



November 19, 2002

Wayne Butz  
Reedsburg Cleaners  
140 Main St  
Mauston, WI 53948

RE: **Qualified Denial of Cost Separation Methodology**

**Commerce # 53959-1941-49**      **WDNR BRRTS # 03-57-002801**  
Reedsburg Cleaners, 349 E Main St, Reedsburg

Dear Mr. Butz:

The Wisconsin Department of Commerce (Commerce) PECFA Site Review Section has reviewed the proposal for dividing PECFA-eligible and ineligible costs that was submitted by your consultant, Vierbicher Associates, Inc. (Vierbicher), on October 8, 2002. The submitted methodology for division of costs is denying at this time.

The proposed 50% split for investigation costs appears reasonable and a note to that effect has already been entered on the PECFA database for the future claim reviewer. Consequently, investigation costs should be clearly separated on any future claim submittals. Commerce does not approve your consultant's methodology for the separation of remediation costs for the following reasons:

1. Commerce is concerned that due to the extensive remedial efforts that will be conducted for clean up of the ineligible product (March 2002 Remedial Action Options Report), reporting costs (both periodic O&M and closure) associated with natural attenuation monitoring will be disproportional (i.e., not 50/50). Reporting costs are often a significant proportion of the overall monitoring costs.
2. Please provide confirmation of the specific groundwater results criteria that Vierbicher will use to trigger no further accrual of eligible costs. If during the post-remedial monitoring contamination associated with eligible product were to indicate that closure would otherwise be available (i.e., chlorinated results do not allow for closure), then no further costs should be incurred by PECFA and the final claim could be submitted at that time.

Both of the concerns above can be readily addressed by submitting a brief, revised request for separation of *remedial* costs only. Please be reminded that as per Comm 47.30(4), Commerce must approve the cost separation methodology prior to PECFA claim submittal.

Thank you for your efforts to protect Wisconsin's environment. If you have any questions, please contact me in writing at the letterhead address or by telephone at (608) 264-8766.

Sincerely,

David Swimm  
Hydrogeologist  
Site Review Section

cc: Joel Janssen, Vierbicher  
Randy Mass, WDNR (email)