

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
Oshkosh Service Center  
625 E CTY Y, Suite 700  
Oshkosh WI 54901-9731

Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 608-266-2621  
Toll Free 1-888-936-7463  
TTY Access via relay - 711



May 23, 2017

City of Menasha  
Attn: Kevin Englebert  
140 Main Street  
Menasha WI 54952

Subject: Site Investigation Report – Not Approved  
Realty Opus Property, 867 W. Valley Road, Menasha WI  
BRRTS# 02-71-555288 & 06-71-578231

Dear Mr. Englebert:

On May 4, 2017 the Northeast Region Voluntary Party Liability Exemption (VPLE) Committee met to review the completeness of the Site Investigation and Remedial Action Options Report dated March 31, 2017 submitted by Key Environmental Group Ltd for the City of Menasha. The VPLE committee review of the site investigation is a required part of the VPLE process to insure the work meets the requirements of state statute and administrative code. The Department review noted deficiencies in the site investigation report and made recommendations for additional work to complete the investigation.

A memo dated May 17, 2017 (attached) was prepared which documents the site conditions and the Departments recommendations to complete the site investigation. This memo was previously provided to the City of Menasha and Key Environmental Group Ltd by email for use to create a work plan to finish the site investigation.

Once the work described in the May 17<sup>th</sup> memo has been completed please submit a revised site investigation report for department review. If you have questions regarding this letter please contact me at 920-424-7890 or by email at [kevin.mcknight@wisconsin.gov](mailto:kevin.mcknight@wisconsin.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin D. McKnight'.

Kevin D. McKnight  
Hydrogeologist  
Remediation and Redevelopment Program

Attachment – May 17, 2017 Memo

Cc: file  
D’Arcy Gravelle, Key Environmental Group Ltd. - via email

## CORRESPONDENCE/MEMORANDUM

DATE: May 17, 2017

FILE REF: 02-71-555288  
06-71-578231

TO: Realty Opus Property VPLE Case File

FROM: Kevin McKnight, RR Oshkosh *KM*

SUBJECT: Site Investigation Completeness Review –Additional SI Work Required

The Northeast Region Voluntary Party Liability Exemption (VPLE) committee composed of Roxanne Chronert, Keld Lauridsen, Tauren Beggs and Kevin McKnight met on May 4, 2017 to discuss this case. This memo documents the recommendations made during the meeting.

**Background:**

Site has been a CVOC ERP case since 2010 with Badger Labs as the consultant. In 2016 the City hired Key Engineering Group, Ltd. (Key) as their consultant during the site acquisition and demolition process. VPLE status was received in October 2016. Key's work focused on the CVOC contamination and a VPLE specific work plan was not created.

This property is a 3.9 acre lot zoned heavy industrial, located at 867 W. Valley Rd in the City of Menasha. At the time of this review the site has been cleared of buildings and foundations and is awaiting department review prior to redevelopment. Proposed redevelopment consists of the construction of self-storage units. The only identified contamination is a chlorinated solvent release that began investigation prior to the City taking acquisition and entering the VPLE program.

Due to the future non-industrial land use, the site is being reviewed utilizing non-industrial standards.

**Site History:**

The site was first utilized in 1945 as a metal manufacturing facility (vegetable peelers and farm equipment), in 1984 the site became a palletizing equipment assembly and distribution facility and in 2000 was used to collect and reuse historic architectural pieces as home furnishings. Please note that attached aerial photo shows pallets of wood/metal goods across the entire property. These were materials for Urban Evolutions and have been removed. All subsurface utilities were removed during demolition.

**Soil:** Table 1, Table 2, Figure 4

Soils described as sand and gravel fill with some cinders to ~2 feet with red silt with some silt/gravel seams below to ~16 feet (depth of borings). Depth to bedrock >50'.

No confirmed source of soil contamination identified. Based on site history, chlorinated solvent and ethylbenzene observed is from historic site use, spills/dumping by the former loading dock. Four test pits were sampled post building demolition in potential source areas and to define extent of soil contamination. 2 soil borings were performed in other areas of the property after demo.

NI-DC – TCE @ B-1 and Ethylbenzene @ B-3 exceed NI-DC (ethylbenzene not observed over PAL in GW)

Page 1 of 2

S-GW – Chlorinated solvent – B-1, B-3, B-7, B-8, MW-4, MW-12 and TP-1 (0.125mg/kg highest level PCE observed)

Soil samples KB-1 and KB-2 performed by Key in 2016 are the **only** 2 PAH samples taken. No VOC or PAH were observed in KB-1 and KB-2. Arsenic (<8) was detected along with other metals, all below RCL's.

**Groundwater:** Table 2 groundwater (2 versions, one summary of detections, other full list - last round of GW data only on summary), Figure 5 Isoconcentration, Figure 3 (4 copies, 1 for each PCE, TCE, DCE, VC).

Depth to groundwater varies from less than 1 foot with an “average” of 3 feet across the site. MW-13 varied by 5 feet over time.

ES: MW-4, 8 & 12 have exceedences for one or more CVOC's and contaminant concentrations indicate breakdown is occurring in the groundwater plume.

PAL: MW-5 & 7 have steady PAL exceedences for CVOC's

Note: PAH's and Metals only sampled on 2/2015 at MW-8 by Key. Several PAH PAL exceedences were observed.

#### **Conclusions and Recommendations:**

The SI is not complete due to:

- Limited soil sampling outside of the initial release area by the loading dock.
- Insufficient PAH and metals soil sampling.
- Insufficient groundwater sampling for PAH and metals.
- CVOC groundwater plume needs additional definition both up-gradient and down-gradient.

Recommendations:

- Site Investigation should be tracked as “not approved”
- Request additional soil sampling for VOC, PAH, RCRA Metals in 5 locations identified on Figure 4 attached.
- Request additional soil sampling for PAH and RCRA Metals in 1 location identified on Figure 4.
- Collect groundwater samples for VOC, PAH and RCRA Metals in 2 of the soil sample locations as identified on Figure 4.
- Soil samples should be taken from 2-4 foot bgs interval. Deeper soil samples are not needed due to shallow water table.
- VI system is not warranted in the area of residual soil and groundwater contamination; however, a vapor barrier should be installed under any future building. This determination is solely for the proposed self-storage warehouse plan. If redevelopment proposal changes the VI pathway will need to be re-evaluated prior to development.
- The area exceeding non-industrial direct contact will require capping prior to closure. Industrial RCL's are not applicable due to proposed land use. A cap maintenance plan will be required. Tables and figures should be modified to reflect this.

