



August 19, 2024

Mrs. Lee Amundson &
Mr. Mark Amundson
6426 Nero Road
Sobieski, WI 54171
Sent via electronic mail only to lee.amundson@ki.com

Subject: Review of Site Investigation Work Plan
1404 S Webster Ave
1404 S Webster Ave, Allouez, Wisconsin
BRRTS #: 02-05-514372, FID #: 405008340

Dear Mr. and Mrs. Amundson:

On July 23, 2024, the Wisconsin Department of Natural Resources (DNR) received the “Further Site Investigation and Quarterly Groundwater Sampling Work Plan” (Report) prepared by R. Scott Powell 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 1404 S Webster Ave site (Site) historically operated as a gas station from at least 1936 until the 1950s, and a drycleaner operated at the Site from approximately 1972 until 1988. The Site is currently occupied by a tattoo parlor. Chlorinated volatile organic compound (CVOC) contamination was discovered at the corner of Webster Avenue and Derby Lane during investigation of the Knothole Books & Gifts leaking underground storage tank (LUST) site, BRRTS # 03-05-002199, and a potential responsible party was subsequently sent to the owners of the Site based on the property’s history.

The CVOC contamination is assumed to be related to the historic drycleaning operations at the Site and has been investigated both on-site and off-site in soil, groundwater, and vapor. Known soil and groundwater contamination extend off-site in the northwestwardly direction.

SIWP Summary

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

- Assessment of vapor intrusion (VI) risk to 917 Derby Lane,
- Preparation of a conceptual site model (CSM),

- Delineation of shallow soil contamination around SB-3, in the area of the former drycleaning machine, and in areas of potential sources identified in the CSM,
- Further delineation of the horizontal extents of CVOCs in groundwater, and
- Assessment of per- and polyfluoroalkyl substances (PFAS) in on-site wells.

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

DNR concurs with locations of proposed soil borings. DNR recommends that if field observations indicate there is contamination present at these proposed locations, then to consider stepping out to further delineate soil contamination while mobilized to the Site.

2. Groundwater

DNR concurs with proposed locations of grab groundwater samples, and recommends that these locations be developed into permanent, Wis. Admin Code NR 141 compliant monitoring wells. DNR also recommends that a monitoring well be installed on the 1324 S. Webster property, to the north/west of the daycare building, to confirm the enforcement standard (ES) exceedances detected in temporary monitoring wells in the footprint of the daycare building during the 2020 Phase II environmental site assessment (ESA). DNR also recommends installation of a monitoring well to the east of the 1324 S Webster property as this area has not historically had any sampling performed and the groundwater contaminant plume is not delineated in this direction.

3. Vapor

DNR has reviewed the vapor assessment for 917 Derby Lane, and concurs that this building does not require a vapor investigation at this time. DNR has also reviewed the vapor sampling results and is not requiring further investigation of the on-site building, or buildings located at 1324 S Webster, 1410 S Webster, or 926 Derby Lane at this time.

DNR is requesting that an additional round of passive long duration (i.e. 7-14 days, preferably 10 days) indoor air sampling be performed at 930 Derby Lane to confirm that TCE is no longer present in indoor air. DNR is also requesting follow-up passive sampling of this property's sanitary cleanout to confirm that PCE is present above the vapor action level (VAL).

4. Preferential Pathways

DNR has reviewed the in-pipe sanitary vapor investigation and concurs that the tetrachloroethylene (PCE) and trichloroethylene (TCE) detected in the sanitary in February of 2022 was not confirmed during the two subsequent rounds of passive, 28-day sampling, and the sanitary sewer does not require additional investigation at this time. Also, as the sanitary sewer is located within intermittently sandy soil, the backfill of the sanitary also does not require investigation at this time.

DNR is, however, requesting that the storm sewer and telecommunication utilities be added to figures. If the storm sewer intersects the contaminant plume, then it will likely require investigation.

5. Emerging Contaminants

DNR is requesting that an emerging contaminant scoping statement be submitted, however concurs with sampling groundwater at monitoring wells MW-1, MW-2, and MW-3 for PFAS analysis.

Other DNR Comments

1. 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.
2. 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)
3. You will need to submit a complete Site Investigation Report once you have completed the investigation.

Schedule

The DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.11(1)(2r), field investigation activities shall be initiated within 60 days of department approval of the work plan, by October 18, 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.
- 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

Sincerely,



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

cc: Scott Powell, EnviroForensics, LLC (rspowell@enviroforensics.com)
Andrew Skwierawski, Halling & Cayo, S.C. (mas@hallingcayo.com)