. Wis. Admin. Code § NR 708.11(1)(b) states that the department may require the use of a vapor mitigation system (VMS), or other engineering control, when vapor concentrations beneath a slab, foundation, or building exceed a vapor risk screening level (VRSL). A vapor mitigation system will be required if VRSL exceedances remain after completion of remedial actions and/or if the building will become occupied
- The remedial action report containing the VMS as-built construction documentation, results of VMS commissioning activities, VMS maintenance plan, VMS inspection log, and all other information required by Wis. Admin. Code § NR 724.15 must be submitted within 60 days after the completion of installation and commissioning activities. Guidance regarding vapor intrusion mitigation and VMS commissioning can be found in the DNR document, "Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin" (RR-800)
- Provide the results of the Toxic Characteristic Leaching Procedure (TCLP) test for soil samples from the areas of elevated PCE concentrations.

### Site Investigation Report

- In accordance with Wis. Admin. Code NR 749 and NR 700.11 (3r), DNR Form 4400-237 should be submitted with the report. A review of the report was requested with a fee
- Include a cover letter per Wis. Admin. Code NR 716 (2)(a). Include the purpose of your submittal and your desired action/response by the DNR
- Include a site layout map per Wis. Admin. Code NR 716.15 (2) 6. Specifically, include underground utilities and land uses on adjacent properties
- Include the most recent deed with legal description per Wis. Admin. Code Ch. NR 716.15 (5)(a)
- Include a Certified Survey Map per Wis. Admin. Code Ch NR 716.15(5)(b)

- Include the parcel identification number for the affected property per Wis. Admin. Code NR 716.15 (5) (c)
- Include WTM Coordinates per Wis. Admin. Code Ch NR 716.15(2)(c)4. WTM Coordinates can be found on the Wisconsin DNR RR Sites Map [Wisconsin DNR](#).
- Update Section 1.2 Involved parties, “Regulatory Agency”. The DNR office managing your project is located at 1027 W. Saint Paul Avenue, Milwaukee, WI 53233
- As stated in your Site Investigation Report, “The results obtained from GRAEF and Ramboll are presented in this Combined Site Investigation and Remedial Action Options Report”. Update the Site Investigation Report to include all soil boring and monitoring well information for all investigation activities conducted at the site Specifically, soil boring logs, borehole abandonment forms, monitoring well construction forms, and monitoring well development forms
- Update the Site Investigation Report to include a discussion of the management of investigative waste per Wis. Admin. Code NR 716.11(6) and (7)
- As stated in your executive summary, “PCE and TCE were not detected in soil above Wisconsin Administrative Code (WAC) Chapter NR720 Direct Contact Residual Contaminant Levels (RCLs)” . This statement is incorrect. PCE was detected in soil boring SB#5 (6-8 feet bgs) at 46mg/kg and in soil boring SB#12 (12.5-15 feet bgs) at 71 mg/kg, exceeding Wis. Admin Code NR720 Non-Industrial Direct Contact RCLs of 33 mg/kg for PCE. Additionally, TCE was detected in soil boring SB#5 (6-8 feet bgs) at 2.9 mg/kg, exceeding Wis. Admin Code NR720 Non-Industrial Direct Contact RCLs of 1.3 mg/kg for TCE. Please update your statement to reflect the correct exceedances
- As stated in Section 3.2 Soil Results, 5 to 10 feet bgs, “All PCE concentrations are below the Non-Industrial Direct Contact RCL of 33 mg/kg.” This statement is incorrect. PCE was detected in soil boring SB#5 (6-8 feet bgs) at 46mg/kg, exceeding Wis. Admin Code NR720 Non-Industrial Direct Contact RCLs of 33 mg/kg for PCE
- Include a discussion of the trimethylbenzene exceedance greater than Wis. Admin Code NR720 Industrial Direct Contact RCL, detected at soil boring SB#6 (8-10 feet bgs)
- As stated in Section 3.2 Soil Results, 10 to 15 feet bgs, “PCE and TCE were not detected above Non-Industrial or Industrial RCLs in samples from this interval. PCE and TCE were only detected above the Groundwater RCL in this interval..” This statement is incorrect. Although TCE was only detected above the Wis. Admin Code NR720 Groundwater RCL, PCE was detected in soil boring SB#12 (12.5-15 feet bgs) at 71 mg/kg, exceeding Wis. Admin Code NR720 Non-Industrial Direct Contact RCLs of 33 mg/kg for PCE
- Update Section 3.5 Soil Vapor, using correct measurements for sub-slab PCE vapors. Additionally, the Spic and Span building is considered a small commercial building in accordance with RR 800. All data should be discussed using Small Commercial vapor risk screening levels

If you have any questions, please let me know.

Thanks,

**We are committed to service excellence.**

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

[Linda Stanek](#)

Hydrogeologist – Bureau of Remediation and Redevelopment

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Southeast Region, Milwaukee Service Center

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