



March 13, 2024

Mr. Roger Dulmes  
RSD of Sheboygan LLC  
3033 N 27<sup>th</sup> Street  
Sheboygan, WI 53083

Subject: **Status Update Request**  
Imogenes Cleaning Center, 1502 Seamann Avenue, Sheboygan, Wisconsin  
DNR BRRTS Activity # 02-60-552193  
DNR FID # 460007460

Dear Mr. Dulmes:

On August 26, 2008, the Wisconsin Department of Natural Resources (DNR) notified you of your legal responsibilities under Wisconsin Statute (Wis. Stat.) § 292.11 to investigate the degree and extent of the hazardous substance discharge on the above-referenced site. The DNR has not received information concerning your efforts to respond to this hazardous substance discharge since December 17, 2020.

The DNR requests that a status update be submitted within 30 days, **by April 12, 2024**, which includes the following information:

- Work completed since the last submittal.
- Status of vapor mitigation system (i.e. operation status of the blower fan) for the adjacent Paper Box and Specialty Co building at 1505 Sibley Court.

DNR is also requesting a supplemental site investigation workplan (SIWP) be submitted within 60 days, **by May 12, 2024**, to address the additional investigation needed at the site, including:

- Further delineation of soil contamination.
- Further delineation and continued monitoring of groundwater contamination.
- Investigation of preferential pathways, including sanitary in-pipe vapor and utility backfill.
- Additional vapor investigation, including:
  - Passive, long duration indoor air sampling at the off-site Paper Box and Specialty Box Co building, where sub-slab vapor concentrations exceeded vapor risk screening levels (VRSLs);
  - Sub-slab sampling at the on-site building; and
  - Concurrent sub-slab and indoor air sampling at off-site adjacent property located at 1520 Saemann Avenue.

As the responsible party for this hazardous substance discharge, you have the legal responsibility under Wis. Stat. § 292.11 to investigate and clean up contamination resulting from the hazardous substance discharge. The DNR will work with you to move this site towards closure.

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Your legal responsibilities are defined in statute and in administrative code. The hazardous substances spill law, Wis. Stat. § 292.11(3), states “A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.”

Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700 to NR 799 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure.

The DNR appreciates your cooperation and looks forward to an update regarding this site. If you have any questions regarding the site or this letter, please contact me at 920-366-5685 or [Josie.Schultz@wisconsin.gov](mailto:Josie.Schultz@wisconsin.gov).

Sincerely,

A handwritten signature in blue ink that reads "Josie Schultz". The signature is written in a cursive style.

Josie Schultz  
Hydrogeologist  
Remediation & Redevelopment Program  
Northeast Region

cc: Kendrick Ebott, Sand County Environmental ([ken.ebbott@sandcountyenv.com](mailto:ken.ebbott@sandcountyenv.com))  
Ted Warpinski, Halling & Cayo, S.C. ([taw@hallingcayo.com](mailto:taw@hallingcayo.com))