



ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

**COMMENT RESPONSE AND
ADDITIONAL WORK PLAN for COMPREHENSIVE SITE INVESTIGATION
REPORT**

November 5, 2018

Ms. Jennifer Dorman
Wisconsin Department of Natural Resources
2300 North Martin Luther King, Jr. Drive
Milwaukee, WI 53212

Re: Former Bayside Natural Cleaners
8828 North Port Washington Road, Bayside, WI
FID# 341140250, BRRTS# 02-41-548572

KPRG Project No. 18806.3

Dear Ms. Dorman:

On January 23, 2018, on behalf of Former Bayside Natural Cleaners, KPRG and Associates, Inc. (KPRG) submitted a Supplemental Site Investigation Report Addendum for the above referenced site to the Wisconsin Department of Natural Resources (WDNR) for review. On October 12, 2018, which was received by KPRG on October 23, 2018, the WDNR issued a comment letter which requested that all site investigation addendum submittals for this site along with the initial site investigation report be combined into one comprehensive site investigation document and that a Work Plan/Cost estimate be submitted to WDNR for Dry Cleaner Environmental Response Fund (DERF) approval. A copy of the letter is provided in Attachment 1 for reference. The following is the requested scope of work and estimated cost requested by WDNR.

ADDITIONAL SCOPE OF WORK AND COST ESTIMATE

SCOPE OF WORK

Based on the above referenced WDNR letter, KPRG will develop a Comprehensive Site Investigation Report which will integrate all data generated to date from the various phases of site investigation work. The report will include, but not be limited to:

- Evaluate site conditions and contaminants to determine if vapor intrusion into residential homes to the east is a potential pathway of concern.

- Evaluate whether the comprehensive soil and groundwater data are adequate to define the degree and extent of chlorinated volatile organic hydrocarbon (CVOC) impacts.
- Revise all maps to include properties to the north, south and east of the source property, including addresses and property boundaries.
- Revise maps to include comprehensive data for soil, groundwater and vapor data.
- Update cross-sections to include additional soil borings performed since the initial site investigation report submittal. The cross-sections will include all structures, location of former dry cleaning machine, subsurface data (soil and groundwater), utilities, etc.
- Comprehensive soil, groundwater and soil vapor data tables integrating all data along with applicable WDNR comparison standards/criteria.
- Create isoconcentration contour maps (pan and cross-section view) depicting the extent of soil and groundwater impacts.

COST ESTIMATE

The above defined scope of work can be completed for an estimated cost of \$6,520. A summary of the estimated cost detailed costing sheet is provided in Attachment 2.

KPRG and Natural Cleaners appreciate the continued cooperation with WDNR in addressing these issues. If there are any questions, please contact me at 262-781-0475.

Sincerely,
KPRG and Associates, Inc.



Richard R. Gnat, P.G.
Principal

cc: Marilyn Fleming, Former Natural Cleaners
Derek Reinke, Ogden & Company, Inc.
John J. Hnat, P.G., C.P.G., WDNR
Donald P. Gallo, Axley Brynelson

ATTACHMENT 1

Copy of WDNR Letter Dated October 12, 2018



October 12, 2018

Ms. Marilyn Fleming
Former Bayside Natural Cleaners
N40 W27880 Glacier Road
Pewaukee, WWI 53072

Subject: Supplemental Site Investigation Report Addendum, former Bayside Natural Cleaners,
8828 North Port Washington Road, Bayside, WI

FID: 341140250
BRRTS: 02-41-548572

Dear Ms. Fleming:

The Wisconsin Department of Natural Resources (DNR) has reviewed the Supplemental Site Investigation Report Addendum dated January 23, 2018. This document was submitted by your environmental consultant KPRG and Associates, Inc. (KPRG) in response to the DNR's scope-of-work approval letter of December 22, 2016. To determine if the number of supplemental site investigations have completed the requirements of Wis. Admin. Code ch. NR 716, a comprehensive Site Investigation Report will need to be completed and approved for the site prior to bidding out the Remedial Action Plan. Have KPRG submit a change order request to cover the costs of the preparation and submittal of this document.

Revisions to Document Submittals

The DNR's review of the Supplemental Site Investigation Report and previous report submittals will require revisions of maps, tables, and responses for the following as required in ch. NR 716, Wis. Admin. Code. Specifically:

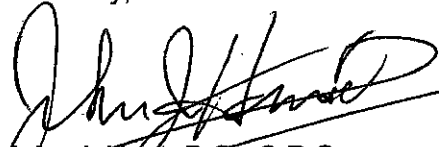
1. Per Wis. Admin. Code § NR 716.11(5)(g), evaluate site conditions and contaminants to determine if vapor intrusion into the residential homes to the east is a potential migration pathway of concern. When conducting a vapor intrusion assessment, use the DNR's vapor intrusion guidance document, RR-800, "*Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin.*"
2. Evaluate whether the comprehensive soil and groundwater data are adequate to define the degree and extent of CVOC (chlorinated volatile organic compound) contamination. Wis. Admin. Code § NR 716.11(3)(a) requires the field investigation to determine the nature, degree, and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media.
3. Revise all maps to include properties to the north, south, and east of the source property, including addresses and all property boundaries.
4. Revise maps to include comprehensive data for soil, groundwater, and vapor information.
5. Provide cross-sections that incorporate applicable site information including, but not limited to, subsurface data, water table elevation, utilities, buildings, and the location of the former dry-cleaning machine.

Former Bayside Natural Cleaners
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6. Provide comprehensive soil data tables that indicate if the soil samples were collected from saturated or unsaturated intervals; include groundwater pathway residual contaminant levels (RCLs), nonindustrial and industrial RCLs, and background threshold values in the tables, and clearly identify an exceedance of each RCL, per Wis. Admin. Code § NR 716.15(4)(e).
7. Use isoconcentration lines on the maps and cross-sections to define the degree and extent of contamination for soil and groundwater. Wis. Admin. Code § NR 716.15(4)(c) and (d) requires the site investigation report to include isoconcentration maps and cross-sections to depict the hazardous substance concentrations in each environmental medium.

Have your consultant KPRG upload an electronic copy to our FTP site and a hard copy to the address located above to our Environmental Program Associate Jennifer Dorman. If you have any questions, call me at 414-263-8644, or email me at john.hnat@wisconsin.gov.

Sincerely,



John J. Hnat, P.G., C.P.G.
Project Manager/Hydrogeologist
Southeast Region
Remediation and Redevelopment Program

C: Richard Gnat & Patrick Allenstein - KPRG
WDNR SER File

ATTACHMENT 2
Cost Estimate Backup

KPRG TASK COSTING SHEET

Project: Natural Cleaners Remedial Action - Bayside, WI

Task: 1 - Comprehensive Site Investigation Report

<u>Professional Labor</u>	<u>Rate (\$/Hr.)</u>		<u>Units</u>	<u>Total</u>
Principal/Proj. Mgr.	\$135		8	\$1,080.00
Field Eng./Sci.	\$70		60	\$4,200.00
CADD	\$60		16	\$960.00
Admin. Asst/ Word Proc.	\$45		4	\$180.00
			Total Labor	<u>\$6,420.00</u>

<u>External Expenses</u>	<u>Rate</u>	<u>Type</u>	<u>Units</u>	<u>Total</u>
Reproduction	\$100	Est.	1	\$100.00
Field Vehicle	\$60	Daily	0	\$0.00
Sampling Supplies	\$20	Daily	0	\$0.00
Drums	\$55	Each	0	\$0.00
PPE - Modified Level D	\$15	Daily	0	\$0.00
PPE - Level C	\$35	Daily	0	\$0.00
			Total Exp.	<u>\$100.00</u>

<u>Contractors</u>	<u>Rate</u>	<u>Type</u>	<u>Units</u>	<u>Total</u>
		Estimate		<u>\$0.00</u>
			Total Contractors	<u>\$0.00</u>

TASK TOTAL: \$6,520.00