

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Scott Hassett, Secretary  
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March 11, 2004

Howard and Inez Zillmer  
1257 White Oak Trail  
Port Charlotte, FL 33950

FID# 268087820  
BRRTS# 02-68-305374

Subject: Site Investigation and Remedial Action Options Report Review for Former Fabricare Site, 323 W. Sunset Drive, Waukesha

Dear Mr. and Mrs. Zillmer:

The Wisconsin Department of Natural Resources (Department) received the *Remedial Investigation/ Remedial Action Options* (RI/RAO) report for the above-referenced site on February 16, 2004. After careful review of the report, the Department has decided to approve the investigation phase of work. The work completed to date appears to be adequate to prepare the remedial action plan. Therefore, you may submit a claim for the investigation costs incurred.

However, the Department does not approve the remedial action option recommended in the report. Remediation by natural attenuation does not appear to be appropriate at this time due to the following concerns:

1. The RI/RAO report states that there are no existing or anticipated threats to public health, safety, welfare or the environment. However, there was no evidence provided in the report to support this statement. In fact, a high capacity municipal well is located approximately 1200 feet to the east of the site. The presence of this receptor and the potential risk to other private wells in the area, as well as the risk of vapor intrusion at the neighboring private residence (1411 and 1413 Victoria) increases the risk to human health.
2. The groundwater monitoring data provided indicates that tetrachlorethylene (PCE) concentrations are increasing at most of the wells, including the piezometer. In addition, subsurface conditions do not appear to be favorable to reductive dechlorination (natural degradation) of contaminants. Elevated levels of dissolved oxygen and redox potential indicate aerobic conditions exist in the impacted aquifer. This data is supported by the lack of breakdown products (TCE, 1,2-DCE and VC) observed in groundwater. These factors indicate that natural attenuation is not appropriate as the sole remedy for this site.

The Department is requiring an active remedial approach for this site. You will need to solicit three competitive consultant bids for the remedial phase of work. The remedial action plan should include the following:

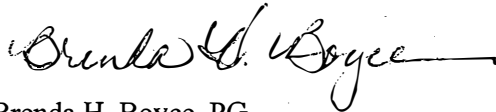
- A complete risk assessment should be conducted. Well construction logs from WGNHS should be obtained for the area to identify any private wells that could be receptors to contaminants. The

Waukesha water utility should be contacted to determine if there are any properties within the area that are not supplied with municipal water.

- A complete vapor intrusion evaluation should be conducted for the neighboring private residence and the subject property.
- Two additional piezometers should be installed to further delineate the vertical extent of PCE migration. A deeper well should be nested next to PZ-1 to an approximate depth of 50 feet and the other piezometer should be nested next to MW-8 to approximately 35 feet below grade.

The Department appreciates the actions you have taken to restore the environment at this site. If you have any questions, you may contact me at (262) 574-2140.

Sincerely,



Brenda H. Boyce, PG  
Hydrogeologist  
Remediation and Redevelopment Program

C: Trenton Ott – Drake Environmental, Inc.  
Michael P. Carlton – von Briesen & Roper, S.C.