



June 22, 2018

James W Lynch  
Estate of Leonard A. Bukowski Jr  
Lenny's Service Center  
623 Marquette Ave  
South Milwaukee, WI 53172

**RE: Response to Notice of Completion of Site Investigation**

PECFA # 53172-1943-00-A DNR BRRTS # 03-41-003443  
Lenny's Service Center, 1500 Rawson Ave, South Milwaukee

Dear Mr. Lynch:

On June 7, 2018, the Wisconsin Department of Natural Resources (DNR) reviewed the *Letter Report of Sampling Results* dated February 20, 2018, from Assured Environmental Associates, Inc. (AEA), for the site referenced above. Based on review of this report and previously requested information, the DNR has determined that additional site investigation is necessary to determine the degree and extent of contamination per Wis. Admin. Code Chapter NR 716.

In September 2017, the DNR identified the need for additional investigation to define the extent and degree of groundwater contamination and approved costs for installation of a down gradient monitoring well west of MW-23 with two rounds of groundwater monitoring from six wells. The DNR recently received AEA's Letter Report of Sampling Results with a Summary of Well Install and Abandon Location map. Based on the information provided, AEA installed a new monitoring well near the center of the groundwater plume, not in a position to define the down gradient extent of the groundwater contamination. A down gradient monitoring well still needs to be installed and monitored. In addition to this requirement, a comprehensive Site Investigation Report per Wis. Admin. Code Chapter NR 716.15 needs to be prepared to present all available information from the site in order to effectively evaluate the soil, groundwater and vapor conditions and to determine a path to closure. The Site Investigation Report should include:

Analysis

- Detailed, comprehensive analysis of all analytical soil data from each soil boring, hand auger and monitoring well. Description of the potential source(s) of soil and groundwater contamination.
- Detailed, comprehensive analysis of all groundwater analytical data including determination of groundwater flow direction and the extent of the groundwater plume.
- A timeline and detailed description of excavation activities and confirmation sampling.
- Recommendations for additional sampling, if necessary, to complete the definition of soil and groundwater contamination. The DNR has identified the need for a down gradient monitoring well.
- A vapor risk screening assessment. Please refer to DNR publication RR800 for guidance.
- An assessment of potential contaminant migration within utility corridors based on utility depth and location compared to soil, groundwater and free product contamination.

Maps

- Location Map and site layout map per Wis. Admin. Code Chapter NR 716.15 (2)(c)
- Detailed soil excavation map, including location of soil borings, geoprobes, hand augers, and monitoring wells.
- Comprehensive residual soil contamination isoconcentration maps for PVOCs, PAHs, and lead concentrations greater than NR 720 Direct Contact RCLs (industrial and non-industrial) and estimated extent of PVOCs, PAHs, and lead concentrations greater than NR 720 Groundwater Pathway RCLs. This should be used to determine where gaps maybe present in the investigation of the extent of contamination.
- Comprehensive groundwater isoconcentration maps for PVOCs, PAHs, and lead impacts greater than NR 140 ESs and/or NR 140 PALs
- Comprehensive geologic cross-section maps per Wis. Admin. Code Chapter NR 716.15 (4)(d).

#### Tables

- Tables containing analytical groundwater results for VOCs, PVOCs, PAHs, and lead for all monitoring wells associated with the site. Tables should include Wis. Admin. Code Chapter NR 140 ES and PAL standards.
- Tables containing analytical soil results for VOCs, PAHs, and lead from all soil borings, geoprobes, and hand auger samples. Tables should include Wis. Admin. Code Chapter NR 720 RCLs for industrial direct contact, non-industrial direct contact, and groundwater pathway standards.
- Groundwater Elevation Table indicating depth to groundwater in feet below ground surface for every monitoring well during each round of groundwater sampling.
- Free Product Table indicating the monitoring well(s) containing free product, the date free product was encountered, and the thickness of the free product in inches.

#### Construction Forms and Boring Logs

- Monitoring well construction forms for each monitoring well associated with the site.
- Soil boring logs for all soil borings and geoprobes associated with the site.

The site investigation report should be prepared and submitted to the DNR within 60 days prior to installation of the requested down gradient well so we can determine whether additional field work is needed to move the case to closure. Thank you for your efforts to protect Wisconsin's environment. If you have any questions, please contact me in writing at the letterhead address or by telephone at (608) 261-8509.

Sincerely,



Andrew Allés  
Hydrogeologist  
Remediation and Redevelopment Program

cc: Mr. Gregory Walsh, Assured Environmental Associates, Inc., 14120 Glendale Avenue, Brookfield, WI 53005  
Case File