State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Scott Humrickhouse, Regional Director

Wausau Service Center
5310 Rib Mountain Drive
Wausau, Wisconsin 54401
Telephone 715-359-6514
FAX 715-355-5253

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FILE COPY

MR CHARLES GHIDORZI
2199 STEWART AVENUE
WAUSAU WI 54401

Subject: Site Investigation Report and May 9, 2003 Meeting, Former Wausau Dry Cleaner Property, Wausau, Wisconsin

Dear Mr. Ghidorzi:

Thank you and Mr. Ray deLong (REI) for meeting with me last Friday. I wanted to discuss the site investigation and remedial options for the former Wausau Dry Cleaner property. The following are the highlights of our discussions and my comments from my report review.

- We agreed that the extent of soil contamination had been defined for all practical purposes. A few soil samples were collected from beneath the building and the results indicated that the contamination was beneath the building.

- Due to the levels of tetrachloroethene (PCE) in the top four feet of the soil, the DNR recommended that an active remedial option be pursued by the REI. The concentrations ranged from "no detect" to 7,753 ug/kg. While the concentrations were not above the generic inhalation and ingestion numbers in EPA's Appendix A, of the **Soil Screening Guidance: Technical Background Document** (May 1996), they may pose a vapor threat once the new building and parking lot are completed. It was recommended that a more active soil remedial option be chosen. The concentrations are also a threat to the groundwater.

- On May 1, 2003, Lisa Gutknecht, Bill Evans and Mark Gordon of the Department of Natural Resources discussed whether the contaminated soil at the site would be considered a hazardous waste. While some of the soil contamination did contain a listed hazardous waste, we looked at the "contained out" portion of the guidance to determine if the soils at the site met this criterion. Contaminated soil containing a listed hazardous waste remains hazardous until one of two criteria is met. If the site specific RCLs values are met then the soil can obtain a "contained out" determination and can be managed in accordance with ch. NR 718 Wisconsin Administrative Code. The Department has calculated site specific RCLs for PCE and trichloroethene (TCE). These numbers are 33 ppm and 14 ppm respectively.

PCE and TCE soil concentrations to date have been below these numbers. Therefore the contaminated soil at the site could be managed under ch. 718 Wis. Adm. Code.

- As we discussed a plan should be submitted for the additional monitoring wells and piezometers that will be installed at the site. A well nest should be installed east of monitoring well MW-4. The nest should include a monitoring well and two piezometers, one to a depth of approximately 45 feet below ground surface and the second to a depth of approximately 65 feet below ground surface. This is one of the locations we discussed during our meeting.

- All wells should be sampled for volatile organic compounds on a quarterly basis. Select wells should be sampled for natural attenuation parameters. These wells will be selected after all wells have been installed and sampled once.

- You need to determine the hydraulic conductivity of the groundwater at the site.

- Please correct units in Table 2A and the concentrations of naphthalene and trichloroethene in Table 2k. Submit corrected pages to the Department.

- Please explain how well nests MW-1 and MW-5 were constructed.

Please submit a workplan for the additional groundwater investigation and the information for the last two bullets. Once the groundwater investigation has been completed, you should submit a remedial action plan for the site. I appreciate the time you took to me with me last Friday. If you have any questions regarding this letter, please contact me at (715) 359-6514.

Sincerely,

Lisa Gutknecht

Lisa Gutknecht
Remediation & Redevelopment Program

c: Bill Evans, Eau Claire
Richard Brown, Wausau
James Silverwood, 60 Longcommon Rd., Riverside, IL 60546
Ray deLong, REI