



June 20, 2017

Brett Donaldson  
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Subject: Case Closure Denial for Additional Investigation and Remedial Action  
Donaldson's One Hour Cleaners (Former), 110 W. Cecil St., Neenah, Wisconsin  
DNR BRRTS Activity # 02-71-110797

Dear Messers. Donaldson:

On June 1, 2017, the Northeast Region (NER) Closure Committee initiated review of your request for closure of the case described above. The Department of Natural Resources (DNR) reviews environmental remediation cases for compliance with state and federal laws to maintain consistency in the closure of these cases. As discussed with your attorney's office on June 13, 2017, the closure committee has denied closure because additional requirements must be met. The DNR therefore does not have authority under s. NR 726.13(1), Wis. Adm. Code to close the case. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with your written response regarding the necessary work and a schedule for completion of this work.

Additional site work is necessary in order to meet the response action goals outlined in s. NR 726.05(4), Wis. Adm. Code and the requirements for site closure outlined in ss. NR 726.05(6) and (8), Wis. Adm. Code. In general, the degree and extent of contamination in groundwater, soil and vapor (air) has not been adequately defined to meet the requirements in ch. NR 716, Wis. Adm. Code. Additional actions also need to be taken to reduce the mass and concentration of residual soil contamination beneath the on-site building to meet the requirements in ch. NR 726, Wis. Adm. Code. Additional remedial actions may be needed dependent upon the additional investigation results.

**Site Review Comments:**

1. Additional soil, groundwater and vapor sampling is needed in order to define the degree and extent of contamination including beyond the property boundaries. (ss. NR 716.11(3)(a) and (4))

**Soil**

2. Unsaturated soil needs to be further investigated in the southwest quarter of 905 South Commercial Street (define extent beyond B900) and residual soil contamination map(s) revised as appropriate. (ss. NR 716.11(3)(a) and (4))
3. Unsaturated soil needs to be further investigated along the sanitary sewer lateral backfill on-site, including at 90° turns. (s. NR 716.11(5)(a))

4. Unsaturated soil and soil gas needs to be further investigated within the backfill of the sanitary sewer main in Cecil Street. (s. NR 716.11(5)(a))

#### Groundwater

5. The extent of contamination in groundwater needs to be further delineated to the east, south and west both horizontally and vertically including installation of additional monitoring points. It is important to note that a uniform groundwater plume is not expected due to numerous factors including the lengthy history of intermittent groundwater extraction and soil vapor extraction operations, presence of sloping clay/bedrock interface and presence of shallow fractured bedrock. (s. NR 716.11(5)(f))
6. Prior to evaluating additional remedial options, it needs to be determined if the groundwater plume, once defined, is stable to receding. (ss. NR 716.11(3) and 726.05(6)(c))
7. Multiple current cross sections are necessary with future submittals that extend through the center of the groundwater plume and along multiple transects to adequately evaluate groundwater plume delineation and potential vapor concerns. (s. NR 716.15(4)(d))
8. Geochemical parameter monitoring including chlorine, methane/ethane/ethene, etc., needs to be added to the groundwater monitoring program if natural attenuation is the selected remedy for residual groundwater contamination. In addition, evaluation of the historical field indicator parameters of Specific Conductivity, Oxidation Reduction Potential (ORP), and Dissolved Oxygen (DO) and discussion is necessary to adequately determine if the residual groundwater contamination will naturally attenuate as suggested in the recent submittals. (s. NR 716.13(13))
9. A list of parameters, including natural attenuation parameters, for continued monitoring along with a schedule for routine monitoring needs to be submitted and executed. Quality assurance and quality control requirements are required as well. (s. NR 716.13)
10. For the purpose of assisting regulatory review and interpretation of the groundwater data for this site, the DNR requests the following:
  - o include well screen intervals in the groundwater data tables (e.g. 6 – 16 ft bgs, 17 – 21 ft bgs, 20 – 25 ft bgs, etc.)
  - o note the status of the groundwater extraction system for each groundwater sampling date, primarily near the extraction location

#### Vapors (Air)

11. Additional site investigation is needed to determine whether or not vapor intrusion is a completed pathway beyond the source property, or if there is a risk of future exposure due to residual contamination. (s. NR 716.11(5)(g))
12. A vapor investigation is necessary at 1015 South Commercial Street (parcel number 80204370000) where shallow groundwater contamination includes CVOCs above the enforcement standard (MW4800); the property is utilized as multi-family residential housing and construction is relatively new and differs from the construction of the structures at 110 West Cecil Street, 905 South Commercial Street and 109 Curtis Avenue. Additional off-site vapor investigation may be needed where shallow groundwater exceeds enforcement standards or other vapor pathways are present and should be further evaluated after cross sections are updated and as new monitoring points are installed and sampled. (s. NR 716.11(5)(g) and (h))

#### Remedial Action

13. Additional remedial action is needed beneath the on-site building to reduce the mass and concentration of contamination causing exceedance of the vapor risk screening levels (VRSLs) resulting in the need for an active vapor mitigation system at 110 West Cecil Street. This residual soil contamination is also potentially continuing to contribute to the groundwater plume. (s. NR 726.05(8)(b)1)

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14. Additional remedial action is potentially needed at 109 Curtis Avenue to address residual soil contamination beneath the building and/or additional groundwater remediation may be needed if the groundwater plume is shown to be increasing or unstable, once fully delineated. (s. NR 726.05(6)(c))
15. Remedial action options need to be evaluated after the groundwater plume is fully defined and natural attenuation parameters are evaluated to determine if additional groundwater remediation is necessary to control the plume. (ss. NR 722.07(2) and (3) and 726.05(6)(c))

#### Monitoring Well Network

16. Monitoring well nest MW1900, PZ1800 and PZ2400 located at 911 South Commercial Street is suspected to have been paved over when the parking lot was sealed. Additional efforts beyond visual inspection and metal detector investigation need to occur. These wells need to be located, repaired and included in the groundwater sampling plan. (s. NR 716.13(14))
17. The condition of MW4600 at 116 Langley Boulevard was not documented in 2015 or 2016. This well must be inspected and included in the groundwater monitoring program. (s. NR 716.13(14))
18. Monitoring wells MW2 EA, MW8 EA and P13 EA – P15 EA at 1115 South Commercial Street (Former Bricco's Video Vault - Gasoline, BRRTS #03-71-000905, closed 05/17/2000 and Former Bricco's Video Vault – Fuel Oil & Waste Oil, BRRTS #03-71-244658, closed 05/11/2000) appear to have been maintained after closure of that case in 2000 for the purpose of the Donaldson's One Hour Cleaners (Former) site, BRRTS #02-71-110797. It is unclear if responsibility for these wells was formerly transferred to the Donaldson's at that time. Monitoring wells MW2 EA, P13 EA and P14 EA were unable to be located and were not sampled in 2016. The condition and responsibility for these wells needs to be discussed with the current property owner and a proposal for location, repair or abandonment in accordance with s. NR 141.25, Wis. Adm. Code needs to be submitted, as appropriate. (s. NR 716.13(14))
19. Monitoring wells MW02 MC, MW07 MC and PZ03 MC at 1117 South Commercial Street (Former Bricco's Southside Beverage, BRRTS #03-71-181673, closed 09/03/2002) appear to have been maintained after closure of that case in 2002 for the purpose of the Donaldson's One Hour Cleaners (Former) site, BRRTS #02-71-110797. It is unclear if responsibility for these wells was formerly transferred to the Donaldson's at that time. Monitoring well MW07 MC was unable to be located and was not sampled in 2016. The condition and responsibility for these wells needs to be discussed with the current property owner and a proposal for location, repair or abandonment in accordance with s. NR 141.25, Wis. Adm. Code needs to be submitted, as appropriate. (s. NR 716.13(14))
20. A number of monitoring wells were identified as being in poor condition in 2015 and were recommended by SCS for abandonment, which was approved by DNR: EW-1, MW-1100, MW-2600, PZ3400 and PZ3500. These wells were not sampled in 2016. The status of these wells and intentions for repair, abandonment in accordance with s. NR 141.25, Wis. Adm. Code or replacement needs to be included in the next written update. (s. NR 716.13(14))

#### Additional Issues:

21. Characterize and properly dispose of the documented nine 55-gallon drums of investigative waste stored outdoors on-site **within 60 days of the date of this letter**. Disposal documentation should be forwarded to the DNR upon receipt.
22. Occupancy of the former dry cleaning store cannot be allowed as communicated on July 29, 2015 until the dry cleaning equipment is removed as that remains a potential source for residual CVOC vapors and the indoor air is resampled. The DNR continues to collaborate with the Winnebago County Health Department and the Wisconsin Department of Health Services (DHS) with the various authorities to assure protection of human health from discharges of

CVOCs.

23. The city of Neenah recently performed utility work in Cecil Street immediately adjacent to the property. It is currently unknown if any contaminated soil was excavated during this work and should be discussed with the city and documented. The recent work may alter the residual soil contamination figures or continuing obligations for the right-of-way holder.

**Considerations for Future Request for Closure:**

- An impermeable (not a direct contact) cap requirement is appropriate at the time of closure at the off-site properties of 905 and 911 South Commercial Street and 109 Curtis Avenue to maintain current impermeable covers (e.g., asphalt, building) based on current soil and groundwater data. Subsequent sampling and/or remedial action may alter this decision.
- Future cap maintenance plans need to include photos of asphalt to document current conditions. (s. NR 726.11(3))
- The building at 109 Curtis Avenue may be considered a “structural impediment” to investigation or remediation if it is determined that additional remedial action is needed to control the plume but cannot be implemented at this location.
- The DNR is unable to determine if there are future construction concerns for vapors at off-site buildings based on the current information. This needs to be discussed with DNR prior to drafting a future request for closure.
- Groundwater isoconcentration maps need to include contours for both the enforcement standard and the preventive action limit as included in the instructions on *Case Closure – GIS Registry Form 4400-202*, under Figure B.3.b. In addition, due to the complexity of this site and numerous contaminants, it is appropriate to create multiple isoconcentration maps (e.g. tetrachloroethylene in water table wells, trichloroethylene in water table wells, tetrachloroethylene in piezometers, etc.).
- *Case Closure – GIS Registry Form 4400-202, Site Summary Item #5, Continuing Obligations*, row v. (Cover/Barrier/Engineered Cover or Control for (soil) direct contact pathways) is appropriate only when direct contact residual contaminant levels (RCLs) are exceeded in the top four feet of unsaturated soil. Based on current data, this is not applicable at this site on or off-site.
- *Case Closure – GIS Registry Form 4400-202, Site Summary Item #5, Continuing Obligations*, row xii. (Vapor: Commercial/industrial exposure assumptions used) is appropriate to check when the following conditions are true: residential vapor risk screening level (VRSL) (sub-slab air) or vapor action levels (VALs) (indoor air) are exceeded; non-residential VRSLs or VALs are not exceeded; the property is utilized for non-residential purposes; and no vapor mitigation is required. This continuing obligation includes the requirement to contact the DNR prior to changing the land use from non-residential to residential. Based on current data, this is not applicable at this site on or off-site.
- Additional changes to the *Case Closure – GIS Registry Form 4400-202* will be appropriate based on additional investigation and remediation on and off-site.
- Figure B.4.a. *Vapor Intrusion Map* needs to include vapor results per instructions on the *Case Closure – GIS Registry Form 4400-202*.
- Notification letters and the reasons for the notification as listed for each property in Attachment G of the *Case Closure – GIS Registry Form 4400-202* need to match the items checked under *Site Summary Item #5, Continuing Obligations*, (e.g. Attachment G, Notifications, ID X, Right-of-Ways, notes residual soil and groundwater contamination but *Site Summary Item #5, Continuing Obligations*, Column ROW lists only residual groundwater contamination (row ii)).

A complete closure request should be re-submitted once all the above requirements have been satisfied, together with any required documentation, to let the DNR know that applicable requirements have been met. It will likely be necessary to submit other required reports prior to requesting closure again (e.g., supplemental site investigation report, remedial action options report, etc.). Case closure can be considered once all the above requirements have been satisfied. The review fee submitted with this request was applied to the site investigation review as allowed under s. 726.05(5), Wis. Adm. Code. A closure review fee will be required with submittal of the next closure packet.

**Within 60 days of the date of this letter, please respond in writing with a schedule of your plans to meet these requirements. Until requirements have been met, your site will remain "open" and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 700.11, Wis. Adm. Code.** You will also be responsible for any operation and maintenance activities required under s. NR 724.13, Wis. Adm. Code, including operation, maintenance and monitoring of the vapor mitigation system at 110 West Cecil Street.

The DNR will issue a brief letter to all owners of properties that were provided notification under ch. NR 725, Wis. Adm. Code prior to submittal of the request for closure (ID "B" through "X" on Attachment G of Form 4400-202) informing them that closure for this case was not approved and additional work is needed.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-662-5120.

Sincerely,



Roxanne N. Chronert  
Team Supervisor, Northeast Region  
Remediation & Redevelopment Program

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