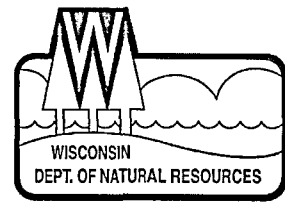


State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
2300 N. Dr. Martin Luther King, Jr. Drive  
Milwaukee WI 53212-3128

Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 608-266-2621  
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August 29, 2014

Mr. Stan Fronczak  
Brew City Enterprises  
4021 S. Kinnickinnic Avenue  
St. Francis, WI 53235

Subject: Case Closure Denial for Incomplete Site Investigation  
MPL Corp. Wire & Metal Specialties, 4021 S. Kinnickinnic Ave., St Francis, WI  
DNR FID # 241039920, BRRTS Activity # 02-41-184461,

Dear Mr. Fronczak:

On January 6, 2009 the Department of Natural Resources (the Department) provided a review of the "ERP Site Vapor Assessment Report" and "Groundwater Monitoring Report", prepared by Midwest Engineering Services, Inc. in 2008, for the case described above. These documents contained a request for the Department to review this case for closure. The Department denied closure because additional requirements had to be met.

The purpose of this letter is to update you as what conditions need to be satisfied before closure can be obtained. Your site was denied closure in 2009 because additional groundwater sampling and analysis was required and a cap maintenance plan needed to be completed. At that time, further assessment of the vapor intrusion pathway was not required. However, the Department's requirement for assessing risk posed by vapor intrusion has changed significantly since this case was denied closure. Therefore, additional actions will need to be completed to comply with current assessment standards. At a minimum, these actions would include the following.

**Need to Complete a Vapor Investigation**

Additional site investigation is needed to determine whether or not vapor intrusion poses a current risk at this site or if there is a risk of future exposure due to residual contamination. A vapor assessment following current guidance documents must be completed. A subslab vapor sample collected on the northwest corner of the property (SS2-NW, collected April 2008) indicated that TCE concentrations may be greater than the Vapor Risk Screening Level (VRSL). Standards for soil vapor contaminant concentrations did not exist when the sample was collected. Concentrations need to be compared to the current VRSL to determine if a risk is present and whether additional investigation will be necessary. If TCE concentrations measured 2008 exceed the current VRSL, additional samples must be collected to confirm that elevated concentrations are still present under the building and, if necessary, to define the extent of impacted vapors. A detailed description of the building (specifically addressing the location where SS2-NW was collected and nearby areas) must be provided to determine whether the Screening Levels for large commercial/industrial buildings will apply.

**Need to Conduct Additional Groundwater Monitoring**

Additional groundwater monitoring is needed in order to establish compliance with the closure criteria of ch. NR 726. You need to determine whether there is a stable or receding plume. At a minimum, three additional consecutive quarterly groundwater sampling events need to be completed to demonstrate

current groundwater conditions.

**Need to Define the Degree and Extent of Contamination**

Additional groundwater and/or vapor sampling may be needed in order to define the degree and extent of contamination. TCE concentrations in vapor and groundwater in the northeast corner of the property suggest that a risk of vapor intrusion may be present on the neighboring property to the north. An assessment must be conducted to determine whether vapor intrusion could be an issue at the neighboring property. If the assessment suggests that the risk exists, then another attempt should be made to contact the property owner and arrange for the collection of groundwater and, if needed, vapor samples on this property.

**Need to Complete a Closure Request**

Upon completing the site investigation, submit a complete closure request by completing a site investigation report and a Case Closure – GIS Registry Form (DNR form 4400-202). Describe what continuing obligations will be required as conditions for closure. These may include maintaining a cap over residual soil contamination or maintaining industrial land use.

Case closure can be considered once all the above requirements have been satisfied. We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (414) 263-8541.

Sincerely,



Paul Grittner  
Hydrogeologist  
Remediation & Redevelopment Program