



June 20, 2017

Livesey Company
Mr. Ryan Eley
2248 Deming Way, Suite #200
Middleton WI 53562

Subject: Case Closure Denial for Additional Groundwater Monitoring
Koeller Center, 1126 South Koeller Street, Oshkosh, Wisconsin
DNR BRRTS Activity # 02-71-547941

Dear Mr. Eley:

On June 14, 2017, the Northeast Region Closure Committee reviewed your request for closure of the case described above. The Department of Natural Resources reviews environmental remediation cases for compliance with state and federal laws to maintain consistency in the closure of these cases. As discussed with your consultant on June 16, 2017, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with your written response regarding the necessary work and a schedule for completion of this work.

As noted above, additional site work is necessary in order to meet the requirements for site closure because groundwater contamination trends at monitoring well MW-1 are increasing and indicate the highest level of contamination since the case was reported.

Need to Conduct Additional Groundwater Monitoring

Additional groundwater monitoring is needed in order to establish compliance with the closure criteria of ch. NR 726. If monitored natural attenuation is to be used as a remedial action, you need to determine whether there is a stable or receding plume. A groundwater monitoring plan which at a minimum consists of semi-annual groundwater monitoring at MW-1, MW-2, MW-3, MW-4 and MW-6 should be implemented.

Need to Define the Degree and Extent of Contamination

Additional groundwater monitoring may be needed in order to define the degree and extent of contamination. The Department recommends you evaluate the need for piezometer installation for vertical definition of the groundwater plume.

Need to Conduct Additional Remedial Action

Additional remedial action is needed in order to comply with the closure criteria of ch. NR 726. You should evaluate the use of additional remedial action such as chemical injection to facilitate remediation in the event groundwater trends do not stabilize.

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A complete closure request should be re-submitted once all the above requirements have been satisfied, together with any required documentation, to let the Department know that applicable requirements have been met. Case closure can be considered once all the above requirements have been satisfied

Within 60 days of the date of this letter, please respond in writing with a schedule of your plans to meet these requirements. Until requirements have been met, your site will remain "open" and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 700.11, Wis. Adm. Code. You will also be responsible for any operation and maintenance activities required under s. NR 724.13, Wis. Adm. Code.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-662-5120.

Sincerely,



Roxanne N. Chronert
Team Supervisor, Northeast Region
Remediation & Redevelopment Program

cc: NER Efiles
Anthony Miller, Gannett Fleming Inc., - awmiller@gfnet.com