



September 18, 2023

Mr. Gregory Gunderson  
Gunderson Cleaners, Inc.  
41 Main Street  
Menasha, WI 54952

*Sent via Electronic Mail Only to [greg.gunderson@gundersongroup.com](mailto:greg.gunderson@gundersongroup.com)*

Subject: Review of Site Investigation Work Plan  
Gunderson Cleaners Inc  
907 S Green Bay Road (formerly 891 South Green Bay Road), Neenah, Wisconsin  
BRRTS #: 02-71-467001, FID #: 471074120

Dear Mr. Gunderson:

On August 18, 2023, the Wisconsin Department of Natural Resources (DNR) received the “Workplan and Cost Estimate for Additional Site Investigation and Closure Reporting” document (Report) prepared for Greg Gunderson of Gunderson Cleaners by Wayne Fassbender of Enviroforensics, LLC. The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

### Background

The Gunderson Cleaners Inc site (Site) formerly contained a strip mall which housed the Gunderson Cleaners dry cleaning facility near the southern end of the former building. Dry cleaning operations were performed from approximately 1984 through 1990, and tetrachloroethylene (PCE) was the primary solvent used. Soil contamination was discovered during a phase II environmental site assessment (ESA) performed in 2003, and a responsible party (RP) letter was sent to Mr. Gary Gunderson of Gunderson Cleaners, Inc. on July 1, 2003.

Since the time of the Site’s creation in 2003, investigation and remedial action have taken place at the Site. The strip mall was demolished, and approximately 5,000 tons of soil was treated and disposed of at a licensed landfill as part of two excavation events that occurred in 2009 and 2013. After the 2013 excavation, a Goodwill store was constructed, which included installation of an active vapor mitigation system (VMS) during the store’s construction.

Residual chlorinated volatile organic compound (CVOC) contamination is present in soil in the southern portion of the Goodwill store and extends westward into the Interstate 41 right-of-way (ROW). CVOC contamination is present in groundwater in the same vicinity, extending into the Interstate 41 ROW, and extending eastward into the Goodwill parking lot.

### SIWP Summary

To delineate the environmental impacts of the reported discharge, the Report recommended completion of the following activities:

- Decommission the VMS in the on-site building and perform three (3) rounds of vapor sampling after the system's fan is shut down.
- Assess whether the adjacent Aldi Foods building screens in for a vapor investigation.
- Perform two rounds of groundwater monitoring at Sump B for VOCs to establish a stable or decreasing trend.
- Sample and analyze previously sampled monitoring wells, MW-105, MW-116, PZ-104 and PZ-119, for per- and polyfluoroalkyl substances (PFAS).
- Contact local agencies to obtain locational information for site utilities and perform an assessment to determine if a utility corridor investigation is required.

#### DNR Review of the SIWP

Following the DNR's review of the Report, the DNR requests that you proceed with the proposed work, while incorporating the following comments:

- Vapor
  - DNR agrees with limiting vapor sampling to newly installed VP-8 and VP-9 for the initial round of post-decommissioning sampling, however, subsequent sampling rounds should include VP-6, VP-7, VP-8 and VP-9, at a minimum, to cover more of the interior of the building footprint.
  - There were conflicting timelines within the report for when the initial round of sampling will be completed, and DNR would like to confirm that the initial round should be performed within 2-4 weeks of VMS shut down.
  - If vapor risk screening levels (VRSLs) are exceeded at any time, the system should immediately be turned active and re-commissioned.
    - Commissioning should include pressure field extension (PFE) testing with vacuum measured at all vapor ports.
    - An interim action report with standalone operation, maintenance and monitoring (OM&M) plan will need to be submitted to the DNR.
    - The continuing obligation for long-term OM&M and annual inspection would be applied to the Site at the time of this interim action.
  - DNR agrees with assessing if Aldi Foods requires a vapor investigation and providing this assessment to the DNR. If vapor sampling is required, a brief supplemental workplan needs to be submitted to DNR for review.
- Groundwater
  - DNR is requesting that the entire monitoring well network be sampled and analyzed for VOCs for at least one round; the entire well network has not been sampled since May 2022.
  - Historic (if available) and future water level measurements for the sumps need to be submitted to the DNR.
- Utilities
  - DNR agrees with the iterative approach to the utility investigation.
  - DNR recommends referencing *Guidance for Documenting the Investigation of Human-made Preferential Pathways Including Utility Corridors* ([RR-649](#)) for whether a utility investigation is warranted.

In addition, please keep in mind that depending upon the results of the sampling, it may be necessary to expand the sampling to define the degree and extent of the contamination.

### Schedule

The submitted Report includes a proposed schedule for conducting the field investigation, per Wis. Admin. Code § NR 716.09(2)(h):

- August – September 2023: Non-heating month sub-slab vapor sampling event for decommissioning of the VMS, along with the first groundwater sampling event and any sanitary sewer or vapor sampling within the Aldi building, if required.
- November – December 2023: First heating month sub-slab sampling event for decommissioning of the VMS, along with second groundwater sampling event and second sanitary sewer and/or Aldi Foods vapor sampling event, if required.
- February – March 2024: Final heating month sub-slab vapor sampling event for decommissioning of the VMS, along with the final sanitary sewer and/or Aldi Foods vapor sampling event, if required.

Based on DNR's conversation with Wayne Fassbender of Enviroforensics on September 18, 2023, this schedule may vary as the VMS is planned to be shut down in October of 2023.

Furthermore, the DNR is requesting implementation of the following schedule:

- Sampling results must be sent to the DNR and property owner(s), including owners of off-site properties from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14).
- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR suggests that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 920-366-5685 or [Josie.Schultz@wisconsin.gov](mailto:Josie.Schultz@wisconsin.gov).

Sincerely,



Josie Schultz  
Project Manager – Hydrogeologist  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

cc: Wayne Fassbender, Enviroforensics LLC ([wfassbender@enviroforensics.com](mailto:wfassbender@enviroforensics.com))  
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