

August 14, 2018

PSK Investments, LLC  
Attn: Mr. Jasdisher Singh Kler  
N61 W14444 Brookside Drive  
Menomonee Falls, WI 53051

Subject: Revised Remedial Action Options Plan and Remedial Design Report PSK  
Investments and Grace Christian Fellowship Properties, 9922 & 9900 West Capitol  
Drive Milwaukee, WI

FID: 241136060  
BRRTS: 03-41-095653 & 03-41-546764

Dear Mr. Kler:

The Department of Natural Resources (DNR) has completed a review of the Revised Remedial Action Options Plan and Remedial Design Report (RAP), received October 4, 2016. Base on the site information and PECFA considerations, the following comments and direction are provided, for each part of the proposed remedy.

#### PECFA Considerations

Upon review of the following technical comments, your consultant should provide a detailed cost proposal, following the PECFA Usual & Customary requirements where possible, and requesting specific variances where needed. The DNR does not see a need to request an overall variance from PECFA U&C for the estimated work. The work will be approved and conducted in phases, as described below, and costs for each phase should be estimated and requested separately.

#### Grace Christian Building Soil Excavation and Expanded Basement Sub-Slab Venting System

Your consultant has proposed to conduct a soil excavation beneath the basement of the church, to reduce the overall contamination footprint under the building and lessen the vapor intrusion risk, as well as to facilitate installation of additional sub-slab vapor mitigation piping. The DNR will approve removal of contaminated soil for these purposes.

Prior to conducting excavation work in the basement of the church, additional sub-slab vapor samples are required to establish the area in need of mitigation. We recommend sampling at and somewhat beyond the area to be included in the new system commissioning (pressure testing), and near the sump. Based on these results, the final design for the excavation and sub-slab system expansion should be submitted with costs for PECFA approval. This should include sub-slab vapor testing prior to the excavation and system expansion. This work is needed both to establish the appropriate system extent and to demonstrate that continued operation of a system will be needed after case closure.

The RAP calls for sampling the exhaust from the sub-slab venting system. This sampling is not necessary. The decision on whether or not to operate the blower for the venting system should be based

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on the sub-slab vapor concentrations (collected after system has been shut down for a few days). The DNR will not approve PECFA reimbursement for this testing, if conducted.

On the western side of the church's exterior wall, soil was excavated, and a vapor mitigation system was installed, tied into the drain tile for the church. This system could affect the pressure differential testing of the new sub-slab depressurization system. Please explain how the drain tile system will be factored into the performance testing of the basement system and whether there is a benefit to testing the extension and effectiveness of each system separately.

According to the RAP, the last indoor air evaluation occurred in 2012. Include indoor air testing in the basement before and after installation of the new barrier system, with seasonal samples for the next three seasonal quarters after installation.

The two sumps that are sealed in the church's basement should be re-evaluated for airtightness and included in the indoor air samples to confirm vapors aren't entering the basement from these areas before and after final system installation.

#### Soil Vapor Extraction – PSK Property

The proposal includes installation of soil vapor extraction wells and use of existing monitoring wells to conduct soil vapor extraction on the north side of the previous excavation, to further reduce residual soil contamination and improve groundwater quality in this area. The DNR will approve costs to run this system for a maximum of 6 months. Groundwater testing should be conducted after shutting down for 2 quarters to determine whether there has been a significant effect. Continued operation of this system will not be eligible for PECFA reimbursement, due to the non-eligible discharge which also occurred in the area of the excavation.

#### Groundwater Sump

The DNR will not approve installation or long-term use of the proposed groundwater sump for monitoring to detect potential future discharges or to respond to potential future discharges. The sump would be a potential direct conduit to groundwater for any type of contamination that enters the sump from a surface or subsurface release. The DNR normally requires that all monitoring wells, sumps and other features meeting the definition of a soil boring/well under Chapter NR141, Wisconsin Administrative Code, be abandoned.

The PSK and church facilities should have in-place warning systems that indicate whether another release to the environment has occurred. Continued monitoring of the underground storage tanks and condition of the system associated with the tanks could minimize the risk of a new release. Notifying the church of a new release should be in-place.

#### Groundwater Monitoring

The RAP proposes two quarterly rounds of post-groundwater monitoring in wells that continue to indicate PAL or ES exceedances. Additional groundwater monitoring may be required depending on the results of the proposed two quarterly monitoring of the proposed wells and excavation sump. To meet closure requirements in the future, all wells, sumps, etc. would have to be sampled at the same time. If two quarterly rounds were completed for groundwater monitoring wells MW-1, MW-2, MW-3, MW-5, MW-7, MW-20, MW-21, and the extraction sump, the DNR would require continued sampling including the rest

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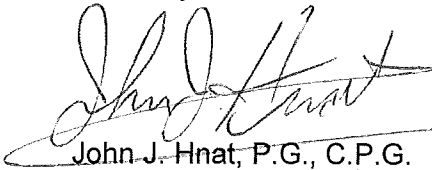
of the monitoring wells associated with the site to meet the requirements of NR 726, WAC. Alternate sampling schedules may be proposed for this site.

### Next Steps

As stated in the PECFA Considerations paragraph, your consultant should provide a request for PECFA cost approval through the U&C, to include specific items/tasks requiring a variance. This request should be for the preliminary vapor assessment work at the church, the installation, operation and monitoring of the vapor extraction system as conditioned in this letter, and the initial two quarters of post-SVE groundwater monitoring.

The Department appreciates the actions you have taken to investigate and remediate the contamination at this site. If you have any questions or comments, please feel free to contact me at the above address, at (414) 263-8644, or email me at, [john.hnat@wisconsin.gov](mailto:john.hnat@wisconsin.gov). Please refer to the FID number at the top of this letter in any future correspondence. Future correspondence should be sent directly to Jennifer Dorman, Remediation & Redevelopment Environmental Program Associate (414-263-8683) at the above address.

Sincerely,



John J. Hnat, P.G., C.P.G.  
Project Manager/Hydrogeologist  
Southeast Region  
Remediation and Redevelopment

C: Lee Delcore - WDNR Email  
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David Peterson – Reinhart, Boerner, Van Deuren  
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