



August 31, 2023

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

Subject: Decorah Shopping Center Annex  
Dry Cleaner Environmental Response Program (DERF) Change Order Approval,  
And Other Work Needed  
1011-1025 South Main Street, West Bend WI  
BRRTS #: 02-67-151266, FID #: 267161400

Dear Mr. Keenan:

The Department of Natural Resources (DNR) reviewed the change order, *Contract Addendum No. 1, Proposed Vapor Intrusion Evaluation, Decorah Shopping Center Annex, West Bend, Wisconsin*, (the Contract Addendum) received by the DNR on March 21, 2023 from your consultant GZA Geoenvironmental Inc. (GZA). On June 29, 2023, GZA submitted additional information needed for our review of this document including a schedule of their fees; the DERF Reimbursement Cost Detail Linking Spreadsheet, Form 4400-214D for prior GZA costs; and a confirmation that passive sampling will be employed in the next round of work for the indoor air samples. Additionally, on August 28, 2023, GZA provided a cost estimate for the collection of a sewer cleanout location vapor sample, at the request of the DNR, which was not included in the Contract Addendum. This sample will be a grab Summa canister sample.

#### Regulatory Background

The DNR approved a limited scope of work on September 28, 2020 that included sewer investigation, vapor testing of four homes, and reporting. Based on the results from this work, GZA has submitted the Contract Addendum which is for follow-up vapor testing at three of the four homes. This includes two additional rounds of paired sub-slab and indoor air sampling at Braun (980 Lincoln Ave), one additional round of paired sub-slab and indoor air sampling at Wertis (981 Lincoln Ave.), and two additional rounds of paired sub-slab and indoor air samples at McElroy (1006 Lincoln Ave).

#### Review

The DNR has reviewed the Contract Addendum and approves the costs of the proposed additional work of \$22,325. Previous approved GZA costs are attached to this letter in the form of a spreadsheet from GZA (Attachment 1).

#### Other Work Needed

As stated previously in the DNR's letter of June 27, 2019 (Attachment 2), and in the DNR's work plan approval email of March 12, 2020 (Attachment 3) other work is still required at the site. Some of those previously stated requirements are, pursuant to Wis. Admin. Code § NR 716.11(3)(a):

Decorah Shopping Center Annex, DERF Change Order Approval

1011-1025 South Main Street, West Bend WI

BRRTS #: 02-67-151266, FID #: 267161400

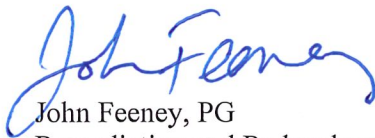
August 31, 2023

- Investigate the vapor pathway at additional locations that may screen in for vapor intrusion risk such as the strip mall (within 100 feet of chlorinated volatile organic (CVOC) soil contamination) and the monitoring well MW-9 area (homes near groundwater CVOC contamination above the Enforcement Standard).
- Investigate the sewer as a potential pathway for vapor migration.
- Provide an update regarding the current status of the groundwater investigation.

Schedule

Submit a Wis. Admin. Code ch. NR 716 compliant site investigation workplan to address the requirements in the DNR's June 27, 2019 letter and the March 12, 2020 email within 90 days. The DNR looks forward to receiving the required site investigation workplan from your consultant that complies with Wis. Admin. Code. The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 262-416-8643 or johnm.feeney@wisconsin.gov.

Sincerely,



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

cc: Mr. Bernard Fenelon, P.G. GZA Geoenvironmental, Inc.

- Attachment 1: Dry Cleaner Environmental Response Program Reimbursement Cost Detail Linking Spreadsheet, Form 4400-214D
- Attachment 2: DNR Letter of June 27, 2019
- Attachment 3: DNR Email of March 12, 2020

Site Name: Decorah Shopping Center Annex

BRRTS #: 02-67-151266

Type of Action: Change Order

TASKS	BUDGET			Previous Claims (If applicable)	INVOICES				
	Bid / Budgeted Amount	INSERT	Total Approved Budget		GZA, 0803981, Oct. 30, 2020	GZA, 0805824, Dec. 4, 2020	GZA, 0807481, Dec. 31, 2020	GZA, 0809033, Feb. 1, 2021	GZA, 0810629, Mar. 4, 2021
<b>Consultant Costs</b>									
Task 1 - Sanitary Sewer Video Survey	\$ 3,500.00	\$ -	\$ 3,500.00		\$ 526.25	\$ 1,087.50			
Task 2 - Vapor Intrusion Testing	\$ 18,200.00		\$18,200.00			\$ 1,537.50	\$ 2,025.00	\$ 555.40	\$ 302.50
			\$ -						
			\$ -						
			\$ -						
			\$ -						
			\$ -						
			\$ -						
			\$ -						
			\$ -						
<i>Consultant Cost Total</i>	\$ 21,700.00	\$-	\$21,700.00	\$ -					
<b>Sub-Contractor Costs</b>									
Laboratory (Eurofins/TestAmerica)	\$ -	\$ -	\$ -						
			\$ -						
			\$ -						
			\$ -						
			\$ -						
			\$ -						
			\$ -						
<i>Sub-Contractor Cost Total</i>	\$ -	\$-	\$ -	\$ -					
<b>DERF ELIGIBLE SUB-TOTALS</b>	\$ 21,700.00	\$-	\$21,700.00	\$ -	\$ 526.25	\$ 2,625.00	\$ 2,025.00	\$ 555.40	\$ 302.50
<b>Non-DERF Eligible Expenses</b>									
<i>Non-DERF Cost Total</i>				\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>INVOICE GRAND TOTAL</b>				\$ -	\$ 526.25	\$ 2,625.00	\$ 2,025.00	\$ 555.40	\$ 302.50

**Check Numbers**

GZA, 0812380, Apr. 6, 2021	GZA, 0814676, May. 17, 2021	GZA, 0815461, Jun. 3, 2021	GZA, 0817285, Jul. 1, 2021	GZA, 0820576, Sep. 1, 2021	GZA, 0828216, Jan. 4, 2022	GZA, 0831691, Mar. 7, 2022	GZA, 0833062, Mar. 30, 2022	GZA, 0834635, Apr. 27, 2022	GZA, 0836588, Jun. 2, 2022	INSERT
\$ 3,677.50	\$ 60.20	\$ 200.00	\$ 2,442.00	\$ 914.15	\$ 3,823.65	\$ 3,622.18	\$ 3,070.12	\$ 1,139.00	\$ 203.01	
\$ 1,575.00			\$ 1,515.00		\$ 2,530.00		\$ 2,330.00	\$ 1,630.00		
\$ 5,252.50	\$ 60.20	\$ 200.00	\$ 3,957.00	\$ 914.15	\$ 6,353.65	\$ 3,622.18	\$ 5,400.12	\$ 2,769.00	\$ 203.01	\$-

\$ 5,252.50	\$ 60.20	\$ 200.00	\$ 3,957.00	\$ 914.15	\$ 6,353.65	\$ 3,622.18	\$ 5,400.12	\$ 2,769.00	\$ 203.01	##



**Dry Cleaner Environmental Response Program  
Reimbursement Cost Detail Linking Spreadsheet Form 4400-214D (R 08/**

DERF COST BREAKOUT (this claim)									
Total Invoiced Costs	A Soil Investigation	B Soil Remediation	C Groundwater Investigation	D Groundwater Remediation	E Air/Vapor Investigation	F Air/Vapor Remediation	G Lab & Other Analysis	H Miscellaneous Costs	Budget Remaining Use (-) to indicate cost over-run
\$ 1,613.75									\$ 1,886.25
\$ 23,572.21									\$ (5,372.21)
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ 25,185.96									\$ (3,485.96)
\$ 9,580.00									\$ (9,580.00)
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ -									\$ -
\$ 9,580.00									\$ (9,580.00)
\$ 34,765.96	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (13,065.96)

Total DERF Eligible Costs This Claim \$ -

WARNING - Double Check Total Invoiced Costs column to DERF Cost Breakout figures - possible error

\$ -
\$ -
\$ -
\$ 34,765.96

12)

% Task Complete, Remarks
Task % Complete

id!

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
Plymouth Service Center  
1155 Pilgrim Road  
Plymouth, WI 53073

Tony Evers, Governor  
Preston D. Cole, Secretary  
Telephone 608-266-2621  
Toll Free 1-888-936-7463  
TTY Access via relay - 711



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.

Decorah Shopping Center Annex  
June 27, 2019  
BRRTS #: 02-67-151266

- 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](mailto:johnm.feeney@wisconsin.gov).

Sincerely,



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

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



**From:** Feeney, John M - DNR  
**Sent:** Thursday, March 12, 2020 8:34 AM  
**To:** 'Alyssa Flandermeyer'; John Osborne  
**Cc:** Eric E Thom; Harrington, Arthur  
**Subject:** RE: BRRTS #02-67-151266 Scope of Work Proposal

Hello Ms. Flandermeyer and Mr. Osborne. The DNR has reviewed the Dec. 13, 2019 work plan scope for the Decorah Shopping Center Annex (02-67-151266). Our comments are presented below:

VI Assessment in Four Homes (961, 980, 981, 1006 West Lincoln Drive)

If the mitigation systems will be installed directly, sub-slab and indoor air samples must be collected prior to installation of the mitigation systems. The DNR will need that information to 1) assess the effectiveness of the systems, 2) differentiate between indoor and sub-slab sources to indoor air, 3) satisfy the requirement of NR716.11(5), 4) determine if a continuing obligation will be necessary, and 5) to further assess the risk to other houses. Regardless of the results of those samples, the systems will need to be commissioned per guidance document RR-800. As TCE is a contaminant of concern at this site, it must be determined if any women of child-bearing age reside in the houses as discussed in Section 3.4.1 of RR-800 and address those houses sooner. If that is the case, the DNR suggests prioritizing mitigation in those houses, use a quick lab turnaround for indoor air samples, and do a post-mitigation follow-up sample sooner to make sure levels have dropped below a VAL if they were above it initially. If it is decided to proceed with a more typical sampling program, expeditiously sample at any house with such a sensitive individual.

Other Homes

Regardless of the results or approach at the four houses mentioned above, there are clearly other occupied structures that should be sampled based on the screening criteria in Section 3.4.2 of RR-800. These include houses overlying the plume above an ES, and maybe within 100 feet of contaminated soil, such as behind the strip mall and probably some retail spaces within the strip mall itself. Submit a proposal which systematically discusses which occupied structures/spaces are within RR-800 screening guidelines. Groundwater concentrations appear to be increasing at some wells, so further refinement of the assessment area will likely be needed. Again, given the presence of TCE and its related health risks, demographics should be assessed and used to guide assessment. External soil gas probes are not adequate to make decisions on whether a house should be sampled at this site.

Sewers

The first step should be to obtain complete records of the sewer system in this area, including construction, flow direction, repair, cleaning, video-logging, etc. including Hawthorne Avenue from the City. The proposal should include a plan to assess possible vapor movement within the sewer pipes. Although a PID may provide some information, taking grab samples with Summa canisters and analyzing them with method TO-15 would likely be necessary to complete this evaluation.

Other Comments

1. Request an exemption to NR 169 to select a new consultant without bidding.
2. Typically, to rule out a home from the vapor pathway, a minimum of 3 rounds of sampling is needed for homes not over VAL/VRSL, with an emphasis on sampling during the heating season.

Please let me know if you have any questions. Thank you

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John Feeney

Phone: 920-893-8523

Johnm.feeney@wisconsin.gov

**From:** Alyssa Flandermeyer <aflandermeyer@cproperties.com>

**Sent:** Friday, December 13, 2019 10:28 PM

**To:** Feeney, John M - DNR <JohnM.Feeney@wisconsin.gov>; John Osborne <John.Osborne@gza.com>

**Cc:** Eric E Thom <ethom@cproperties.com>; Harrington, Arthur <ajharrin@gklaw.com>

**Subject:** BRRTS #02-67-151266 Scope of Work Proposal

Mr Feeney,

Please see attached for the scope of work proposal for DERF Funding reimbursement at the Decorah Annex site in West Bend, WI.

Please let me know if you have any questions.

Thank you,

Alyssa Flandermeyer

Development Coordinator



Continental Properties Company, Inc.

W134 N8675 Executive Parkway

Menomonee Falls, WI 53051-3310

p: 262.532.9351

e: [aflandermeyer@cproperties.com](mailto:aflandermeyer@cproperties.com)

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