

June 27, 2019

Mr. Thomas Keenan
Continental Properties Co
W134 N8675 Executive Parkway
Menomonee Falls, WI 53051

Subject: Request for Report
Decorah Shopping Center Annex
1011-1025 South Main Street, West Bend WI
BRRTS #: 02-67-151266, FID #: 267161400

Dear Mr. Keenan:

The Department of Natural Resources (DNR) has recently reviewed the most recent groundwater monitoring results table from the Decorah Shopping Center Annex site (the Site) submitted by your consultant, Arcadis, on May 8, 2019. Recent groundwater monitoring indicates increased concentrations of trichloroethylene (TCE) at monitoring well MW-13, which is in a residential area located northeast of the site, on Lincoln Drive West. This is of concern to the DNR because TCE has a lower vapor inhalation standard for human health risk than perchloroethylene (PCE), which has historically been the primary contaminant of concern at the Site.

Background

In 1997 The DNR directed Continental Properties Co (Continental) to investigate contamination that was reported to the DNR in June of that year. Key Engineering Group, Inc. (Key), on behalf of Continental conducted several investigations between 1997 to 2003 to determine the extent and degree of soil and groundwater contamination. In 2003 the DNR approved a workplan to screen the vapor exposure pathway based on soil gas sampling from soil gas vapor probes, which was the current practice at that time. In 2003 Continental applied for funding under DNR's Dry Cleaner Environmental Repair Program (DERP), and your current consultant, Arcadis submitted a written remedial action proposal for chemical oxidation of contaminants in the groundwater using potassium permanganate which took place from 2007 to 2010.

Work Needed

Based on our review, the DNR requests that you direct your consultant to submit a combination report that includes groundwater monitoring reporting, a site investigation workplan for vapor intrusion sampling, and a remedial action options section to deal with the remaining contamination. The report should contain the following:

- Pursuant to Wis. Admin. § NR 716.07(7) submit a proposal to collect sub-slab samples in homes with potential vapor intrusion risk from current concentrations of TCE and PCE downgradient from the site. The DNR suggests sub-slab testing at the following addresses on Lincoln Drive West near monitoring well MW-13: 961, 980, 981, 1006.

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- In accordance with Wis. Admin. Code § NR 716.14(2), sample results must be provided to the DNR and individual property owners within 10 business days of receiving the sample results. (DNR guidance Document RR-800 outlines the most up to date methodology for conducting this sampling)
- Pursuant to Wis. Admin. § NR 700.11(1)(a), submit a groundwater monitoring and site progress report.
- Pursuant to Wis. Admin. §§ NR 722.07 and 722.13 the report should include a revised remedial action options report (RAOR) to address the remaining contamination.
- Include recommendations for any other work needed, such as monitoring well replacement, soil sampling, groundwater sampling program etc.
- Also include a utilities map similar to, but more detailed than Figure 1 in the 2001 Key Engineering Group site investigation report, (attached), to include an additional city block to the east, and to include individual sanitary connections to individual homes and shops).

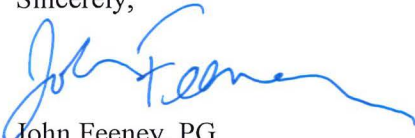
If you intend to continue in the DERF reimbursement program, submit a change order cost estimate to the DNR for DNR approval for the additional costs to complete the vapor intrusion investigation work, the RAOR, and any other needed work such as soil sampling or monitoring well replacement.

Schedule

The DNR is requesting that you have your consultant submit the combination report by August 26, 2019.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions or concerns regarding this letter, please contact me, the DNR Project Manager, at (920) 893-8523, or by email at johnm.feeney@wisconsin.gov.

Sincerely,



John Feeney, PG
Remediation & Redevelopment Program
Wisconsin Department of Natural Resources

Cc: Ms. Dawn Gabardi, Arcadis (electronic)
SER File