



June 2, 2022

Mr. Ray Rogus
R&R Transmission Specialists
731 8th Street south
Wisconsin Rapids, WI 54494

Mr. Matt Rowe
PB Holdings of Marshfield LLC C/O Ruder Ware
500 First Street Suite 800
PO Box 8050
Wausau, WI 54402-8050

Subject: Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended
Former Normington Dry Cleaners, 821 Chestnut Street, Wisconsin Rapids, Wisconsin
DNR BRRTS Activity # 02-72-257528, FID #: 772014650

Dear Mr. Rogus and Mr. Rowe:

On May 19, 2022, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. As you are aware, the DNR reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b). As discussed with your consultant on May 26, 2022, case closure is not recommended because additional legal requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with the information requested or your written response regarding the necessary work and a schedule for completion of this work.

Additional Requirements Needed for Case Closure Under Wis. Admin. Code ch. NR 726

As noted above, additional work is necessary to meet the requirements for case closure because the site investigation at this site has not been completed.

Need to Define the Degree and Extent of Contamination

Additional groundwater sampling is needed to define the degree and extent of contamination per Wis. Admin. Code § NR 716.11, and to identify where the discharge entered the environment. It is unclear if volatile organic compounds (VOCs) are present at the water table surface downgradient of the source property. Shallow groundwater samples are needed to determine specifically where the discharge occurred and to identify if a vapor assessment is necessary at affected properties. Additionally, the extent of groundwater contamination needs to be defined south of the existing piezometer network. The Department understands that groundwater samples were collected from a Kwik Trip gas station in the

vicinity of the Normington groundwater plume; please provide additional information regarding depth to the water table and screen depth for these sample locations (B-1, B-2, B-3, B-4, B-5, B-6, and B-7). This information should be incorporated into a site investigation report (SIR). The SIR should also describe the source location of the suspected discharge. If there is minimal soil and shallow groundwater contamination at the source property, the SIR should outline where and how the discharge entered the environment to create a widespread CVOC plume at depth.

Need to Complete a Vapor Investigation

Additional site investigation, per Wis. Admin. Code § NR 716.11 (5), is needed to determine whether vapor intrusion is a completed pathway at this site, or if there is a risk of future vapor exposure due to residual contamination. If vapor intrusion is an issue at this site, document all source control actions taken under Wis. Admin. Code § NR 726.05 (8). The Department understands that sub-slab vapor samples were collected from the basement of the former Normington Dry Cleaners and from the R&R Transmission Specialists buildings. Additional vapor intrusion assessment is necessary within the sewer system in the vicinity of the VOC groundwater plume associated with the site. This assessment should include both on-site and off-site sewer laterals.

It is also unclear if off-site residential properties are impacted by vapors from the VOC plume beneath their properties. The piezometer network demonstrates VOC contamination at depth; however, because of the lack of groundwater samples from the water table surface below the residences, vapor intrusion into these homes cannot be ruled out. Given the presence of trichloroethylene in groundwater below the residences it is imperative that this assessment occurs as soon as possible.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements with a site investigation work plan.

Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

The review fee submitted with this request was applied to the site investigation review. Another closure review fee will be required with the submittal of the next closure packet.

Conclusion

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the DNR project manager, Matt Thompson by phone at 715-492-2304 or email at matthewa.thompson@wisconsin.gov. For more information on the closure reconsideration process, please see DNR publication, RR-102, “Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process” by visiting dnr.wi.gov, search: RR-102, for more information.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,

A handwritten signature in blue ink that reads "David Rozeboom". The signature is fluid and cursive, with the first name "David" and last name "Rozeboom" clearly legible.

David Rozeboom
West Central Region Team Supervisor
Remediation & Redevelopment Program

cc: Andrew Delforge, REI Engineering Inc.