



August 6, 2013

Mark Lake
Midland (Wisconsin/Broadway Associates)
W 228 N745 Westmound Drive
Waukesha WI 53186

John F. Butz
2580 South Broadway
PO Box 12115
Green Bay, WI 54307

Judy Schmidt-Lehman, City Attorney
City of De Pere
335 South Broadway
De Pere, WI 54115-2593

Ken Pabich, Director
Planning & Economic Development
City of De Pere/Redevelopment Authority
335 South Broadway
De Pere, WI 54115-2593

SUBJECT: Site Investigation Work Plan: Conditional Approval
Walgreens Property, 200 South Wisconsin, De Pere
BRRTS # 02-05-560597
VPLE # 06-05-560553

Dear Messrs. Lake, Butz, and Pabich, and Ms. Schmidt-Lehman,

The Department of Natural Resources received the above referenced Site Investigation Work Plan (SIWP) on July 30, 2013. The SIWP was submitted by Mr. Dave Lennon of Key Engineering Group, LTD on behalf of Mr. Mark Lake of Wisconsin/Broadway Associates. The purpose of the Site Investigation is to verify previous conditions of the two closed BRRTS sites on the property (*the former Royal Cleaners, BRRTS case # 02-05-513320, and portions of Silverado Speedy Stop, BRRTS case # 03-05-000008*) and to investigate other historical uses of the property that were identified during the Phase I investigation which was submitted to the Department on April 24, 2013.

The Department has reviewed the above referenced SIWP with respect to continuing in the VPLE process and hereby provides a summary of field work to be completed plus any additional work items (needed items in addition to those listed in the SIWP are underlined). Please note Item #17 requests submittal of a brief Addendum Work Plan:

1. All soil boring locations are chosen based on historical land uses at the various parcels (see table below). All soil borings will be completed using direct push technologies. Some of the soil boring locations will also be used for installation of monitoring wells (blind drilling with hollow stem augers). All boring locations are to be field screened with a PID.

2. Two soil samples per borehole will be laboratory analyzed at approximately 18 locations within the property boundary at two depths, one at 0-4 feet in fill or native soils away from any asphalt or concrete, and the second at a depth just above the shallow water table.
3. All soil samples are to be analyzed for VOC, PAH, and RCRA metals.
4. Additional soil borings to be sampled for VOC, PAH, and RCRA metals shall be placed within the footprint of the building at 413 Charles Street. This is needed to verify if historic uses on that parcel contributed to contamination that would be not detected through the planned subslab sampling.
5. The groundwater investigation will consist of at least three well/piezometer nests to confirm the presence or absence of residual tetrachloroethylene (PCE) contamination as well as any other historic uses of the 135 S. Broadway property. An additional piezometer shall be placed downgradient and off-property in the direction of groundwater flow. An ideal location may be the green space located northwest of the roundabout. This is needed to ascertain if any residual PCE had migrated at depth away from the source property and beneath any previously installed water table wells.
6. The remaining groundwater wells are intended to verify current conditions and to gain a better understanding of the residual groundwater plume associated with the former Silverado Speedy Shop. It should be noted that the Department doesn't necessarily believe that five wells are needed along the roundabout. As a prospective purchaser, Walgreens has already received an off-site exemption letter for any petroleum related contamination migrating onto its property.
7. For VPLE purposes it would be more environmentally beneficial to install a monitoring well or two in the east half of the new Walgreens property as this is an area of unknown environmental conditions. Furthermore if soil sampling would detect any contamination in the east part of the property the Department would likely require additional groundwater investigation and possible remediation.
8. All groundwater samples shall be analyzed for VOC, PAH and RCRA metals.
9. Appropriate documentation will be completed per Wis Adm. Code requirements [e.g., boring logs, well construction forms per the requirements of s. NR 141.23 and NR 716.15(2)(i), and locations surveyed per s. NR 141.065(2).]
10. An effort must be made to locate records of the 6000 gallon fuel oil tank removal at 135 S. Broadway as noted in the Phase I Report. One confirmation boring should be placed at the tank's former location and a soil sample collected at an appropriate depth and analyzed for PAH. The location of this tank shall be identified on the map noted in item 12 below.
11. A shallow soil sample (~1 feet or less) shall be collected at the transformer located on 129 S. Broadway parcel and analyzed for PCBs.

12. Three 10,000 gallon gasoline tanks; and 5,900 yds³ of contaminated soil, and 283 and 273 tons of contaminated soil were excavated and disposed of from the 205 S. Broadway parcel and nearby intersections in 2007. These tanks and excavated areas should be identified on a map and included the SI Report.
 13. At a minimum, one north-south and one east-west cross section of the property shall be prepared and submitted in the SI report. As appropriate, on it shall be displayed excavated areas, former tank beds, water table, soil and groundwater contaminant concentrations.
 14. Six vapor samples will be collected from the subslabs of the buildings at 135 S. Broadway and 413 Charles Street. Vacuum testing of lines and leak detection tracers shall be used to ensure integrity of the samples. Refer to PUB-RR800 for proper procedures to be followed.
 15. While we can't yet require it, it would be a preferred that Task 2: Site Investigation Report, be prepared consistent with the requirement of the revised ch. NR 716.15 Wis. Adm. Code.
 16. The SIWP states that one of the goals is to remove the deed restriction from the former Royal Cleaners Project. To reiterate a comment made by the previous project manager, Al Nass: *The Royal Cleaners and Silverado sites will always remain on the GIS Registry and the Royal Cleaners deed will always show the restriction is there / was there (even if negated). The Royal Cleaners GIS Registry could be updated to show the deed restriction is no longer applicable, but the original information talking about the deed restriction would still be there.*
- Prior to issuance of a Certification of Completion under the VPLE process, the Department can work with the applicants on updating the contents of the GIS packet. Furthermore, since the former location of the speedy Silverado stop is now located in municipal right-of-way, we can also work on updating that GIS packet to be reflective of current conditions.
17. Please submit a brief SIWP addendum addressing the items in this conditional approval prior to the start of field work.

Background

The Walgreens property consists of several parcels that had numerous historic uses over the last 125 years. The table below lists the parcels and their current and former uses. As a participant in the VPLE Process the applicant(s) must complete an environmental investigation of the entire property that is approved by the Department [s. 292.15(2)1 Wis. Stats.]. An off-site Liability clarification letter was issued to Midland Commercial Development in March 12, 2013 that discusses two closed BRRTS activities on the property. An attachment to this letter described several remediation options that could be pursued during construction of the new Walgreens.

The December 2012 Phase I Report, completed by Arcadis, noted the following historic uses of the various parcels included in the Walgreen's property.

| Acres | Parcel # | Address | Current use | Former use |
|-------|------------------|-----------------|--|--|
| 0.085 | ED-814 | 205 S Broadway | City parking | Dentist Further south: Riverside Shell, Silverado |
| 0.15 | ED-818 (part of) | 114 S Wisconsin | City Parking | Bowling Pin factory |
| 0.083 | ED-821 | 413 Charles | Church | Rays TV and Service, Photo studio Also a gasoline station 201 S Broadway |
| 0.061 | ED-821-1 | 132 S Wisconsin | City Green space | ? |
| 0.123 | ED-823 | 135 S Broadway | Butz: Office apartment bldg. Paint and cleaning supplies in storage room | Dry cleaner and Dyer Also location of a former 6000 gal fuel oil UST removed in 2007. |
| 0.045 | ED-825 | 129 Broadway | Shier: CPA office apartment bldg. Paint/cleaning supplies in storage room | Built prior to 1884, unfinished below grad area De Pere home appliance repair shop |
| 0.183 | ED-333-1 | George Street | City parking | Alley |
| ? | ? | | City parking | Former Charles Street ROW |

We look forward to working with you as you proceed through the VPLE process as part of the construction of the new Walgreens in De Pere. If you have any questions in regard to the contents of this letter please feel free to contact me at (920)662-5165 or annette.weissbach@wisconsin.gov.

Sincerely,



Annette Weissbach, Project Manager
Northeast Region Land Recycling Coordinator
Remediation and Redevelopment Program

cc: Dave Lennon – dlennon@keyengineering.com
Michelle Williams – mwilliam@reinhardt.com