

**From:** Ken Ebbott <ken.ebbott@sandcountyenv.com>  
**Sent:** Wednesday, April 17, 2024 9:07 AM  
**To:** Schultz, Josie M - DNR  
**Cc:** Ken Ebbott; Roger Dulmes  
**Subject:** RE: Imogenes Cleaning Center DERF Site 1502 Saeman, Sheboygan WI BRRTS 02-60-552193

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Thanks Josie!

I visited the Paper Box and Merry Maids buildings yesterday so can propose sample locations. Also pulled the maps of the sanitary sewer from the City, and opened some manholes – not the ones in the busy traffic lanes, but some others to take a look.

The fan was installed and is running at Imogenes – pulling from the four extraction points under the floor of Paper Box – at a vacuum of 3.25” water column, so the system is functioning again.

The space of the Paper Box is a storage basement and the concrete floor is in great condition for construction in the late 1800’s. No sump to keep it dry, the owner says it doesn’t flood, so built just above the water table. Walls don’t show evidence of moisture that I could see.

There is hardly any worker occupancy down there, they may come down to find rarely look for a pattern or pick up a supply item, but people work on floors 1 and 2. It is a huge space – like 125’ x 180’ or so in the basement, with a few internal walls dividing it up but much is open. It has storage of 50 5’ x 4’ wheeled totes they got from Advanced Disposal that are in the way all over the place, previously used for storage of paper for recycling. We can probably move them aside for better access to the vapor mitigation system during the assessment. There are also some drums of waste oil / grease, etc. in another part of the basement, and boiler chemicals, so testing needs to be limited to the drycleaning compounds PCE, TCE, DCE, but not petroleum substances or full VOC’s.

The four extraction pipes are all intact, and there are 7 floor penetrations capped with a bolt that were used for the communication testing when installed (VP-B to VP-H) -they are still present. The original vapor sample location – VP-A – was at the base of the stairwell, and it was not apparent and was probably pulled and capped with cement, but hard to tell with the presence of leaves and debris, dust, and spider webs. Can sweep and look for it later, but I don’t think it is present for follow-up testing.

There is a stairwell above VP-A in the far SE corner of the building that accesses an outside door at ground level, and then goes up to the first and second floor manufacturing spaces. Good air flow there as the ground floor door can often be open, and workers use the outside door for breaks to exit the building. Testing in the stairwell might be tricky as it may display some amount of ambient air from outside that collects in the dead space of the bottom of the stairs. The Imogenes active drycleaning operation roof and wall vents are right outside to the south, so swirling air related to their drycleaning

operations might collect in the base of the stairwell through the open door. It may be hard to interpret results as to whether they are from the subslab air entry, or the outside air entry, if we test there.

I'll give it some thought and send a Work Plan documenting the test layout, and we can tweak it as needed.

Ken

Regards,

**Ken Ebbott, PG, CGWP**

**Senior Project Manager/Senior Geologist**

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

W5877 Pheasant Lane | Plymouth, WI 53073

main 920.918.9024 | fax 866.608.6473

[www.sandcountyenv.com](http://www.sandcountyenv.com) | [ken.ebbott@sandcountyenv.com](mailto:ken.ebbott@sandcountyenv.com)

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

**Sent:** Wednesday, April 17, 2024 8:25 AM

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

**Subject:** RE: Imogenes Cleaning Center DERF Site 1502 Saeman, Sheboygan WI BRRTS 02-60-552193

Hi Ken,

I double-checked with the DERF fund manager and as long as there is enough budget in the consultant costs (\$7,945 for this scope) and sub-contractor costs (\$2,215 for lab analysis for this scope), then a change order will not be required.

Seeing as the total remaining budget is \$148,350, I doubt this will go over either budget, so no change order would be required.

Thanks!

Josie

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**Josie Schultz**

Cell Phone: (920) 366-5685

[Josie.Schultz@Wisconsin.gov](mailto:Josie.Schultz@Wisconsin.gov)

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

**Sent:** Thursday, April 4, 2024 10:00 AM

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

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

**Subject:** RE: Imogenes Cleaning Center DERF Site 1502 Saeman, Sheboygan WI BRRTS 02-60-552193

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Josie,

OK, feel free to check. I don't know that we'll be wasting time / money on that effort if it's required, and will likely assume future claims will have some leniency related to the need for approvals due to the onerous approval requests when the fund was essentially insolvent. Maybe I'll rethink that, if it isn't too hard to do, but I'm not entering every invoice on the project from 2008 on that have already been reimbursed into an excel spreadsheet just to get the new budget Ok.

On another matter- what happened to the BRRTS Web listing for Imogenes?

It used to have a link to download "entire Project File" from like 2008 to 2019, but that doesn't appear any more. I tried to download it earlier when it was present, but it was wonky and I couldn't save the whole thing, so to get documents out of it, I had to go to the DNR web site and download it, then print to PDF the pages I wanted. There is some information in there that I was hoping to access, nothing essential but helpful.

Also – at the bottom of the BRRTS listing page for Imogenes, under "substances and RP", it has a different site- Nekoosa Papers Port Edwards Mill – so clearly there's been some kind of mess up with the listing internally. Maybe if that gets fixed, the pdf of the "Entire Project File" returns again.

Thanks,

Ken

Regards,

**Ken Ebbott, PG, CGWP**

**Senior Project Manager/Senior Geologist**

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

W5877 Pheasant Lane | Plymouth, WI 53073

main 920.918.9024 | fax 866.608.6473

[www.sandcountyenv.com](http://www.sandcountyenv.com) | [ken.ebbott@sandcountyenv.com](mailto:ken.ebbott@sandcountyenv.com)

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

**Sent:** Thursday, April 4, 2024 9:42 AM

**To:** Ken Ebbott <[ken.ebbott@sandcountyenv.com](mailto:ken.ebbott@sandcountyenv.com)>; Roger Dulmes <[roger3033@charter.net](mailto:roger3033@charter.net)>; Roger Dulmes ([imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)) <[imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)>

**Cc:** Stacy Stroud <[stacy.stroud@sandcountyenv.com](mailto:stacy.stroud@sandcountyenv.com)>

**Subject:** RE: Imogenes Cleaning Center DERF Site 1502 Saeman, Sheboygan WI BRRTS 02-60-552193

Hi Ken –

I will double check with people who are more familiar with the fund and get back to you. I want to make sure that if you're putting in the work for DERF coverage that we have everything required for it to be covered, otherwise it might get messy on the backend at time of reimbursement.

This is a screengrab from our DERF change order page, which is why I requested the spreadsheet, but I will see if this has changed.

The screenshot shows a web interface with a horizontal navigation bar containing the following tabs: Basics, Bidding, Milestones, Reimbursement, Change orders, Fund stats, Laws, and Contact. Below the navigation bar, the main content area contains the following text:

As of July 1, 2012, all reimbursement claims and scope change requests (change orders) must be submitted with the DERF Linking Spreadsheet (Form 4400-214D). The form, instructions for using the spreadsheet and a case study of a claim are provided in the [Reimbursement tab](#). Visit the [Contact tab](#) for DNR staff contact information.

**CHANGE ORDER INSTRUCTIONS**

Changes needed to the original contract for site investigation or remedial action work require approval by the DNR project manager unless costs will be less than \$3,000 or five percent of the total contract. All changes require prior approval from the DNR project manager and notification to the owner/operator.

- A change order is needed when either:
  - changes are needed to the scope of work tasks that result in increased costs; or
  - costs need to be shifted between consultant costs and sub-contractor costs.
- All change orders must be accompanied by:
  - a summary of work completed to date. This must include a description of all work that has been completed and a description of the proposed additional work to be performed;
  - any maps necessary to detail activities; and
  - the [DERF Reimbursement Linking Spreadsheet \(Form 4400-214D\) \[xls\]](#).

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**Josie Schultz**

Cell Phone: (920) 366-5685

[Josie.Schultz@Wisconsin.gov](mailto:Josie.Schultz@Wisconsin.gov)

---

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

**Sent:** Thursday, April 4, 2024 9:18 AM

**To:** Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>; Roger Dulmes <[roger3033@charter.net](mailto:roger3033@charter.net)>;

Roger Dulmes ([imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)) <[imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)>

**Cc:** Stacy Stroud <[stacy.stroud@sandcountyenv.com](mailto:stacy.stroud@sandcountyenv.com)>

**Subject:** RE: Imogenes Cleaning Center DERF Site 1502 Saeman, Sheboygan WI BRRTS 02-60-552193

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Josie,

I received the signed OK from Roger Dulmes for the budget, so I will contact the neighbors to obtain access for the vapor testing, and view the Sheboygan Box building. I'll reach out to the City regarding the sanitary sewer manhole locations for testing.

I'll also work up a scope and methods email for your review.

As for DERF – the form you referenced is for putting together a claim – 4400-214D. We aren't submitting at this time. That form shows the tasks and budgets, approved amounts, and then the invoices being charged against those tasks.

We are just seeking approval of the budget expenses, which I've always done using the Change Order process. However, for this project, the costs have previously been approved by the DNR, and we are just reallocating those funds. I believe just an email saying the costs look reasonable and the work is necessary, as an interim action, should suffice. I've attached the last two budget approvals – from 2015 when we shifted the approved funds to cover a modified remedial action budget, and 2020 when we did groundwater sampling. Neither time was the 4400-214D form used.

Since it is a long shot to get coverage under DERF anyway, I don't want to put a lot of time into formal claim forms, particularly if it isn't going to be needed. If the DNR agrees the costs are needed, if we ever get a chance to do a claim on this site, the requirements . forms for a claim can be met at that time.

Let me know if you agree – and I'll get to work on the other stuff.

Ken

Regards,

**Ken Ebbott, PG, CGWP**

**Senior Project Manager/Senior Geologist**

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main 920.918.9024 | fax 866.608.6473

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

**Sent:** Thursday, April 4, 2024 7:31 AM

**To:** Ken Ebbott <[ken.ebbott@sandcountyenv.com](mailto:ken.ebbott@sandcountyenv.com)>; Roger Dulmes <[roger3033@charter.net](mailto:roger3033@charter.net)>; Roger

Dulmes ([imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)) <[imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)>

Cc: Stacy Stroud <[stacy.stroud@sandcountyenv.com](mailto:stacy.stroud@sandcountyenv.com)>

**Subject:** RE: Imogenes Cleaning Center DERF Site 1502 Saeman, Sheboygan WI BRRTS 02-60-552193

Good Morning Ken,

In order for DNR to approve of the change order, we will need the DERF linking spreadsheet (Form 4400-214D) submitted as well.

Please see the "Change orders" tab on the DERF webpage for more information, otherwise feel free to contact me if you have any questions.

[Dry Cleaner Environmental Response Fund \(DERF\) | Wisconsin DNR](#)

I will be starting my vacation tomorrow, and won't be back until April 15<sup>th</sup>.

Thank you,  
Josie

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**Josie Schultz**

Cell Phone: (920) 366-5685

[Josie.Schultz@Wisconsin.gov](mailto:Josie.Schultz@Wisconsin.gov)

---

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

**Sent:** Monday, April 1, 2024 2:39 PM

**To:** Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>; Roger Dulmes <[roger3033@charter.net](mailto:roger3033@charter.net)>;

Roger Dulmes ([imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)) <[imogenescc@yahoo.com](mailto:imogenescc@yahoo.com)>

**Cc:** Ken Ebbott <[ken.ebbott@sandcountyenv.com](mailto:ken.ebbott@sandcountyenv.com)>; Stacy Stroud <[stacy.stroud@sandcountyenv.com](mailto:stacy.stroud@sandcountyenv.com)>

**Subject:** Imogenes Cleaning Center DERF Site 1502 Saeman, Sheboygan WI BRRTS 02-60-552193

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Roger and Josie,

The DNR is pushing to complete more assessment of potential drycleaning vapor migration to three off-site areas:

- Sheboygan Paper Box Company
- 1514 Saemann Avenue (Merry Maids) Building to southwest
- Within the Sanitary Sewer line to east

Since 2010, a vapor mitigation system has been running to capture vapors under the Sheboygan Paper Box Company due to elevated vapor levels of the drycleaning chemical tetrachloroethene (PCE) and the degradation compound trichloroethene (TCE) observed under their basement floor. However, there have been additional advancements and requirements from the WDNR for vapor migration since 2010, and information on TCE in particular indicates it is a higher risk to humans than previously thought. To evaluate whether vapors from the Imogenes site are impacting neighbors off-site, they want more assessment and testing of the vapor pathway. The WDNR laid out expectations in an email dated March 28, 2024.

## **SCOPE**

A cost estimate and contract is attached that has been put together by Sand County Environmental to meet the WDNR expectations. The work has been divided into the following tasks, and for brevity, the work to be completed is listed in bullet format below:

### **Task 1 Project Management and Assemble Information about Off-site Properties, Obtain Access for Work**

- Prepare Access Agreement Sheboygan Paper Box and 1514 Saemann Avenue owners
- View site conditions at each building
- Meet with Sheboygan Paper Box to discuss building use and occupancy
- Contact City Sheboygan for Sanitary Sewer construction details and permission to sample
- Communication with Imogenes and WDNR

### **Task 2 Work Plan for WDNR Review**

- Email scope of work, schedule, and proposed sampling methods
- Photographs of site conditions
- WDNR informal review – no WDNR Review Fee

### **Task 3 Field Sampling**

- Vapor sampling at three locations in Sheboygan Paper Box
- Subslab vapor sampling at two locations under 1514 Saemann building
- Vapor sampling at three locations in sanitary sewer
- Hammer Drill, Vapor Pins, Repair floor

### **Task 4 Data Evaluation and Letters of Results to Property Owners**

- Tables and maps preparation
- Compare to standards
- Letter of results to property owners per WDNR format and schedule

### **Task 5 Letter Report to WDNR**

- Review and interpretation

- Need for further actions
- Email summary of findings and recommendations to WDNR
- No formal WDNR review fee

## **BUDGET and DERF**

The site has participated in the drycleaner environmental repair fund (DERF) with reimbursement of most expenses previously spent. Alpha Terra Science completed the initial work on the project in 2008, and was acquired by Fehr Graham, who continued the work. Work in 2020 was completed by Sand Creek Consultants, which changed names to Sand County Environmental.

While the viability of DERF is questionable, we have decided to continue to conduct the project as if DERF were in place, meaning we are matching billing rates from 2008, and are not charging for expenses that are DERF ineligible, such as mileage. I have been the project manager of the project since approximately 2010, and it makes sense for continuity to shift the work to Sand Creek / Sand County.

As identified in an email to the WDNR from Sand County Environmental on July 19, 2020, the established total project budget approved by the WDNR and Imogenes is \$208,195 which covers the completed investigation, vapor mitigation system installation, and the initial pilot test for the remedial action. Claimed expenses totaling \$55,853 have been submitted and paid, leaving a remaining approved budget of \$152,342.

In 2020, a round of groundwater samples was obtained at a cost of \$3,992.65, including the laboratory analytical charges, leaving approximately \$148,350 of approved funding remaining.

The proposed scope of work referenced in Tasks 1 to 5 above is projected to cost \$10,160 which includes \$2,215 in laboratory charges that will be paid directly by Imogenes to the testing laboratory.

## **APPROVALS**

- 1) Approval of this budget is requested from Imogenes by signing and returning the attached Professional Service Agreement with Sand County Environmental.
- 2) To maintain DERF paperwork, we request that the WDNR also approve the proposed budget for the scope of work referenced above, as it falls within the previously approved cost. We also seek a waiver to the DERF consultant selection bid process so Sand County Environmental can continue as a DERF-eligible consultant on the project. Approval of the WDNR was obtained in 2020 of the previous groundwater sampling scope of work, but this scope and the hiring of Sand County should also be approved, in case DERF reimbursement may one day prove viable.

Once we get signed approval, we can begin with the tasks identified above.

Let me know if you have questions or comments, and I look forward to keeping this project moving forward.

Thanks,



Ken

Regards,

**Ken Ebbott, PG, CGWP**

**Senior Project Manager/Senior Geologist**

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