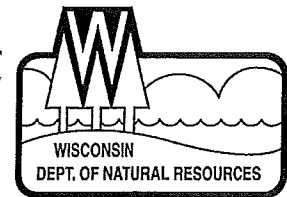


State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Waukesha Service Center
141 NW Barstow St
Waukesha WI 53188

Scott Walker, Governor
Daniel L. Meyer, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



February
January 6, 2018

Mr. Greg Butts
Westbrook Delaware Limited Partnership
c/o Realty Management Consultants, Inc.
4811 South 76th Street
Greenfield, WI 53220

Subject: Request to Modify Additional Work Plan and Budget Request
Former Bask Dry Cleaner, Westbrook Shopping Center
2136 East Moreland Boulevard, Waukesha, WI
FID# 268188800, BRRTS#s 02-68-297669

Dear Mr. Butts:

On November 16, 2017, the Wisconsin Department of Natural Resources (DNR) received the November 14, 2017 *Status Report, Additional Work Plan and Budget Request* (the Work Plan) prepared by KPRG and Associates, Inc. (KPRG) for the Former Bask Dry Cleaner, Westbrook Shopping Center site. The case was presented to a DNR Peer Review Committee for evaluation. It was determined that additional work is required for the site investigation. Listed below are the portions of the site investigation that need additional work, and comments from the DNR regarding the case:

- One monitoring well, MW-20 is proposed downgradient from MW-19. The DNR believes a minimum of two monitoring wells would be needed to define the extent of groundwater contamination beyond MW-19. It may, however, be pertinent to complete the groundwater investigation in a stepped approach (i.e. installing MW-20 and receiving the results prior to installing additional wells), in case the extent of contamination is not defined. Please advise the DNR regarding how you plan on proceeding with further investigation of the groundwater contaminant plume.
- The DNR is requesting additional vapor sampling. The DNR's vapor intrusion guidance recommends vapor sampling when a building overlies groundwater with CVOC concentrations above § NR 140.10, Wis. Adm. Code, Enforcement Standards (ES) at the water table. The concentration of tetrachloroethene in MW-19 is approximately ten times the ES and there are homes between monitoring wells MW-15 and MW-19 that have not been tested for vapors. Please prepare a limited vapor sampling plan for evaluating vapor intrusion in select homes that have not been evaluated between MW-15 and MW-19. If vapor intrusion is shown to not be an issue in this area, then provide an explanation based on vapor results and the geology (groundwater depth, soil type, etc.) to describe why the conditions warrant that further vapor investigation is not needed.

- Because additional soil borings/monitoring wells were completed further downgradient from the contaminant source, a revised cross section would be useful in demonstrating the site geology.
- The DNR has not received documentation showing that the sub-slab depressurization systems (SSDSs), which were installed in homes affected by the release at the site, have been inspected and continue to operate properly to protect human health. Ultimately when the case is closed, a continuing obligation will be that the SSDSs will have to remain operating, unless it is demonstrated by additional vapor sampling that vapor intrusion is no longer an issue in each home. A maintenance plan will be also required for each SSDS.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter or the case, please contact me at the letterhead address, by calling (262) 574-2166, or by e-mail at david.volkert@wisconsin.gov.

Sincerely,



David G. Volkert
Hydrogeologist
Bureau for Remediation & Redevelopment

cc: Brian Riordan
Richard Gnat, KPRG
Michelle Williams, Husch Blackwell LLP
SER File