



October 19, 2018

MR JERRY RAND  
PO BOX 97  
WEBSTER WI 54893

SUBJECT: Case Closure Not Recommended – Additional Actions Needed  
Webster VOC Contamination Site (Webster Quik Wash)  
26507 Lakeland Avenue, Webster, Wisconsin  
DNR BRRTS #02-07-000337

Dear Mr. Rand:

On October 4, 2018, the Department of Natural Resources' (DNR) Northern Region Closure Committee reviewed your request for closure of the case described above. The Closure Committee 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, MSA Professional Services, on October 5, 2018, the closure committee has determined that closure could not be approved because additional requirements must be met. The purpose of this letter is to further inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with your written response regarding the necessary work and a schedule for completion of this work.

As noted above, additional site work is necessary to meet the requirements for site closure because the following deficiencies in the site investigation, remedial action and closure request package were identified (applicable administrative code citations are in parentheses).

**Need to Define the Degree and Extent of Contamination (Wis. Adm. Code § NR 716)**

Additional soil and groundwater sampling is needed to define the degree and extent of tetrachloroethylene (also known as PCE) contamination. Sampling is needed to define the residual contamination source area. Additional groundwater monitoring wells, and potentially nested piezometers, are needed on the source property and to the south, west and north-northwest of the property to further define degree and horizontal and vertical extent of contamination in groundwater.

**Need to Complete a Vapor Investigation (Wis. Adm. Code § NR 716)**

Additional site investigation is needed to determine whether or not vapor intrusion is a completed pathway at this site, or if there is a risk of future exposure due to residual PCE contamination. The primary concern is with properties to the north-west and south-west of the source property.

**Need to Conduct Additional Groundwater Monitoring (Wis. Adm. Code §§ NR 716, NR 726)**

Additional groundwater monitoring is needed in order to establish compliance with the closure criteria of ch. NR 726. If monitored natural attenuation is to be used as a remedial action for groundwater, you need to demonstrate that there is a stable or receding plume.

**Need to Conduct A Remedial Action (Wis. Adm. Code §§ NR 722, NR 726)**

A remedial action is needed to comply with the closure criteria of ch. NR 726. The remedial action will need to address residual contamination in the source area with respect to contamination in soil, dissolved in groundwater and in the vapor phase. As we have explained to your consultant, installation of vapor mitigation systems is not a substitute for conducting a remedial action. Further justification of natural attenuation as a remedial strategy will be needed as well.

A complete closure request should be re-submitted once all the above requirements have been satisfied, together with any required documentation, to let the Department know 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 Wis. Adm. Code § NR 700.11.** You will also be responsible for any operation and maintenance activities required under Wis. Adm. Code § NR 724.13.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact the DNR Project Manager Ralph Smith at (608) 261-6543 or by email at [Ralph.Smith@Wisconsin.gov](mailto:Ralph.Smith@Wisconsin.gov). You can also contact me at (715) 685-2920 or by email at [Christopher.Saari@Wisconsin.gov](mailto:Christopher.Saari@Wisconsin.gov).

Sincerely,



Christopher A. Saari  
Northern Region Team Supervisor  
Remediation and Redevelopment Program

cc: Erica Klingfus – MSA Professional Services (via email)  
Brian Hegge – MSA Professional Services (via email)  
Ralph Smith – DNR Madison (via email)