



December 13, 2019

Mr. John M. Feeney, Hydrogeologist
Wisconsin Department of Natural Resources
1155 Pilgrim Road
Plymouth, WI 53073

Re: Decorah Shopping Center Annex Site Scope of Work Proposal
BRRTS #02-67-151266

Dear Mr. Feeney:

Continental VI Fund LP ("Continental") seeks approval of the attached scope of work proposal for DERF Funding reimbursement at BRRTS #02-67-151266 ("Site"). This proposal is based on GZA GeoEnvironmental, Inc's (GZA) knowledge of the site, previous data collected and work proposed, and discussion during the meeting with the WDNR on October 15, 2019. As discussed in the October meeting, Continental no longer owns the Site and its limited revenue stream makes the DERF funding vital for the completion of the remediation. There is approximately \$63,000 remaining in the DERF fund for this project. GZA has provided a project schedule and cashflow for both Option A and Option B in the proposal.

Two scope of work options have been developed as a result of that meeting. The Option A is the conventional approach for the closure of this project, Options B is an alternative strategy Continental proposes to optimize the remaining DERF funding. Options B allows Continental to complete the Scope of Work faster and utilizes DERF funding better than Option A. For Option A, the DERF reimbursement will be complete in about May 2020, with a remaining \$53,000 for installation of the remaining vapor mitigation systems and a third round of Vapor Intrusion testing, closure documentation, and well abandonment not covered. DERF reimbursement for Option B will be complete in August 2020, with only a remaining \$14,600 in well abandonment not covered.

Because of the limited resources left in the DERF fund and limited equity available from Continental, Continental recommends Option B, as described in the attached proposal.

Thank you,

Alyssa Flandersmeyer for

Eric Thom
Vice President of Development Services
Continental VI Fund LP
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Enclosures:
GZA GeoEnvironmental letter Dated December 13, 2019



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December 13, 2019
File No. 20.P000526.20

Mr. John Feeney
Wisconsin Department of Natural Resources
1155 Pilgrim Road
Plymouth, Wisconsin 53073-4294

Re: BRRTS #02-67-151266
Site Advancement Toward Regulatory Closure
Decorah Shopping Center Annex
West Bend, Wisconsin

Dear John:

GZA GeoEnvironmental, Inc. (GZA) is pleased to present this proposed scope of work and budgetary estimate, on behalf of Continental VI Fund LP (Continental/"Client"), to conduct a series of activities designed to fill information gaps and ultimately facilitate regulatory closure of the open case at the Decorah Shopping Center Annex at 1011-1025 South Main Street in West Bend, Wisconsin ("Site"). GZA has prepared this proposal based on our understanding of Site history and conditions from our review of the files made available to GZA and on our discussions during the meeting with the Wisconsin Department of Natural Resources (WDNR) and Continental on October 15, 2019.

Please note, in this proposal, we offer two options for advancing the work necessary: Option A, which is a conventional approach; and Option B, which is preferred by Continental and adjusts the scope of work to maximize the use of remaining Dry Cleaner Environmental Response Fund Program (DERP) funds to accomplish the highest priority elements of the work scope. Further details of this option are provided below.

BACKGROUND

During the October 15, 2019 meeting with WDNR staff, GZA provided its response to the WDNR's June 27, 2019 letter requesting an assessment of current groundwater conditions, the likely need for assessment of the vapor pathway, and possible consideration of supplemental remediation, if necessary. In response to this request and on behalf of Continental, GZA reviewed the background history of the Site, evaluated trends in groundwater, estimated tetrachloroethene (PCE) mass reduction achieved through previous in situ remediation phases, and developed next steps that appear necessary to advance the Site toward closure. Based on GZA's evaluations, as presented at the meeting, the following conclusions were drawn:

1. Mass reduction of PCE in groundwater is estimated at about 85% to 90% based on the strength of the remaining plume. Based on the limited groundwater sampling in 2018 and none in 2019, a full round of water levels and groundwater sampling are needed to complete a more thorough assessment of volatile organic compound (VOC) trends and existing VOC concentrations downgradient of the Site;
2. There are off-Site sources of PCE in the area of the Site that are likely affecting water quality being monitored within the downgradient portion of the monitoring well network established for Continental. GZA questions the distribution of monitoring wells on the



far northeastern portion of the well network, and through its proposed sampling activities herein, will provide its conclusions and technical basis for whether the impacts in the far northeast monitoring wells are from the Site or from other off-Site sources.

3. Although previous calculations of vapor intrusion (VI) potential were conducted on behalf of Continental, VI assessment through data collection will be necessary in immediately downgradient homes overlying the dissolved-phase plume.
4. Because of the attention being afforded by regulators to vapor transmission through sewer networks, GZA will provide a more thorough evaluation of sanitary sewer lines distributed in the area of the PCE-impacted area and evaluate the basis for further evaluation of the sewer pathway.

These are the primary requests or conditions that shape the scope of work presented in this proposal. As Continental desires to maximize the use of the DERP funding to pay for the additional activities needed at the Site, we seek the WDNR's approval of the work elements and budget proposed for this work.

SCOPE OF WORK

In consideration of our file review and discussions with the WDNR, and in consideration of Continental's status with respect to remaining DERP funding, two scope of work options were developed: Option A, which follows a more conventional series of work elements; and Option B, which optimizes remaining DERP funding to execute more work elements under the program than Option A. Continental desires the WDNR consider the merits and cost efficiency of this alternate option, although it does depart from conventional methodology.

Option A - Conventional Approach

Task 1 - Responding to the Elements of the June 27, 2019 WDNR Letter (Substantially Completed in Preparation for October 15, 2019 Meeting)

In response to WDNR's requests, GZA conducted the following:

1. Site background and review of investigation and remediation tasks conducted;
2. A comparative analysis of PCE plume mass from the completion of the Site investigation in 2002 to the 2018 plume extents;
3. An analysis of VOC concentration trends at key monitoring wells along the plume;
4. A survey of downgradient water supply wells and natural groundwater discharge zones to understand the location and condition of features that could be receptors to impacted groundwater downgradient of the Site through time;
5. An evaluation of the likelihood of other closed or open cases with similar contaminants in the vicinity of the Site that could affect the interpretation of downgradient impacts in groundwater; and
6. Recommendations for additional data gathering tasks, such as VI assessment, groundwater monitoring, and water level measurement.

Although GZA did not prepare a written report of its assessment of existing conditions, we believe our discussion at the October 15, 2019 meeting was sufficient to identify next steps, as described in Tasks 2, 3, and 4 below, after which a report will be prepared, as described in Task 5.

Task 2 - VI Assessment in Four Homes

In reviewing the most recent trichloroethene (TCE) concentrations, GZA proposes to conduct VI testing at four residences immediately downgradient of the AutoZone property (961, 980, 981, and 1006 West Lincoln Drive). To



initiate the work, GZA will reach out to these residences and provide access agreements to obtain authorization to collect the samples and a letter explaining the purpose and methods to be employed. Assuming authorization is granted, GZA will proceed with scheduling the work, installing the vapor pins and collecting sub-slab air samples as follows:

1. 24-hour integrated indoor air samples will be collected in 6-liter evacuated SUMMA[®] canisters placed on each floor of each home targeted for sampling and an upwind outside air background sample will be collected over the same time period as the indoor air samples.
2. Indoor air and background air samples will be analyzed for PCE, TCE, cis-and trans-1,2-dichloroethene (DCE), and vinyl chloride in accordance with United States Environmental Protection Agency (USEPA) Method TO-15LL.
3. Following the collection of indoor air samples, an estimated two vapor sampling probes will be installed in holes drilled through the concrete floor of each home using a rotary hammer drill. Probe installation will include drilling an approximately 1.5-inch hole through the floor slab followed by the installation of a Vapor Pin[™] probe flush to the floor.
4. Prior to sampling, at least five sample train volumes of air will be purged to ensure that the exiting vapor concentration is representative of the entering concentration. A helium-filled shroud will be placed over each sub-slab probe while purging with a helium meter to ensure no or minimal leakage of air through the floor and a shut-in test will be performed to ensure no or minimal leakage through the sample train. The shut-in test will be conducted by using a vacuum pump to exert a vacuum of at least 5 pounds per square inch (psi) on the sample train and make sure the vacuum holds for at least 1 minute.
5. Following purging and system leak testing, sub-slab vapor samples will be collected over a period of approximately 10 minutes using 1-liter SUMMA[®] canisters at a rate of less than 200 milliliters per minute (ml/min).
6. Sub-slab air samples will be analyzed for PCE, TCE, cis-and trans-1,2-DCE, and vinyl chloride in accordance with USEPA Method TO-15.
7. Indoor air and sub-slab sample results will be provided in letters to the homeowners and tenants, if applicable, within 10 business days of GZA's receipt of the analytical results. The letters will include a request for access to install a vapor mitigation system if screening levels are exceeded.

For homes where mitigation systems are unnecessary, two or three rounds of paired indoor air/sub-slab samples will be collected.¹ Upon completion of two or three rounds of paired sampling, GZA will prepare a report documenting the sampling conducted and the analytical results obtained, as described in Task 5 below.

Task 3 - Groundwater Level Measurements and Sampling

GZA will measure and record groundwater levels in existing monitoring wells to prepare a groundwater flow map. This process will also allow GZA to inventory existing wells and note the respective conditions. Based on information provided by Client, GZA estimates that approximately 24 monitoring wells will be available for water level measurements and sampling.

GZA will collect the samples from the monitoring wells utilizing low-flow purging and sampling methods with field parameters (temperature, pH, conductivity, dissolved oxygen [DO], turbidity and oxidation-reduction potential [ORP]) measured in a flow-through chamber. Water will be purged with a peristaltic pump with purging continuing until the water levels and measured field parameters are generally stable. Upon reaching stable field parameters,

¹ In our meeting, WDNR stated that two rounds of paired samples may be sufficient if sub-slab concentrations are below detection or a low percentage of the screening level.



samples will be collected for VOC analyses. GZA will transfer the purge water to a container on-Site and arrange for disposal.

Task 4 - Contingent Mitigation System Installation and Follow-Up Sampling

For budgetary purposes, GZA anticipates the installation of typical residential mitigation systems in up to four homes consisting of three to four suction locations or suction from a sump crock in the basement connected to effluent piping that will be discharged outside of the home above the roofline. Air will be drawn from beneath the floor slab with either high-suction or high-volume fans. GZA will contract with a mitigation subcontractor for installation of the system under GZA's observation. The pressure field extension will be evaluated with the system operating by measuring sub-slab pressures at the two sub-slab sampling locations and in supplemental locations near each of the walls of the basement.

After the mitigation system has been operating for approximately three months, GZA will re-sample indoor air from approximately the same locations as the pre-mitigation indoor air samples and from an outside, upwind, background location outside of the building. The samples will be collected over a 24-hour period utilizing 6-liter evacuated SUMMA® canisters and will be analyzed for PCE, TCE, cis-and trans-1,2-DCE, and vinyl chloride in accordance with USEPA Method TO-15LL.

Task 5 - Report Preparation

Upon completion of Tasks 2 through 4, GZA will prepare a report documenting the VI assessment, additional groundwater monitoring, and installation of mitigation systems, if applicable. The report will include an update of the VOC trend plots, current groundwater plume configuration and groundwater flow. GZA will consolidate the existing information and evaluate whether there is suitable information to make a recommendation for proceeding with preparation of a case closure form.

Task 6 - Preparation of WDNR Closure Submittal

Upon completion of the prior task and assuming typical closure conditions have been met, GZA will consolidate existing documentation and complete Closure Form 4400 for submittal to the WDNR. This effort will rely on the body of information in Continental's files and results of work conducted by GZA. The closure request will include a description of institutional controls and notifications and GIS registrations related to residual on- and off-Site soil and groundwater impacts. Upon completion, the forms will be submitted to the WDNR in accordance with WDNR's submittal requirements.

Task 7 - Monitoring Well Abandonment

Upon WDNR issuing conditional closure, the abandonment of the monitoring well and injection well networks will be necessary. GZA assumes that the injection networks in Lincoln Drive can be abandoned in place and not over-drilled and removed. In total, there are approximately 51 wells (32 2-inch diameter monitoring wells, one 6-inch-diameter monitoring well, and 18 1-inch-diameter injection wells) on which GZA's costs for abandonment are based. GZA assumes that there are no City-based requirements to be met that would increase the cost of abandonment. In general, GZA will remove the protective casings where feasible and abandon the casings with bentonite/cement slurry and finish the surface to match surrounding conditions. The abandonment procedures and documentation will comply with the requirements of Wisconsin Administrative Code (Wis. Adm. Code) NR 141.

Option B - Alternative Approach

In this alternative approach, Continental seeks to meet the intention of the primary objectives of the work described in Option A, including addressing the VI pathway, but reduces excessive upfront testing while optimizing the use of remaining DERP funding to eliminate the VI pathway for immediately downgradient residents. In summary, this option proposes the following sequence of activities.



Task 1 - Responding to the Elements of the June 27, 2019 WDNR Letter

Same as Option A.

Task 2 - VI Assessments of Four Homes

This option is substantially changed by eliminating up to three rounds of paired sub-slab and indoor testing in each of four homes, but includes conducting up to six deep soil-gas tests up and downgradient of the four targeted homes to obtain baseline soil-gas conditions that represent vapor conditions under the homes. The soil-gas data will be used to confirm the extent of soil-gas impacts corresponding to where vapor mitigation would be required. This testing involves installing six soil-gas points to within 2 feet of the water table, two which will be located between the Auto Zone right-of-way (ROW) and the first two residences overlying the plume, two in the West Lincoln ROW, between the target homes and two soil gas points in the next ROW to the east beyond the four homes to confirm conditions do not warrant additional downgradient VI assessment.

Task 3 - Groundwater Level Measurements and Sampling

Same as Option A.

Task 4 - Contingent Mitigation System Installation and Follow-Up Sampling

In Option B, Continental proposes to proactively install VI mitigation systems in the four proposed homes followed by up to two rounds of confirmatory indoor air sampling. This option focuses on applying the available DERP funding to mitigation of the four homes with the highest potential for VI impact. The soil-gas measurements in Task 2 will further inform the needs for VI mitigation by providing spatial and temporal vapor conditions along the plume.

Task 5 - Report Preparation

Same as Option A.

Task 6 - Preparation of WDNR Closure Submittal

Same as Option A.

Task 7 - Monitoring Well Abandonment

In Option B, the abandonment efforts include the closure of the soil gas monitoring points installed under Task 2.

Please note that Continental's strong preference is for the implementation of Option B for the following reasons:

1. Option B puts the VI system into the homes promptly without the significant delay associated with three rounds of paired sampling in the homes that would otherwise be associated with Option A;
2. There is less disruption to the homeowner (one intrusion vs. four intrusions [three sampling rounds and one installation]); and
3. It reduces costs to be reimbursed by the DERP Fund given the significant additional costs associated with three paired rounds of in-house sampling in Option A.

The comparison of costs between Options A and B is provided in detail in the following section.

BASIS OF BILLINGS

Billings for GZA's professional services for the above scope of work will be on a time and materials basis in accordance with the Schedule of Fees provided in the September 2019 Contract. According to financial information provided during our WDNR meeting, we understand the DERP reimbursement fund has paid out \$436,961.76 for this Site. With the total claim allowed being \$500,000, there is \$63,038.24 of remaining reimbursable funding for the project.



However, this reimbursement is at 90% of eligible costs, thus the total spending on the project to achieve maximum reimbursement would be \$70,042.49, with the difference (\$7,004.25) being Continental’s out-of-pocket cost.

Consistent with the scope of work options presented above, GZA provides two cost options, each of which includes a schedule and cashflow projection that tracks total estimated expenditures relative to the available DERP fund reimbursement allowance.

Option A - Conventional Approach

The estimated budget to conduct the full scope of work for Option A is \$114,000. The cost breakdown by task is as follows:

Task 1 - Developing Site Closure Strategy (including WDNR Meeting)	\$ 9,000 (already completed)
Task 2 - VI Assessment in Four Homes (3 rounds of paired samples)	
Round 1 VI Sampling	\$ 18,000
Round 2 VI Sampling	\$ 18,000
Round 3 VI Sampling (if necessary)	\$ 18,000
Task 3 - Groundwater Level Measurements and Sampling	\$ 10,000
Task 4 - Contingent Mitigation System Installation/Sampling (assumes four homes)	\$ 20,000 ²
Task 5 - Report Preparation	\$ 6,000
Task 6 - Preparation of Closure Documents Including WDNR GIS Registry Fees	\$ 11,000
Task 7 - Well Abandonment and Documentation	<u>\$ 14,000</u>
Total Estimate	\$124,000

To provide an estimated schedule and cashflow, GZA provides Table 1 below, illustrating the approximate timing of work scope elements in relation to available reimbursable funding. This estimate is based on the scope of work outlined above, which represents our present judgment as to the level of effort required. Actual charge may vary, either upward or downward, depending on the execution of the work.

Table 1
Option A - Work Task and Spending Schedule by Month

Task No.	Description	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20
1	Site Closure Strategy	\$ 9,000										
2	Vapor Intrusion Assessment											
	Round 1		\$ 9,000	\$ 9,000								
	Round 2					\$ 18,000						
	Round 3 (if necessary)									\$ 18,000		
3	Groundwater Sampling		\$ 10,000									
4	Contingent Mitigation System Installation						\$ 10,000		\$ 10,000			
5	Report Preparation							\$ 6,000				
6	Closure Documentation									\$ 11,000		
7	Well Abandonment											\$ 14,000
	Monthly Spend	\$ 9,000	\$ 19,000	\$ 9,000	\$ -	\$ 18,000	\$ 10,000	\$ 6,000	\$ 10,000	\$ 29,000	\$ -	\$ 14,000
	Running Total	\$ 9,000	\$ 28,000	\$ 37,000	\$ 37,000	\$ 55,000	\$ 65,000	\$ 71,000	\$ 81,000	\$ 110,000	\$ 110,000	\$ 124,000

² Mitigation system costs may change after a mitigation subcontractor has had a chance to observe conditions in homes.



Option B - Alternative Approach

The cost breakdown by task is as follows:

Task 1 - Developing Site Closure Strategy (including WDNR Meeting)	\$ 9,000 (already completed)
Task 2 - VI Assessment through Soil-Gas Probes in ROWs (3 rounds of sampling)	\$ 12,500
Task 3 - Groundwater Level Measurements and Sampling	\$ 10,000
Task 4 - Mitigation System Install./Confirm. Sampling (assumes 4 homes)	\$ 27,000 ³
Task 5 - Report Preparation	\$ 6,000
Task 6 - Preparation of Closure Documents Including WDNR GIS Registry Fees	\$ 11,000
Task 7 - Well Abandonment and Documentation	<u>\$ 14,600</u>
Total Estimate	\$ 90,100

As for Option A, Table 2 below illustrates the approximate timing of work scope elements in relation to available reimbursable funding. We believe this option advances the primary objectives of the work by actually mitigating the four nearby homes rather than using up limited resources for indoor testing.

Table 2
Option B - Work Task and Spending Schedule by Month

Task No.	Description	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20
1	Site Closure Strategy	\$9,000										
2	Vapor Intrusion Assessment											
	Deep Soil Gas Testing		\$ 6,500			\$ 3,000			\$ 3,000			
3	Groundwater Sampling		\$10,000									
	Contingent Mitigation System Installation w/ Confirmatory Indoor Sampling (4 homes)			\$14,000	\$ 6,500	\$ 6,500						
5	Report Preparation					\$ 6,000						
6	Closure Documentation									\$11,000		
7	Well Abandonment											\$ 14,600
	Monthly Spend	\$9,000	\$16,500	\$14,000	\$ 6,500	\$15,500	\$ -	\$ -	\$ 3,000	\$11,000	\$ -	\$ 14,600
	Running Total	\$9,000	\$25,500	\$39,500	\$46,000	\$61,500	\$61,500	\$61,500	\$64,500	\$75,500	\$75,500	\$90,100

DERP REIMBURSEMENT COMPLETE

CONDITIONS OF ENGAGEMENT

The conditions of engagement will be in accordance with the September 2019 Contract.

³ Mitigation system costs may change after a mitigation subcontractor has had a chance to observe conditions in homes.



ACCEPTANCE

This proposal may be accepted by signing in the appropriate spaces below and returning one copy to GZA. If you have any questions or comments, please feel free to contact the undersigned at (262) 754-2560.

Very truly yours,

GZA GeoEnvironmental, Inc.

Ken W. Oanes, P.G.
Hydrogeologist
Engineer/Geologist I

Bernard Fenelon, P.G.
Hydrogeologist
Senior Consultant

John C. Osborne, P.G.
Principal Hydrogeologist
Senior Vice President

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cc: Ms. Alyssa Flandermeyer
Mr. Eric Thom

This Contract Addendum No. 1 and the September 2019 Contract are hereby accepted and executed by a duly authorized signatory, who by execution hereof, warrants that he/she has full authority to act for, in the name, and on behalf of Continental VI Fund LP.

CONTINENTAL VI FUND LP

By: _____ Title: _____

Typed Name: _____ Date: _____

This Contract Addendum No. 1 and the September 2019 Contract may be executed in two or more counterparts, each of which together shall be deemed an original, but all of which together shall constitute one and the same instrument. In the event that any signature is delivered by facsimile transmission or by an e-mail delivery of a document in “.pdf” format, each such signature shall create a valid and binding obligation of the party executing the document, or on whose behalf each document is executed, with the same force and effect as if each such facsimile or “.pdf” signature was an original thereof.