



October 25, 2012

Frank Pacetti
City of Kenosha Administrator
625 52nd Street, Room 300
Kenosha, WI 53140

Dear Mr. Pacetti:

Subject: Former C&L Industrial Cleaners Property, 8927 Sheridan Rd., Kenosha, file reference FID #230011650, BRRTS #0230379474.

This case came up in a recent file audit as not having any activity since 2007. It is my understanding that the City of Kenosha has this property due to foreclosure. I have reviewed the file and have determined that significant contamination is at the site. Furthermore there is a residence nearby, a duplex that may be at risk for vapor intrusion of chlorinated solvent vapors since it is within 100 feet of a source of perchloroethylene (PCE) in soil. You should take action to investigate this pathway by means of collecting a soil gas or sub-slab sample in the near future.

The City of Kenosha started investigations here with state and federal grants with the purpose of redevelopment in 2001 and 2002. The City's consultant at the time, STS, did a phase I and phase II environmental assessments that revealed the presence of hazardous chemicals that were later removed by US EPA. STS also documented several areas of concern including drum storage areas and industrial cleaning wash/rinse pits in the floor. Phase 2 sampling, and subsequent site investigations funded with state and federal brownfields grants showed soil and groundwater contaminated with PCE and its breakdown products. In 2007 the City's consultant did an extensive round of investigation and developed a remedial action plan that includes excavation and proper disposal of the most heavily PCE contaminated soils (above 100,000 parts-per-billion PCE), engineered cover of soils above 10,000 ppb PCE and enhanced bioremediation in the groundwater, followed by natural attenuation groundwater monitoring using the existing network of monitoring wells.

Please have your consultant submit an update as to what work has been done since 2007 and a brief plan for work needed to move this case towards closure. If no work has been done, the department directs you to take actions needed to minimize the threat to public health and safety posed by high concentrations of chlorinated solvent contamination in soil and groundwater on the property. I am particularly concerned with the following:

- Soil concentrations above direct contact standards in surface soil.
- Concentrations of chlorinated solvent in groundwater that appear to be increasing in concentration.
- The potential vapor intrusion threat to the nearby residence.

I have the following additional comments/requirements:

- Install a source area and a downgradient piezometer to be sampled for VOCs.
- Make a hazardous waste determination on the soil to be excavated for remedial purposes.

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- Measure current groundwater elevations in the monitoring wells and submit an updated groundwater flow map.
- Further evaluate the potential for vapor intrusion into the on-site residence by means of soil gas or sub-slab sampling.
- I approve your consultant's remedial action plan in concept; however, please do a current sampling round of the monitoring wells and submit a brief update to the remedial action plan based on current conditions.

Have your consultant submit, within 30-days of your receipt of this letter, a brief schedule of when this work will get started to Shanna Laube in the Sturtevant office at:

Shanna Laube, Hydrogeologist
Wisconsin Department of Natural Resources Sturtevant Service Center
9531 Rayne Rd, Suite 4
Sturtevant, WI 53177

Send a copy to me. If you have any questions about this letter, please call me at 920-892-8756 extension 3023.

Sincerely



John Feeney
Wisconsin Department of Natural Resources

Cc: STS
Shanna Laube, WDNR
SER File