

**From:** Schultz, Josie M - DNR  
**Sent:** Thursday, March 28, 2024 9:17 AM  
**To:** ken.Ebbott@sandcountyenv.com  
**Cc:** Roger Dulmes  
**Subject:** RE: Status Update Request Letter - Imogenes Cleaning Center, BRRTS # 02-60-552193

Good Morning Ken,

Thank you for the conversation yesterday to discuss the planned next steps for the Imogenes Cleaning Center Site.

DNR concurs that assessing the primary risk(s) to receptors should be the priority at this time. Additional site investigation is required at the site, however, the following should be prioritized:

1. Gather additional information about the Sheboygan Paper Box Company building where VRSLs are exceeded, including:
  - a. Building construction (e.g. foundation type, footing locations, presence of sump, drain tile location, points of entry for utilities, condition of concrete, etc);
  - b. Demographics of building occupants, particularly women of childbearing years;
  - c. Building usage and areas where employees are working; and
  - d. Inventory of items that may contain VOCs and removal of those that may contain contaminants of concern at least 24 hours prior to sampling.
2. Based on the above information, a workplan should be submitted to DNR for long duration (7-14 days) passive indoor air sampling at the Sheboygan Paper Box Company building.
  - a. The number of samples and sampling locations will be dependent on information obtained about the building and its occupants.
3. A workplan should also be submitted for off-site vapor sampling at the Merry Maids building, and for preferential pathway investigation (e.g. in- pipe sanitary sewer and utility backfill)
  - a. Guidance document [RR-649](#) should be referenced for this investigation.

The items above are what should be prioritized for the site investigation with knowledge that there is limited funding, however, the site will also need to continue through the NR 700 process of a full investigation including delineation of all media types, including soil, groundwater and vapor. Because the on-site building is an active drycleaner with chemicals of concern in use, I concur that this building's sub-slab investigation can be postponed in order to allocate funding to investigate the off-site buildings and sanitary.

Please be aware that the Sheboygan Paper Box Company will need additional delineation of the VRSL exceedance at the one vapor monitoring point, and the VMS may need modifications to capture all vapors accumulating beneath the slab of the building. This VMS will also need to be commissioned with documentation and long-term OM&M plan submitted to DNR. DNR recommends that a National Radon Proficiency Program (NRPP) certified mitigator be contracted if modifications are required.

DNR is requesting that additional information about the Sheboygan Paper Box Company building be obtained within 2 weeks, and a workplan for passive sampling at the Sheboygan Paper Box Company building, the Merry Maids building, and in-pipe sanitary investigation be submitted to DNR within 30 days, by **April 29, 2024**. Please note that sampling results need to be submitted to DNR within 10 days of

receiving the analytical results, however DNR requests the vapor results be submitted immediately if they exceed standards.

Please feel free to reach out if you have any questions or concerns.

Thank you,  
Josie

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**Josie Schultz**

Cell Phone: (920) 366-5685

Josie.Schultz@Wisconsin.gov

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**From:** Ken Ebbott <ken.ebbott@sandcountyenv.com>

**Sent:** Wednesday, March 27, 2024 9:08 AM

**To:** Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>; Roger Dulmes <ROGER3033@charter.net>

**Subject:** RE: Status Update Request Letter - Imogenes Cleaning Center, BRRTS # 02-60-552193

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Josie,

Should I give you a call about 1:00 today to discuss?

Ken

Regards,

**Ken Ebbott, PG, CGWP**

**Senior Project Manager/Senior Geologist**

**Sand County Environmental, Inc.** (fka Sand Creek Consultants, Inc.)

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**From:** Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>

**Sent:** Tuesday, March 26, 2024 5:30 PM

**To:** Ken Ebbott <[ken.ebbott@sandcountyenw.com](mailto:ken.ebbott@sandcountyenw.com)>; Roger Dulmes <[ROGER3033@charter.net](mailto:ROGER3033@charter.net)>  
**Subject:** RE: Status Update Request Letter - Imogenes Cleaning Center, BRRTS # 02-60-552193

Hi Ken,

Thank you for the update on the fan; its replacement should be a priority as there is an acute risk associated with the TCE vapors accumulating beneath the slab at the Sheboygan Paper Box building.

I would be available Wednesday after noon or Thursday after 11:00 if either of those days and timeframes work for you. I work until 5:30 both days.

Thank you,  
Josie

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**Josie Schultz**

Cell Phone: (920) 366-5685

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**From:** Ken Ebbott <[ken.ebbott@sandcountyenw.com](mailto:ken.ebbott@sandcountyenw.com)>

**Sent:** Tuesday, March 26, 2024 10:45 AM

**To:** Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>; Roger Dulmes <[ROGER3033@charter.net](mailto:ROGER3033@charter.net)>

**Cc:** Ken Ebbott <[ken.ebbott@sandcountyenw.com](mailto:ken.ebbott@sandcountyenw.com)>

**Subject:** RE: Status Update Request Letter - Imogenes Cleaning Center, BRRTS # 02-60-552193

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Josie,

I've met with Roger and we're working on a scope and budget for further action.

We checked on the fan system that extracts air from the subslab of the neighboring Sheboygan paper Box Company basement. It appeared to be running based on the slight hum the motor was making, but upon checking the manometer, it was not pulling vapors. Roger is purchasing a new fan and will have his electrician replace it to restore it to proper functional operation. The system was installed in 2010 and the fan was replace in 2014, so it is time for a new one.

I'll be in touch regarding the scope and objectives of further work, particularly the requested sanitary sewer in-pipe and backfill sampling, and the vapor investigations at the facility and the two off-site properties.

As you know, DERF is no longer viable, so we try to keep costs to a minimum on these single facility drycleaning operations where the owner is nearly retired.

If you're around, I can give you call later this week to discuss the scope and methods, and then send an email Work Plan once a scope is identified.

Thanks,

Ken

Regards,

**Ken Ebbott, PG, CGWP**

**Senior Project Manager/Senior Geologist**

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**From:** Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>

**Sent:** Wednesday, March 13, 2024 12:27 PM

**To:** Roger Dulmes <[ROGER3033@charter.net](mailto:ROGER3033@charter.net)>

**Cc:** Ken Ebbott <[ken.ebbott@sandcountyenv.com](mailto:ken.ebbott@sandcountyenv.com)>; Ted Warpinski <[taw@hallingcayo.com](mailto:taw@hallingcayo.com)>

**Subject:** Status Update Request Letter - Imogenes Cleaning Center, BRRTS # 02-60-552193

Good Afternoon Roger,

Attached to this email is a letter requesting a status update and additional investigation for the Imogene Cleaning Center site.

Please review the letter and feel free to reach out if you would like to discuss anything.

Best Regards,

Josie

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**Josie M. Schultz**

Hydrogeologist – Northeast Region Remediation and Redevelopment Team

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