



August 11, 2021

Mr. Dale Lythjohan  
Cedarburg Light and Water Commission  
PO Box 767  
Cedarburg, WI 53012

Subject: Request for Information  
Cedarburg City Power Plant, W61 N617 Mequon Avenue, Cedarburg  
BRRTS #: 02-46-547626, 03-46-003301, FID #: 246100800

Dear Mr. Lythjohan:

On May 17, 2018, the Department of Natural Resources (DNR) met with you and your consultant, Stu Gross of Stantec Consulting Services, Inc. The meeting was held to discuss the DNR's response to Stantec's January 31, 2018 letter that summarized the groundwater sampling data at the site and recommended case closure. The DNR did not concur that the site should be closed and requested a site investigation work plan (SIWP) to address unresolved site investigation issues for compliance with Wis. Admin. ch. NR 716, including the 1) identification and evaluation of source area(s) for the reported contaminants, 2) current groundwater sampling and identification of the flow direction, 3) completion of a vapor screening evaluation and further vapor assessment if indicated by the screening evaluation, and 4) evaluation of utilities as migration pathways and/or receptors.

To-date, the DNR has not received the requested SIWP.

### Background

The site formerly operated as a power plant for the City of Cedarburg. The power plant building has been converted into office space. The DNR understands that on-site underground storage tanks (USTs) were a likely source of petroleum-related impacts. Chlorinated volatile organic solvents (CVOCs) were used on-site in a parts washing area and stored in drums on the south end of the building. Waste solvents were also discharged onto the ground surface to control weeds between the former cooling towers and the building. Site investigation activities completed to-date have identified a discharge of trichloroethylene (TCE) at the site.

Recent studies indicate that vaporized TCE in indoor air is more toxic than previously understood, and the risk posed by TCE vapors requires an immediate response when women of child-bearing years are present. **TCE poses short-term risks to human health that justify accelerated assessment, investigation, and mitigation of the vapor intrusion pathway.** Assessment of the vapor intrusion pathway is part of the investigation process and should be assessed as early as possible and routinely re-assessed throughout the life of a project. Immediate and interim actions may be necessary early in the site investigation process to protect human health from contaminated vapors.

### Schedule

In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

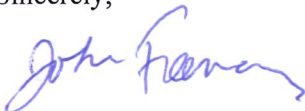
- Per Wis. Admin. Code § NR 716.09, the DNR is requesting the submittal of a site investigation work plan within 60 days, by October 9, 2021, to complete the site investigation. The DNR recommends that the SIWP be submitted with a fee for review and response. As a reminder, the SIWP should include scoping for emerging contaminants, including PFAS.
- Per Wis. Admin. Code § NR 716.11(2g), field investigation activities must begin within 90 days of submittal of the work plan.
- All sampling results are required to be submitted within 10 days of receiving laboratory data, per Wis. Admin. Code § NR 716.14.
- Per Wis. Admin. Code § NR 716.15(1), a site investigation report shall be submitted within 60 days after completion of the field investigation. The DNR recommends that the SIWP be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

On August 17, 2020, the DNR sent you a letter titled, *Reminder to Include Evaluation of Emerging Contaminants in Site Investigation*, which stated that it is your responsibility to evaluate hazardous substance discharges and environmental pollution including emerging contaminants under the Wis. Admin. Code NR 700 rule series. Per Wis. Admin. Code §§ NR 716.07, 716.09, provide an evaluation of potential perfluoroalkyl and polyfluoroalkyl substances (PFAS) and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the site. This should include any available information on whether any products containing PFAS were used in any process services, the duration of PFAS-containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded.

Please be aware that the site investigation can be an iterative process and that data results may indicate further assessment is needed to define the degree and extent of contamination. Additionally, dependent on the results of the additional investigative work, remedial actions must be evaluated and identified, as applicable, per Wis. Admin. Code ch. NR 722.

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 262-416-8643 or [johnm.feeney@wisconsin.gov](mailto:johnm.feeney@wisconsin.gov).

Sincerely,



John Feeney, PG  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

cc: Mr. Stu Gross, Stantec Environmental Services, Inc.  
Mr. Vince Micha, The Kubala Washatko Architects