

**From:** Schultz, Josie M - DNR  
**Sent:** Tuesday, July 25, 2023 6:45 PM  
**To:** Andy Delforge  
**Cc:** Ken Juza  
**Subject:** DNR Response to RADR and OM&M Plan V&L Stripping, BRRTS # 02-05-216722

Hi Andy,

Thanks for the phone conversation this afternoon to discuss the V&L Stripping site; it looks like we're on a good path towards closure.

As discussed on the phone, DNR has the following comments and/or recommendations after review of the latest RADR and OM&M Plan:

- Soil
  - Soil contamination is delineated. No additional soil sampling required.
  - Need to change soil delineation on figure(s)
    - Delineate non-industrial direct contact vs. groundwater pathway
    - Delineate around B1400 for Non-industrial direct contact exceedance
    - Groundwater pathway should encompass all historic groundwater pathway exceedances, including onto the properties to the north and the east
  - Able to resample B2200 and B2300 locations if do not want to delineate soil onto eastern property
- Groundwater
  - Additional groundwater sampling is required to monitor concentrations after excavation.
  - Recommend two additional rounds at least three months apart (e.g. August and November 2023) of groundwater monitoring, and submit results to DNR to determine if additional rounds are necessary prior to closure submittal.
  - Include natural attenuation parameter analysis
- Vapor
  - The off-site vapor investigation and sanitary sewer vapor investigation are complete.
  - Consider decommissioning of the on-site vapor mitigation system (VMS) to see if the excavation reduced the risk of vapor intrusion and there is no longer a need for mitigation.
    - B1400 beneath building slab had 124,000 PCE @ 0-2' in 2002, this area was not resampled. If still present, likely will still have sub-slab exceedances.
  - If unable to decommission the VMS, then long-term operation and maintenance of the VMS will be required as a continuing obligation.
  - Edits needed to VMS OM&M Plan
    - Perform pressure field extension testing with the vapor ports.
    - Include photo of outside vent in inspection log
    - Case file in DNR North East Region office (currently says West Central Region)
    - Resubmit OM&M plan with \$350 vapor continuing obligation database fee
- DNR anticipates the following continuing obligations will apply at the time of closure submittal:
  - On-Site
    - Residual soil contamination exceeds RCLs
    - Residual groundwater contamination above enforcement standards

- Vapor – Future Risk
- Vapor mitigation, long-term OM&M with annual inspection and submittal of inspection log to DNR
- Cap maintenance required to prevent direct contact and groundwater infiltration.
- Limit to impermeable surfaces: on-site building and pavement
- Notification to property to the North
  - Residual soil contamination
  - Residual groundwater contamination exceeds ES
  - Vapor Future Risk
- Notification to property to the East
  - Residual soil contamination
  - Residual groundwater contamination exceeds ES
  - Vapor Future Risk
- Notification to City of Green Bay (Mather Street and possibly Velp Avenue)
  - Residual groundwater contamination exceeds ES
  - Residual soil contamination

Please let me know if you have any questions or concerns regarding DNR's comments.

Thank you & have a nice trip in Canada

Josie

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**Josie M. Schultz**

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