

Konicek Environmental Consulting, LLC

December 27, 2023

Joseph J. Martinez
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
1027 W. St. Paul Avenue
Milwaukee, Wisconsin 53233

Re: *Revised Site Investigation Work Plan*
Twin Lakes Laundry
111 South Lake Avenue, Twin Lakes, Wisconsin 53181
BRRTS # 02-30-545024
WDNR FID # 230117910

Dear Mr. Martinez:

This submittal is in response to your letter of December 11, 2023 to Olsen Properties LLC. Konicek Environmental Consulting LLC (KEC), on behalf of Tom Olsen, Olsen Properties LLC., has prepared this *Revised Site Investigation Work Plan*.

The previous scope of work was based on the previously Wisconsin Department of Natural Resources (WDNR) Dry Cleaner Environmental Response Fund (DERF) funding January 29, 2016, scope of work approval reference in the WDNR July 18, 2019, letter and our conversations in April and May 2020.

The previous scope of work included:

“SCOPE OF WORK

Task 1: Preparation of an Additional Site Investigation Work Plan – This document will serve as the Additional Site Investigation Work Plan. In addition, a Site Investigation Work Plan Preparation Checklist is provided as Attachment A.

Task 2: Additional Groundwater Well Sampling - A complete round of groundwater monitoring will be performed using the network of existing groundwater monitoring wells located in the vicinity of the site. The groundwater sampling will include seven shallow water table wells (MW-1 through MW-7) and one piezometer (PZ-1) as shown on Figures 1 and 2. For all the monitoring wells the following measurements will be recorded: depth to the water table, total depth and in-situ field parameters (Dissolved oxygen {DO}, pH, conductivity, salinity, temperature and Oxidation Reduction Potential {ORP}) to assess the groundwater biodegradation conditions. The wells will then be purged and sampled for volatile organic compounds (VOCs) by EPA Method 8260 laboratory analysis. The samples will be collected in accordance with the WDNR Groundwater Sampling Field Manual, PUB-DG-038 96 with well dedicated bailers and include one duplicate sample and a trip blank. The groundwater monitoring wells/piezometer sample results will be reported to the WDNR using Form 4400-294 within 10 days of receiving results.

Task 3: Additional Potable Well Sampling – An attempt to sample fifteen (15) potable wells or properties will be made through the exterior building hose via. bib/spick due to the on-going COVID-19 pandemic. The properties are listed on

Table 1 (Planned Environmental Work Activity Per Property) and as shown on Figures 1 and 2. The samples will be collected in accordance with the WDNR Groundwater Sampling Field Manual, PUB-DG-038 96 for VOCs by using EPA Method 524.2 laboratory analysis.

If potable well logs are available then the volume of water within the well casing will be calculated in accordance with NR 141.21 then purging four well volumes will commence. A garden hose flow meter will be used to keep track of the total gallons removed in the field and recorded. KEC will use the historic water depth listed on the logs as a basis of the water levels since KEC will not be measuring them. If no potable well logs exist for the property, then purging of the potable wells will assume running the well pump for duration of 15-minutes¹ to ensure that the water is cold and that the pressure tank has had at least one or more full pump cycles to complete.

Access agreements will use the model templates on the WDNRs website for vapor intrusion and be modified as needed. WDNR will review a sample of the first draft going out, subsequents to follow. Access agreements will be made up to three times, if needed; 1st not-certified mail due to the on-going COVID-19 pandemic, 2nd certified mail and 3rd certified mail. If authorization is not made after the 3rd attempt KEC will not be responsible for sampling after this point. KEC is assuming a response time of 7 days in-between mailings. KEC will verify current occupancy status of all sampling properties. In addition, KEC may need to ask for help for access agreements through the Twin Lakes Village Administrator, if necessary.

Following receipt of the analytical results a letter will be sent to either the owner or occupant with the laboratory results, including a compressive table of past results and current, property specific figure (including the well location on the property) and a discussion of the results within 10 days of receiving the results. WDNR will review a sample of the first draft going out, subsequents to follow.

A search of State of Wisconsin online well log records will be researched and compiled to determine if unique well identification numbers exist for the planned potable wells to be sampled. If not, then unique well ID stickers and WDNR well forms will be completed for the potable wells. Stickers obtained from the WDNR are to be provided by KEC to the owner/occupants to be placed on the water pressure tank.

Task 4: Sub-Slab Vapor Intrusion Investigation – It is proposed to collect five off-site vapor samples as identified on Table 1 and Figures 1 and 2. Off-site sub-slab locations will be attempted within the following buildings: two in the 110 building (Subway and Community Library), two in the 118 & 120 building (one in each half), and one in the 121 building. The vapor sample investigation will be conducted in accordance with the WDNR Vapor Intrusion Guidance Document PUB-RR-800 dated January 2018. Access agreements will follow the methodology and protocol of Task 3 above.

The sub-slab vapor sampling locations will be determined in the field based on building interior design/accommodation and utilizing the FLX-VP Vapor Pin® and in accordance with Cox-Colvin & Associates, Inc. standard operating procedure. The

¹ According to the WDNR Groundwater Sampling Field Manual, PUB-DG-038 96 small water supply systems are to be run for 5-minutes. KEC is proposing 3-times that amount for quality assurance.

vapor samples will then be collected in a laboratory supplied 6.0-liter SUMMA canister submitted to a certified laboratory for analysis using EPA Method TO-15. In addition, to the five sub-slab vapor samples, an indoor ambient air sample from each building location will be collected and one outdoor ambient air sample from the general exterior area of the three buildings will be collected utilizing 6.0-liter SUMMA canisters for TO-15 analysis. All samples will be run for duration of 30-minutes.

Following receipt of the analytical results a letter will be sent to either the owner or occupant with the laboratory results, including a table of the results, property specific figure and a discussion of the results within 10 days of receiving the results. WDNR will review a sample of the first draft going out, subsequents to follow.

Task 5: Evaluate On-Site Sub-Slab Vent System - To evaluate the effectiveness of the sub-slab vent system a sub-slab vapor sample will be collected from inside the Southeast source area of Twin Lakes Laundry building and collecting one indoor ambient air sample. The samples will be collected in accordance with same procedures described in Task 4 and will be conducted while the current vapor system is operating.

In addition, KEC will figure what the layout is for the subject-site for both for the 407 Basset St. and 111 S. Lake St. addresses for the potential of future sub-slab locations.

Task 6: Utility Identification - To evaluate the potential vapor migration pathways associated with the area buried utility locations will be obtained from digger's hotline markings and Village of Twin Lakes Department of Public Works plans. Attempts to identify the depths of the utilities will also be made to determine if they maybe intersecting the groundwater table.

Task 7: Evaluate Source Area Soil Conditions - A total of eight soil probes are proposed to evaluate the source area soil conditions near the southeast corner of the Twin Lakes Laundry building. Three of the soil probes (pounded by hand) will be installed inside the building and completed relatively shallow to collect a soil sample from one to two feet below the slab. A private utility locating service will be used to check the proposed hand probe locations. Five additional soil probes are proposed outside the southeast corner of the laundry building. The locations of the soil probes are shown on Figure 2.

At each location continuous soil sampling will be performed from ground surface to a depth of approximately 10 feet below ground surface (bgs). The soil samples will be screened in the field using a photoionization detector (PID) and visually inspected for color and staining. Soil samples from 1-2 feet bgs and at the groundwater interface expected to be 6-8 feet bgs will be submitted for VOCs by EPA Method 8260 laboratory analysis. The interior of the building configuration may alter or prohibit the exhibited soil probe locations. An access agreement will follow the methodology and protocol of Task 3 above.

Soil sample results will be reported to the WDNR using Form 4400-294 within 10 days of receiving results.

Task 8: Sub-Slab Vent System Documentation and O&M Plan - At the request of the WDNR the sub-slab vent system installed at the former Twin Lakes Laundry will be field verified; photographed and as-built information will be compiled. Sub-slab vacuum field measurements will be drilled through the floor by a subcontractor retained by KEC to evaluate the effectiveness of the sub-slab vent system. The concrete holes will be filled in following the collection of the field measurements. Manometers will also be installed if

there are none present. A System Operation and Maintenance (O&M) plan will be prepared in accordance with the WDNR Vapor Intrusion Guidance Document PUB-RR-800 dated January 2018.

Task 9: Data Evaluation and Report – The additional site investigation activities will be complied, evaluated and presented in an update site investigation report to the WDNR. The updated report will incorporate past analytical data with the new collected data and recommendations to address vapor intrusion concerns, impacted soil and groundwater contaminate plume margin.”

Due to financial constraints, the completion of the tasks was conducted in order and completion of Tasks 6 & 7 is pending. Based on our previous telephone discussions and your December 11, 2023 letter, it is understood that emphasis on the sampling and analysis of potable wells in the area and that the vapor mitigation system is functioning properly is requested. As such, KEC will complete additional potable well sampling and an evaluation of the sub-slab mitigation system respective of current vapor mitigation guidance. KEC will also evaluate potential vapor migration through existing utility corridors. These tasks will be completed before the completion of Tasks 7, 8, & 9.

Please note that past attempts to obtain access to sample some of the potable wells that may be at risk have failed.

SCHEDULE

Pending Olsen Properties LLC. and WDNR approval, it is anticipated that letters to property owners requesting access to the off-site properties for potable well sampling will be implemented upon authorization with sampling conducted within a one to four weeks of granted access permission. The initiation of the sub-slab vapor system evaluation and utility corridor evaluation will also be in one to four weeks following authorization.

CLOSING

KEC's will complete the field services utilizing the WDNRs Chapter 141, 169, and the NR 700 Series Wisconsin Administrative Cod (WAC) plus various WDNRs guidance documents as outlined in this scope of work. KEC will complete our services and procuring subcontractors using the degree of care and skill ordinarily exercised under similar circumstances, by environmental consultants practicing in this or similar localities. If you should have any questions or comments regarding the scope of work outlined, please feel free to contact our office.

Sincerely,
Konicek Environmental Consulting, LLC



Gregory A. Konicek P.G., CHMM