



August 9, 2018

Kevin Manely
State Bank of Arcadia
131 West Main Street
Arcadia, WI 54612

Subject: RE: Department Review of Interim Remedial Action Plan
Former Dry Cleaner Building-Arcadia, 127 Main Street, Arcadia
BRRTS # 02-62-259-051

Dear Mr. Manley:

Thank you for the submittal of Interim Remedial Action Plan Report (Report) to the Wisconsin Department of Natural Resources (WDNR), received on December 28, 2015. The report was prepared by CB&I on behalf of State Bank of Arcadia. The report presents the findings from the August 2015 soil and groundwater site investigation activities and presents options for remediation to move the site towards regulatory closure.

The Former Dry Cleaner Building (Site) is located at 127 Main Street, Arcadia. The Site is currently occupied by Westlake Insurance and is bordered to the west by State Bank of Arcadia, to the north by Main Street, beyond which lies commercial and retail properties, to the east by commercial properties and to the south by the Arcadia CO-OP.

The Report proposes the following remedial actions for the Site:

- Construction of an engineering control and develop a cap maintenance plan.
- Installation of a vapor mitigation systems and the sealing of crawlspaces at the West Lake Insurance Building.
- Removal & disposal of source soils behind the West Lake Insurance Building. Following the soil excavation, the area will need to be paved and will need a cap maintenance plan.
- Natural attenuation will be used to address the remaining residual constituents. A minimum of four rounds groundwater sampling is proposed to evaluate the groundwater conditions following the previous remedial efforts. A groundwater monitoring program will be developed and forwarded to the WDNR.

Based on the above proposal of remedial actions, the WDNR approves going forward with the following considerations/requests:

- Removal and disposal of the impacted soils south of the West Lake Insurance building will eliminate the continuation of leaching contaminants to the groundwater and volatilization in soil gas. A finalized plan should be submitted that will include the tentative boundaries of the excavation, depth to be achieved, confirmation sampling and a soil management plan for the excavated soils.
- A minimum of four sampling events following the above remedial activities are essential to establish a baseline of data to observe groundwater impacts. Until the baseline of data is collected and reviewed a determination regarding the number of sampling events cannot be determined at this time.
- Paving the areas around the site. While this is a solution to prevent contact of impacted soils it is recommended at this point to post-pone capping the site until the other remedial activities have been implemented and evaluated to assess the need for a cap and maintenance plan.

Installation of a vapor mitigation system will be needed. The data provided in the Report identified impacted vapors, however, the data is more than three years old and did not achieve definition of extent and magnitude for vapor intrusion. It is recommended to complete a sub-slab and soil-gas investigation to complete the extent and magnitude for the Site and other potential receptors. Once a complete set of data is collected, mitigation of the Site can be completed and a proposal to address the remaining vapor plume can then be submitted.

To be eligible for closure under Wis. Admin Code § NR 726 impacted, all media must demonstrate stable and or decreasing trends post-remedial action(s). If you have any further questions, concerns or comments please feel free to contact me by phone at 715-839-1602 or by email at: Candace.Sykora@wisconsin.gov

Sincerely,

A handwritten signature in cursive script that reads "Candace Sykora".

Candace Sykora
Hydrogeologist
Remediation and Redevelopment