

November 8, 2019

Mr. Matt Thompson
Wisconsin Department of Natural Resources
Eau Claire Service Center
1300 West Clairemont Avenue
Eau Claire, Wisconsin 54701-6127

SUBMITTED ELECTRONICALLY

Re: **Change Order Request #13 (Revised)**
Former Camelot Cleaners
1006 North Sixth Street
Wausau, Wisconsin
BRRTS #02-37-551039
Terracon Project No. 58117011

Dear Mr. Thompson:

On behalf of Mr. Kurt Butz, Terracon Consultants, Inc. (Terracon) is submitting this revised remedial interim action change order request for the former Camelot Cleaners property located at 1006 North Sixth Street, Wausau, Wisconsin for review and decision. Change order request #13 was submitted to the Wisconsin Department of Natural Resources (WDNR) on September 27, 2019. In our October 17, 2019 telephone conversation, we discussed the following:

- Waterproofing: The WDNR inquired if waterproofing was performed at the facility. Terracon contacted Mr. Butz, and confirmed that waterproofing was not performed at the facility;
- Sanitary sewer: The WDNR requested an evaluation of the sanitary sewer as a potential vapor migration pathway. The WDNR subsequently provided additional suggestions on how Terracon personnel can combine the requested sewer line assessment with the proposed groundwater sampling to save time and money;
- Proposed Workplan: We understand that the WDNR agreed with the rationale outlined in Terracon's September 27, 2019 Change Order #13 to locate/evaluate condition of monitoring wells, and determine current groundwater quality;
- Alley Soils: There are no direct-contact residual contaminate level (RCL) exceedances; however, there are soil to groundwater RCLs present. Terracon requested confirmation from the WDNR that the pavement covering the soil in the alley can be used as a cap; and
- Reporting: The WDNR was asked to determine if the Soil Vapor Extraction (SVE) Remedial Action Report (RAR) can be combined into the Case Closure submittal to save time and money.



The WDNR provided the following comments in an October 31, 2019 electronic mail:

- The SVE RAR can be combined with the Case Closure submittal;
- The alley pavement can be used as a cap to prevent infiltration, provided a continuing obligation (CO) will be placed on the alley pavement specifying it is a cap and has to be maintained; and
- For sanitary sewer vapor sampling, a 1-Liter summa canister sample from within the sanitary sewer would be sufficient to characterize vapors that may enter the building.

1.0 SCOPE OF WORK (REVISED)

Terracon subsequently revised its scope of work to incorporate comments from our October 17, 2019 discussion and the WDNR's October 31, 2019 electronic mail.

1.1 Groundwater Monitoring Well Reconnaissance

Terracon personnel will perform a site reconnaissance to evaluate the condition of the well network. Minor repairs will be performed as needed. If major repairs are needed, such as flush mount protective cover replacement or if wells are missing, Terracon will consult with the WDNR and discuss if actions are needed prior to sampling.

1.2 Groundwater Monitoring Well/Piezometer Re-Development

The groundwater monitoring well network was last sampled on April 29, 2014. Therefore, Terracon personnel will re-develop the 5 groundwater monitoring wells (MW-1 through MW-5) and 2 piezometers (PZ-1 and PZ-2) with disposable bailers and/or pumps in accordance with NR 141, Wisconsin Administrative Code (WAC). Terracon will be prepared to perform minor repairs/patching to the flush mounts and surrounding pads based on observations made during the groundwater monitoring well reconnaissance. Development water will be placed in labeled, 55-gallon drums for temporary on-site storage, pending receipt of analytical results.

1.3 Groundwater Monitoring Well/Piezometer Sampling

No sooner than 1 week after re-development, Terracon personnel will collect groundwater samples. Low-flow sampling methods will be used if feasible. The groundwater monitoring well expandable caps will be opened, and groundwater will be allowed to equilibrate prior to the collection of static water levels. Terracon personnel will purge the monitoring well prior to sampling using either a low-flow pump and dedicated tubing, or dedicated bailers. The groundwater sample collection method is dependent upon the depth to water. If groundwater depth is shallow enough for the use of low-flow sampling technique (i.e., less than 25 feet below top of casing), natural attenuation field parameters such as dissolved oxygen (DO), oxidation-reduction potential (ORP), specific conductance, pH, and temperature will be measured using a water quality meter with a flow-through cell until stable readings are observed for each of the

parameters. Generally, a goal of 3 consecutive readings within 10% taken a minimum of 5 minutes apart during purging is indicative that groundwater in the well has stabilized. Upon stabilization, a groundwater sample will be collected from the monitoring wells/piezometers. Alternatively, if groundwater is deeper than what the peristaltic pump can draw, samples will be collected with dedicated bailers.

The groundwater samples will be submitted for laboratory analysis of volatile organic compounds (VOCs) using USEPA Method 8260B. The groundwater samples will be collected in laboratory-supplied containers, placed in an ice chest to cool to approximately 4 degrees Celsius (°C), and transferred under chain-of-custody protocol to a Wisconsin-certified laboratory for analysis. A duplicate sample and trip blank will also be submitted for laboratory analysis.

1.4 Sanitary Sewer Line Vapor Assessment

Terracon personnel will collect a vapor sample from the sanitary sewer line in a laboratory provided 6-liter summa canister which will have the flow controller calibrated for 30-minute sample collection. The proposed sample collection method is to lower tubing into the sanitary line and/or floor drain and connect the tubing to the summa cannister. The vapor sample will be submitted for analytical testing of tetrachloroethylene (PCE), trichloroethylene (TCE), trans-1,2 dichloroethylene (DCE), cis-1,2-DCE, and vinyl chloride (VC) using EPA Method TO-15.

1.5 Investigative Derived Waste Disposal

Upon receipt of the analytical results, Terracon personnel will arrange for the appropriate disposal of the investigative derived waste (IDW) generated during well re-development/purging. The assumption is that there will be a total of seven 55-gallon drums of water generated for disposal as a non-hazardous waste.

1.6 SVE System Decommissioning

Upon WDNR approval, Terracon will disconnect and remove the SVE system. The 3-inch diameter schedule 40 polyvinyl chloride (PVC) SVE lateral piping will temporarily capped flush with or slightly below the ground surface for potential future use. The piping will be permanently sealed upon receipt of site closure.

1.7 Status Report Preparation

Terracon will evaluate the groundwater and vapor data and recommend additional actions. The status report will include:

- Documentation of field activities;

- Site Diagram;
- Groundwater Contour Map;
- Groundwater monitoring well development and sampling information forms;
- Sanitary sewer vapor and groundwater analytical laboratory results;
- Data evaluation and presentation of pertinent findings; and
- Recommendations for further action.

2.0 REQUESTED COST APPROVAL

The total estimated cost for the activities proposed above is \$20,461.00. The costs are summarized in the attached *Linking Spreadsheet*.

We look forward to receiving your letter of concurrence. Please contact us with any questions regarding this request.

Sincerely,



Timothy P. Welch, P.G.
Environmental Department Manager

For
Edmund A. Buc, P.E.
Senior Project Engineer

Attachment: Linking Spreadsheet (Form 2400-214D)

TPW/EAB:tpw/N:\Projects\2011\58117011\PROJECT DOCUMENTS (Reports-Letters-Drafts to Clients)\Chg. Order No. 13\58117011_Chg Order Request No 13_REV_11082019.doc

Copy to: Mr. Kurt Butz (Electronically)
File

Site Name: Former Camelot Cleaners
 BRRTS #: 02-37-551039
 Type of Action: Interim Action

Dry Cleaner Environmental Response Program
 Reimbursement Cost Detail Linking Spreadsheet Form 4400-214D (R 08/12)

TASKS		BUDGET			INVOICES					DERF COST BREAKOUT (this claim)								Budget Remaining Use (-) to indicate cost over-run	% Task Complete, Remarks	
Bid / Budgeted Description	Bid / Budgeted Amount	INSERT	Total Approved Budget	Previous Claims (If applicable)	Provider Name, Invoice #, Billing Date	Provider Name, Invoice #, Billing Date	Provider Name, Invoice #, Billing Date	Provider Name, Invoice #, Billing Date	INSERT	Total Invoiced Costs	A Soil Investigation	B Soil Remediation	C Groundwater Investigation	D Groundwater Remediation	E Air/Vapor Investigation	F Air/Vapor Remediation	G Lab & Other Analysis	H Miscellaneous Costs		
Consultant Costs																				
Work Plan/Change Order Preparation & Project Mgt.	\$ 4,420.00	\$ -	\$ 4,420.00							\$ -			\$ 4,420.00						\$ 4,420.00	Task % Complete
Groundwater Monitoring Well/Piezometer Recon & Development	\$ 4,215.00		\$ 4,215.00							\$ -		\$ 4,215.00							\$ 4,215.00	
Sewer Line Assessment	\$ 460.00		\$ 460.00												\$ 460.00				\$ 460.00	
Groundwater Monitoring Well/Piezometer Sampling	\$ 3,090.00		\$ 3,090.00							\$ -		\$ 3,090.00							\$ 3,090.00	
Investigative Derived Waste Disposal	\$ 475.00		\$ 475.00									\$ 475.00							\$ 475.00	
SVE System Decommissioning	\$ 460.00		\$ 460.00							\$ -					\$ 460.00				\$ 460.00	
Status Report/Data Transmittal & Project Mgt.	\$ 3,130.00		\$ 3,130.00							\$ -		\$ 3,130.00							\$ 3,130.00	
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			\$ -							\$ -									\$ -	
Consultant Cost Total	\$ 16,250.00	\$ -	\$ 16,250.00	\$ -						\$ -									\$ 16,250.00	
Sub-Contractor Costs																				
Service	\$ -	\$ -	\$ -							\$ -									\$ -	
Analytical-Sewer Line (T0-15)	\$ 215.00		\$ 215.00							\$ -						\$ 215.00			\$ 215.00	
Analytical-Groundwater (VOCs)	\$ 496.00		\$ 496.00							\$ -						\$ 496.00			\$ 496.00	
IDW Disposal	\$ 1,000.00		\$ 1,000.00							\$ -		\$ 1,000.00							\$ 1,000.00	
SVE System Decommissioning	\$ 2,500.00		\$ 2,500.00							\$ -					\$ 2,500.00				\$ 2,500.00	
			\$ -							\$ -									\$ -	
			\$ -							\$ -									\$ -	
Sub-Contractor Cost Total	\$ 4,211.00	\$ -	\$ 4,211.00	\$ -						\$ -									\$ 4,211.00	
DERF ELIGIBLE SUB-TOTALS	\$ 20,461.00	\$ -	\$ 20,461.00	\$ -	\$ -	\$ -	\$ -	\$ -	##	\$ -	\$ -	\$ -	\$ 16,330.00	\$ -	\$ 460.00	\$ 2,960.00	\$ 711.00	\$ -	\$ 20,461.00	

Non-DERF Eligible Expenses										\$ -
										\$ -
Non-DERF Cost Total										\$ -
INVOICE GRAND TOTAL									##	\$ -

Total DERF Eligible Costs This Claim **\$ 20,461.00**
 WARNING - Double Check Total Invoiced Costs column to DERF Cost Breakout figures - possible errors found!

Check Numbers