



October 19, 2015

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

Subject: Case Closure Denial for Incomplete Site Investigation  
Spic & Span, Inc., 4301 North Richards Street, Milwaukee, Wisconsin  
DNR BRRTS Activity #: 02-41-000033  
FID #: 241040690

Dear Mr. Miller:

On October 8, 2015, the Wisconsin Department of Natural Resource (WDNR) Southeast Region Closure Committee reviewed your request for closure of the case identified above. The WDNR reviews environmental remediation cases for compliance with state and federal laws to maintain consistency in the closure of these cases. As discussed with your consultant on October 8, 2015, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure.

**Need to Define the Degree and Extent of Contamination**

To meet the requirements for site closure, additional investigation is necessary to delineate the degree and extent of contamination.

- 1) Additional investigation is necessary to delineate the extent of soil contamination both vertically and horizontally. Samples should be analyzed for full volatile organic compounds (VOCs) as many of the locations previously sampled and used for delineation purposes were not analyzed for select VOCs that were identified in the January 27, 2015 sampling event.
- 2) Collect water level data from the monitoring well network to confirm the direction of groundwater flow. Resample the existing monitoring well network and evaluate the data to determine future monitoring. Samples should be analyzed for full VOCs. Additional investigation may be necessary to the east of GP-1A/TMW-1 to delineate the extent of groundwater contamination.
- 3) Include soil and groundwater sampling results on a map to assist in delineation. Update soil tables to reflect both industrial and non-industrial direct contact residual contaminant levels (RCLs). A geologic cross section figure should be completed for this site, see section B.3.a of the Case Closure – GIS Registry form.
- 4) Upon resubmittal of a completed closure request, applicable GIS Fee(s) may be required: \$350 Database Fee for Groundwater or Other Condition and \$300 Database Fee for Soil.

A complete closure request should be resubmitted once all the above requirements have been satisfied, together with any additional documentation, to inform the Department that applicable requirements have been met. Case closure can be considered once all the above requirements have been satisfied.

**Within 60 days of the date of this letter, please respond in writing 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 700.11, Wis. Adm. Code.** You will also be responsible for any operation and maintenance activities required under s. NR 724.13, Wis. Adm. Code.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact the Project Manager, Trevor Nobile, at (414) 263-8524 or at [trevor.nobile@wisconsin.gov](mailto:trevor.nobile@wisconsin.gov).

Sincerely,



Michele R. Norman  
SER Team Supervisor  
Remediation & Redevelopment Program

cc: Brian Schneider, Graef, 125 South 84<sup>th</sup> Street, Suite 401, Milwaukee, WI 53214  
SER File