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

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

December 22, 2020

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

Subject: PFAS Groundwater Sampling
Westbrook Shopping Center/Bask Inc.
2316 E. Mooreland Blvd., Waukesha WI 53186
BRRTS #: 02-68-297669

Dear Mr. Butts:

On August 25, 2020, the Wisconsin Department of Natural Resources (DNR) received the PFAS Sampling Summary Report prepared by KPRG & Associates, Inc., dated August 25, 2020, for the above referenced site. Based on the DNR's review of the PFAS groundwater sampling data summarized in the report, additional groundwater sampling is requested to define the degree and extent of contamination.

Groundwater Sampling Summary

Groundwater samples were collected from monitoring wells MW-6, MW-15 and MW-21 on July 27, 2020 for PFAS analysis. The monitoring wells were selected based on their location within the delineated tetrachloroethene (PCE) and trichloroethene (TCE) groundwater plume associated with the site. MW-6 is in the area of greatest PCE and TCE groundwater impact, MW-15 is downgradient from MW-6 and in the center of the plume, and MW-21 is furthest downgradient near the leading edge of the plume. Upgradient and background monitoring well MW-1 (and possibly MW-2) was not sampled due to loss from recent parking lot resurfacing.

Perfluorooctanoic acid (PFOA) was detected in monitoring wells MW-6, MW-15 and MW-21 and Perfluorooctanesulfonic acid (PFOS) was detected in monitoring wells MW-6 and MW-21. Individually, only the PFOA concentration of 22 nanograms per liter (ng/L) in the duplicate sample for MW-6 exceeded the proposed DNR Guideline of 20 ng/L. The combined PFOA and PFOS concentrations of 25.6 ng/L in MW-6 and 29.6 ng/L in the duplicate sample for MW-6 exceeded the combined DNR Guideline of 20 ng/L.

Additional PFAS Sampling and Investigative Work

The DNR requests completing the following work based on the groundwater sampling results:

- Perform a second round of PFAS groundwater sampling at monitoring wells MW-6, MW-15 and MW-21 to confirm the July 27, 2020 results.
- Perform PFAS groundwater sampling at the historically most-impacted monitoring well, an upgradient background monitoring well, and side gradient monitoring wells to further define the areal degree and extent of PFAS groundwater contamination.
- Construct a cross-section along the axis of the PCE and TCE groundwater plume to illustrate the hydrogeology and vertical extent of the groundwater contamination. The cross-section should extend from an upgradient background monitoring well, through the source area, the area of most-impacted groundwater, and to the furthest downgradient monitoring well (MW-21). Include PCE, TCE and combined PFAS results on this cross-section, in addition to hydrogeologic and topographic conditions.

- Prepare a report to summarize the groundwater data, present the cross-section, and make recommendations.

Schedule
The DNR is requesting that you submit a workplan for PFAS groundwater sampling within 60 days of the date of this letter.

You are reminded that an evaluation of potential PFAS compounds that were historically produced, used, handled or stored at the site was requested in the March 3, 2020 DNR letter and is required by Wis. Admin. Code § NR 716.07 and Wis. Admin. Code NR § 716.09. The evaluation should include any available information on whether products containing PFAS were used in process services, the duration of PFAS use, the types of PFAS used, and areas where PFAS may have been used, stored, or discarded.

The DNR appreciates your efforts to restore the environment at this site. If you have questions regarding anything outlined in this letter, please contact me at (262) 202-3921, or at gregory.moll@wisconsin.gov.

Sincerely,

J. Gregory Moll, P.G.
Hydrogeologist
Remediation and Redevelopment Program

cc: Donald P. Gallo, Axley Brynelson, LLP
Richard Gnat, KPRG & Associates, Inc.
SER Files