



February 13, 2020

Mr. Lee Delcore
Wisconsin Department of Natural Resources
1155 Pilgrim Road
Plymouth, WI 53073

**Re: Change Order Request – Case Closure at:
Suggar Property
3301 – 60th St.
Kenosha, WI 53144
PECFA# 53144-4143-05
BRRTS# 03-30-004964
FID# 230156410**

Dear Mr. Delcore:

Midwest Environmental Consulting (MEC) is hereby submitting a Change Order Request for Petroleum Environmental Cleanup Fund (PECFA) costs to complete the Case Closure Request packet and abandon the groundwater monitoring wells for the above-referenced site. The additional costs total \$5,871.23.

On January 14, 2020, monitoring well MW-9 was installed on the Westown LLC property at 3203 – 60th Street, near the southwest corner of the intersection of 60th Street and 32nd Avenue. MW-9 was installed downgradient (East) from monitoring wells MW-6 and MW-7, located at 3213 – 60th Street, to provide definition of the groundwater quality standard exceedances exhibited at both wells.

The groundwater sample collected from MW-9 on January 22, 2020 and analyzed for petroleum volatile organic compounds (PVOCs) and naphthalene exhibited no contaminants above method detection limits (MDLs). As a consequence, the extent of groundwater contamination at the site has been defined. MEC is now the process of preparing the Site Investigation Report (SIR) and Remedial Action Options Report (ROAR) for the site. The location of monitoring well MW-9 and the distribution of groundwater quality standard exceedances are illustrated on Figure 1, attached.

The northern portion of the Suggar Property on-site building was constructed in 1912 as an apparent gasoline filling station and available records from as early as 1946 confirm that use. Three 500-gallon gasoline underground storage tanks were filled with concrete and closed in place on the site in 1980, with an unused 275-gallon used oil tank being removed in 2010. Due to the age of the release, the petroleum contamination at the site is highly weathered. The lighter end components have degraded in both soil and groundwater to levels below MDLs or to low level detections at nearly all sampling locations.



Definition of soil contamination was completed in 2018 and is confined to the source property and the immediately adjacent portion of the 33rd Avenue right-of-way. Two rounds of groundwater sampling at all of the site wells except MW-9 exhibit concentrations that are stable to decreasing. In addition, nine rounds of groundwater monitoring at MW-8 from 2008 to 2019 exhibit concentrations decreasing from exceeding enforcement standards to exceeding only preventive action limits. Therefore, the overall groundwater plume is stable to decreasing in extent and concentration. The groundwater monitoring well analytical results are summarized on Tables 1 and 2 attached.

Furthermore, vapor assessment and investigation activities, including collection of two sub-slab vapor samples onsite have demonstrated that vapor intrusion of the on-site building is not occurring and the buildings down gradient are not at risk for vapor intrusion.

In light of the above, it is MECs opinion that natural attenuation will bring groundwater contamination at the site into compliance with groundwater quality standards over time. Therefore, case closure is warranted based on the notification of the owners of three affected properties on the 3200 block of 60th Street as well as the City of Kenosha for the adjacent 33rd Avenue right-of-way. A Cap Maintenance Plan will be developed for the source property, requiring maintenance and inspection of the existing concrete pavement that covers the entire site.

If approved, the Closure Request activities will be conducted in accordance with the Petroleum Environmental Cleanup Fund Act usual & customary cost schedule. The proposed costs are outlined on the attached usual & customary spread sheet.

If you have any questions or need additional information please contact me at (262) 237-4351.

Sincerely,

A handwritten signature in blue ink that reads 'Sean Cranley'. The signature is written in a cursive style and is positioned above a horizontal line.

Sean Cranley, P.G.
Principal Hydrogeologist

Cc: Jose Ochoa – Responsible Party

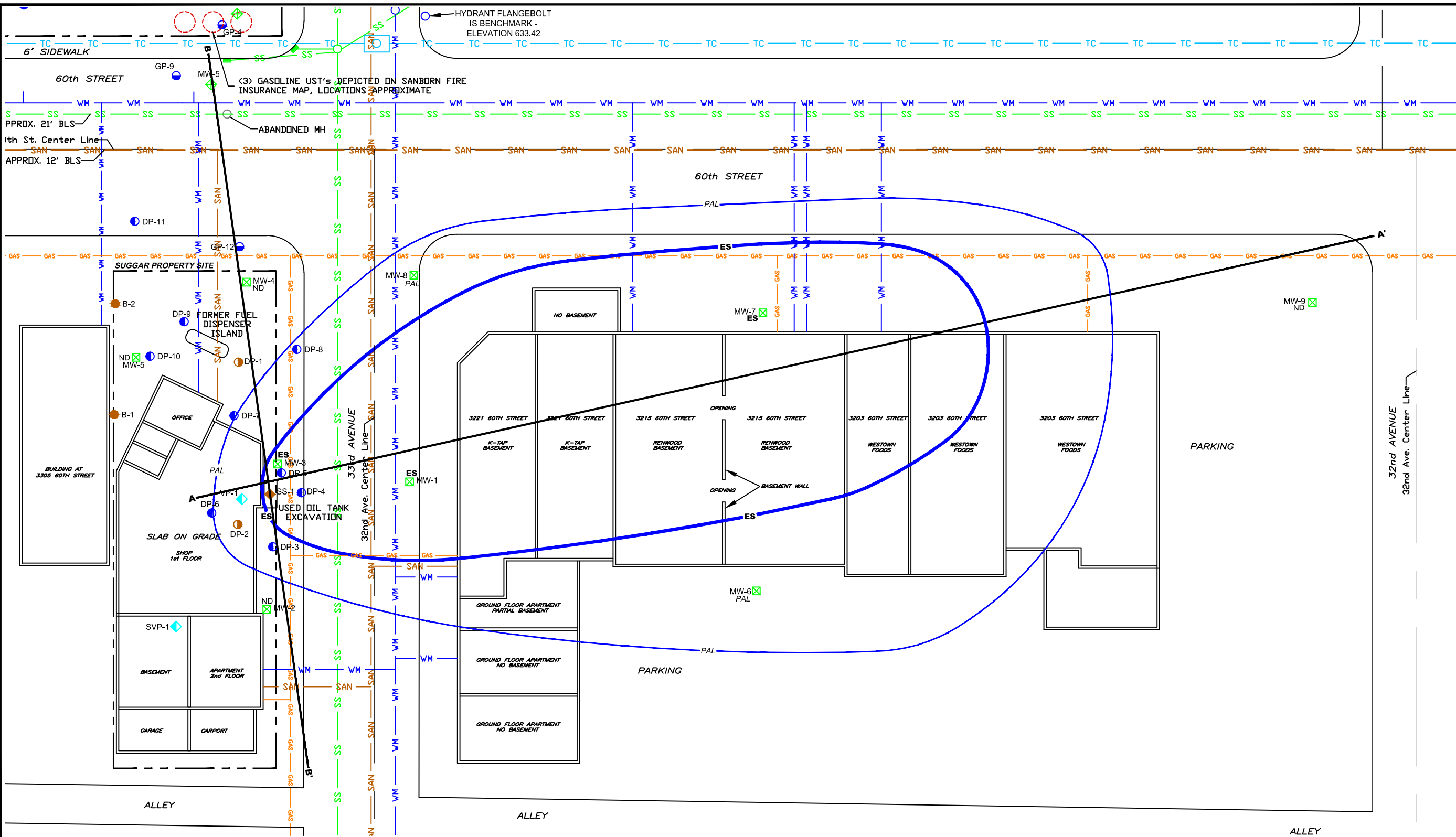


FIGURE 1
SUGGAR PROPERTY
SITE CONFIGURATION MAP
3301 60TH STREET
KENOSHA, WISCONSIN

LEGEND

- ☒ - SUGGAR GROUNDWATER MONITORING WELL LOCATION
- ◇ - MUELLERS GROUNDWATER MONITORING WELL LOCATION
- - SUGGAR DIRECT-PUSH SOIL BORING LOCATION
- - SUGGAR DIRECT-PUSH SOIL BORING / GROUNDWATER SAMPLING LOCATION
- - MUELLERS DIRECT-PUSH SOIL BORING / GROUNDWATER SAMPLING LOCATION
- ◇ - SUGGAR SUB-SLAB VAPOR SAMPLING LOCATION
- ◆ - TANK CLOSURE SOIL SAMPLE LOCATION
- - 3305 60th STREET PHASE II SOIL BORING LOCATION
- - FLOOR DRAIN
- GAS - GAS
- ELEC - ELECTRICAL
- WM - WATER
- SAN - SANITARY SEWER
- SS - STORM SEWER
- TC - TELECOM
- ND - NO DETECTS
- ES - ONE OR MORE GROUNDWATER CONTAMINANTS EXCEED ENFORCEMENT STANDARDS
- PAL - ONE OR MORE GROUNDWATER CONTAMINANTS EXCEED PREVENTIVE ACTION LIMITS
- ES (thick blue line) - INFERRED EXTENT OF GROUNDWATER CONTAMINATION EXCEEDING ENFORCEMENT STANDARDS
- PAL (thin blue line) - INFERRED EXTENT OF GROUNDWATER CONTAMINATION EXCEEDING PREVENTIVE ACTION LIMITS



Approved By: S. CRANLEY	Figure 1
Date Approved: 2/13/2020	
Date Drawn: 2/13/2020	
Drawn by: R. SCHWARTZ	

Table 1 (Page 1 of 2)
Groundwater Sample Analytical Results Summary
Suggar Property
Kenosha, WI

Parameters	Sample Information / Results								Groundwater Quality Standards	
Sample ID	MW-1		MW-2		MW-3		MW-4		PAL	ES
Sample Date	6/6/18	6/13/19	6/6/18	6/13/19	6/6/18	6/13/19	12/20/18	6/13/19		
PVOCs (ug/l)									ug/l	ug/l
Benzene	<u>3.9</u>	<u>1.9</u>	<0.31	<0.31	<0.31	1.8	<0.31	<0.31	0.5	5
Ethylbenzene	2800	1680	<0.33	<0.33	1250	1170	<0.33	<0.33	140	700
Methyl-tert-butyl-ether	9.6	6.1	<0.32	<0.32	5.7	6.2	<0.32	<0.32	12	60
Naphthalene	<u>17.9</u>	4.9	<0.51	<0.51	7.9	4.8	<0.51	<0.51	10	100
Toluene	14.6	5.5	<0.49	<0.49	5.1	4.6	<0.49	<0.49	160	800
1,2,4-Trimethylbenzene	<u>231</u>	84.6	<0.34	<0.34	1080	809	<0.34	<0.34	96 (1)	480 (1)
1,3,5-Trimethylbenzene	<u>5.4</u>	1.5	<0.33	<0.33	76.2	15.2	<0.33	<0.33	96 (1)	480 (1)
Xylenes	<u>988.7</u>	365.1	<0.98	<0.98	<u>936.9</u>	<u>830.1</u>	<0.98	<0.98	400	2000

Notes:

Table includes detected analytes only, which are right justified in the columns.

Italic type indicates concentration exceeds PAL.

Bold type indicates concentration exceeds ES.

PVOCs - Petroleum Volatile Organic Compounds

PAL - NR 140 Preventive Action Limit

ES - NR 140 Enforcement Standard

NA - Not analyzed or not applicable

(1) - The groundwater quality stanadards are applied to the combined concentrations of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene.

Table 1 (Page 2 of 2)
Groundwater Sample Analytical Results Summary
Sugar Property
Kenosha, WI

Parameters	Sample Information / Results									Groundwater Quality Standards			
	Sample ID	MW-5		MW-6		MW-7		MW-8		MW-9	PAL	ES	
Sample Date	6/6/18	6/13/19	12/20/18	6/13/19	12/20/18	6/13/19	12/20/18	6/13/19	12/20/18	6/13/19	1/27/20		
PVOCs (ug/l)												ug/l	ug/l
Benzene	<0.31	<0.31	5.2	<i>1.7</i>	79.2	42.6	<i>2.4</i>	<i>2.1</i>	<0.25			0.5	5
Ethylbenzene	<0.33	<0.33	552	<i>153</i>	2690	1440	<i>455</i>	<i>584</i>	<0.22			140	700
Methyl-tert-butyl-ether	<0.32	<0.32	<i>20.7</i>	5.2	<i>51.2</i>	<i>21.2</i>	6.6	6.7	<1.2			12	60
Naphthalene	<0.51	<0.51	80.5	<i>19.6</i>	277	127	3.1	2.9	<1.2			10	100
Toluene	<0.49	<0.49	12.7	4.8	<i>648</i>	<i>475</i>	2.7	4.5	<0.17			160	800
1,2,4-Trimethylbenzene	<0.34	<0.34	10.9	2.3	1250	663	<i>99.9</i>	<i>162</i>	<0.84			96 (1)	480 (1)
1,3,5-Trimethylbenzene	<0.33	<0.33	45.0	16.0	304	166	<0.66	<1.3	<0.87			96 (1)	480 (1)
Xylenes	<0.98	<0.98	34.8	9.8	2565	<i>1405</i>	47.4	63.3	<1.5			400	2000

Notes:

Table includes detected analytes only, which are right justified in the columns.

Italic type indicates concentration exceeds PAL.

Bold type indicates concentration exceeds ES.

PVOCs - Petroleum Volatile Organic Compounds

PAL - NR 140 Preventive Action Limit

ES - NR 140 Enforcement Standard

NA - Not analyzed or not applicable

(1) - The groundwater quality stanadards are applied to the combined concentrations of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene.

Table 2 (Page 1 of 1)
Groundwater Analytical Table - MW-8
Suggar Property
Kenosha

Sample ID	MW-8										NR 140 Standards	
	Sample Collection Date	07/09/08	10/17/08	10/19/09	01/13/10	04/28/10	07/14/10	11/09/10	04/13/11	06/06/18	06/13/19	PAL
Analyte												
PVOCs/Naphthalene (ug/l)												
Benzene	<2.5	<2.5	6.6	NA	<u>4.0</u>	<1.9	<3.9	<2.5	<u>2.4</u>	<u>2.1</u>	0.5	5
Ethylbenzene	<u>410</u>	<u>440</u>	997	NA	785	<u>669</u>	816	<u>560</u>	<u>455</u>	<u>584</u>	140	700
Methyl tert-butyl ether	<2.3	<2.3	10.2	NA	7.6	9.5	6.9	<2.3	6.6	6.7	12	60
Napthalene	<5.0	<5.0	6.8	NA	5.5	7.7	<u>15.9</u>	<u>26</u>	3.1	2.9	10	100
Toluene	4.8	3.7	6.3	NA	7.9	8.8	10.3	<2.5	2.7	4.5	160	800
1,2,4 -Trimethyl benzene	740	720	1210	NA	986	913	1090	780	<u>99.9</u>	<u>162</u>	96(1)	480(1)
1,3,5-Trimethylbenzene	<u><2.8</u>	<u><1.9</u>	<u><4.0</u>	NA	<u><4.0</u>	<u><2.0</u>	<u><4.0</u>	<u><1.9</u>	<u><0.66</u>	<u><1.3</u>	96(1)	480(1)
Total Xylenes	230	280	<u>661.1</u>	NA	<u>508.8</u>	<u>414.9</u>	<u>504.8</u>	280	47.4	63.3	400	2,000

Notes:

Table includes detected analytes only.

Italic type indicates concentration exceeds PAL.

Bold type indicates concentration exceeds ES.

PVOCs - Petroleum Volatile Organic Compounds

PAL - NR 140 Preventive Action Limit

ES - NR 140 Enforcement Standard

NA - Well Inaccessible Due to Ice

(1) - The groundwater quality stanadards are applied to the combined concentrations of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene.

Usual and Customary Standardized Invoice #27

January 2020 - June 2020



RR-113a-E

PECFA #: 53144-4143-05
 BRRTS #: 03-30-004964
 Site Name: Suggar Property
 Site Address: 3301 - 60th St. Kenosha

Vendor Name: Midwest Environmental Consulting
 Invoice #: NA
 Invoice Date: 2020 02
 Check #: NA

U&C Total \$ 5,871.23
 Variance to U&C Total \$ -
 Grand Total \$ 5,871.23

TASK	TASK DESCRIPTION	SERVICES	ACTIVITY CODE	ACTIVITY REFERENCE CODE DESCRIPTION	UNIT	MAX UNIT COST	UNITS	TOTAL MAX
5	Closure Request		CR15	Continuing Obligation Packet Submittal (For Source Property	Packet	\$ 522.58	1	\$ 522.58
5	Closure Request		CR20	Continuing Obligation Packet Submittal (For off-site Propertie	Per Additional Property	\$ 229.39	4	\$ 917.56
5	Closure Request		CR25	Closure Request Following SIR	Submittal	\$ 1,287.50	1	\$ 1,287.50
5	Closure Request		CR30	PE review and certification of closure packet	Site	\$ 1,129.60	1	\$ 1,129.60
8	Well Abandonment	Consultant	WAB05	Coordination	Site	\$ 162.86	1	\$ 162.86
8	Well Abandonment	Commodity	WAB35	Well Abandonment Mob/Demob	Site	\$ 453.81	1	\$ 453.81
8	Well Abandonment	Commodity	WAB40	Well Abandonment (2 inch)	Ft	\$ 5.74	117.5	\$ 674.45
35	Cap Maintenance Plan		CMP05	Cap Maintenance Plan	Plan	\$ 329.64	1	\$ 329.64
36	Change Order Request		COR05	Change Order Request (cost cap exceedance requests)	Change Order	\$ 393.23	1	\$ 393.23