

CORRESPONDENCE/MEMORANDUM

DATE: September 5, 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 –SI Complete

Memo routed to the Northeast Region Voluntary Party Liability Exemption (VPLE) committee composed of Roxanne Chronert, Keld Lauridsen, Tauren Beggs and Kevin McKnight following receipt of additional site investigation work performed according to the May 17, 2014 site memo.

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 significant 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 confirm RCLs and analytes on soil tables.

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)

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S-GW – Chlorinated solvents and/or petroleum compounds – B-1, B-3, B-7, B-8, MW-4, MW-12 and TP-1 and TP-3 (0.125mg/kg highest level PCE observed) Have consultant review/confirm gw elevations in relation to soil samples

Soil samples KB-1 and KB-2 performed by Key in 2015 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 and/or BTVs.

Update: Six (6) additional soil samples were taken according to the May 2017 memo. The only exceedances observed was for Lead above the soil to groundwater RCL at GP17-03 and benzo(a)pyrene barely above the NI-DC RCL at GP17-06 (PM considers this de minimus for capping).

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, 7,8 &12 have exceedences for one or more CVOC's and contaminant concentrations indicate breakdown is occurring in the groundwater plume.

PAL: MW-5 has 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.

Update: Two temp wells were installed and sampled for VOCs, PAHs, and metals in accordance with the May 2017 memo. No VOCs or metals detected above PAL or ES. No PAHs detected above the ES. PAL exceedences for benzo(a)pyreneJ, benzo(b)fluoranthene and chryseneJ in GP17-02 (no PAHs detected above lab detection limits in soil at this location

Conclusions and Recommendations:

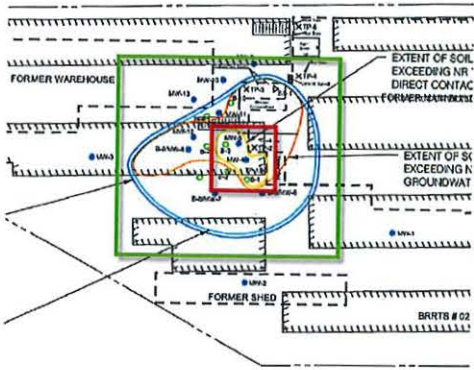
The SI is complete:

- VOC, PAH, and metal soil contamination defined in soil and groundwater
- CVOC groundwater plume defined.
- No PZ required due to site

Recommendations:

- Site Investigation should be tracked as “approved”
- 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. Committee agreed to proposed capping area (figure attached)
- Chlorinated solvent groundwater contamination exists at the site. Question for committee- Committee Recommended 1 more round of PAH groundwater sampling for trend confirmation.



Red Box - Extent of Cap
Green Box - Extent of Vapor Barrier (under buildings only)

