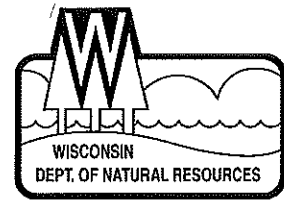


State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Waukesha Service Center
141 NW Barstow St
Waukesha WI 53188

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
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TTY Access via relay - 711



November 17, 2014

Mr. Robert Miller
Spic & Span, Inc.
4301 North Richards Street
Milwaukee, WI 53212

Subject: Spic & Span, Inc.
4301 North Richards Street, Waukesha, WI
FID# 241040690, BRRTS# 02-41-000033

Dear Mr. Miller:

On November 6, 2014, the Wisconsin Department of Natural Resources' (the Department) Southeast Region Closure Committee reviewed your request for closure of the case described above. The Southeast Region Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of your closure request, the closure committee has denied closure because additional work must be completed. The purpose of this letter is to inform you of the remaining requirements for obtaining closure, and to request your written response within 60 days of receiving this letter.

Your site was denied closure because the site investigation has not been completed. After the site investigation is finalized, a remedial action must be completed. Also Spic & Span, Inc. provided the available documentation regarding the excavated soils from the three Stoddard solvent underground storage tanks (USTs) beneath the building; however, because the contaminants present in the release currently may pose a vapor intrusion risk to the building the Department is requiring an assessment of the vapor intrusion pathway in that UST area.

Site Investigation

The extent of soil contamination has not been defined at the site. Several sampling locations or borings were identified on Figure B.2.b, the Post-remedial Soil Contamination map; however, there is no documentation verifying whether contamination is present or not at most listed sampling locations. Soil samples with associated analytical data only include SB-1 (only EP Toxicity data, not volatile organic compound {VOC} data), SB-2, B1, S5, S7, S8, S13 and S15. Soil samples collected from B1, S5, S7, S8, S13 and S15 all contain a number VOCs at concentrations that exceed the s. NR 720.10, Wis. Adm. Code, groundwater pathway residual contaminant levels (RCLs). These same samples, except those from B1, also contained ethylbenzene at concentrations that exceed the s. NR 720.12, Wis. Adm. Code, residential direct contact RCL. Sample S5 also contained vinyl chloride at a concentration that exceeded

the residential direct contact RCL. Additional soil sampling will be required to delineate the extent of soil contamination.

In the future when submitting figures illustrating the extent of soil or groundwater contamination, in addition to showing the extent of contamination with a line, please have you consultant include the analytical data on the figure(s). On soil data analytical tables, please also have you consultant include the Department's RCLs for each contaminant in the future.

Groundwater flow direction as mapped in the last three groundwater sampling events was mapped as generally westerly. In 1988, when groundwater was sampled the first time at the site groundwater flow direction was generally easterly. Due to the nature of the contaminants present and the potential for vapor intrusion from these contaminants, it would be pertinent to install a groundwater monitoring well between the former UST excavation and the building, or collect sub-slab vapor samples from beneath the building.

Remedial Action

A remedial action must be taken to alleviate the direct contact threat represented by the soils that contain VOCs at concentrations that exceed the residential direct contact RCLs. The site will also have to be included on the Remediation and Redevelopment Program's GIS Registry for soil contamination. The appropriate GIS fee(s) must be submitted when closure is requested.

Additional groundwater monitoring will have to be completed to demonstrate the concentrations of contaminants in the groundwater are below the s. NR 140.10, Wis. Adm. Code, enforcement standard for two consecutive sampling events, or the site will have to be included on the GIS Registry for groundwater contamination. The laboratory should be able to achieve a detection level that is equal or less than the enforcement standard for the targeted analytes. In the last two sampling events, the laboratory detection level exceeded the enforcement standard for vinyl chloride.

Three Stoddard Solvent USTs

In a March 16, 2004 letter, the Department requested a response as to the disposition of the excavated contaminated soil removed from the area of the three former Stoddard solvent USTs. The Department received your response in an October 8, 2014 letter. In 2004, vapor intrusion was not a known health risk or issue. Vapor intrusion is now known to be a serious risk to human health. The VOCs present in Stoddard solvent present a potential vapor intrusion risk to the building. The Department is therefore requiring that you conduct a vapor intrusion assessment of the area of the former three Stoddard solvent USTs beneath the building.

Please provide a brief plan for the work requested above.

Please respond in writing, within 60 days of the date of this letter, with a schedule of your plans to meet these requirements. Until requirements have been met, your site will remain "open" and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 724.13 (3), Wis. Adm. Code.

The Department 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,

A handwritten signature in black ink, appearing to read "D. G. Volkert", with a long horizontal flourish extending to the right.

David G. Volkert, P.G.
Hydrogeologist
Bureau for Remediation & Redevelopment

Attachment

cc: Brian Schneider, Graef
SER File