



January 30, 2024

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

Sent via electronic mail only to greg.gunderson@gundersongroup.com

Subject: Review of Site Investigation Work Plan
Gunderson Cleaners Inc
118 High Avenue, Oshkosh, Wisconsin
BRRTS #: 02-71-467002, FID #: 471011970

Dear Mr. Gunderson:

On December 19, 2023, the Wisconsin Department of Natural Resources (DNR) received the “Investigation Work Plan” (Report) prepared for Gunderson Cleaners Inc. by 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 Site operated as a laundry service since the 1920s, and dry cleaning operations were performed by Mr. Gary Gunderson from approximately the 1940s through the mid-1980s; both perchloroethylene (PCE) and Stoddard solvents were used for dry cleaning purposes. On June 24, 2003, DNR was notified of contamination discovered on the Site during a Phase II Environmental Site Assessment, and a responsible party letter was issued to Mr. Gary Gunderson on July 14, 2003. Since that time, site investigation and a remedial action, including multiple excavations, have occurred at the site.

SIWP Summary

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

- Shallow soil sampling in the source area;
- Groundwater monitoring;
- Installation of two additional monitoring wells;
- Investigation of preferential pathways; and
- Obtaining additional information regarding off-site buildings that screen in for a vapor investigation.

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:

1. Soil

- a. DNR concurs with the proposed shallow soil sampling locations, however, additional shallow soil sampling is recommended in the following locations:
 - i. To the south of the SE by Thompson Studio excavation sidewall sample. This sample location detected 6,000 ug/kg PCE at 2-3 feet below ground surface (fbgs), and there was no basement present to the south of this location.
 - ii. Surrounding the excavation in the north alley. There were no shallow soil samples obtained in this area and surface contamination may be present from disposal of dry cleaning waste in dumpsters historically located here.
- b. DNR recommends that soil samples be obtained from the 0-2 and 4-6 fbgs intervals for laboratory analysis, rather than the 2-4 fbgs interval as proposed within the Report.

2. Groundwater

- a. DNR concurs with the continued monitoring of the entire well network and revisiting if a deeper piezometer is required if trends increase at PZ-117.
- b. The placement of the proposed monitoring wells is adequate, however, DNR recommends that a deeper soil and/or groundwater sample be obtained from both locations in the same interval that PZ-117 is screened.
- c. DNR concurs with collecting groundwater samples from the preferential pathway study locations within the rights-of-way.

3. Vapor

- a. DNR is unable to concur that the vapor investigation is complete at this time as it is dependent on findings of the proposed field visit.
- b. DNR may require installation and sampling of additional vapor ports nearer to the center of the off-site building(s), unless adequate justification can be provided that the former/current vapor port sample locations are representative of vapor accumulation beneath the slab.
- c. Due to most buildings previously having a vapor risk screening level (VRSL) exceedance for sub-slab vapors, DNR recommends performing long duration (i.e. 7 to 14 days) passive indoor air sampling at all previously sampled locations for drycleaner chlorinated volatile organic compounds (CVOCs); i.e. perchloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene, trans-1,2-dichloroethylene, and vinyl chloride.

4. Utilities and Preferential Pathways

- a. DNR is unable to concur that the Sparr Building and Opera House have been ruled out of the vapor intrusion pathway at this time.
- b. DNR concurs with the proposed sanitary backfill sample locations in Market Street and downgradient from the north alley excavation and agrees with obtaining a grab groundwater, soil, and soil gas sample from each location.

5. Emerging Contaminants

- a. DNR concurs with sampling PFAS at the following monitoring well locations:
 - i. MW-109 (Parking lot north of site) – Upgradient location with no CVOC contamination.
 - ii. South Sump (former on-site source area) – In middle of source area, with highest on-site CVOC concentrations
 - iii. MW-116 (parking lot south of High Ave) – off-site to the south with highest CVOC concentrations.

Schedule

DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 days of submittal of the work plan, by **March 19, 2024**.
- 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.
- Per Wis. Admin. Code § NR 716.14, all sampling results are required to be submitted within 10 days of receiving the laboratory data.
- NR 700 semi-annual progress reports will be required until the case is closed.

Once the additional work has been completed and documented, your consultant should evaluate the appropriateness of case closure based on the results of this additional work. If additional remedial action is warranted, your consultant should submit a remedial actions option report (RAOR) within 60 days after the completion of the field investigation.

The site investigation is an iterative process. The results of the additional investigation should be evaluated to determine if additional investigation is needed to fully define the degree and extent of contamination in all affected media. Once the additional information and/or investigation is completed and submitted to the DNR, these recommendations may be re-evaluated.

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.

Sincerely,



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

cc: Brad Lewis, Enviroforensics (blewis@enviroforensics.com)
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