

**From:** Sykora, Candace A - DNR  
**Sent:** Tuesday, March 31, 2020 7:39 PM  
**To:** 'Aldrian, Gregory'; Myers, Timothy; Bader, Nicole  
**Cc:** Rozeboom, David B - DNR  
**Subject:** RE: Electronic Submittal Directions  
**Attachments:** 20190331\_Closure Information Request.pdf

Greg,

Attached is the compilation of requests and comments that require your attention to complete the closure packet for final review. The document is organized by sections of the closure packet for ease of reference. Upon completion please submit electronically following the directions in the link below specifically on page 2 under Case Closure Submittals. An example can be found in the second attached link. Please note that during the current health advisories DNR staff are working remotely and communications are encourage to be via email as desk lines are not check as frequently.

<https://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

<https://dnr.wi.gov/topic/brownfields/documents/directory.pdf>

Thank you,

Candace Sykora  
Hydrogeologist  
Remediation & Redevelopment  
Wisconsin Department of Natural Resources  
890 Spruce St, Baldwin, WI 54002  
Phone: 715-684-2914 ext. 134  
[Candace.sykora@wisconsin.gov](mailto:Candace.sykora@wisconsin.gov)



## Nor-Lake Inc Closure Packet request for more information

The following is organized by each section of the closure packet.

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### 1<sup>ST</sup> Page:

- Check the box for Database fee for groundwater or monitoring wells and submit \$350 fee
- Check the box for Database fee for soil and submit \$350 fee.

### Section 1.F.

Please correct statement that no ES exceedances exist on or off the site. MW-19 has had exceedances. While it was noted on table C.1.b that the well was not constructed to Ch. NR 141 Standards, the well was continuously sampled, and the data should be acknowledged in this section.

### Section 3.A.i.

1. Provide a brief narrative history of the site investigation history. Please include the summary as stated in the packet directions. Include documentation in Attachment C.
2. Also, include all reports submitted with dates. The list provided in this section ended with 2008 reports. List all reports to include those submitted since 2008.
3. Provide any and all legal documents to include but not limit to the 1992 Consent order, 1994 Special Order etc.

### Section 3. A. ii.

Please modify the narrative of this section to reflect MW-19 data. Note: the explanation of the well being poorly constructed is not acceptable as it continued to be sampled. The well should have been addressed upon awareness of the condition of the well. Since sampling continued, the data shall be included as is.

### Section 3. B. i.

Please describe the horizontal extent of impacts.

### Section 3.C.i.

1. In this section please include narrative that describes the homes that still have water treatment systems.
2. Also, include groundwater concentrations of the last four sample events to document that the conditions of the 2011 modified spill agreement have been met.
3. Including a map with these homes located and the monitoring well network with the 2019 TCE concentrations would be helpful for the closure committee members.

### Section 4.D.

Elaborate how linear regression (reference when & how this was calculated) has determined Green and Sustainable Remediation were evaluated

Section 4.C Include effectiveness and overall performance of SVE and GRT (i.e. mass contaminants removed, volume water pumped, etc.)

#### Section 4.E.

- 1) The statement is made: *“Essentially, natural attenuation including... has successfully reduced TCE concentrations well below the ES of 5ug/L for all monitoring wells.”* Comment/ question that needs to be addressed in this section: An SVE system has operated on the site from 1993 to 2019, and a groundwater treatment system operated from 1986 to 2014. Therefore, TCE concentrations were reduced via active remediation, not solely through natural attenuation. The Plume stability map evaluated natural attenuation to take 27 years to reach concentrations of TCE to be at or below PALs based on data obtained during active remediation. Please explain how this calculation can be made under such conditions.
- 2) This section states: **Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure.** Describe the current residual contamination i.e. groundwater, soil and or vapor impacts at the site and or off-site upon case closure.

#### Section 4.G

The soil standard for the groundwater pathway for TCE is 3.6ug/kg. Groundwater RCLs were exceeded in most of the soil samples collected from borings on site. Groundwater monitoring is not an appropriate evaluation of soil contamination

#### Section 4.H.

- 1) Please correct the statement *“No NR140 ES standards exist on the source property...”* As noted in previous comments, MW-19 exceeded the NR 140 as recently as 2019 sampling events.
- 2) Please indicate how the statement *“Nor Lake is recommending that all residential and businesses with an active carbon filtration system be removed”* is in accordance with the 2011 modified Spill Agreement which requires that an average of less than 1 ug/l TCE over the last 4 rounds of sampling must be achieved before removal of a treatment system will be approved. There currently are six residential properties that do not meet these criteria.
- 3) Reference comments in 3.C.i when proposing removal of residential systems and edit text in this section to be consistent (i.e. which homes, where, and why, etc.) May reference same table once constructed for 3.C.i.

#### Section 4.I.

See comments in section 4.E and address the same concerns, observations and questions regarding the natural attenuation study.

#### Section 5. Continuing Obligations

- Check Source Property for Residual groundwater contamination
- Check Source Property for Residual soil contamination meets NR720 industrial soil RCLs, land use is classified as industrial.
- Check Source Property for Vapor: Commercial/ Industrial exposure assumptions used

#### **Data Tables:**

##### A.1.

Groundwater Analytical tables; include all groundwater analytical results (including the 2019 tables found in C.1.c.) in one comprehensive table format

#### A.2. Soil Analytical Tables

Follow data table instructions listed at the beginning of this section.

- Include WI standards.
- Replace ND with detection limit.
- Use bold font for RCL exceedances.
- All tables in this section should be labeled and in table form i.e. SVE bore hole data
- All tables should be labeled A.2....

#### A.6. Water elevations

Include 2019 groundwater elevations (found in C.1.a) with tables in A.6.

#### B.1.b.

As stated in the direction for this map please label all roads, railroads...Also, as stated in previous comments include MW-19 in the plume on-site.

#### B.2.b

Missing. If residual soil is not applicable at this site confirm with recent analytical (also any submitted analytical shall be in table form and submitted in Attachment A.2).

#### B.3.b, c, and d;

Correct the label on this map

#### B.4.a Vapor Intrusion map,

Resubmit a map that includes the entire building footprint and all potential receptors within and outside the building. This includes all walls, drains, trenches, bathroom facilities, utility corridor, etc. The submitted map is not to scale nor relational to the exterior groundwater residual impacts. For further information on potential vapor pathways our guidance RR-800 <https://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf> sections 3.3 & 3.4 may be of assistance.

#### C.1. Site investigation documentation

As stated in the directions: if documentation requested has been submitted to the DNR, please note the title and date of the report for the document requested. C.1.a, b, and c should be consolidated with like tables as noted in previous comments.

#### G. Notification to Owners of Affected Properties

Include the process of communication to homeowners regarding the termination of water treatment systems and how this meets the qualifications of the 2011 modified Spill Agreement.