



August 20, 2020

PAUL ZUEGE  
ZECO LLC  
PO BOX 560  
NEW LONDON WI 54961-8034  
ZIGJIGS@GMAIL.COM

SUBJECT: Interim Actions and Additional Investigation Required  
Notice of Intent to Incur Expenses  
Dry Cleaners Etc  
102 East Cook Street, New London, WI  
BRRTS #: 02-69-552218

Dear Mr. Zuege:

On August 29, 2008, the Department of Natural Resources (“department”) sent a letter directing you to take appropriate response actions at the above-referenced property (“site”) under Wis. Stats. ch. 292 and Wis. Admin. Code §§ NR 700 through 754. On May 4, 2020 the department received the most recent round of sub-slab vapor sampling results for the former Dry Cleaners Etc building, now currently a video game store, and the New London Public Library. The results from this round of sampling showed contamination at the site and off-site properties which includes trichloroethylene (“TCE”) and tetrachloroethylene (“PCE”).

### **Special Vapor Intrusion Concern with Trichloroethylene**

Contamination that includes TCE, a chlorinated solvent and common degreaser, is of special concern from a human health perspective due to its potential for acute (short-term) health risks at relatively low concentrations in air. TCE is also a breakdown product of PCE, (also known as “Perc”), a historically common dry-cleaning chemical. Vapors can travel from contaminated soil or groundwater or within sewer lines and enter occupied buildings. This is known as vapor intrusion (VI). Screening for VI must be conducted at every contaminated site in Wisconsin, as defined in Wis. Admin. Code § 716.11(5)(a). However, when TCE is present, screening for VI should be made a priority and an interim action under Wis. Admin. Code § NR 708.11 may be necessary. For more information about VI, go to [dnr.wi.gov](http://dnr.wi.gov) and search “Vapor”. Additional technical guidance on VI is available in *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, RR-800.

Based on the results of the sub-slab sampling from May 4, 2020 the department is requiring an interim action to mitigate the identified risk from VI at the site building and at the New London Public Library in accordance with Wis. Admin. Code § NR 708.11. Furthermore, the department is requiring prioritized investigation for VI at multiple off-site properties in accordance with Wis. Admin Code § 716.11(5)(a) and ch. NR 708.

Within **14 days** of receipt of this letter please respond via e-mail to [gwen.saliars@wisconsin.gov](mailto:gwen.saliars@wisconsin.gov) indicating your intentions to move forward with the VI interim actions in a timely manner and additional VI investigation.

Within **30 days** provide a Site Investigation Report with a summary of activities at the site to date and combined with a brief Site Investigation Work Plan for the following VI investigation.

### PHASE I of VI Investigation

Install a sub-slab depressurization system (“SSDS”) in the site building (102 E Cook St), and in the New London Public Library (412 S Pearl St). If pursuing DERF eligibility, then follow Wis. Admin. Code § NR 169.11(1)(b); submit the cost estimate and a schedule for performing the action for department approval. If not pursuing DERF eligibility then department approval is not needed prior to installing the SSDS per Wis. Admin. Code § NR 708.11(2)(d). If conditions do not allow for the installation of the SSDS then in accordance with Wis. Admin. Code § NR 708.11(4)(b) submit a detailed alternative design plan for department approval prior to implementation. The department recommends hiring a certified radon mitigation contractor to install the chosen systems. A list of contractors can be found at <https://www.dhs.wisconsin.gov/radon/radon-proficiency.htm>

Utility investigation:

1. Include storm, sanitary and other sewer utility laterals for the site and all off-site properties on the site map.
2. Collect soil and groundwater samples adjacent to the site sanitary sewer lateral to determine if a secondary release occurred on the property.
3. Provide information from the New London Department of Public Works on direction of flow for utility main lines, and type of backfill material around utilities.
4. Collect vapor samples from behind the cleanout to the site sanitary sewer lateral to determine whether the utility lateral to the site could be acting as a preferential pathway for vapor.
5. If chemical vapors are found within the site utility lateral, additional investigation within the utilities beyond the source property is required.

### PHASE II of VI Investigation

Based on the current extent of the groundwater plume and the soil plume (full extent currently undefined), access the following off-site properties to perform a minimum of two rounds of “full column” sampling (sub-slab, indoor air, and outdoor air), one during heating season and one during cooling season:

412 South Pearl Street	111 East Beacon Avenue
420 South Pearl Street	113 East Beacon Avenue
520 South Pearl Street	117 East Beacon Avenue
108 East Cook Street	121 East Beacon Avenue
114 East Cook Street	

### PHASE III of VI Investigation

Based on vapor sampling results, mitigate any occupied buildings where VI has the potential to occur (i.e., where vapor risk screening levels exceeded or a direct pathway from impacted utilities to occupied space identified).

In accordance with Wis. Stats. § 292.81(2), you are hereby notified, as a responsible party under Wis. Stats. ch. 292 and Wis. Admin. Code § NR 700.03 (51), that the department intends to incur expenses as authorized under Wis. Stats. § 292.31(3). The department may hire a contractor to implement all or a portion of the actions listed

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above. In addition, if you are unable to implement these actions the department will collect demographic information for who works in the site building, and perform a minimum of two rounds of “full column” sampling (defined above) at the site building.

Please be aware that you could be held responsible for reimbursing the department for the expenses incurred to do the work described in this letter and that the department may file a lien against the above-described property to recover the incurred expenses.

If you have questions concerning the activities described in this letter, please do not hesitate to contact me at (920) 510-4343 or [gwen.saliares@wisconsin.gov](mailto:gwen.saliares@wisconsin.gov).

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Gwen Saliars". The signature is written in a cursive, flowing style.

Gwen Saliars

Hydrogeologist

Remediation & Redevelopment Project Manager

cc. Scott Hodgson, Terracon ([scott.hodgson@terracon.com](mailto:scott.hodgson@terracon.com))